



Maryland

INSURANCE ADMINISTRATION

**2018 Report on the Health Care
Appeals & Grievances Law**

MSAR #6

**Al Redmer, Jr.
Commissioner**

December 1, 2019

TABLE OF CONTENTS

Background	3
Adverse Decisions	4
Grievance Decisions	6
Complaints	9
Conclusions	10
Appendix 1- Adverse Decisions by Carrier	12
Appendix 2- Grievance Decisions by Carrier	20
Appendix 3- Dispositions of Carrier Grievance Decisions	30
Appendix 4- Grievance Decisions by Carrier for Hospital Length of Stay	32
Appendix 5- Time Frame for Rendering a Grievance Decision by Carrier, Emergency Cases	33
Appendix 6- Time Frame for Rendering a Grievance Decision by Carrier, Non-Emergency Cases	34
Appendix 7- Internal Grievances Filed Considered Emergency Cases as Reported by Carrier	36
Appendix 8- Administration Complaints	37
Appendix 9- Summaries of Appeals and Grievances Orders	40

Background

In 1998, the Appeals and Grievances Law was enacted by the General Assembly to provide a full and fair process for resolving disputes regarding the medical necessity of a proposed or delivered health care service (See Title 15, Subtitle 10A of the Insurance Article). Until July 1, 2011, the Appeals and Grievances law applied only to individuals with insured health benefits. However, effective July 1, 2011, the Department of Budget and Management for the State of Maryland and effective June 28, 2013, Cecil County Public Schools voluntarily elected to use the Maryland Insurance Administration's external review process to provide external review for their self-funded employee health benefit plans.

When the Appeals and Grievance Law was enacted, the percentage of the population under the age of 65 with insured health benefits (42.8 percent) slightly exceeded the percentage of the population under the age of 65 with other employment based health benefits (37.9 percent). Other employment based health benefit plans include self-insured health benefit plans and the Federal Employees Health Benefit Plan (FEHBP). By 2018, the percentage of the population under the age of 65 with insured health benefits declined to 18.3 percent.¹

The Appeals and Grievances process begins when a carrier renders an "adverse decision," a determination that a proposed or delivered health care service is not medically necessary, appropriate or efficient. The member, the member's representative, or the treating provider on behalf of the member has the right to protest this decision through the carrier's internal review process. When the member, the member's representative, or the treating provider on behalf of the member files a protest with the carrier, this is a "grievance." If the carrier again determines the proposed or delivered health care service is not medically necessary, the member, the member's representative, or the treating provider on behalf of the member may ask the Administration to review the carrier's grievance decision by filing a "complaint".

The Appeals and Grievances Law gives the Administration the authority to contract with an Independent Review Organization (hereinafter referred to as the "IRO") to review these medical necessity complaints. When the Administration sends a complaint to an IRO for review, Maryland law requires that the review be performed by an unbiased provider in the same specialty as the area or areas appropriate to the subject of review. In addition, an IRO may not be a subsidiary of, or in any way be owned or controlled by, a health benefit plan, or a trade association of health benefit plans, or a trade association of health care providers. Based on the IRO's medical opinion, the Administration reaches a decision. If the complainant remains dissatisfied with the Administration's decision, he or she may make a written request for a hearing to

¹ Maryland Insurance Administration Administration's 2018 Report on the number of Insured and Self-Insured Lives.

challenge the Administration's decision.² Carriers do not have the right to an administrative hearing, but may file a petition for judicial review with the Circuit Court.

The Appeals and Grievance Law also requires carriers to submit quarterly reports to the Commissioner about their adverse decisions and grievance decisions. Specifically, carriers must provide to the Administration:

- The number of adverse decisions issued by the carrier;
- The outcome of each grievance filed with the carrier;
- The number and outcomes of cases that were considered emergency cases;
- The time within which the carrier made a grievance decision on all other cases that were not considered emergency cases;
- The number of grievances filed with the carrier that resulted from an adverse decision involving length of stay for inpatient hospitalization as related to the medical procedure involved; and
- The number and outcome of all other cases that resulted from an adverse decision involving the length of stay for inpatient hospitalization.

These quarterly reports, coupled with the Administration's data regarding complaints, allows for a comprehensive year over year review of this process. This report summarizes the statistical information the Administration has compiled for adverse decisions, grievance decisions and complaints for 2018, noting changes in certain areas since 2015 for nonprofit health services plans, insurers, and health maintenance organizations.

Adverse Decisions

Carriers rendered 78,314 adverse decisions in 2018 and 47,878 in 2015, representing an increase of 63.6 percent over the four year period. Pharmacy services and dental services accounted for the majority of this increase. Adverse decisions for pharmacy services increased by 560.6 percent from 2015 to 2018 (4,432 in 2015 to 29,279 in 2018). Adverse decisions for dental services increased by 266.6 percent from 2015 to 2018 (6,732 in 2015 to 24,677 in 2018). Adverse decisions for physician services increased by 8.6 percent from 2015 to 2018 (6,197 in 2015 to 6,733 in 2018). Also, adverse decisions for the combined categories of physical therapy, occupational therapy and speech therapy increased by 3.2 percent from 1,648 in 2015 to 1,700 in 2018.

In 2018, three categories of services accounted for 84.3 percent of all adverse decisions: (1) pharmacy services, (2) dental services; and (3) the combined categories of laboratory, radiology services. In 2015, these same services accounted for 58.6 percent of all adverse decisions. In 2015, pharmacy services ranked fifth in terms of the percentage of all adverse decisions at 9.3 percent (4,432), while in 2018, pharmacy services ranked first at 37.4 percent of all adverse decisions (29,279).

² The Memorandum of Understanding between the Maryland Department of Budget and Management does not provide State employees who are covered under a State of Maryland health benefit plan the right to a hearing to appeal the Maryland Insurance Administration's decision.

Over the years, policymakers have expressed concern about denials of emergency room services and mental health services. While the data provided by carriers indicate that there are still relatively few adverse decisions for these two types of services (0.0 percent and 1.2 percent of all adverse decisions in 2018, respectively), there has been a decrease in the number of adverse decisions for both emergency room services and mental health services from 2015 to 2018. Adverse decisions for emergency room services decreased by 93.8 percent from 2015 to 2018 (387 in 2015 to 24 in 2018). Adverse decisions for mental health services decreased by 44.3 percent from 2015 to 2018 (1,626 in 2015 to 906 in 2018).

Table 1: Adverse Decisions

MIA Category/Type of Service	2015		2018		Percent Change 2015-2018
	Number	Percent	Number	Percent	
Inpatient hospital services	1,306	2.7%	1,211	1.5%	-7.3%
Emergency room services	387	0.8%	24	0.0%	-93.8%
Mental health services	1,626	3.4%	906	1.2%	-44.3%
Physician services	6,197	12.9%	6,733	8.6%	8.6%
Laboratory, radiology services	16,879	35.3%	12,059	15.4%	-28.6%
Pharmacy services	4,432	9.3%	29,279	37.4%	560.6%
PT, OT, ST services (including inpatient rehab)	1,648	3.4%	1,700	2.2%	3.2%
Skilled nursing facility	47	0.1%	30	0.0%	-36.2%
Durable medical equipment	8,010	16.7%	1,179	1.5%	-85.3%
Dental	6,732	14.1%	24,677	31.5%	266.6%
Home health services	202	0.4%	88	0.1%	-56.4%
Obesity, IVF, Podiatry, Hearing and Vision	412	0.8%	428	0.5%	3.8%
Total	47,878	100.0%	78,314	100.0%	

Grievance Decisions

Table 2 provides an overview of the number and type of grievances carriers reviewed in 2015 and 2018. In 2015, there were 5,679 grievances, increasing to 8,765 in 2018, representing a 54.3 percent increase.

In 2015, the largest number of grievances reported involved dental at 1,459, followed by the combined categories of laboratory, radiology services at 1,260, with pharmacy services finishing third with 1,259 grievances reported. By comparison, in 2018, dental ranked second with 2,564 grievances reported, while the combined categories of laboratory, radiology services ranked third with 1,340 grievances reported and pharmacy services ranked first with 3,484 grievances reported.

The number of grievances reported by carriers increased in four types of services; pharmacy, dental, the combined categories of obesity, in vitro fertilization, podiatry, hearing and vision, and the combined categories of laboratory, radiology services. Grievances reported by carriers increased for pharmacy services (1,259 in 2015 to 3,484 in 2018), representing an increase of 176.7 percent. Grievances reported for dental services increased (1,459 in 2015 to 2,564 in 2018), representing an increase of 75.7 percent. Significant declines reported during this same period involved emergency room services, the combined categories of physical therapy, occupational therapy and speech therapy services, durable medical equipment and home health services. For example, grievances reported for emergency room services decreased (47 in 2015 to 23 in 2018), representing a decrease of 51 percent. Grievances reported for the combined categories of physical therapy, occupational therapy and speech therapy services decreased (105 in 2015 and 61 in 2018), representing a decrease of 41.9 percent. Please see table 2 for more information.

Table 2: Grievances

MIA Category/Type of Service	2015		2018		Percent Change 2015-2018
	Number	Percent	Number	Percent	
Inpatient hospital services	191	3.4%	183	2.1%	-4.2%
Emergency room services	47	0.8%	23	0.3%	-51.0%
Mental health services	118	2.1%	112	1.3%	-5.1%
Physician services	935	16.5%	681	7.8%	-27.2%
Laboratory, radiology services	1,260	22.2%	1,340	15.3%	6.3%
Pharmacy services	1,259	22.2%	3,484	39.7%	176.7%
PT, OT, ST services (including inpatient rehab)	105	1.8%	61	0.7%	-41.9%
Skilled nursing facility	16	0.3%	15	0.2%	-0.6%
Durable medical equipment	184	3.2%	132	1.5%	-28.3%
Dental	1,459	25.7%	2,564	29.3%	75.7%
Home health services	11	0.2%	8	0.1%	-27.3%
Obesity, IVF, Podiatry, Hearing and Vision	94	1.7%	162	1.8%	72.3%
Total	5,679			8,765	

Table 3 describes how the number of grievances received by carriers compares to the number of adverse decisions that carriers made in 2015 and 2018. Grievances decreased as a percentage of adverse decisions from 2015 to 2018 (11.9 percent to 11.2 percent). However, the differences varied according to the category of service. In 3 of the 12 categories, individuals were less likely to appeal an adverse decision in 2018 than in 2015, but in 9 of the 12 categories individuals were more likely to appeal the adverse decision in 2018.

Table 3: Grievances as a percent of adverse decisions

MIA Category/Type of Service	2015	MIA Category/Type of Service	2018
Inpatient hospital services	14.6%	Inpatient hospital services	15.1%
Emergency room services	12.1%	Emergency room services	95.8%
Mental health services	7.3%	Mental health services	12.4%
Physician services	15.0%	Physician services	10.1%
Laboratory, radiology services	7.5%	Laboratory, radiology Services	11.1%
Pharmacy services	28.4%	Pharmacy services	11.9%
PT, OT, ST services (including inpatient rehab)	6.4%	PT, OT, ST services (including inpatient rehab)	35.9%
Skilled nursing facility	34.0%	Skilled nursing facility	50.0%
Durable medical equipment	2.3%	Durable medical equipment	11.2%
Dental	21.7%	Dental	10.4%
Home health services	5.4%	Home health services	9.1%
Obesity, IVF, Podiatry, Hearing and Vision	22.8%	Obesity, IVF, Podiatry, Hearing and Vision	37.9%
Total	11.9%	Total	11.2%

Table 4 compares how often carriers upheld their original decisions in 2015 and in 2018. More detailed information about grievance decisions for each carrier may be found in Appendices 2 and 3 for 2018. Carriers upheld adverse decisions 48.7 percent of the time in 2015 as compared to 46.8 percent in 2018, indicating that carriers were more likely to uphold an adverse decision in 2015 than in 2018.

Table 4: Grievance Decision

	2015		2018	
	Number	Percent	Number	Percent
Carrier upheld adverse decision	2,764	48.7%	4,104	46.8%
Carrier overturned adverse decision	2,810	49.5%	4,262	48.6%
Carrier modified original adverse decision	105	1.8%	399	4.6%
Total	5,679		8,765	

Complaints

While the number of the number of adverse and grievance decisions increased between 2015 and 2018, the number of complaints filed with the Administration decreased in this time period. The Administration received 1,109 in 2015 and 1,039 complaints in 2018, representing a decrease of 6.31 percent. As summarized in Table 5, 32.3 percent of the complaints received in 2018 were outside of the Administration's jurisdiction, as were 32.9 percent of the complaints received in 2015. These non-jurisdiction cases included complaints filed by individuals covered under Medicare, Medicaid, the Federal Employee Health Benefit Plan, employer group self-funded plans, and contracts subject to the laws of states other than Maryland.

In 2015, the Administration modified or reversed the carrier's grievance decision (or the carrier reversed its own grievance decision during the course of the Administration's investigation) 52.7 percent of the time. In 2018, data indicates that the Administration reversed or modified the carrier's grievance decision (or the carrier reversed or modified their grievance decisions during the investigation) 67 percent of the time, representing an increase in reversals of 27.1 percent. All of the reversals of the carriers' grievance decisions resulted in more benefits for Maryland consumers.

In 2018, the Administration issued two Orders based on the medical necessity complaints which it received and imposed \$2,500 in administrative penalties. During this same year, the Administration recovered \$348,612 for complainants. By comparison, in 2015, the Administration issued 3 Orders and Consent Orders based on medical necessity complaints it received, and imposed \$5,000 in administrative penalties. During this same year, the Administration recovered \$1,470,148 for complainants. Since the enactment of the Appeals and Grievances law, the Administration has recovered just under \$11 million dollars (\$10,948,612) for complainants.

As noted above, in 2011, the Administration entered into an agreement with the Maryland Department of Budget and Management to perform the external review for the medical necessity type complaints filed by State employees. In 2013, the Administration entered into a similar agreement with Cecil County Public Schools to perform the same function. This meant that during 2018, State employees and Cecil County Public School employees could use the Administration's external review process for their medical necessity type complaints. Since 2011, the Administration has received 532 complaints which involved denials based on medical necessity from State and Cecil County Public School employees.

Table 5 describes how the number of complaints filed with Administration in 2015 compares to the number of complaints filed in 2018.

Table 5: Complaints

	2015	2018	Percent Change
Total complaints received	1,109	1,039	-6.3%
No Jurisdiction	365	336	-7.9%
Complaint withdrawn	10	6	-40%
Insufficient Information to perform investigation	90	124	37.8%
No action required	147	102	-30.6%
Referred to HEAU	106	71	-33.0%
Complaints investigated by MIA	391	400	2.3%
Percent of total complaints investigated by the MIA	35.3%	38.5%	9.0%
Number of complaints carrier or MIA reversed or modified grievance decisions	206	268	30.1%
Percent of total complaints investigated by MIA where carrier or MIA reversed or modified grievance decisions	52.7%	67.0%	27.1%

Conclusion

Between 2015 and 2018, the number of adverse decisions increased by 63.6 percent and the number of grievance decisions increased by 54.3 percent, while the number of medical necessity complaints investigated by the Administration decreased by 6.3 percent.

Carriers rendered 78,314 adverse decisions in 2018 and 47,878 in 2015, representing an increase of 63.6 percent over the four year period. Between 2015 and 2018, there was a decrease in adverse decisions for the following four categories: (1) emergency room; (2) durable medical equipment; (3) mental health services; and (4) the combined categories of laboratory and radiology services. Between 2015 and 2018, there was an increase in adverse decisions for the following four categories of service: (1) pharmacy services; (2) dental services; (3) physician services; and (4) the combined categories of physical, occupation and speech therapy services. Between 2015 and 2018, the largest decline in the number of adverse decisions was for the combined categories of laboratory and radiology services and the largest increase in the number of adverse decisions was for dental care services.

Grievances decreased as a percentage of adverse decisions from 2015 to 2018 (11.9 percent to 11.2 percent) suggesting that consumers were more likely to take advantage of the carriers' internal grievance process in 2015 than in 2018. When consumers filed grievances regarding initial adverse decisions, carriers upheld their

adverse decisions 48.7 percent of the time in 2015 as compared to 46.8 percent in 2018, indicating that carriers were more likely to uphold and adverse decision in 2015 than in 2018.

In 2018, the Administration achieved a carrier reversal percentage of 67 percent for complaints that were investigated by the Administration. In 2018, the Administration recovered \$348,612 for complainants under the Appeals and Grievances Law. Since the Appeals and Grievances Law was enacted by the General Assembly, the Administration has recovered over \$11 million dollars for complainants. The Appeals and Grievances Law remains an important protection for Maryland consumers, providing a fair, impartial, and balanced process for resolving disputes regarding the medical necessity of proposed or delivered health care services.

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	ADVERSE DECISIONS		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
	COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
			HOSPITAL SERVICES	% TOTAL	ROOM SERVICES	% TOTAL
Aetna Dental, Inc.	863	1.1%	0	0.0%	0	0.0%
Aetna Health Inc. (a Pennsylvania corporation)	275	0.4%	143	52.0%	0	0.0%
Aetna Life Insurance Company	222	0.3%	109	49.1%	0	0.0%
Alpha Dental Programs, Inc.	1	0.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp.	102	0.1%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	20,326	26.0%	22	0.1%	2	0.0%
CareFirst of Maryland, Inc.	7,775	9.9%	4	0.1%	6	0.1%
CIGNA Dental Health of Maryland, Inc.	80	0.1%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	7,395	9.4%	76	1.0%	0	0.0%
Connecticut General Life Insurance Company	4	0.0%	0	0.0%	0	0.0%
Delta Dental Insurance Company	18	0.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	42	0.1%	0	0.0%	0	0.0%
Dental Benefit Providers of Illinois, Inc.	6,424	8.2%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	420	0.5%	0	0.0%	0	0.0%
Evergreen Health, Inc.	5	0.0%	5	100.0%	0	0.0%
Golden Rule Insurance Company	17	0.0%	2	11.8%	0	0.0%
Group Dental Service of Maryland, Inc.	3,940	5.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Services, Inc.	7,569	9.7%	11	0.1%	6	0.1%
Guardian Life Insurance Company of America	1,236	1.6%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	43	0.1%	16	37.2%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	664	0.8%	13	2.0%	0	0.0%
Kaiser Permanente Insurance Company	66	0.1%	11	16.7%	0	0.0%
Lincoln Life and Annuity Company of New York	1	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company	197	0.3%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	1,441	1.8%	102	7.1%	0	0.0%
Metropolitan Life Insurance Company	312	0.4%	0	0.0%	0	0.0%
National Health Life Insurance Company	5	0.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	2,221	2.8%	184	8.3%	0	0.0%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	ADVERSE DECISIONS		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
	COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
Principal Life Insurance Company	290	0.4%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	3	0.0%	0	0.0%	0	0.0%
Standard Insurance Company	26	0.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	2	0.0%	0	0.0%	0	0.0%
Unicare Life and Health Insurance Company	1	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	724	0.9%	0	0.0%	0	0.0%
United Concordia Dental Plans, Inc.	4	0.0%	0	0.0%	0	0.0%
United Concordia Insurance Company	792	1.0%	0	0.0%	0	0.0%
United Concordia Life and Health Insurance Company	75	0.1%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	13,657	17.4%	492	3.6%	7	0.1%
UnitedHealthcare of the Mid-Atlantic, Inc.	1,076	1.4%	21	2.0%	3	0.3%
Total	78,314	100.00%	1,211	1.5%	24	0.0%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Dental, Inc.	0	0.0%	0	0.0%	0	0.0%
Aetna Health Inc. (a Pennsylvania corporation)	4	1.5%	66	24.0%	0	0.0%
Aetna Life Insurance Company	17	7.7%	44	19.8%	0	0.0%
Alpha Dental Programs, Inc.	0	0.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	287	1.4%	1,719	8.5%	2,939	14.5%
CareFirst of Maryland, Inc.	186	2.4%	318	4.1%	669	8.6%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	39	0.5%	1,469	19.9%	3,261	44.1%
Connecticut General Life Insurance Company	0	0.0%	0	0.0%	4	100.0%
Delta Dental Insurance Company	0	0.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	0	0.0%	0	0.0%	0	0.0%
Dental Benefit Providers of Illinois, Inc.	0	0.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	0	0.0%	0	0.0%	0	0.0%
Evergreen Health, Inc.	0	0.0%	0	0.0%	0	0.0%
Golden Rule Insurance Company	3	17.6%	1	5.9%	11	64.7%
Group Dental Service of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Services, Inc.	109	1.4%	395	5.2%	613	8.1%
Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	0	0.0%	10	23.3%	7	16.3%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	44	6.6%	262	39.5%	33	5.0%
Kaiser Permanente Insurance Company	0	0.0%	29	43.9%	14	21.2%
Lincoln Life and Annuity Company of New York	0	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	18	1.2%	202	14.0%	244	16.9%
Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
National Health Insurance Company	0	0.0%	5	100.0%	0	0.0%
Optimum Choice, Inc.	25	1.1%	290	13.1%	447	20.1%
Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	0	0.0%	0	0.0%	0	0.0%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Standard Insurance Company	0	0.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	0	0.0%	0	0.0%
Unicare Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	0	0.0%	0	0.0%	0	0.0%
United Concordia Dental Plans, Inc.	0	0.0%	0	0.0%	0	0.0%
United Concordia Insurance Company	0	0.0%	0	0.0%	0	0.0%
United Concordia Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	160	1.2%	1,461	10.7%	3,459	25.3%
UnitedHealthcare of the Mid-Atlantic, Inc.	14	1.3%	462	42.9%	358	33.3%
Total	906	1.2%	6,733	8.6%	12,059	15.4%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	F. PHARMACY SERVICES		G. PT, OT, ST SERVICES (incl INPAT REHAB)		H. SKILLED NURS FAC, Sub Acute, Nursing Home	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Dental, Inc.	0	0.0%	0	0.0%	0	0.0%
Aetna Health Inc. (a Pennsylvania corporation)	57	20.7%	4	1.5%	1	0.4%
Aetna Life Insurance Company	45	20.3%	5	2.3%	2	0.9%
Alpha Dental Programs, Inc.	0	0.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	14,182	69.8%	580	2.9%	8	0.0%
CareFirst of Maryland, Inc.	3,760	48.4%	118	1.5%	0	0.0%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	1,331	18.0%	726	9.8%	6	0.1%
Connecticut General Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Delta Dental Insurance Company	0	0.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	0	0.0%	0	0.0%	0	0.0%
Dental Benefit Providers of Illinois, Inc.	0	0.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	0	0.0%	0	0.0%	0	0.0%
Evergreen Health, Inc.	0	0.0%	0	0.0%	0	0.0%
Golden Rule Insurance Company	0	0.0%	0	0.0%	0	0.0%
Group Dental Service of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Services, Inc.	3,179	42.0%	113	1.5%	1	0.0%
Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	0	0.0%	3	7.0%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	0	0.0%	38	5.7%	10	1.5%
Kaiser Permanente Insurance Company	0	0.0%	8	12.1%	0	0.0%
Lincoln Life and Annuity Company of New York	0	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	783	54.3%	9	0.6%	0	0.0%
Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
National Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	1,053	47.4%	53	2.4%	0	0.0%
Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Standard Insurance Company	0	0.0%	0	0.0%	0	0.0%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	F. PHARMACY SERVICES		G. PT, OT, ST SERVICES (incl INPAT REHAB)		H. SKILLED NURS FAC, Sub Acute, Nursing Home	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Sun Life Assurance Company of Canada	0	0.0%	0	0.0%	0	0.0%
Unicare Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	0	0.0%	0	0.0%	0	0.0%
United Concordia Dental Plans, Inc.	0	0.0%	0	0.0%	0	0.0%
United Concordia Insurance Company	0	0.0%	0	0.0%	0	0.0%
United Concordia Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	4,736	34.7%	23	0.2%	2	0.0%
UnitedHealthcare of the Mid-Atlantic, Inc.	153	14.2%	20	1.9%	0	0.0%
Total	29,279	37.4%	1,700	2.2%	30	0.0%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. DENTAL		K. HOME HEALTH SERVICES		L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
	Aetna Dental, Inc.	0	0.0%	863	100.0%	0	0.0%	0
Aetna Health Inc. (a Pennsylvania corporation)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Aetna Life Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Alpha Dental Programs, Inc.	0	0.0%	1	100.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp.	0	0.0%	102	100.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	381	1.9%	181	0.9%	18	0.1%	7	0.0%
CareFirst of Maryland, Inc.	51	0.7%	2,646	34.0%	17	0.2%	0	0.0%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	80	100.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	357	4.8%	99	1.3%	25	0.3%	6	0.1%
Connecticut General Life Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Delta Dental Insurance Company	0	0.0%	18	100.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	0	0.0%	42	100.0%	0	0.0%	0	0.0%
Dental Benefit Providers of Illinois, Inc.	0	0.0%	6,424	100.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	0	0.0%	420	100.0%	0	0.0%	0	0.0%
Evergreen Health, Inc.	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Golden Rule Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Group Dental Service of Maryland, Inc.	0	0.0%	3,940	100.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Serv. Inc.	39	0.5%	3,094	40.9%	8	0.1%	1	0.0%
Guardian Life Insurance Company of America	0	0.0%	1,236	100.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	0	0.0%	0	0.0%	0	0.0%	7	16.3%
Kaiser Foundation Health Plan Mid-Atlantic States, Inc.	100	15.1%	8	1.2%	6	0.9%	150	22.6%
Kaiser Permanente Insurance Company	4	6.1%	0	0.0%	0	0.0%	0	0.0%
Lincoln Life and Annuity Company of New York	0	0.0%	1	100.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company	0	0.0%	197	100.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	23	1.6%	33	2.3%	5	0.3%	22	1.5%
Metropolitan Life Insurance Company	0	0.0%	312	100.0%	0	0.0%	0	0.0%
National Health Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	44	2.0%	56	2.5%	2	0.1%	67	3.0%
Principal Life Insurance Company	0	0.0%	290	100.0%	0	0.0%	0	0.0%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. DENTAL		K. HOME HEALTH SERVICES		L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Reliance Standard Life Insurance Company	0	0.0%	3	100.0%	0	0.0%	0	0.0%
Standard Insurance Company	0	0.0%	26	100.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	2	100.0%	0	0.0%	0	0.0%
Unicare Life and Health Insurance Company	0	0.0%	1	100.0%	0	0.0%	0	0.0%
Union Security Insurance Company	0	0.0%	724	100.0%	0	0.0%	0	0.0%
United Concordia Dental Plans, Inc.	0	0.0%	4	100.0%	0	0.0%	0	0.0%
United Concordia Insurance Company	0	0.0%	792	100.0%	0	0.0%	0	0.0%
United Concordia Life and Health Ins. Company	0	0.0%	75	100.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	167	1.2%	2,998	22.0%	7	0.1%	145	1.1%
UnitedHealthcare of the Mid-Atlantic, Inc.	13	1.2%	9	0.8%	0	0.0%	23	2.1%
Total	1,179	1.5%	24,677	31.5%	88	0.1%	428	0.5%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC#	COMPANY NAME	GRIEVANCES FILED			A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
		COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL	
80985	4 Ever Life Insurance Company	1	0.0%	1	100.0%	0	0.0%	
95109	Aetna Health Inc. (a Pennsylvania corporation)	309	3.5%	51	16.5%	7	2.3%	
60054	Aetna Life Insurance Company	187	2.1%	22	11.8%	4	2.1%	
61301	Ameritas Life Insurance Corp.	31	0.4%	0	0.0%	0	0.0%	
96202	CareFirst BlueChoice, Inc.	2,505	28.6%	25	1.0%	5	0.2%	
47058	CareFirst of Maryland, Inc.	784	8.9%	1	0.1%	0	0.0%	
67369	CIGNA Health and Life Ins Company	483	5.5%	18	3.7%	0	0.0%	
52053	Dental Benefit Providers of Illinois, Inc.	518	5.9%	0	0.0%	0	0.0%	
95657	Dominion Dental Services, Inc.	89	1.0%	0	0.0%	0	0.0%	
15090	Evergreen Health, Inc.	3	0.0%	2	66.7%	0	0.0%	
62286	Golden Rule Insurance Company	7	0.1%	1	14.3%	0	0.0%	
53007	Group Hospitalization and Medical Services, Inc.	846	9.7%	1	0.1%	0	0.0%	
64211	Guarantee Trust Life Insurance Company	1	0.0%	0	0.0%	0	0.0%	
64246	Guardian Life Insurance Company of America	498	5.7%	0	0.0%	0	0.0%	
	Johns Hopkins HealthCare LLC	156	1.8%	47	30.1%	4	2.6%	
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	30	0.3%	3	10.0%	0	0.0%	
60053	Kaiser Permanente Insurance Company	18	0.2%	3	16.7%	0	0.0%	
60321	MAMSI Life and Health Ins Company	151	1.7%	1	0.7%	0	0.0%	
65978	Metropolitan Life Insurance Company	44	0.5%	0	0.0%	0	0.0%	
82538	National Health Insurance Company	1	0.0%	0	0.0%	0	0.0%	
96940	Optimum Choice, Inc.	229	2.6%	1	0.4%	3	1.3%	
61271	Principal Life Insurance Company	53	0.6%	0	0.0%	0	0.0%	
86355	Standard Insurance Company	1	0.0%	0	0.0%	0	0.0%	

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC#	COMPANY NAME	GRIEVANCES FILED		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
		COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
80314	Unicare Life and Health Insurance Company	1	0.0%	0	0.0%	0	0.0%
70408	Union Security Insurance Company	52	0.6%	0	0.0%	0	0.0%
95253	United Concordia Dental Plans, Inc.	2	0.0%	0	0.0%	0	0.0%
85766	United Concordia Insurance Company	367	4.2%	0	0.0%	0	0.0%
62294	United Concordia Life and Health Insurance Company	50	0.6%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	1,293	14.8%	6	0.5%	0	0.0%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	55	0.6%	0	0.0%	0	0.0%
	TOTAL	8,765	100%	183	2.1%	23	0.3%

APPENDIX 2 GRIEVANCE DECISIONS BY CARRIER									
NAIC#	COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES			
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL		
80985	4 Ever Life Insurance Company	0	0.0%	0	0.0%	0	0.0%		
95109	Aetna Health Inc. (a Pennsylvania corporation)	3	1.0%	144	46.6%	66	21.4%		
60054	Aetna Life Insurance Company	7	3.7%	81	43.3%	41	21.9%		
61301	Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%		
96202	CareFirst BlueChoice, Inc.	2	0.1%	150	6.0%	551	22.0%		
47058	CareFirst of Maryland, Inc.	0	0.0%	6	0.8%	31	4.0%		
67369	CIGNA Health and Life Insurance Company	24	5.0%	135	28.0%	147	30.4%		
52053	Dental Benefit Providers of Illinois, Inc.	0	0.0%	0	0.0%	0	0.0%		
95657	Dominion Dental Services, Inc.	0	0.0%	0	0.0%	0	0.0%		
15090	Evergreen Health, Inc.	0	0.0%	0	0.0%	1	33.3%		
62286	Golden Rule Insurance Company	2	28.6%	0	0.0%	3	42.9%		
53007	Group Hospitalization and Medical Services, Inc.	2	0.2%	27	3.2%	119	14.1%		
64211	Guarantee Trust Life Insurance Company	0	0.0%	0	0.0%	0	0.0%		
64246	Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%		
	Johns Hopkins HealthCare LLC	2	1.3%	34	21.8%	49	31.4%		
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	10	33.3%	3	10.0%	0	0.0%		
60053	Kaiser Permanente Insurance Company	0	0.0%	12	66.7%	2	11.1%		
60321	MAMSI Life and Health Insurance Company	5	3.3%	8	5.3%	16	10.6%		
65978	Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%		
82538	National Health Insurance Company	0	0.0%	1	100.0%	0	0.0%		
96940	Optimum Choice, Inc.	8	3.5%	16	7.0%	40	17.5%		
61271	Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%		
86355	Standard Insurance Company	0	0.0%	0	0.0%	0	0.0%		
80314	Unicare Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%		

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC#	COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES	
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
70408	Union Security Insurance Company	0	0.0%	0	0.0%	0	0.0%
95253	United Concordia Dental Plans, Inc.	0	0.0%	0	0.0%	0	0.0%
85766	United Concordia Insurance Company	0	0.0%	0	0.0%	0	0.0%
62294	United Concordia Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	44	3.4%	61	4.7%	265	20.5%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	3	5.5%	3	5.5%	9	16.4%
	TOTAL	112	1.3%	681	7.8%	1,340	15.3%

APPENDIX 2 GRIEVANCE DECISIONS BY CARRIER									
NAIC#	COMPANY NAME	F. PHARMACY SERVICES		G. PT. OT, ST SERVICES		H. SKILLED NURSING FACILITY, Sub Acute, Nursing Home			
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL		
80985	4 Ever Life Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	32	10.4%	2	0.6%	1	0.3%	1	0.3%
60054	Aetna Life Insurance Company	25	13.4%	0	0.0%	0	0.0%	0	0.0%
61301	Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	1,695	67.7%	15	0.6%	2	0.1%	2	0.1%
47058	CareFirst of Maryland, Inc.	507	64.7%	1	0.1%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Insurance Company	111	23.0%	13	2.7%	0	0.0%	0	0.0%
52053	Dental Benefit Providers of Illinois, Inc.	0	0.0%	0	0.0%	0	0.0%	0	0.0%
95657	Dominion Dental Services, Inc.	0	0.0%	0	0.0%	0	0.0%	0	0.0%
15090	Evergreen Health, Inc.	0	0.0%	0	0.0%	0	0.0%	0	0.0%
62286	Golden Rule Insurance Company	0	0.0%	1	14.3%	0	0.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	414	48.9%	1	0.1%	3	0.4%	3	0.4%
64211	Guarantee Trust Life Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
64246	Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Johns Hopkins HealthCare LLC	7	4.5%	3	1.9%	0	0.0%	0	0.0%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	0	0.0%	4	13.3%	6	20.0%	6	20.0%
60053	Kaiser Permanente Insurance Company	0	0.0%	1	5.6%	0	0.0%	0	0.0%
60321	MAMSI Life and Health Insurance Company	101	66.9%	2	1.3%	0	0.0%	0	0.0%
65978	Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
82538	National Health Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	123	53.7%	2	0.9%	3	1.3%	3	1.3%
61271	Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
86355	Standard Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
80314	Unicare Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
70408	Union Security Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%

APPENDIX 2 GRIEVANCE DECISIONS BY CARRIER									
NAIC#	COMPANY NAME	F. PHARMACY SERVICES		G. PT. OT, ST SERVICES		H. SKILLED NURSING FACILITY, Sub Acute, Nursing Home			
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL		
95253	United Concordia Dental Plans, Inc.	0	0.0%	0	0.0%	0	0.0%	0	0.0%
85766	United Concordia Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
62294	United Concordia Life and Health Ins Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	436	33.7%	15	1.2%	0	0.0%	0	0.0%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	33	60.0%	1	1.8%	0	0.0%	0	0.0%
	TOTAL	3,484	39.7%	61	0.7%	15	0.2%	15	0.2%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC#	COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. DENTAL		K. HOME HEALTH SERVICES	
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
		80985	4 Ever Life Insurance Company	0	0.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	1	0.3%	1	0.3%	0	0.0%
60054	Aetna Life Insurance Company	1	0.5%	4	2.1%	1	0.5%
61301	Ameritas Life Insurance Corp.	0	0.0%	31	100.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	55	2.2%	2	0.1%	0	0.0%
47058	CareFirst of Maryland, Inc.	5	0.6%	233	29.7%	0	0.0%
67369	CIGNA Health and Life Insurance Company	4	0.8%	29	6.0%	2	0.4%
52053	Dental Benefit Providers of Illinois, Inc.	0	0.0%	518	100.0%	0	0.0%
95657	Dominion Dental Services, Inc.	0	0.0%	89	100.0%	0	0.0%
15090	Evergreen Health, Inc.	0	0.0%	0	0.0%	0	0.0%
62286	Golden Rule Insurance Company	0	0.0%	0	0.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	6	0.7%	272	32.2%	0	0.0%
64211	Guarantee Trust Life Insurance Company	0	0.0%	0	0.0%	1	100.0%
64246	Guardian Life Insurance Company of America	0	0.0%	498	100.0%	0	0.0%
	Johns Hopkins HealthCare LLC	5	3.2%	0	0.0%	3	1.9%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	2	6.7%	0	0.0%	1	3.3%
60053	Kaiser Permanente Insurance Company	0	0.0%	0	0.0%	0	0.0%
60321	MAMSI Life and Health Insurance Company	1	0.7%	1	0.7%	0	0.0%
65978	Metropolitan Life Insurance Company	0	0.0%	44	100.0%	0	0.0%
82538	National Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	6	2.6%	1	0.4%	0	0.0%
61271	Principal Life Insurance Company	0	0.0%	53	100.0%	0	0.0%
86355	Standard Insurance Company	0	0.0%	1	100.0%	0	0.0%
80314	Unicare Life and Health Insurance Company	0	0.0%	1	100.0%	0	0.0%
70408	Union Security Insurance Company	0	0.0%	52	100.0%	0	0.0%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC#	COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. DENTAL		K. HOME HEALTH SERVICES	
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
95253	United Concordia Dental Plans, Inc.	0	0.0%	2	100.0%	0	0.0%
85766	United Concordia Insurance Company	0	0.0%	367	100.0%	0	0.0%
62294	United Concordia Life and Health Insurance Company	0	0.0%	50	100.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	45	3.5%	315	24.4%	0	0.0%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	1	1.8%	0	0.0%	0	0.0%
	TOTAL	132	1.5%	2,564	29.3%	8	0.1%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC#	COMPANY NAME	L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
		NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	1	0.3%
60054	Aetna Life Insurance Company	1	0.5%
61301	Ameritas Life Insurance Corp.	0	0.0%
96202	CareFirst BlueChoice, Inc.	3	0.1%
47058	CareFirst of Maryland, Inc.	0	0.0%
67369	CIGNA Health and Life Insurance Company	0	0.0%
52053	Dental Benefit Providers of Illinois, Inc.	0	0.0%
95657	Dominion Dental Services, Inc.	0	0.0%
15090	Evergreen Health, Inc.	0	0.0%
62286	Golden Rule Insurance Company	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	1	0.1%
64211	Guarantee Trust Life Insurance Company	0	0.0%
64246	Guardian Life Insurance Company of America	0	0.0%
	Johns Hopkins HealthCare LLC	2	1.3%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	1	3.3%
60053	Kaiser Permanente Insurance Company	0	0.0%
60321	MAMSI Life & Health Insurance Company	16	10.6%
65978	Metropolitan Life Insurance Company	0	0.0%
82538	National Health Insurance Company	0	0.0%
96940	Optimum Choice, Inc.	26	11.4%
61271	Principal Life Ins. Company	0	0.0%
86355	Standard Insurance Company	0	0.0%
80314	Unicare Life and Health Insurance Company	0	0.0%
70408	Union Security Insurance Company	0	0.0%
95253	United Concordia Dental Plans, Inc.	0	0.0%
85766	United Concordia Insurance Company	0	0.0%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC#	COMPANY NAME	L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
		NUMBER	% TOTAL
62294	United Concordia Life and Health Insurance Company	0	0.0%
79413	UnitedHealthcare Insurance Company	106	8.2%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	5	9.1%
	TOTAL	162	1.8%

**APPENDIX 3
DISPOSITION OF CARRIER GRIEVANCE DECISIONS**

NAIC#	COMPANY NAME	GRIEVANCES FILED		ORIGINAL DECISION OF INSURANCE COMPANY WAS...					
		COMPANY TOTAL	% OF ALL COMPANIES	UPHELD		OVERTURNED		MODIFIED	
				NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	1	0.0%	0	0.0%	1	100.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	309	3.5%	175	56.6%	129	41.7%	5	1.6%
60054	Aetna Life Insurance Company	187	2.1%	101	54.0%	81	43.3%	5	2.7%
61301	Ameritas Life Insurance Corp.	31	0.4%	16	51.6%	13	41.9%	2	6.5%
96202	CareFirst BlueChoice, Inc.	2,505	28.6%	1,298	51.8%	1,202	48.0%	5	0.2%
47058	CareFirst of Maryland, Inc.	784	8.9%	375	47.8%	392	50.0%	17	2.2%
67369	CIGNA Health and Life Ins. Co.	483	5.5%	305	63.1%	171	35.4%	7	1.4%
52053	Dental Benefit Providers of Illinois, Inc.	518	5.9%	58	11.2%	397	76.6%	63	12.2%
95657	Dominion Dental Services, Inc.	89	1.0%	42	47.2%	38	42.7%	9	10.1%
15090	Evergreen Health, Inc.	3	0.0%	2	66.7%	0	0.0%	1	33.3%
62286	Golden Rule Insurance Company	7	0.1%	6	85.7%	1	14.3%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	846	9.7%	432	51.1%	392	46.3%	22	2.6%
64211	Guarantee Trust Life Insurance Co.	1	0.0%	1	100.0%	0	0.0%	0	0.0%
64246	Guardian Life Insurance Company of America	498	5.7%	237	47.6%	59	11.8%	202	40.6%
	Johns Hopkins HealthCare LLC	156	1.8%	68	43.6%	81	51.9%	7	4.5%

**APPENDIX 3
DISPOSITION OF CARRIER GRIEVANCE DECISIONS**

NAIC#	COMPANY NAME	GRIEVANCES FILED		ORIGINAL DECISION OF INSURANCE COMPANY WAS...					
		COMPANY TOTAL	% OF ALL COMPANIES	UPHELD		OVERTURNED		MODIFIED	
				NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
95639	Kaiser Fndtn Health Plan Mid-Atlantic	30	0.3%	26	86.7%	4	13.3%	0	0.0%
60053	Kaiser Permanente Insurance Co.	18	0.2%	11	61.1%	7	38.9%	0	0.0%
60321	MAMSI Life and Health Ins. Co.	151	1.7%	60	39.7%	88	58.3%	3	2.0%
65978	Metropolitan Life Ins. Company	44	0.5%	27	61.4%	13	29.5%	4	9.1%
82538	National Health Insurance Co	1	0.0%	1	100.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	229	2.6%	117	51.1%	109	47.6%	3	1.3%
61271	Principal Life Insurance Company	53	0.6%	49	92.5%	2	3.8%	2	3.8%
69019	Standard Insurance Company	1	0.0%	1	100.0%	0	0.0%	0	0.0%
80314	Unicare Life and Health Ins. Co.	1	0.0%	0	0.0%	1	100.0%	0	0.0%
70408	Union Security Insurance Co.	52	0.6%	28	53.8%	23	44.2%	1	1.9%
95253	United Concordia Dental Plans, Inc.	2	0.0%	2	100.0%	0	0.0%	0	0.0%
85766	United Concordia Insurance Co.	367	4.2%	123	33.5%	224	61.0%	20	5.4%
62294	United Concordia Life and Health Ins. Co.	50	0.6%	27	54.0%	21	42.0%	2	4.0%
79413	UnitedHealthcare Insurance Co.	1,293	14.8%	492	38.1%	782	60.5%	19	1.5%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	55	0.6%	24	43.6%	31	56.4%	0	0.0%
	Total	8,765	100%	4,104	46.8%	4,262	48.6%	399	4.6%

**APPENDIX 4
GRIEVANCE DECISIONS BY CARRIER FOR HOSPITAL LENGTH OF STAY (“LOS”)**

NAIC#	COMPANY* NAME	HOSPITAL LOS		HOSPITAL LOS		UPHELD		OVERTURNED		MODIFIED	
		TOTAL*	OUTCOME**	Number	Percent	Number	Percent	Number	Percent	Number	Percent
96202	CareFirst BlueChoice, Inc.	11	9	0	0.0%	9	100.0%	0	0.0%	0	0.0%
47057	CareFirst of Maryland, Inc.	1	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Insurance Co.	18	4	3	75.0%	1	25.0%	0	0.0%	0	0.0%
15090	Evergreen Health, Inc.	2	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%
62286	Golden Rule Insurance Company	1	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%
53007	Group Hospitalization and Med Serv Inc.	5	1	0	0.0%	1	100.0%	0	0.0%	0	0.0%
95639	Kaiser Fndtn Health Plan Mid-Atlantic	3	1	0	0.0%	1	100.0%	0	0.0%	0	0.0%
60053	Kaiser Permanente Insurance Company	3	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	2	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	10	2	1	50.0%	1	50.0%	0	0.0%	0	0.0%

* This chart only includes those carriers who received grievances involving hospital length of stay during calendar year 2018.
 ** Represents the number of grievances that were resolved in calendar year 2018.

**APPENDIX 5
TIME FRAME FOR RENDERING A GRIEVANCE DECISION BY CARRIER EMERGENCY CASES**

NAIC#	COMPANY ** NAME	EMERGENCY CASES - RESOLUTION TIME*			
		1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
96202	CareFirst BlueChoice, Inc.	24	24	24	24
47058	CareFirst of Maryland, Inc.	24	24	24	24
67369	CIGNA Health and Life Insurance Company	47.8	55.5	11.8	27.9
53007	Group Hospitalization and Medical Services, Inc.	24	24	24	24
95639	Kaiser Foundation Health Plan-Mid-Atlantic	18.8	19.8	17.7	20.1
60321	MAMSI Life and Health Ins. Company	14	13	39	14
96940	Optimum Choice, Inc.	15	14	24	22
79413	UnitedHealthcare Insurance Company	21	22	16	39
95025	UnitedHealthcare of the Mid-Atlantic	22	19	22	18

** This report only includes carriers who had grievances which were considered emergency cases during calendar year 2018.

* Reported as hours

**APPENDIX 6
TIME FRAME FOR RENDERING A GRIEVANCE DECISION BY CARRIER, NON-EMERGENCY CASES**

NAIC#	COMPANY NAME	NON-EMERGENCY CASES - RESOLUTION TIME*			
		1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
80985	4 Ever Life Insurance Company	5.0	0	0	0
95109	Aetna Health Inc. (a Pennsylvania corporation)	27.4	22.4	19.4	23.9
60054	Aetna Life Insurance Company	25	17.3	16	21
61301	Ameritas Life Insurance Corporation	10	12	13.6	15
96202	CareFirst BlueChoice, Inc.	23.5	24.1	17.3	25
47058	CareFirst of Maryland, Inc.	39.2	21	25.4	25
67369	CIGNA Health and Life Insurance Company	28.3	26.4	30.1	30.1
52053	Dental Benefit Providers of Illinois, Inc.	3	3	3	3
95657	Dominion Dental Services, Inc.	16	19	16	20
15090	Evergreen Health, Inc.	39.3	0	0	0
62286	Golden Rule Insurance Company	22	0	43	77
53007	Group Hospitalization and Medical Services, Inc.	27.3	28.2	27.9	30.1
64211	Guarantee Trust Life Insurance Company	26	0	0	0
64246	Guardian Life Insurance Company of America	3	3	3	3
	Johns Hopkins HealthCare LLC	0	28	27	28.5
95639	Kaiser Foundation Health Plan-Mid-Atlantic	21	1	28	25.3
60053	Kaiser Permanente Insurance Company	8	5	7	7.2
60321	MAMSI Life and Health Insurance Company	32	36	35	35
65978	Metropolitan Life Insurance Company	10.3	15.5	12.6	7.3
82538	National Health Insurance Company	0	0	0	25.3
96940	Optimum Choice, Inc.	24	28	29	34
61271	Principal Life Insurance Company	19.3	14	15.4	14.4

APPENDIX 6 TIME FRAME FOR RENDERING A GRIEVANCE DECISION BY CARRIER, NON-EMERGENCY CASES						
NAIC#	COMPANY NAME	NON-EMERGENCY CASES – RESOLUTION TIME**				
		1 ST Quarter	2 ND Quarter	3 RD Quarter	4 TH Quarter	
69019	Standard Insurance Company	0	0	0	19	
80314	Unicare Life and Health Insurance Company	0	10	0	0	
70408	Union Security Insurance Company	77	62	28	56	
95253	United Concordia Dental Plans, Inc.	3	0	9	0	
85766	United Concordia Insurance Company	6.4	7.3	8.1	6.5	
62294	United Concordia Life and Health Insurance Co.	6.8	0	0	0	
79413	UnitedHealthcare Insurance Company	38	41	36	34	
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	31	29	43	31	

**Reported as Calendar Days

APPENDIX 7

INTERNAL GRIEVANCES FILED CONSIDERED EMERGENCY CASES AS REPORTED BY CARRIER

NAIC#	COMPANY* NAME	*TOTAL NUMBER OF "EMERGENCIES" CASES	"EMERGENCIES"		UPHELD		OVERTURNED		MODIFIED	
			OUTCOME**	Number	Percent	Number	Percent	Number	Percent	Number
96202	CareFirst BlueChoice, Inc.	288	119	53	44.5%	66	55.5%	0	0.0%	
47058	CareFirst of Maryland, Inc.	49	49	20	40.8%	29	59.2%	0	0.0%	
67369	CIGNA Health and Life Ins. Co.	24	24	13	54.2%	11	45.8%	0	0.0%	
53007	Group Hospitalization and Medical Services, Inc.	171	41	13	31.7%	28	68.3%	0	0.0%	
95639	Kaiser Fndtn Health Plan Mid-Atl	18	18	18	100.0%	0	0.0%	0	0.0%	
60321	MAMSI Life and Health Ins. Co.	66	66	17	25.8%	49	74.2%	0	0.0%	
96940	Optimum Choice, Inc.	75	70	28	40.0%	39	55.7%	3	4.3%	
79413	UnitedHealthcare Ins. Company	324	302	105	34.8%	158	52.3%	39	12.9%	
95025	UnitedHealthcare of the Mid-Atl	27	27	10	37.0%	17	63.0%	0	0.0%	
	Total	1,042	716	277	38.3%	397	55.4%	42	5.9%	

*This chart only includes carriers who had grievances which were considered emergency cases during calendar year 2018.

** Represents the number of grievances that were resolved in calendar year 2018.

**APPENDIX 8
ADMINISTRATION COMPLAINTS**

Appeals and Grievance Statistics
Totals for Complaints Filed
January 1, 2018 – December 31, 2018

COMPLAINTS	1,039
NO JURISDICTION	336
Referred to DBM/Cecil County	19
Referred to Department of Labor (ERISA plans)	143
Referred to Office of Personnel Management (Federal employee health benefit plans)	53
Referred to Medicaid	29
Referred to Medicare	12
Out of State Plan	80
COMPLAINT WITHDRAWN	6
INSUFFICIENT INFORMATION TO COMPLETE INVESTIGATION	124
NO ACTION REQUIRED (includes non-medical necessity complaint cases transferred to Complaint Unit, duplicate files, inquiries)	102
REFERRED TO HEALTH, EDUCATION AND ADVOCACY UNIT (for complainants who had not exhausted the carrier's internal appeal process)	71
MIA CONDUCTED INVESTIGATION	400
MIA Decision Upheld Carrier	132
Carrier Reversed Itself During Investigation	185
MIA Reversed Carrier Decision	70
MIA Reversed Carrier Decision in Part and Upheld Carrier Decision in Part	13

Administration Complaints (Continued)

Carrier	COMPLAINTS INVESTIGATED		Carrier Upheld by MIA		Carrier Reversed by MIA		Carrier Modified by MIA		Carrier Reversed by Itself During Investigation	
	Total	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Aetna Health, Inc. (a Pennsylvania corporation)	6	2%	2	33%	2	33%	0	0%	2	33%
Aetna Health Insurance Company	1	0%	0	0%	1	100%	0	0%	0	0%
Aetna Life Insurance Company	6	2%	4	67%	1	17%	0	0%	1	17%
Ameritas Life Insurance Company	1	0%	0	0%	0	0%	0	0%	1	100%
Carefirst BlueChoice, Inc.	99	25%	36	36%	17	17%	2	2%	44	44%
Carefirst of Maryland, Inc.	100	25%	34	34%	14	14%	5	5%	47	47%
CaremarkPCS Health L.L.C.	10	3%	2	20%	0	0%	0	0%	8	80%
CIGNA Dental Health of Maryland, Inc.	2	1%	0	0%	0	0%	0	0%	2	100%
CIGNA Health and Life Insurance Co.	16	4%	7	44%	5	31%	0	0%	4	25%
CVS Caremark	4	1%	0	0%	0	0%	0	0%	4	100%
Delta Dental of Pennsylvania	1	0%	0	0%	1	100%	0	0%	0	0%
Evergreen Health, Inc.	1	0%	0	0%	0	0%	0	0%	1	100%
Group Hospitalization and Medical Services, Inc.	26	7%	12	46%	3	12%	1	4%	10	38%
Guardian Life Ins. Co. of America	5	1%	1	20%	1	20%	0	0%	3	60%
Kaiser Foundation Health Plan	14	4%	7	50%	3	21%	0	0%	4	29%
Kaiser Permanente Insurance Company	1	0%	0	0%	1	100%	0	0%	0	0%
MAMSI Life and Health Insurance Co.	4	1%	1	25%	0	0%	1	25%	2	50%
Optimum Choice, Inc.	8	2%	2	25%	1	13%	0	0%	5	63%
Unicare Life and Health Insurance Co.	1	0%	1	100%	0	0%	0	0%	0	0%
United Concordia Insurance Company	3	1%	0	0%	1	33%	1	33%	1	33%
United Concordia Life and Health Ins. Co.	11	3%	4	36%	3	27%	1	9%	3	27%
UnitedHealthcare Ins. Company	70	18%	18	23%	12	17%	2	3%	38	54%
UnitedHealthcare of the Mid-Atlantic, Inc.	7	2%	0	0%	3	43%	0	0%	4	57%
UnitedHealthcare Services, Inc.	3	1%	1	33%	1	33%	0	0%	1	33%
TOTAL	400	100%	132	32%	70	18%	13	3%	185	46%

Administration Complaints (Continued)

Type of Procedure	Carrier Code**	Total	Carrier Upheld by MIA		Carrier Reversed by MIA		Carrier Modified by MIA		Carrier Reversed Itself During Investigation	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Acupuncture	D	1	0	0%	0	0%	0	0%	1	100%
Air Ambulance	B	4	4	100%	0	0%	0	0%	0	0%
Cosmetic	D	3	2	67%	1	33%	0	0%	0	0%
Denial of Hospital Days	A	8	2	25%	3	38%	0	0%	3	38%
Dental Care Services	J	71	23	32%	13	18%	4	6%	31	44%
Durable Medical Equipment	I	12	6	50%	2	17%	0	0%	4	33%
Emergency Room Denial	B	3	0	0%	0	0%	0	0%	3	100%
Experimental	D	58	37	64%	14	24%	3	5%	4	7%
Eye Care Services	L	1	0	0%	0	0%	0	0%	1	100%
Home Care Services	K	2	0	0%	1	50%	0	0%	1	50%
In-Patient Rehabilitation Services	G	1	0	0%	0	0%	0	0%	1	100%
Lab, Imaging, Test Services	E	21	8	38%	4	19%	0	0%	9	43%
Lymphedema Treatment	I	1	0	0%	1	100%	0	0%	0	0%
Mental Health Partial Hospitalization	L	2	0	0%	2	100%	0	0%	0	0%
Mental Health/Substance (Inpatient) Services	C	2	1	50%	0	0%	1	50%	0	0%
Mental Health/Substance (Outpatient) Services	C	3	2	67%	0	0%	1	33%	0	0%
Morbid Obesity	L	1	0	0%	0	0%	0	0%	1	100%
Opioid Use Disorders	F	11	1	9%	2	18%	0	0%	8	73%
Out Patient Services	C	1	0	0%	1	100%	0	0%	0	0%
PCP Referrals	D	2	2	100%	0	0%	0	0%	0	0%
Pharmacy Benefits	F	4	0	0%	0	0%	0	0%	4	100%
Pharmacy Services/Formulary Issues	F	146	28	19%	16	11%	2	1%	100	68%
Physician Services	D	37	14	38%	9	24%	1	3%	13	35%
PT, OT, ST Services	G	4	1	25%	1	25%	1	25%	1	25%
Transportation Services	G	1	1	100%	0	0%	0	0%	0	0%
TOTAL		400	132		70		13		185	

Appendix 9
Summaries of Appeals and Grievance Orders

Aetna Life Insurance Company (“Aetna”)

Case No.: MIA-2018-10-002

Effective Date: October 2, 2019

The Administration ordered Aetna to provide documentation to the Commissioner showing that it is no longer relying on criteria regarding the transitioning of patients from a PCA pump to oral analgesics for members with the complainant’s medical condition that are not correctly applied, that are not clinically valid, not compatible with established principles of health care and not flexible enough to allow for deviations from norms when justified on a case by case basis in accordance with § 15-10A-02(i) of the Insurance Article.

CareFirst BlueChoice, Inc. (“BlueChoice”)

Case No.: MIA-2018-11-011

Effective Date: November 1, 2018

Penalty: \$2,500.00

The Administration ordered BlueChoice to provide documentation to the Commissioner showing that it is no longer relying on criteria and standards for utilization review of Breast/Ovarian Cancer Panel testing to test members with the complainant’s condition that are not clinically valid, not compatible with established principles of healthcare and not flexible enough to allow for deviations from norms when justified on a case by case basis. The Administration also ordered BlueChoice pay an administrative penalty \$2,500 for violation of § 15-10B-09.1 and therefore § 27-303(7) of the Insurance Article.