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March 10, 2025

The Honorable Joseline Pena-Melnyk
Chair, House Health and Government Operations Committee
Room 241
House Office Building
Annapolis, MD 21401

House Bill 1315 – Health Insurance – Coverage for Child Wellness Services -- Immunizations

Dear Chair Pena-Melnyk,

The League of Life and Health Insurers of Maryland, Inc. *supports* **House Bill 1315 – Health Insurance – Coverage for Child Wellness Services – Immunizations** with amendments.

House Bill 1315 requires carriers to cover immunizations recommended by either the Center for Disease Control's Advisory Committee on Immunization Practices (ACIP) or the American Academy of Pediatrics (AAP). League members appreciate the sponsor's objective to ensure access to childhood immunizations.

While the recommendations of ACIP and AAP likely have substantial overlap, they may not be identical. This could lead to confusion for carriers in knowing exactly which immunizations must be covered. Furthermore, the ACIP and AAP adopt recommendations at different points in the year, making it more difficult for carriers to track updates.

We are offering amendments (*below*) that would require coverage of immunizations recommended by ACIP as of December 31, 2024, and to allow the commissioner to add immunizations adopted at a later date that enhance the scope of preventive services to the benefit of consumers in the state. This amendment tracks the language of amendments for House Bill 974, which are under consideration by this committee.

For these reasons, the League urges the committee to give House Bill 1315 a favorable with amendment report.

Very truly yours,



Matthew Celentano
Executive Director

cc: Members, House Health and Government Operations Committee

Amendments:

Article – Insurance

§ 15-817.

(c) (1) A policy or plan subject to this section shall include under the family member coverage a minimum package of child wellness services that are consistent with:

- (i) public health policy;
- (ii) professional standards; and
- (iii) scientific evidence of effectiveness.

(2) The minimum package of child wellness services shall cover at least:

- (i) all visits for and costs of childhood and adolescent immunizations;

~~1.~~ recommended by the Advisory Committee on Immunization Practices of the Centers for Disease Control and Prevention AS OF DECEMBER 31, 2024; OR

2. RECOMMENDED BY THE AMERICAN ACADEMY OF PEDIATRICS IN ITS CHILD AND ADOLESCENT IMMUNIZATION SCHEDULE BY AGE;

(ii) visits for the collection of adequate samples, the first of which is to be collected before 2 weeks of age, for hereditary and metabolic newborn screening and follow-up between birth and 4 weeks of age;

- (iii) universal hearing screening of newborns provided by a hospital before discharge;

(iv) all visits for and costs of age-appropriate screening tests for tuberculosis, anemia, lead toxicity, hearing, and vision as determined by the American Academy of Pediatrics;

- (v) all visits for obesity evaluation and management;

(vi) all visits for and costs of developmental screening as recommended by the American Academy of Pediatrics;

(vii) a physical examination, developmental assessment, and parental anticipatory guidance services at each of the visits required under items (i), (ii), (iv), (v), and (vi) of this paragraph; and

(viii) any laboratory tests considered necessary by the physician as indicated by the services provided under items (i), (ii), (iv), (v), (vi), or (vii) of this paragraph.

(G) THE COMMISSIONER MAY ADOPT REGULATIONS NECESSARY TO CARRY OUT SUBPARAGRAPH (C)(2)(I) THIS SECTION, CONSISTENT WITH FEDERAL STATUTES, RULES, AND GUIDANCE IN EFFECT:

(1) ON DECEMBER 31, 2024 ; OR

(2) AT A LATER DATE THAT ENHANCE THE SCOPE OF PREVENTIVE SERVICES TO THE BENEFIT OF CONSUMERS IN THE STATE.