



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