



September 17, 2025

Marie Grant, Commissioner Mary Kwei, Associate Commissioner Via email: mary.kwei@maryland.gov

Re: Health Insurance Advisory Board

Dear Commissioner Grant and Associate Commissioner Kwei:

The Nurse Practitioner Association of Maryland (NPAM) and the Maryland Chesapeake Chapter of the National Association of Pediatric Nurse Practitioners (NAPNAP) endorse the establishment of a Health Insurance Advisory Board, with nurse practitioner representation.

Nurse Practitioners frequently bill insurance companies for services under their licenses and routinely navigate issues related to claim denials, reimbursement, and provider networks. Nurse Practitioners also serve as the primary care providers in regions across the state and as practice owners, these providers engage extensively with insurance companies.

We also respectfully request and offer the following thoughts as it relates to the questions outlined by the MIA:

- 1. What are health insurance industry trends that could or should be examined through the creation of an advisory board?
 - a. The Board should examine denial of care trends due to practices including prior authorization and step therapy.
- 2. How can we encourage public engagement with the Board and its actions?
 - The Board should open a portion of the meeting to public comment
 - b. Should encourage the public to submit questions to the Board.

NPAM and the Maryland Chesapeake Chapter of NAPNAP appreciate the opportunity to submit comments and look forward to the creation of such a Board. Thank you for considering our comments.

Yours truly,

Dr. Millicent Edgar, DNP, APRN, FNP-BC NPAM, President

Dr. Yvette Laboy DNP, CPNP-AC, CCRN, CPN

NAPNAP, President

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