



September 23, 2025

Maryland Insurance Administration  
Pharmacy Benefit Managers Workgroup

Dear Pharmacy Benefits Managers Workgroup,

The Frederick County Chamber of Commerce Public Policy Committee, which represents 1,030 businesses and nonprofits, in Frederick County, thanks you for the chance to share our thoughts after the first meeting of Maryland's Pharmacy Benefits Manager (PBM) Workgroup.

As this process moves forward, we ask the Workgroup to keep in mind the needs of Maryland's employers, public institutions, and other plan sponsors, especially those that provide self-funded health plans for their employees and families.

Our members rely on these self-funded plans to make healthcare more affordable and accessible. These plans are based on a federal law called ERISA, which has guided employer-sponsored healthcare in Maryland and across the U.S. for more than 50 years.

We know the Workgroup has been asked to look at "ERISA exemptions for pharmacy benefits management regulation," as noted in HB813. When it comes to ERISA, it's important to remember that having one consistent federal standard helps employers keep benefits fair, manageable, and cost-effective across state lines. Maryland employers depend on this flexibility.

As the Workgroup reviews pharmacy benefit management, it's essential to include employer and plan sponsor voices. Employers are the ones actually operating these health plans, so their perspective needs to be part of the conversation.

It's also important to point out that ERISA preemption issues are still being debated in court. Because the law isn't settled yet, we believe it's too soon for this Workgroup to make big decisions on this matter.

We support a careful, data-driven approach that improves transparency, accountability, and competition. At the same time, reforms that take away tools like rebate negotiations or limit formulary management could backfire—making it harder for employers to keep coverage affordable in today's tough economic environment.

Thank you again for the chance to comment. We look forward to staying involved and contributing as the Workgroup works on its 2025 agenda and begins its interim report.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Rick Weldon', written over the word 'Respectfully,'.

Rick Weldon  
President/CEO  
Frederick County Chamber of Commerce