



January 31, 2020

Director Regulatory Affairs
The Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, Maryland 21202

RE: Title 31, Chapters 46, 47, and 48 Proposed Regulations

Dear Director,

On behalf of URAC, I would like to thank you for your continued leadership on the important topic of increasing transparency in the delivery of a drug benefit in Maryland. We are generally supportive of the proposed rules and appreciate the opportunity to provide feedback on the proposed regulations.

As background, URAC is an independent, non-profit national health care organization focused on improving the quality of care delivered to patients through accreditation, education, and measurement. URAC has unique insight as it relates to the management of drug benefits as we are the premier accreditor of pharmacies and pharmacy benefit managers (PBMs). The largest PBMs operating in Maryland, including CVS Caremark, Express Scripts, and OptumRx, currently hold URAC accreditation. URAC also accredits more than 400 licensed pharmacies as specialty pharmacies across the county. Many of the pharmacies that have achieved URAC Specialty Pharmacy Accreditation are small, independent community pharmacies.

URAC accreditation is a rigorous and comprehensive review of a pharmacy and PBM's operations and the quality of care management based on nationally recognized best practices. We appreciate your recognition of the vital role that accreditation plays in protecting patients and elevating the quality of care patients receive.

URAC has extensive knowledge of the interplay between PBMs and its contract pharmacies given our role evaluating the deployment of key PBM functions regulated by the proposed rule, including required disclosures, appeal process, and pharmacy network management, URAC stands ready to be of assistance to the state in its ongoing efforts to increase pharmacy transparency and access for all Marylanders.

Should you have any questions or if there is anything URAC can do to provide assistance, please do not hesitate to contact Aaron Turner-Phifer, Vice President of Government Relations and Policy at aturner-phifer@urac.org or by phone at 202-326-3957.

Sincerely,

Shawn Griffin, M.D.
President and CEO

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