

June 25, 2021

Commissioner Kathleen A. Birrane
Maryland Insurance Administration
200 St. Paul Place
Suite 2700
Baltimore, MD 21202
VIA EMAIL: networkadequacy.mia@maryland.gov

RE: Response to MIA questions posed for the June 18, 2021 Network Adequacy meeting

Dear Commissioner Birrane,

The Maryland Academy of Nutrition and Dietetics (MAND) represents approximately 1200 licensed dietitians and nutritionists, dietetic interns, and students within the state of Maryland. As a follow up to the oral presentation, we want to address the questions proposed by the Maryland Insurance Administration concerning Network Adequacy and Telehealth and the connection to the consumer, provider, and the insurance carriers.

We note in particular the following statement from the MIA's first question, "the existing quantitative network adequacy standards that apply to in-person services and are measured on an aggregate basis for a carrier's entire network are based solely on clinical appropriateness and do not account for individual enrollee preference." We believe this statement is very profound. The training and practice of dietitians focus on looking at patients as individuals that are part of families and communities. To look at a health treatment on an aggregate and not individual basis is a concern.

If we have learned nothing else from COVID-19 outcomes in all population groups are not the same, nor are individuals. When we deliver services to populations and individuals we must examine the social determinants of health that look at income, geographical location, education level, marital status, gender, etc. The five critical areas of social determinants of health¹ are:

Economic stability

- Employment
- Food insecurity
- Housing instability
- Poverty
- Access to internet

Education

- Enrollment in Higher Education
- High School Graduation
- Language and Literacy

Social and Community Context

- Civic Participation
- Discrimination
- Incarceration
- Social Cohesion

¹ <https://www.healthypeople.gov/2020/topics-objectives/topic/social-determinants-of-health>

Health and Health Care

- Access to Health Care
- Access to Primary Care
- Health Literacy

Neighborhood and Built Environment

- Access to Foods that Support Healthy Eating Patterns
- Crime and Violence
- Environmental Conditions
- Quality of Housing

Telehealth plays a significant role in delivering health care to many groups and in particular minority population groups. Access to health care is the real problem for minority groups and people who live in rural areas. Access involves the inability to travel for in-person visits and geographical location, requiring travel time. The education level of an individual or population group may also reduce their ability to manipulate the health care system. Individuals may feel overwhelmed on how to seek care. Even marital status plays a pivotal role in health care; married couples tend to support each other in appointments and follow-up visits. Telehealth will allow married or single to not depend on others for their healthcare visit but rely on themselves.

The patients I have worked with over the pandemic felt more comfortable and less stressed when they made appointments and followed through with their appointments than before COVID-19. In terms of Telehealth, we as health care providers and health care insurance carriers should also consider the relationship between health disparities and the social determinants of health. If one lives in a neighborhood where crime is rampant, poor quality of houses, food insecurity, and high incarceration rates, this would strongly affect the delivery of health care to many population groups.

In the past, the preference was on the insurance carrier's side and the providers with little or no consideration for the population groups they served. Therefore, we see no decrease in health disparities of minority groups or people living in rural or urban areas. If we are going to change health care, we must also change how we deliver care to all population groups.

Thank you so much for the opportunity to participate and provide comments in this very important effort.

Sincerely,

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