



Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc  
4000 Garden City Drive  
Hyattsville, Maryland 20785

February 26, 2026

The Honorable Heather Bagnall  
Health and Government Operations Committee  
House Office Building Room 240  
6 Bladen Street  
Annapolis, Maryland 21401

**RE: HB 917 – Oppose**

Dear Chair Bagnall and Members of the Committee:

On behalf of Kaiser Permanente, I am writing to express our opposition to House Bill 917. While we share the committee's goal of ensuring transparency and fairness in the reimbursement process, we have significant concerns regarding the operational impact and unintended consequences of the proposed legislation.

Retrospective reviews are a critical component of ensuring the integrity of the health care system. They serve as a vital safeguard to detect fraudulent activity, identify systemic billing errors, and correct claims that do not align with established clinical and contractual standards.

Prohibiting retrospective denials beyond a three-month window for non-coordination-of-benefit cases significantly limits our ability to protect the health plan, and by extension our members, from inaccurate charges. Complex billing issues, particularly those requiring detailed audit procedures, often require more time to identify than the proposed three-month period allows.

The requirement that carriers provide direct training on reimbursement protocols, billing standards, and compliance requirements to providers is fundamentally impractical. We work with an extensive network of diverse providers, each with unique billing software, staffing structures, and internal workflows. A standardized, one-size-fits-all training program is not feasible.

The mandate to implement and document formal training plans would impose a massive administrative burden on both the carrier and the provider community, diverting critical resources away from direct patient care and essential clinical operations. Carriers already provide comprehensive billing manuals, online portals, and dedicated provider relations support to assist practices. Our efforts are best spent maintaining these resources rather than managing exhaustive, mandated training programs.

Kaiser Permanente is committed to fair reimbursement practices and meaningful transparency. However, we believe HB 917, as currently drafted, will increase administrative costs and reduce our ability to maintain fiscal accountability. We respectfully request that the committee consider these operational challenges and exclude these provisions.

Kaiser Permanente  
Comments on HB 917  
February 26, 2026

We appreciate your commitment to Maryland's health care landscape and look forward to working with you on more effective, sustainable solutions.

Thank you for the opportunity to comment. Please feel free to contact me at [Allison.W.Taylor@kp.org](mailto:Allison.W.Taylor@kp.org) or (919) 818-3285 with questions.

Sincerely,

A handwritten signature in cursive script that reads "Allison Taylor".

Allison Taylor  
Head of Government Relations  
Kaiser Permanente Mid-Atlantic Region