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March 13, 2026

The Honorable Heather Bagnall
Chair, House Health Committee
240 Taylor Office Building
Annapolis, MD 21401

House Bill 1251 – Health Facilitis and Health Insurance – Palliative Care – Required Access and Coverage (Edna G. Neal Palliatie Care Act)

Dear Chair Bagnall,

The League of Life and Health Insurers of Maryland, Inc. respectfully opposes *House Bill 1251 – Health Facilitis and Health Insurance – Palliative Care – Required Access and Coverage (Edna G. Neal Palliatie Care Act)* and urges the committee to give the bill an unfavorable report.

League members are concerned with House Bill 1251 as carriers, although not in a uniform approach, are already covering services associated with palliative care, and expanding a coverage mandate could increase utilization of palliative care services beyond what is medically necessary. A mandate in this space would also limit insurers' flexibility in designing plans to meet beneficiaries' needs as well as reduce consumer choice in selecting lower-cost, limited benefit plans. There have also been concerning issues in some facilities related to fraud and misuse of services that become more challenging to monitor.

Additionally, under the ACA, each state must pay for every health plan purchased through the Maryland Health Benefit Exchange, the additional premium associated with any state-mandated benefit beyond the federally mandated essential health benefits. This means, should the Commissioner include the mandate in the State benchmark plan, the State would be required to defray the cost of the benefits to the extent it applies to the individual and small group market ACA plans.

The League opposes any additional mandated benefits to Maryland's law. Mandated benefits add cost to health insurance policies in our state and limit the ability of insurers to design benefits to best meet the needs of enrollees. Given the potential impact to health insurance costs in the State, Maryland law includes a statutory framework for review and evaluation of proposed mandated benefits by the Maryland Health Care Commission under § 15-1501 of the Insurance Article. The law requires the assessment of a proposed mandate for the social, medical and financial impact of the proposed mandate and equips the General Assembly with such information as the extent to which the service is generally utilized by a significant portion of the population; the extent to which the insurance coverage is already generally available; if coverage is not generally available, the extent to which the lack of coverage results in individuals avoiding

necessary health care treatments; if coverage is not generally available, the extent to which the lack of coverage results in unreasonable financial hardship; and the level of public demand for the service. Before adopting this or any other mandated health benefit, we urge the Committee first request an evaluation of the proposed benefit to facilitate an informed decision.

For these reasons, the League urges the committee to give House Bill 1251 an unfavorable report.

Very truly yours,

A handwritten signature in black ink, appearing to read "Matthew Celentano", with a long horizontal line extending to the right.

Matthew Celentano
Executive Director

cc: Members, House Health Committee