



Maryland
Hospital Association

December 4, 2020

Director of Regulatory Affairs
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, MD 21202

Emailed to: InsuranceRegReview.MIA@maryland.gov

Dear Director of Regulatory Affairs:

On behalf of the Maryland Hospital Association's (MHA) 60 member hospitals and health systems, we appreciate the opportunity to comment on the Maryland Insurance Administration's (MIA) draft proposed revisions to the Maryland Network Adequacy regulations, COMAR § 31.10.44. MHA commends MIA for proposing standards that give meaningful information to providers and consumers on network coverage. As a member of the Maryland Parity Coalition, MHA supports its comment letter regarding these proposed regulations, especially their recommendations on newly proposed telehealth standards. However, due to the focus of proposed § 31.10.44.04(C)(5) on hospital-based providers, we are submitting this letter to separately comment on this specific provision.

MHA is concerned the requested reporting process and metrics are not efficient. Specifically, the proposal requires carriers to report the percentage of participating on-call doctors, anesthesiologists, and radiologists. To calculate this percentage, carriers would also need to have information about non-participating providers, which may be outside the purview of their gathered data. MHA requests clarification on the intended benefit of this reporting requirement.

Similarly, § 31.10.44.04(C)(5)(b)(v) requires carriers to report on the number—not just the percentages—of non-physician providers who are not participating providers. MHA requests the removal of this particular provision because carriers do not generally have access to this information.

Thank you for considering our views and recommendations, and we look forward to working with MIA and all stakeholders throughout the regulatory process.

Sincerely,

Jennifer Witten
Vice President, Government Affairs