



To: Issuers Seeking to Participate in Maryland Health Connection in 2017

From: Maryland Health Benefit Exchange – Plan Management

Date: June 21, 2016

Re: Second Amendment to FINAL 2017 Letter to Issuers Seeking to Participate in Maryland Health Connection

The MHBE *FINAL 2017 Letter to Issuers Seeking to Participate in Maryland Health Connection* dated January 25, 2016 (the Letter) detailed qualified health plan (QHP) and stand-alone dental plan (SADP) carrier and plan certification standards for the 2017 plan year. As described in the Letter, the plan certification standards are subject to amendment due to changes in federal and State statutes and regulations.

From the issuance of the Letter to date, MHBE has engaged with stakeholders to develop regulation on carrier and plan certification. As this process continues, MHBE understands that certain certification requirements detailed in the Letter will benefit from continued refinement through the stakeholder notice and comment process. MHBE also notes that discussions with carriers that have taken place between issuance of the 2017 Letter to Issuers has resulted in collaborative learning and reaffirmance that the majority of the information required to complete the voluntary template are already collected and reported to NCQA for those carriers that are accredited by NCQA. It is therefore MHBE's expectation that carriers will welcome this opportunity to increase transparency and consumer choice through voluntary submission of the network adequacy metrics.

Accordingly, MHBE provides the amendments to the Letter set forth below to amend the mandatory Network Adequacy Metrics reporting requirements specified in Chapter 4, Section G.iv. of the Letter.

Specifically, the Letter is hereby amended as follows:

1. Chapter 4, Section G, vi. Network Adequacy Metrics, is amended to now read, in its entirety:

iv. Network Adequacy Metrics

To assist consumers in assessing issuer provider networks, QHP issuers may voluntarily report certain quantitative provider network metrics. An issuer may share these metrics with MHBE as part of its plan certification materials.



MHBE will post this information on its website. For 2017, these metrics will include:

- a. Average wait time for Primary Care Providers (PCP) and Mental Health (MH) providers;
- b. Average drive distance and time to PCPs and MH providers;
- c. Percent of PCPs and MH providers in network accepting new patients;
- d. Consumer Assessment of Healthcare Providers and Systems scores; and
- e. Additional metrics for any other specialist categories of the issuer's choosing.¹

MHBE has provided a template that carriers may use to provide the metric information to MHBE. The template will delineate reporting for specific types of providers that fall under the "Primary Care Provider", and "Mental Health Provider" categories. MHBE also encourages carriers to report non-public metrics for a separate category of "Substance Use Disorder" providers or, if the carrier chooses not to report such metrics, an explanation of why it intends not to share this information. MHBE will use any such reports to review whether this metric should be included for public reporting in future years. The template will include a category encouraging carriers to report wait times based upon two broad categories of appointments: Well Appointments (specifically, appointments billed under zero-cost sharing for preventive services); and Sick Appointments (specifically, appointments billed under cost sharing for Primary Care Visit for Illness or Sickness).

Furthermore, in line with the draft 2017 FFM issuer standards, the template will encourage carriers to report average driving distances and times by geographical setting/population density, along with the carrier's definitions for the presented indicators (i.e. definition of "urban", "suburban", "rural", etc.). The template will be drafted to gather network information for each specific network type (i.e. "Issuer 1 HMO - Network Information 1 - HIOS ID 1"). MHBE will provide additional guidance on how to complete the template, including how to calculate driving distances and times, by the end of January 2016.

MHBE intends to collect this data from QHP issuers during 2016 for the specific purpose of providing additional information to consumers to assist in decision making during plan selection. MHBE will not use compliance with this voluntary reporting as an evaluation criteria for plan certification. MHBE will engage stakeholders further to discuss the utility of certain metrics such as

¹ Carriers are encouraged to provide an explanation of any additional metrics reported.



driving time and distance and to determine if certain network adequacy metrics or standards would benefit consumers enrolled in SADPs.

In addition to the voluntary one-time submission of this information with its 2017 plan certification materials, a carrier may provide updated information to MHBE on a quarterly basis if desired.



