

WES MOORE
Governor

ARUNA MILLER
Lt. Governor



MARIE GRANT
Commissioner

JOY Y. HATCHETTE
Deputy Commissioner

200 St. Paul Place, Suite 2700, Baltimore, Maryland 21202
1-800-492-6116 TTY: 1-800-735-2258
www.insurance.maryland.gov

BULLETIN 25-15

Date: September 25, 2025

To: Insurers, Nonprofit Health Service Plans, Health Maintenance Organizations and Dental Plan Organizations (Carriers)

Re: Updates to Carrier Reporting Form for Adverse Decisions and Grievances
House Bill 820, Chapter 747, Acts of 2025
Senate Bill 474, Chapter 670, Acts of 2025

The purpose of this bulletin is to notify carriers of updates to the required Reporting Form for Adverse Decisions and Grievances under § 15-10A-06 of the Insurance Article.

House Bill 820, Chapter 747, Acts of 2025 and Senate Bill 474, Chapter 670, Acts of 2025 each amend § 15-10A-06 of the Insurance Article, Annotated Code, effective October 1, 2025, to revise the requirement for carriers to submit specified information to the Maryland Insurance Administration (the "Administration") on a quarterly basis.

House Bill 820 requires a carrier, when reporting the number of adverse decisions issued, to identify whether an artificial intelligence, algorithm, or other software tool was used in making the adverse decision.

Senate Bill 474 requires the information reported to the Commissioner under § 15-10A-06 to be aggregated by zip code, as required by the Commissioner. Carriers will be required to report the top 5 zip codes for adverse decisions and the top 5 zip codes for grievance decisions, determined according to the ratio of adverse decisions/grievance decisions to clean claims in each zip code. Zip code shall be based on the location of the proposed or delivered treatment, service, or item that was the subject of the applicable adverse decision, grievance decision, or clean claim. Carriers will be required to report the zip code, the number of adverse decisions (or, as applicable, the number of grievance decisions), the number of clean claims, and the calculated ratio expressed as a percentage.

The Administration has updated the required Reporting Form for Adverse Decisions and Grievances to include the information required by House Bill 820 and Senate Bill 474, and the updated form may be accessed on the Administration's website at the following link:

<https://insurance.maryland.gov/Pages/carrier-report-filing.aspx>

The updated form must be used, beginning with the quarterly report applicable to the period from October 1, 2025 – December 31, 2025. This report is due on January 30, 2026. For the quarterly report due on October 30, 2025, applicable to the period from July 1, 2025 – September 30, 2025, carriers may continue to use the prior version of the form, which is also available at the link provided above.

Additionally, the online carrier application for filing the report will be updated to include the information required by House Bill 820 and Senate Bill 474 on or before October 1, 2025. Carriers will be required to provide the aggregated zip code data and the AI data for the report due on January 30, 2026, but are not required to provide this data during the online filing period from October 1, 2025 – October 30, 2025.

Questions about this Bulletin may be directed to the Life & Health Unit of the Maryland Insurance Administration at 410-468-2170.

MARIE GRANT
Commissioner

By:

signature on original

David Cooney
Associate Commissioner