To: Maryland Insurance Administration
From: Robyn Elliott on behalf of the Maryland Assembly on School-Based Health Care
RE: Draft Network Adequacy Regulations
Date: August 1, 2022

Thank you for the opportunity to comment on the draft network adequacy regulations. The Maryland Assembly on School-Based Health Care appreciates the continued inclusion of school-based health centers in the definition of essential community providers.

In 2021, the Maryland General Assembly enacted HB 1148/SB 606 to move the development and implementation of school-based guidelines from the Maryland State Department of Education to the Bureau of Maternal and Child Health under the Maryland Department of Health. As a result, the Maryland Department of Health has assumed responsibility for the school-based health center program. Therefore, we suggest the following technical amendment to align the draft regulations with the change in law regarding the school-based health center program. Under 31.44.02(B)(26), please replace “Maryland State Department of Education” with “Maryland Department of Health.”

Thank you for the opportunity to make this suggestion. If we can provide any additional information, please just let me know. I can be reached at relliott@policypartners.net.

cc: Dr. Shelly Choo, Maryland Department of Health, Bureau of Maternal and Child Health