

**BEFORE THE MARYLAND INSURANCE COMMISSIONER**

**MARYLAND INSURANCE  
ADMINISTRATION**

\*

v.

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**CASE NO.: MIA-2020-02-005**

**CHRISTIAN HEALTHCARE  
MINISTRIES**

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**CONSENT ORDER**

This Consent Order is issued by the Maryland Insurance Administration (“the Administration”), with respect to Christian Healthcare Ministries (“Respondent”), with its consent, pursuant to §§ 2-108 and 2-204 of the Insurance Article, Annotated Code of Maryland (2017 Repl. Vol. & Supp.) (“the Insurance Article”) to resolve the administrative action captioned above.

**Explanatory Statement**

1. The Administration conducted an investigation (MCLH-184-2017-I) into the Respondent’s activities within the State of Maryland.
2. The Administration’s factual and legal conclusions were noted in an Order dated February 20, 2020, and an Amended Order issued on December 7, 2020.
3. The Amended Order concluded that Respondent violated §§ 4-101, 4-205 and 2-203 of the Insurance Article.
4. The Amended Order further concluded that Respondent did not qualify as a religious publication arrangement exempt from regulation pursuant to § 1-202(a)(4) of the Insurance Article.
5. Respondent disagreed with the conclusions expressed in the Amended Order and requested a hearing seeking review of the Amended Order.

6. Respondent accepts the terms of this Consent Order in order to resolve the issue without the need for further litigation, and does not admit that it has violated any law or that it is subject to the regulatory authority of the Commissioner.

7. Respondent operates a healthcare sharing ministry in Maryland, among other places, and with respect to Maryland members will operate in the following manner:

(a) Respondent's ministry will not utilize an organized network or panel of health care providers.

(b) Respondent will not require members to seek pre-approval for any medical treatment in order for such treatment to be considered eligible for cost sharing.

(c) Respondent will not limit eligibility for sharing based on the geographic location of health care services or where medical bills were incurred.

(d) Respondent will not maintain formal reserves for the purpose of paying for members' medical costs.

(e) Respondent will not maintain any subrogation rights.

(f) Respondent will not specifically target individual Maryland residents with advertising.

(g) Respondent will not remit payments for medical costs directly to members or to health care providers.

(h) Respondent directs contributions to the medical bills of a fellow member; but, if requested, will offer the opportunity for Maryland members to request a different member to whom the Maryland member may contribute for the period or payment in question, so long as other needs are available.

(i) To whatever extent Respondent offers current members credits for referring new members, such offers must be limited to no more than six membership referrals per year.

(j) To whatever extent Respondent publishes member testimonials that mention specific amounts shared, such testimonials must be accompanied by a statement that these past instances of sharing do not guarantee future successful sharing of needs.

(k) To whatever extent Respondent charges Maryland members administrative fees, such amounts will be clearly designated and charged distinctly (as a line item or otherwise) from ordinary monthly sharing payments made by Maryland members.

(l) Respondent will provide its members with opportunities for purely charitable contributions beyond any minimum monthly payments.

(m) Any member who fails to make a monthly payment will be given a 90-day period during which any medical needs incurred will be considered eligible for sharing under the Respondent's normal Guidelines, provided the member in question pays any sharing amounts past due.

8. As long as Respondent continues to operate consistent with the foregoing, the Administration agrees Respondent is not subject to regulation by the Administration and is operating in accordance with Maryland law, absent any change in the relevant statutory provisions.

### **Order**

**WHEREFORE**, for the reasons set forth above, it is **ORDERED** by the Commissioner and consented to by Respondent, that

A. The Order and the Amended Order issued by the Administration in Case No. MIA-2020-02-005 are hereby withdrawn.

B. Effective immediately, and as of the date of the execution of this Consent Order noted below, Respondent agrees to operate its health care sharing ministry consistent with the findings in Paragraph (7) of this Consent Order.

C. This matter is hereby removed from the docket of the Administration's Office of Hearings.

#### **Other Provisions**

D. The executed Consent Order shall be sent to the attention of: Mary M. Kwei, Associate Commissioner, Market Regulation & Professional Licensing, 200 St. Paul Place, Suite 2700, Baltimore, MD 21202.

E. For the purposes of the Administration's operations, and with regard to any requests for information about Respondent made under the Maryland Public Information Act or properly made by governmental agencies, this Consent Order will be kept and maintained in the regular course of business by the Administration. For the purposes of the business of the Administration, the records and publications of the Administration will reflect this Consent Order.

F. The parties acknowledge that this Consent Order resolves all matters relating to the Administration's investigation, all matters raised in and related to the pending hearing requested by Respondent, and all matters related to any factual assertions and agreements discussed within this Consent Order. This Consent Order contains the entire agreement between the parties relating to the administrative actions addressed herein. This Consent Order supersedes any and all earlier Orders issued with respect to Respondent, including any sanctions imposed by any other Orders. This Consent Order may be amended or modified only by subsequent written agreement of the parties.

G. Respondent has had the opportunity to have this Consent Order reviewed by legal counsel of its choosing, and is aware of the benefits and any burdens of the Consent Order. Respondent waives any and all rights to any hearing or judicial review of this Consent Order to which it would otherwise be entitled, under the Insurance Article or any other source of law, with respect to any of the determinations made or actions ordered by this Consent Order.

H. This Consent Order shall be effective upon signing by the Commissioner or her designee, and is a Final Consent Order of the Commissioner under § 2-204 of the Insurance Article.

I. This Final Consent Order resolves all issues with the Administration through the date of this Final Consent Order.

Maryland Insurance Commissioner

signature on original

By: \_\_\_\_\_  
Mary M. Kwei  
Associate Commissioner  
Market Regulation & Professional Licensing

Date: January 3, 2023

**RESPONDENT'S CONSENT**

Without admitting or acknowledging the Administration's jurisdiction, RESPONDENT hereby CONSENTS to the terms of the above Consent Order. On behalf of Respondent, the undersigned hereby represents and affirms that he has the authority to sign this Consent Order on behalf of Respondent.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_  
signature on original

Title: \_\_\_\_\_

Date: \_\_\_\_\_