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Governor

BOYD K. RUTHERFORD
Lt. Governor



Maryland

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KATHLEEN A. BIRRANE
Commissioner

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Deputy Commissioner

November 30, 2022

The Honorable Larry Hogan
Governor
State of Maryland
State House
100 State Circle
Annapolis, MD 21401-1991

The Honorable Bill Ferguson
President of the Senate
State House, Room H-107
100 State Circle
Annapolis, Maryland 21401

The Honorable Adrienne A. Jones
Speaker of the House of Delegates
State House, H-101
Annapolis, Maryland 21401

Re: Report required by Insurance Article §15-10A-06(b)(2) (MSAR # 6)

Dear Governor Hogan, President Ferguson and Speaker Jones:

On behalf of the Maryland Insurance Administration (MIA), I am pleased to submit the *2021 Report on the Health Care Appeals & Grievance Law* as required by Insurance Article § 15-10A-06. Section 15-10A-06 requires the MIA to annually compile information provided under subsection (a) of this section and by the Secretary under § 19-705.2(e) of the Health-General Article. This report summarizes the statistical information the MIA has compiled for adverse decisions, grievance decisions and complaints for 2021, noting changes in certain areas since 2018 for nonprofit health services plans, insurers, and health maintenance organizations.

Five printed copies of this report have been mailed to the DLS library for its records.

Should you have any questions regarding this report, please do not hesitate to contact me or my Director of Government Relations, Andrew Tress, at Andrew.tress1@maryland.gov.

Sincerely,

Kathleen A. Birrane
Insurance Commissioner

cc: Sarah T. Albert, Department of Legislative Services (5 copies)



MSAR #6

2021 Report on the Healthcare
Appeals & Grievances Law

Kathleen Birrane
Commissioner

November 30, 2022

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Background

In 1998, the Appeals and Grievances Law was enacted by the Maryland General Assembly to provide a full and fair process for resolving disputes regarding the medical necessity of a proposed or delivered healthcare 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 Maryland 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 (MIA or Administration) 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%) slightly exceeded the percentage of the population under the age of 65 with other employment based health benefits (37.9%). Other employment based health benefit plans include self-insured health benefit plans and the Federal Employees Health Benefit Plan (FEHBP). By 2021, the percentage of the population under the age of 65 with insured health benefits declined to 17.7%.¹

The Appeals and Grievances process begins when a carrier renders an "adverse decision," which includes a determination that a proposed or delivered healthcare 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 regarding an adverse decision, this is a "grievance." If the carrier again determines the proposed or delivered healthcare 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 (IRO) to review these medical necessity complaints. When the Administration sends a complaint to an IRO for review, and the IRO assigns an expert reviewer for the complaint, Maryland law requires that the reviewer be 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 healthcare providers. The Administration's final decision on the complaint may be based on the opinion of the IRO. If the complainant remains dissatisfied with the Administration's decision, he or she may make a written request for a hearing to challenge

¹ Maryland Insurance Administration Administration's 2021 Report on the Number of Insured and Self-Insured Lives.

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 MIA 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 2021, noting changes in certain areas since 2018 for nonprofit health services plans, insurers, and health maintenance organizations.

Adverse Decisions

Table 1 provides an overview of the number and type of adverse decisions carriers made in 2018 and 2021. More detailed information about adverse decisions made by each carrier is provided in Appendix 1 for 2021.

Carriers rendered 81,143 adverse decisions in 2021 compared to 78,314 in 2018, representing an increase of 3.61% over the 4-year period. Pharmacy services and dental services accounted for the majority of adverse decisions rendered during the period between 2018 and 2021. Adverse decisions for pharmacy services increased by 32.8% from 2018 to 2021, (29,279 in 2018 to 38,893 in 2021). Adverse decisions for dental services decreased by 38.7% from 2018 to 2021, (24,677 in 2018 and 15,133 in 2021). Adverse decisions for physician services decreased by 31.8% from 2018 to 2021, (6,733 in 2018 to 4,589 in 2021). However, adverse decisions for the combined categories of laboratory and radiology services increased by 21.7% from 2018 to 2021, (12,059 in 2018 to 14,673 in 2021). Adverse decisions for the combined categories of obesity, IVF, podiatry and hearing aid services also increased by 92.8% from 2018 to 2021, (428 in 2018 to 825 in 2021).

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.

In 2021, three categories of services accounted for 84.6% of all adverse decisions. They were pharmacy services, which ranked first, followed by dental services, with the combined categories of laboratory and radiology services ranking third. In 2018, these same services accounted for 84.3% of all adverse decisions. In 2018, pharmacy services ranked first in terms of the percentage of all adverse decisions at 37.4% (29,279), followed by dental services at 31.5% with the combined categories of laboratory and radiology services ranking third at 15.4% (12,059).

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 emergency room services and mental health services when compared to adverse decisions for dental and pharmacy services, it is unclear from the data why this continues to be the case.

Table 1: Adverse Decisions

| MIA Category/Type of Service | 2018 | | 2021 | | Percent Change 2018-2021 |
|---|---------------|---------------|---------------|---------------|--------------------------|
| | Number | Percent | Number | Percent | |
| Inpatient hospital services | 1,211 | 1.5% | 1,092 | 1.3% | -9.8% |
| Emergency room services | 24 | 0.0% | 10 | 0.0% | -58.3% |
| Mental health services | 906 | 1.2% | 570 | 0.7% | -37.1% |
| Physician services | 6,733 | 8.6% | 4,589 | 5.7% | -31.8% |
| Laboratory, radiology services | 12,059 | 15.4% | 14,673 | 18.1% | 21.7% |
| Pharmacy services | 29,279 | 37.4% | 38,893 | 47.9% | 32.8% |
| PT, OT, ST services (including inpatient rehab) | 1,700 | 2.2% | 3,819 | 4.7% | 124.6% |
| Skilled nursing facility | 30 | 0.0% | 32 | 0.0% | 6.7% |
| Durable medical equipment | 1,179 | 1.5% | 1,364 | 1.7% | 15.7% |
| Dental | 24,677 | 31.5% | 15,133 | 18.6% | -38.7% |
| Home health services | 88 | 0.1% | 143 | 0.2% | 62.5% |
| Obesity, IVF, Podiatry, Hearing and Vision | 428 | 0.5% | 825 | 1.0% | 92.8% |
| Total | 78,314 | 100.0% | 81,143 | 100.0% | 3.61% |

Grievance Decisions

Table 2 provides an overview of the number and type of grievances carriers reviewed in 2018 and 2021. While the number of adverse decisions reported by carriers increased during the aforementioned period, the number of grievances self-reported by carriers decreased over the same period. According to the data, carriers received 8,765 grievances in 2018 compared to 8,073 received in 2021 representing a decrease of 7.9%.

In 2018, the largest number of grievances reported involved pharmacy services at 3,484, followed by dental services at 2,564 and the combined categories of laboratory and radiology services finishing third with 1,340 grievances reported. By comparison, in 2021, pharmacy services ranked first with 3,789 grievances reported, followed by dental services at 2,375 with combined categories of laboratory and radiology services ranked third with 808 grievances reported.

The number of grievances reported by carriers increased in four types of services as noted in Table 2 and they were: pharmacy services, the combined categories of physical, occupational and speech therapies, durable medical equipment, and the combined categories of obesity, in-vitro fertilization, podiatry, hearing and vision services. The number of grievances reported by carriers decreased in the remaining eight categories of the types of services referenced in Table 2, which included inpatient hospital services, emergency room services, mental health services, physician services, the combined categories of laboratory and radiology services, skilled nursing facility services, dental services and home health services.

Some of the largest percentage increases in grievances reported by carriers involved pharmacy services (3,484 in 2018 to 3,789 in 2021), representing an increase of 8.8%, and durable medical equipment (132 in 2018 to 143 in 2021), representing an increase of 8.3%. Some of the largest percentage decreases in grievances reported by carrier involved inpatient hospital services (183 in 2018 to 105 in 2021), representing a decrease of 42.6%; the combined category of laboratory and radiology services (1,340 in 2018 to 808 in 2021), representing a decrease of 39.7%; and physician services (681 in 2018 to 452 in 2021), representing a decrease of 33.6%.

Table 2: Grievances

| MIA Category/Type of Service | 2018 | | 2021 | | Percent Change 2018 - 2021 |
|---|--------|---------|--------|---------|----------------------------|
| | Number | Percent | Number | Percent | |
| Inpatient hospital services | 183 | 2.1% | 105 | 1.3% | -42.6% |
| Emergency room services | 23 | 0.0% | 20 | 0.2% | -13.0% |
| Mental health services | 112 | 1.3% | 71 | 0.9% | -36.6% |
| Physician services | 681 | 7.8% | 452 | 5.6% | -33.6% |
| Laboratory, radiology services | 1,340 | 15.3% | 808 | 10.0% | -39.7% |
| Pharmacy services | 3,484 | 39.7% | 3,789 | 46.9% | 8.8% |
| PT, OT, ST services (including inpatient rehab) | 61 | 0.7% | 77 | 1.0% | 26.2% |
| Skilled nursing facility | 15 | 0.2% | 5 | 0.1% | -66.6% |
| Durable medical equipment | 132 | 1.5% | 143 | 1.8% | 8.3% |
| Dental | 2,564 | 29.3% | 2,375 | 29.4% | -7.4% |
| Home health services | 8 | 0.1% | 3 | 0.0% | -62.5% |

| MIA Category/Type of Service | 2018 | | 2021 | | Percent Change 2018 - 2021 |
|---|--------------|------|--------------|------|-------------------------------|
| | | | | | |
| Obesity, IVF, Podiatry, Hearing and Vision | 162 | 1.8% | 225 | 2.8% | 38.9% |
| Total | 8,765 | | 8,073 | | -7.9% |

Table 3 describes how the number of grievances received by carriers compares to the number of adverse decisions that carriers made in 2018 and 2021. Grievances decreased as a percentage of adverse decisions from 2018 to 2021 (11.2% to 9.9%), in all categories with the exception of mental health services and dental care services.

Table 3: Grievances as a % of Adverse Decisions

| MIA Category/Type of Service | 2018 | MIA Category/Type of Service | 2021 |
|---|--------------|---|-------------|
| Inpatient hospital services | 15.1% | Inpatient hospital services | 9.6% |
| Emergency room services | 95.8% | Emergency room services | 2.0% |
| Mental health services | 12.4% | Mental health services | 12.5% |
| Physician services | 10.1% | Physician services | 9.8% |
| Laboratory, radiology services | 11.1% | Laboratory, radiology services | 5.5% |
| Pharmacy services | 11.9% | Pharmacy services | 9.6% |
| PT, OT, ST services (including inpatient rehab) | 35.9% | PT, OT, ST services (including inpatient rehab) | 2.0% |
| Skilled nursing facility | 50.0% | Skilled nursing facility | 15.6% |
| Durable medical equipment | 11.2% | Durable medical equipment | 10.5% |
| Dental | 10.4% | Dental | 16.1% |
| Home health services | 9.1% | Home health services | 2.1% |
| Obesity, IVF, Podiatry, Hearing and Vision | 37.9% | Obesity, IVF, Podiatry, Hearing and Vision | 27.3% |
| Total | 11.2% | Total | 9.9% |

Table 4 compares how often carriers upheld their original decisions in 2018 and in 2021. More detailed information about grievance decisions for each carrier may be found in Appendices 2 and 3. Carriers upheld adverse decisions 46.8% of the time in 2018 as compared to 44.1% in 2021, indicating that carriers were more likely to uphold an adverse decision in 2018 than in 2021.

Table 4: Grievance Decision

| | 2018 | | 2021 | |
|--|--------------|-------------|--------------|-------------|
| | Number | Percent | Number | Percent |
| Carrier upheld adverse decision | 4,104 | 46.8% | 3,560 | 44.1% |
| Carrier overturned adverse decision | 4,262 | 48.6% | 4,127 | 51.1% |
| Carrier modified original adverse decision | 399 | 4.6% | 386 | 4.8% |
| Total | 8,765 | 100% | 8,073 | 100% |

Complaints

Just as the number of grievance decisions decreased between 2018 and 2021, so did the number of complaints filed with the Administration during this same time period. The Administration received 1,039 in 2018 compared to 839 complaints received in 2021, representing a decrease of 19.2%. While it is difficult to determine the exact cause for the reduction in the number of complaints filed in 2021, it is important to note that data provided by the Maryland Department of Health confirms that more than 15,000 deaths related to the COVID-19 pandemic occurred in Maryland. In 2018, the unemployment rate in Maryland was 3.9%; by 2021 the unemployment rate increased to 6.4%. As summarized in Table 5, 29.4% of the complaints received in 2021 were outside of the Administration’s jurisdiction, as were 32.3% of the complaints received in 2018. These non-jurisdiction cases included complaints filed by individuals covered under Medicare, Medicaid, FEHBP, employer group self-funded plans, and contracts subject to laws of states other than Maryland.

In 2018, 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), 67% of the time. In 2021, complaint data indicates that the Administration reversed or modified the carrier’s grievance decision 70.5% of the time, representing an increase in reversals of 3.5%. All of the reversals of the carrier’s grievance decisions resulted in more benefits for Maryland consumers.

Consumers of insurance who have filed complaints with this Administration continue to benefit financially when a carrier’s grievance decision was either reversed or modified in favor of the complainant. In 2018, the Administration recovered \$348,612 for complainants when the carrier’s grievance decision was either reversed or modified in the complainant’s favor. In 2021, the Administration recovered \$470,824 for complainants when the carrier’s grievance decision was either reversed or modified in the complainant’s favor. Since the enactment of the Appeals and Grievance law, the Administration has recovered over \$12 million (\$12,605,603) 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 2021, 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 600 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 2018 compares to the number of complaints filed in 2021. The number of complaints received by the Administration decreased from 2018 to 2021 (1,039 to 839), representing a decrease of 19.2%.

Table 5: Complaints

| | 2018 | 2021 | Percent Change |
|---|--------------|-------------|-----------------------|
| Total complaints received | 1,039 | 839 | -19.2% |
| No Jurisdiction | 336 | 247 | -26.5% |
| Complaint withdrawn | 6 | 6 | 0.0% |
| Insufficient Information to perform investigation | 124 | 74 | -40.3% |
| No action required | 102 | 152 | 49.0% |
| Referred to HEAU | 71 | 52 | -26.8% |
| Complaints investigated by MIA | 400 | 308 | -23.0% |
| Percent of total complaints investigated by the MIA | 38.5% | 36.7% | -4.6% |
| Number of complaints carrier or MIA reversed or modified grievance decisions | 268 | 217 | -19.0% |
| Percent of total complaints investigated by MIA where carrier or MIA reversed or modified grievance decisions | 67.0% | 70.5% | 3.5% |

Conclusion

Carriers rendered 78,314 adverse decisions in 2018 compared to 81,143 rendered in 2021, representing an increase of 3.61% over the 4-year period. Pharmacy services and dental care services accounted for the majority of adverse decisions rendered during the period between 2018 and 2021. Adverse decisions for pharmacy services increased by 32.8% from 2018 to 2021, while the number of adverse decisions for dental care services decreased by 38.7% during this same time period. Over the years, policymakers have expressed concerns regarding the denial of mental health services. While the data provided by carriers indicate that there are still relatively few adverse decisions for mental health services when compared to adverse decisions for dental and pharmacy services, the Administration continues to provide outreach and training to Maryland consumers and providers on various insurance issues related to mental health and substance use disorders, including how to request authorization to receive out-of-network services when an in-network provider is not reasonably available.

Carriers received 8,765 grievances in 2018, compared to 8,073 received in 2021, representing a decrease of 7.9%. In 2018, the largest number of grievances reported involved pharmacy and dental care services. In 2021, again, pharmacy services and dental care services accounted for the majority of grievances reported by carriers. Just as the number of adverse decisions for mental health services decreased during this time period, so did the number of grievances received for mental health services from 2018 to 2021.

Consumers of insurance who have filed complaints with this Administration continued to benefit financially when a carrier's grievance decision was either reversed or modified in the favor of the complainant. In 2018, the Administration recovered \$348,612 for complainants when the carrier's grievance decision was either reversed or modified. In 2021, the Administration recovered \$470,824 for complainants when the carrier's grievance decision was either reversed or modified. Since the enactment of the Appeals and Grievances law, the Administration has recovered over \$12 million dollars for complainants.

**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 |
| | | | | | | |
| 4 Ever Life Insurance Company | 1 | 0.0% | 1 | 100.0% | 0 | 0.0% |
| Aetna Dental, Inc. | 693 | 0.9% | 0 | 0.0% | 0 | 0.0% |
| Aetna Health Inc. (a Pennsylvania corporation) | 115 | 0.1% | 39 | 33.9% | 0 | 0.0% |
| Aetna Life Insurance Company | 188 | 0.2% | 69 | 36.7% | 0 | 0.0% |
| Ameritas Life Insurance Corp. | 285 | 0.4% | 0 | 0.0% | 0 | 0.0% |
| CareFirst BlueChoice, Inc. | 21,128 | 26.0% | 12 | 0.1% | 0 | 0.0% |
| CareFirst of Maryland, Inc. | 7,057 | 8.7% | 2 | 0.0% | 1 | 0.0% |
| CIGNA Dental Health of Maryland, Inc. | 47 | 0.1% | 0 | 0.0% | 0 | 0.0% |
| CIGNA Health and Life Insurance Company | 17,081 | 21.1% | 284 | 1.7% | 0 | 0.0% |
| Connecticut General Life Insurance Company | 7 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Delta Dental Insurance Company | 8 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Delta Dental of Pennsylvania | 55 | 0.1% | 0 | 0.0% | 0 | 0.0% |
| Dentegra Insurance Company | 9 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Dental Network, Inc. The | 8 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Dominion Dental Services, Inc. | 1,111 | 1.4% | 0 | 0.0% | 0 | 0.0% |
| Golden Rule Insurance Company | 12 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Group Dental Service of Maryland, Inc. | 1,922 | 2.4% | 0 | 0.0% | 0 | 0.0% |
| Group Hospitalization and Medical Services, Inc. | 5,515 | 6.8% | 6 | 0.1% | 0 | 0.0% |
| Guardian Life Insurance Company of America | 1,263 | 1.6% | 0 | 0.0% | 0 | 0.0% |
| Johns Hopkins HealthCare LLC | 90 | 0.1% | 16 | 17.8% | 0 | 0.0% |
| Kaiser Foundation Health Plan-Mid-Atlantic States, Inc. | 812 | 1.0% | 33 | 4.1% | 0 | 0.0% |
| Kaiser Permanente Insurance Company | 61 | 0.1% | 24 | 39.3% | 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 | 117 | 0.1% | 0 | 0.0% | 0 | 0.0% |
| MAMSI Life and Health Insurance Company | 916 | 1.1% | 7 | 0.8% | 0 | 0.0% |
| Metropolitan Life Insurance Company | 668 | 0.8% | 0 | 0.0% | 0 | 0.0% |
| National Health Life Insurance Company | 5 | 0.0% | 2 | 40.0% | 0 | 0.0% |
| Optimum Choice, Inc. | 2,376 | 2.9% | 101 | 4.3% | 1 | 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 | 695 | 0.9% | 0 | 0.0% | 0 | 0.0% |
| Reliance Standard Life Insurance Company | 13 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Standard Insurance Company | 71 | 0.1% | 0 | 0.0% | 0 | 0.0% |
| Starmount Life Insurance Company | 28 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Sun Life Assurance Company of Canada | 709 | 0.9% | 0 | 0.0% | 0 | 0.0% |
| United Concordia Insurance Company | 725 | 0.9% | 0 | 0.0% | 0 | 0.0% |
| United of Omaha Life Insurance Company | 89 | 0.1% | 0 | 0.0% | 0 | 0.0% |
| UnitedHealthcare Insurance Company | 15,630 | 19.3% | 447 | 2.9% | 4 | 0.0% |
| UnitedHealthcare of the Mid-Atlantic, Inc. | 1,547 | 1.9% | 39 | 2.5% | 3 | 0.2% |
| Wellfleet Group LLC | 67 | 0.1% | 10 | 14.9% | 1 | 1.5% |
| Wellfleet Insurance Company | 18 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 81,143 | 100% | 1,092 | 1.3% | 10 | 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 |
| .4 Ever Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Aetna Dental, Inc | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Aetna Health Inc. (a Pennsylvania corporation) | 4 | 3.5% | 42 | 36.5% | 2 | 1.7% |
| Aetna Life Insurance Company | 11 | 5.9% | 68 | 36.2% | 8 | 4.3% |
| Ameritas Life Insurance Corp. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| CareFirst BlueChoice, Inc. | 298 | 1.4% | 1,182 | 5.6% | 3,015 | 14.3% |
| CareFirst of Maryland, Inc. | 31 | 0.4% | 184 | 2.6% | 239 | 3.4% |
| CIGNA Dental Health of Maryland, Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| CIGNA Health and Life Insurance Company | 65 | 0.4% | 737 | 4.3% | 6,699 | 39.2% |
| Connecticut General Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 4 | 57.1% |
| 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 Network, Inc. The | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Dentegra Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Dominion Dental Services, Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Golden Rule Insurance Company | 5 | 41.7% | 0 | 0.0% | 6 | 50.0% |
| Group Dental Service of Maryland, Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Group Hospitalization and Medical Services, Inc. | 39 | 0.7% | 199 | 3.6% | 273 | 5.0% |
| Guardian Life Insurance Company of America | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Johns Hopkins HealthCare LLC | 1 | 1.1% | 19 | 21.1% | 15 | 16.7% |
| Kaiser Foundation Health Plan-Mid-Atlantic States, Inc. | 37 | 4.6% | 165 | 20.3% | 21 | 2.6% |
| Kaiser Permanente Insurance Company | 0 | 0.0% | 18 | 29.5% | 4 | 6.6% |
| 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 | 9 | 1.0% | 92 | 10.0% | 81 | 8.8% |
| Metropolitan Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| National Health Insurance Company | 0 | 0.0% | 2 | 40.0% | 0 | 0.0% |
| Optimum Choice, Inc. | 5 | 0.2% | 218 | 9.2% | 291 | 12.2% |
| Principal 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 |
| 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% |
| Starmount Life 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% |
| United Concordia Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| United of Omaha Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| UnitedHealthcare Insurance Company | 56 | 0.4% | 1,296 | 8.3% | 3,466 | 22.2% |
| UnitedHealthcare of the Mid-Atlantic, Inc. | 7 | 0.5% | 357 | 23.1% | 530 | 34.3% |
| Wellfleet Group LLC | 1 | 1.5% | 10 | 14.9% | 11 | 16.4% |
| Wellfleet Insurance Company | 1 | 5.6% | 0 | 0.0% | 8 | 44.4% |
| Total | 570 | 0.7% | 4,589 | 5.7% | 14,673 | 18.1% |

**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 |
| 4 Ever Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Aetna Dental, Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Aetna Health Inc. (a Pennsylvania corporation) | 15 | 13.0% | 4 | 3.5% | 2 | 1.7% |
| Aetna Life Insurance Company | 19 | 10.1% | 5 | 2.7% | 2 | 1.1% |
| Ameritas Life Insurance Corp | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| CareFirst BlueChoice, Inc. | 15,727 | 74.4% | 85 | 0.4% | 6 | 0.0% |
| CareFirst of Maryland, Inc. | 5,810 | 82.3% | 14 | 0.2% | 2 | 0.0% |
| CIGNA Dental Health of Maryland, Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| CIGNA Health and Life Insurance Company | 5,464 | 32.0% | 3,499 | 20.5% | 3 | 0.0% |
| Connecticut General Life Insurance Company | 0 | 0.0% | 3 | 42.9% | 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 Network, Inc. The | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Dentegra Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Dominion Dental Services, 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. | 4,522 | 82.0% | 19 | 0.3% | 0 | 0.0% |
| Guardian Life Insurance Company of America | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Johns Hopkins HealthCare LLC | 4 | 4.4% | 0 | 0.0% | 0 | 0.0% |
| Kaiser Foundation Health Plan-Mid-Atlantic States, Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Kaiser Permanente Insurance Company | 0 | 0.0% | 0 | 0.0% | 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 | 613 | 66.9% | 2 | 0.0% | 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. | 1,544 | 65.0% | 26 | 1.1% | 1 | 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% |

**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 |
| Standard Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Starmount Life 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% |
| United Concordia Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| United of Omaha Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| UnitedHealthcare Insurance Company | 4,597 | 29.4% | 42 | 0.3% | 9 | 0.1% |
| UnitedHealthcare of the Mid-Atlantic, Inc. | 554 | 35.8% | 4 | 0.3% | 0 | 0.0% |
| Wellfleet Group LLC | 23 | 34.3% | 9 | 13.4% | 0 | 0.0% |
| Wellfleet Insurance Company | 1 | 5.6% | 8 | 44.4% | 0 | 0.0% |
| Total | 38,893 | 47.9% | 3,819 | 4.7% | 32 | 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 |
| 4 Ever Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Aetna Dental, Inc. | 0 | 0.0% | 693 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Aetna Health Inc. (a Pennsylvania corporation) | 2 | 1.7% | 0 | 0.0% | 0 | 0.0% | 5 | 4.3% |
| Aetna Life Insurance Company | 2 | 1.1% | 0 | 0.0% | 1 | 0.5% | 3 | 1.6% |
| Ameritas Life Insurance Corp. | 0 | 0.0% | 285 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| CareFirst BlueChoice, Inc. | 786 | 3.7% | 4 | 0.0% | 9 | 0.0% | 4 | 0.0% |
| CareFirst of Maryland, Inc. | 111 | 1.6% | 659 | 9.3% | 4 | 0.1% | 0 | 0.0% |
| CIGNA Dental Health of Maryland, Inc. | 0 | 0.0% | 47 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| CIGNA Health and Life Insurance Company | 48 | 0.3% | 162 | 0.9% | 85 | 0.5% | 35 | 0.2% |
| Connecticut General Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Delta Dental Insurance Company | 0 | 0.0% | 8 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Delta Dental of Pennsylvania | 0 | 0.0% | 55 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Dental Network, Inc. The | 0 | 0.0% | 8 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Dentegra Insurance Company | 0 | 0.0% | 9 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Dominion Dental Services, Inc. | 0 | 0.0% | 1,111 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Golden Rule Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 1 | 8.3% |
| Group Dental Service of Maryland, Inc. | 0 | 0.0% | 1,922 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Group Hospitalization and Medical Serv. Inc. | 80 | 1.5% | 373 | 6.8% | 4 | 0.1% | 0 | 0.0% |
| Guardian Life Insurance Company of America | 0 | 0.0% | 1,263 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Johns Hopkins HealthCare LLC | 4 | 4.4% | 0 | 0.0% | 0 | 0.0% | 31 | 34.4% |
| Kaiser Foundation Health Plan Mid-Atlantic States, Inc. | 133 | 16.4% | 10 | 1.2% | 11 | 1.4% | 311 | 38.3% |
| Kaiser Permanente Insurance Company | 0 | 0.0% | 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% | 117 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| MAMSI Life and Health Insurance Company | 25 | 2.7% | 73 | 8.0% | 6 | 0.7% | 8 | 0.9% |
| Metropolitan Life Insurance Company | 0 | 0.0% | 668 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| National Health Insurance Company | 0 | 0.0% | 1 | 20.0% | 0 | 0.0% | 0 | 0.0% |
| Optimum Choice, Inc. | 35 | 1.5% | 62 | 2.6% | 6 | 0.3% | 86 | 3.6% |

**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 |
| Principal Life Insurance Company | 0 | 0.0% | 695 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Reliance Standard Life Insurance Company | 0 | 0.0% | 13 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Standard Insurance Company | 0 | 0.0% | 71 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Starmount Life Insurance Company | 0 | 0.0% | 28 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| Sun Life Assurance Company of Canada | 0 | 0.0% | 709 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| United Concordia Insurance Company | 0 | 0.0% | 725 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| United of Omaha Life Insurance Company | 0 | 0.0% | 89 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| UnitedHealthcare Insurance Company | 122 | 0.8% | 5,263 | 33.7% | 13 | 0.1% | 315 | 2.0% |
| UnitedHealthcare of the Mid-Atlantic, Inc. | 16 | 1.0% | 9 | 0.6% | 4 | 0.3% | 24 | 1.6% |
| Wellfleet Group LLC | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 2 | 3.0% |
| Wellfleet Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 1,364 | 1.7% | 15,133 | 18.6% | 143 | 0.2% | 825 | 1.0%15 |

**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 | 10 | 0.1% | 2 | 20.0% | 2 | 20.0% |
| 95910 | Aetna Dental Inc. | 1 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 95109 | Aetna Health Inc. (a Pennsylvania corporation) | 217 | 2.7% | 23 | 10.6% | 5 | 2.3% |
| 60054 | Aetna Life Insurance Company | 143 | 1.8% | 18 | 12.6% | 1 | 0.7% |
| 95183 | Alpha Dental Programs, Inc. | 174 | 2.2% | 0 | 0.0% | 0 | 0.0% |
| 61301 | Ameritas Life Insurance Corp. | 134 | 1.7% | 0 | 0.0% | 0 | 0.0% |
| 96202 | CareFirst BlueChoice, Inc. | 1,738 | 21.5% | 8 | 0.5% | 2 | 0.1% |
| 47058 | CareFirst of Maryland, Inc. | 901 | 11.2% | 0 | 0.0% | 0 | 0.0% |
| 67369 | CIGNA Health and Life Ins Company | 590 | 7.3% | 15 | 2.5% | 0 | 0.0% |
| 62146 | Combined Insurance Company of America | 7 | 0.1% | 0 | 0.0% | 0 | 0.0% |
| 81396 | Delta Dental Insurance Company | 75 | 0.9% | 0 | 0.0% | 0 | 0.0% |
| 54798 | Delta Dental of Pennsylvania | 419 | 5.2% | 0 | 0.0% | 0 | 0.0% |
| 73474 | Dentegra Insurance Company | 39 | 0.5% | 0 | 0.0% | 0 | 0.0% |
| 95657 | Dominion Dental Services, Inc. | 153 | 1.9% | 0 | 0.0% | 0 | 0.0% |
| 62286 | Golden Rule Insurance Company | 4 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 95846 | Group Dental Service of Maryland, Inc. | 1 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 53007 | Group Hospitalization and Medical Services, Inc. | 787 | 9.7% | 1 | 0.1% | 2 | 0.3% |
| 64246 | Guardian Life Insurance Company of America | 548 | 6.8% | 0 | 0.0% | 0 | 0.0% |
| | Johns Hopkins HealthCare LLC | 40 | 0.5% | 9 | 22.5% | 3 | 7.5% |
| 95639 | Kaiser Foundation Health Plan-Mid-Atlantic States, Inc. | 80 | 1.0% | 8 | 10.0% | 0 | 0.0% |
| 60053 | Kaiser Permanente Insurance Company | 8 | 0.1% | 3 | 37.5% | 0 | 0.0% |
| 60321 | MAMSI Life and Health Ins Company | 104 | 1.3% | 1 | 1.0% | 0 | 0.0% |
| 65978 | Metropolitan Life Insurance Company | 21 | 0.3% | 0 | 0.0% | 0 | 0.0% |
| 82538 | National Health Insurance Company | 1 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 96940 | Optimum Choice, Inc. | 227 | 2.8% | 4 | 1.8% | 5 | 2.2% |
| 61271 | Principal Life Insurance Company | 13 | 0.2% | 0 | 0.0% | 0 | 0.0% |
| 68381 | Reliance Standard Life Insurance Company | 2 | 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 |
| 69019 | Standard Insurance Company | 14 | 0.2% | 0 | 0.0% | 0 | 0.0% |
| 68985 | Starmount Life Insurance Company | 25 | 0.3% | 0 | 0.0% | 0 | 0.0% |
| 80802 | Sun Life Assurance Company of Canada | 38 | 0.5% | 0 | 0.0% | 0 | 0.0% |
| 85766 | United Concordia Insurance Company | 301 | 3.7% | 0 | 0.0% | 0 | 0.0% |
| 69868 | United of Omaha Life Insurance Company | 37 | 0.5% | 0 | 0.0% | 0 | 0.0% |
| 79413 | UnitedHealthcare Insurance Company | 1,151 | 14.3% | 10 | 0.9% | 0 | 0.0% |
| 95025 | UnitedHealthcare of the Mid-Atlantic, Inc. | 54 | 0.7% | 1 | 1.9% | 0 | 0.0% |
| | Wellfleet Group LLC | 15 | 0.2% | 2 | 13.3% | 0 | 0.0% |
| 32280 | Wellfleet Insurance Company | 1 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| | TOTAL | 8,073 | 100% | 105 | 1.3% | 20 | 0.2% |

**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% | 2 | 20.0% | 4 | 40.0% |
| 95910 | Aetna Dental Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 95109 | Aetna Health Inc. (a Pennsylvania corporation) | 0 | 0.0% | 96 | 44.2% | 34 | 15.7% |
| 60054 | Aetna Life Insurance Company | 3 | 1.4% | 53 | 37.1% | 26 | 18.2% |
| 95183 | Alpha Dental Programs, Inc. | 3 | 2.1% | 0 | 0.0% | 0 | 0.0% |
| 61301 | Ameritas Life Insurance Corp. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 96202 | CareFirst BlueChoice, Inc. | 8 | 0.5% | 38 | 2.2% | 112 | 6.4% |
| 47058 | CareFirst of Maryland, Inc. | 1 | 0.1% | 6 | 0.7% | 16 | 1.8% |
| 67369 | CIGNA Health and Life Insurance Company | 18 | 3.1% | 65 | 11.0% | 198 | 33.6% |
| 32146 | Combined Insurance Company of America | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 81396 | Delta Dental Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 54798 | Delta Dental of Pennsylvania | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 73474 | Dentegra Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 95657 | Dominion Dental Services, Inc. | 0 | 0.0% | 1 | 25.0% | 2 | 50.0% |
| 62286 | Golden Rule Insurance Company | 1 | 25.0% | 0 | 0.0% | 0 | 0.0% |
| 95846 | Group Dental Service of Maryland, Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 53007 | Group Hospitalization and Medical Services, Inc. | 4 | 0.5% | 24 | 3.0% | 30 | 3.8% |
| 64246 | Guardian Life Insurance Company of America | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| | Johns Hopkins HealthCare LLC | 0 | 0.0% | 5 | 12.5% | 12 | 30.0% |
| 95639 | Kaiser Foundation Health Plan-Mid-Atlantic States, Inc. | 18 | 22.5% | 22 | 27.5% | 1 | 1.3% |
| 60053 | Kaiser Permanente Insurance Company | 0 | 0.0% | 3 | 37.5% | 0 | 0.0% |
| 60321 | MAMSI Life and Health Insurance Company | 4 | 3.8% | 8 | 7.7% | 7 | 6.7% |
| 65978 | Metropolitan Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 82538 | National Health Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 96940 | Optimum Choice, Inc. | 1 | 0.4% | 18 | 7.9% | 43 | 18.9% |
| 61271 | Principal Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 68381 | Reliance Standard 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% |
| 68985 | Starmount Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 80802 | Sun Life Assurance Company of Canada | 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 |
| 85766 | United Concordia Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 69868 | United of Omaha Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 79413 | UnitedHealthcare Insurance Company | 10 | 0.9% | 106 | 9.2% | 302 | 26.2% |
| 95025 | UnitedHealthcare of the Mid-Atlantic, Inc. | 0 | 0.0% | 5 | 9.3% | 19 | 35.2% |
| | Wellfleet Group LLC | 0 | 0.0% | 0 | 0.0% | 2 | 13.3% |
| 32280 | Wellfleet Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| | TOTAL | 71 | 0.9% | 452 | 5.6% | 808 | 10% |

**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% |
| 95910 | Aetna Dental Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 95109 | Aetna Health Inc. (a Pennsylvania corporation) | 46 | 21.2% | 0 | 0.0% | 0 | 0.0% |
| 60054 | Aetna Life Insurance Company | 31 | 21.7% | 1 | 0.7% | 0 | 0.0% |
| | Alpha Dental Programs, Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 61301 | Ameritas Life Insurance Corp. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 96202 | CareFirst BlueChoice, Inc. | 1,476 | 84.9% | 6 | 0.3% | 2 | 0.1% |
| 47058 | CareFirst of Maryland, Inc. | 796 | 88.3% | 0 | 0.0% | 0 | 0.0% |
| 67369 | CIGNA Health and Life Insurance Company | 201 | 34.1% | 44 | 7.5% | 0 | 0.0% |
| 062146 | Combined Insurance Company of America | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 81396 | Delta Dental Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 54798 | Delta Dental of Pennsylvania | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 73474 | Dentegra Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 95657 | Dominion Dental Services, Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 62286 | Golden Rule Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 95846 | Group Dental Service of Maryland, Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 53007 | Group Hospitalization and Medical Services, Inc. | 605 | 76.9% | 1 | 0.1% | 0 | 0.0% |
| 64246 | Guardian Life Insurance Company of America | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| | Johns Hopkins HealthCare LLC | 10 | 25.0% | 0 | 0.0% | 0 | 0.0% |
| 95639 | Kaiser Foundation Health Plan-Mid-Atlantic States, Inc. | 1 | 1.3% | 13 | 16.3% | 1 | 1.3% |
| 60053 | Kaiser Permanente Insurance Company | 0 | 0.0% | 2 | 25.0% | 0 | 0.0% |
| 60321 | MAMSI Life and Health Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 65978 | Metropolitan Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 82538 | National Health Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 96940 | Optimum Choice, Inc. | 101 | 44.5% | 7 | 3.1% | 1 | 0.4% |
| 61271 | Principal Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 68381 | Reliance Standard 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% |
| 68985 | Starmount Life Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 80802 | Sun Life Assurance Company of Canada | 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 |
| 85766 | United Concordia Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 69868 | United of Omaha Life Ins. Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 79413 | UnitedHealthcare Insurance Company | 413 | 35.9% | 3 | 0.3% | 1 | 0.1% |
| 95025 | UnitedHealthcare of the Mid-Atlantic, Inc. | 24 | 44.4% | 0 | 0.0% | 0 | 0.0% |
| | Wellfleet Group LLC | 11 | 73.3% | 0 | 0.0% | 0 | 0.0% |
| 32280 | Wellfleet Insurance Company | 1 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| | TOTAL | 3,716 | 46.9% | 77 | 1.0% | 5 | 0.1% |

**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% | 0 | 0.0% |
| 95910 | Aetna Dental Inc. | 0 | 0.0% | 1 | 100.0% | 0 | 0.0% |
| 95109 | Aetna Health Inc. (a Pennsylvania corporation) | 0 | 0.0% | 0 | 0.0% | 1 | 0.5% |
| 60054 | Aetna Life Insurance Company | 1 | 0.7% | 3 | 2.1% | 1 | 0.7% |
| | Alpha Dental Programs, Inc. | 0 | 0.0% | 174 | 100.0% | 0 | 0.0% |
| 61301 | Ameritas Life Insurance Corp. | 0 | 0.0% | 134 | 100.0% | 0 | 0.0% |
| 96202 | CareFirst BlueChoice, Inc. | 83 | 4.8% | 3 | 0.2% | 0 | 0.0% |
| 47058 | CareFirst of Maryland, Inc. | 4 | 0.4% | 78 | 8.7% | 0 | 0.0% |
| 67369 | CIGNA Health and Life Insurance Company | 2 | 0.3% | 45 | 7.6% | 1 | 0.2% |
| 62146 | Combined Insurance Company of America | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 81396 | Delta Dental Insurance Company | 0 | 0.0% | 75 | 100.0% | 0 | 0.0% |
| 54798 | Delta Dental of Pennsylvania | 0 | 0.0% | 419 | 100.0% | 0 | 0.0% |
| 73474 | Dentegra Insurance Company | 0 | 0.0% | 39 | 100.0% | 0 | 0.0% |
| 95657 | Dominion Dental Services, Inc. | 0 | 0.0% | 153 | 100.0% | 0 | 0.0% |
| 62286 | Golden Rule Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 95846 | Group Dental Service of Maryland, Inc. | 0 | 0.0% | 1 | 100.0% | 0 | 0.0% |
| 53007 | Group Hospitalization and Medical Services, Inc. | 25 | 3.2% | 95 | 12.1% | 0 | 0.0% |
| 64246 | Guardian Life Insurance Company of America | 0 | 0.0% | 548 | 100.0% | 0 | 0.0% |
| | Johns Hopkins HealthCare LLC | 1 | 2.5% | 0 | 0.0% | 0 | 0.0% |
| 95639 | Kaiser Foundation Health Plan-Mid-Atlantic States, Inc. | 1 | 1.3% | 1 | 1.3% | 0 | 0.0% |
| 60053 | Kaiser Permanente Insurance Company | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| 60321 | MAMSI Life and Health Insurance Company | 2 | 1.9% | 0 | 0.0% | 0 | 0.0% |
| 65978 | Metropolitan Life Insurance Company | 0 | 0.0% | 21 | 100.0% | 0 | 0.0% |
| 82538 | National Health Insurance Company | 0 | 0.0% | 1 | 100.0% | 0 | 0.0% |
| 96940 | Optimum Choice, Inc. | 4 | 1.8% | 0 | 0.0% | 0 | 0.0% |
| 61271 | Principal Life Insurance Company | 0 | 0.0% | 13 | 100.0% | 0 | 0.0% |
| 68381 | Reliance Standard Life Insurance Company | 0 | 0.0% | 2 | 100.0% | 0 | 0.0% |
| 86355 | Standard Insurance Company | 0 | 0.0% | 14 | 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 |
| | | 68985 | Starmount Life Insurance Company | 0 | 0.0% | 25 | 100.0% |
| 80802 | Sun Life Assurance Company of Canada | 0 | 0.0% | 38 | 100.0% | 0 | 0.0% |
| 85766 | United Concordia Insurance Company | 0 | 0.0% | 301 | 100.0% | 0 | 0.0% |
| 69868 | United of Omaha Insurance Company | 0 | 0.0% | 37 | 100.0% | 0 | 0.0% |
| 79413 | UnitedHealthcare Insurance Company | 0 | 0.0% | 154 | 13.4% | 0 | 0.0% |
| 95025 | UnitedHealthcare of the Mid-Atlantic, Inc. | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| | Wellfleet Group LLC | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| | TOTAL | 143 | 1.8% | 2,429 | 29.4% | 3 | 0.0% |

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% |
| 95910 | Aetna Dental Inc. | 0 | 0.0% |
| 95109 | Aetna Health Inc. (a Pennsylvania corporation) | 9 | 4.1% |
| 60054 | Aetna Life Insurance Company | 5 | 3.5% |
| 95163 | Alpha Dental Programs, Inc. | 0 | 0.0% |
| 61301 | Ameritas Life Insurance Corp. | 0 | 0.0% |
| 96202 | CareFirst BlueChoice, Inc. | 0 | 0.0% |
| 47058 | CareFirst of Maryland, Inc. | 0 | 0.0% |
| 67369 | CIGNA Health and Life Insurance Company | 1 | 0.2% |
| 62146 | Combined Insurance Company of America | 7 | 100.0% |
| 81396 | Delta Dental Insurance Company | 0 | 0.0% |
| 54798 | Delta Dental of Pennsylvania | 0 | 0.0% |
| 73474 | Dentegra Insurance Company | 0 | 0.0% |
| 95657 | Dominion Dental Services, Inc. | 0 | 0.0% |
| 62286 | Golden Rule Insurance Company | 0 | 0.0% |
| 95846 | Group Dental Service of Maryland, Inc. | 0 | 0.0% |
| 53007 | Group Hospitalization and Medical Services, Inc. | 0 | 0.0% |
| 64246 | Guardian Life Insurance Company of America | 0 | 0.0% |
| | Johns Hopkins HealthCare LLC | 0 | 0.0% |
| 95639 | Kaiser Foundation Health Plan-Mid-Atlantic States, Inc. | 14 | 17.5% |
| 60053 | Kaiser Permanente Insurance Company | 0 | 0.0% |
| 60321 | MAMSI Life & Health Insurance Company | 9 | 8.7% |
| 65978 | Metropolitan Life Insurance Company | 0 | 0.0% |
| 82538 | National Health Insurance Company | 0 | 0.0% |
| 96940 | Optimum Choice, Inc. | 0 | 0.0% |
| 61271 | Principal Life Ins. Company | 0 | 0.0% |
| 68381 | Reliance Standard Life Insurance Company | 0 | 0.0% |
| 86355 | Standard Insurance Company | 0 | 0.0% |
| 68985 | Starmount Life Insurance Company | 0 | 0.0% |
| 80802 | Sun Life Assurance Company of Canada | 0 | 0.0% |

APPENDIX 2 GRIEVANCE DECISIONS BY CARRIER

| NAIC # | COMPANY NAME | L. OBESITY, IVF, PODIATRY, HEARING AND VISION | |
|-----------|--|---|-------------|
| | | NUMBER | % TOTAL |
| 85766 | United Concordia Insurance Company | 0 | 0.0% |
| 69868 | United of Omaha Insurance Company | 0 | 0.0% |
| 79413 | UnitedHealthcare Insurance Company | 132 | 11.5% |
| 95025 | UnitedHealthcare of the Mid-Atlantic, Inc. | 5 | 9.3% |
| | Wellfleet Group LLC | 0 | 0.0% |
| 32280 | Wellfleet Insurance Company | 0 | 0.0% |
| | TOTAL | 225 | 2.8% |

**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 | 10 | 0.1% | 3 | 30.0% | 7 | 70.0% | 0 | 0.0% |
| 95910 | Aetna Dental Inc. | 1 | 0.0% | 0 | 0.0% | 1 | 100.0% | 0 | 0.0% |
| 95109 | Aetna Health Inc. (a Pennsylvania corporation) | 217 | 2.7% | 110 | 50.7% | 94 | 43.3% | 13 | 6.0% |
| 60054 | Aetna Life Insurance Company | 143 | 1.8% | 80 | 55.9% | 62 | 43.4% | 1 | 0.7% |
| 95163 | Alpha Dental Programs, Inc. | 174 | 2.2% | 79 | 45.4% | 71 | 40.8% | 24 | 13.8% |
| 61301 | Ameritas Life Insurance Corp. | 134 | 1.7% | 76 | 56.7% | 46 | 34.3% | 12 | 9.0% |
| 96202 | CareFirst BlueChoice, Inc. | 1,738 | 21.7% | 648 | 37.3% | 1,088 | 62.6% | 2 | 0.1% |
| 47058 | CareFirst of Maryland, Inc. | 901 | 11.2% | 288 | 32.0% | 608 | 67.5% | 5 | 0.6% |
| 67369 | CIGNA Health and Life Ins. Co. | 590 | 7.4% | 311 | 52.7% | 259 | 43.9% | 20 | 3.4% |
| 62146 | Combined Ins. Co. of America | 7 | 0.1% | 2 | 28.6% | 5 | 71.4% | 0 | 0.0% |
| 81396 | Delta Dental Ins. Company | 75 | 0.9% | 46 | 61.3% | 22 | 29.3% | 7 | 9.3% |
| 54798 | Delta Dental of Pennsylvania | 419 | 5.2% | 285 | 68.0% | 87 | 20.8% | 47 | 11.2% |
| 73474 | Dentegra Insurance Company | 39 | 0.5% | 21 | 53.8% | 17 | 43.6% | 1 | 2.6% |
| 95657 | Dominion Dental Services, Inc. | 153 | 1.9% | 79 | 51.6% | 60 | 39.2% | 14 | 9.2% |
| 62286 | Golden Rule Insurance Co. | 4 | 0.0% | 2 | 50.0% | 2 | 50.0% | 0 | 0.0% |
| 95846 | Group Dental Service of Md., Inc. | 1 | 0.0% | 1 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| 53007 | Group Hospitalization and Medical Services, Inc. | 787 | 9.8% | 297 | 37.7% | 481 | 61.1% | 9 | 1.1% |
| 64246 | Guardian Life Insurance Company of America | 548 | 6.8% | 338 | 61.7% | 94 | 17.2% | 116 | 21.2% |
| | Johns Hopkins HealthCare LLC | 40 | 0.5% | 31 | 77.5% | 9 | 22.5% | 0 | 0.0% |

**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 | 80 | 1.0% | 65 | 81.3% | 15 | 18.8% | 0 | 0.0% |
| 60053 | Kaiser Permanente Insurance Co. | 8 | 0.1% | 6 | 75.0% | 2 | 25.0% | 0 | 0.0% |
| 60321 | MAMSI Life and Health Ins. Co. | 104 | 1.3% | 52 | 50.0% | 51 | 49.0% | 1 | 1.0% |
| 65978 | Metropolitan Life Ins. Company | 21 | 0.3% | 21 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| 85238 | National Health Insurance Co. | 1 | 0.0% | 1 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| 96940 | Optimum Choice, Inc. | 227 | 2.8% | 109 | 48.0% | 112 | 49.3% | 6 | 2.6% |
| 61271 | Principal Life Insurance Company | 13 | 0.2% | 10 | 76.9% | 1 | 7.7% | 2 | 15.4% |
| 68381 | Reliance Standard Life Ins. Co. | 2 | 0.0% | 2 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| 69019 | Standard Insurance Company | 14 | 0.2% | 6 | 42.9% | 4 | 28.6% | 4 | 28.6% |
| 68985 | Starmount Life Insurance Co. | 25 | 0.3% | 20 | 52.6% | 5 | 20.0% | 0 | 0.0% |
| 80802 | Sun Life Assurance Co. of Canada | 38 | 0.5% | 20 | 52.6% | 15 | 39.5% | 3 | 7.9% |
| 69868 | United of Omaha Life Ins. Co. | 37 | 0.5% | 8 | 21.6% | 29 | 78.4% | 0 | 0.0% |
| 85766 | United Concordia Insurance Co. | 301 | 3.7% | 79 | 26.2% | 158 | 52.5% | 64 | 21.3% |
| 79413 | UnitedHealthcare Insurance Co. | 1,106 | 13.8% | 431 | 39.0% | 647 | 58.5% | 28 | 2.5% |
| 95025 | UnitedHealthcare of the Mid-Atlantic, Inc. | 54 | 0.7% | 14 | 25.9% | 37 | 68.5% | 3 | 5.6% |
| | Wellfleet Group LLC | 15 | 0.2% | 6 | 35.7% | 9 | 64.3% | 0 | 0.0% |
| 32280 | Wellfleet Insurance Company | 1 | 0.0% | 0 | 0.0% | 1 | 100.0% | 0 | 0.0% |
| | Total | 8,073 | 100% | 3,560 | 44.1% | 4,127 | 51.1% | 386 | 4.8% |

**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 |
| 80985 | 4 Ever Life Insurance Company | 4 | 2 | 2 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| 96202 | CareFirst BlueChoice, Inc. | 8 | 3 | 2 | 66.7% | 1 | 33.3% | 0 | 0.0% |
| 67369 | CIGNA Health and Life Insurance Co. | 15 | 5 | 3 | 60.0% | 1 | 20.0% | 1 | 20.0% |
| 53007 | Group Hospitalization and Med Serv Inc. | 1 | 1 | 1 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| | Johns Hopkins HealthCare LLC | 9 | 3 | 1 | 33.3% | 2 | 66.7% | 0 | 0.0% |
| 60053 | Kaiser Permanente Insurance Company | 1 | 1 | 1 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| 79413 | UnitedHealthcare Insurance Company | 2 | 2 | 2 | 100.0% | 0 | 0.0% | 0 | 0.0% |
| | Wellfleet Group LLC | 1 | 1 | 0 | 0.0% | 1 | 100.0% | 0 | 0.0% |

* This chart only includes those carriers who received grievances involving hospital length of stay during calendar year 2021

** Represents the number of grievances that were resolved in calendar year 2021.

| 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 |
| 80895 | 4 Ever Life Insurance Company | 432 | 0 | 0 | 0 |
| 96202 | CareFirst BlueChoice, Inc. | 24 | 24 | 24 | 24 |
| 47058 | CareFirst of Maryland, Inc. | 24 | 24 | 24 | 24 |
| 67369 | CIGNA Health and Life Insurance Company | 10.1 | 34.8 | 21.8 | 29 |
| 53007 | Group Hospitalization and Medical Services, Inc. | 24 | 24 | 24 | 24 |
| 95639 | Kaiser Foundation Health Plan-Mid-Atlantic | 73 | 230.6 | 312 | 41.3 |
| 60321 | MAMSI Life and Health Ins. Company | 2 | 60 | 14 | 9 |
| 96940 | Optimum Choice, Inc. | 20 | 60 | 14 | 7 |
| 79413 | UnitedHealthcare Insurance Company | 22 | 42 | 20 | 43 |
| 95025 | UnitedHealthcare of the Mid-Atlantic | 29 | 28 | 17 | 12 |
| | Wellfleet Group LLC | 0 | 0 | 24 | 0 |

**** This report only includes carriers who had grievances which were considered emergency cases during calendar year 2021.**

*** 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 | 3.0 | 1.0 | 0 | 0 |
| 95910 | Aetna Dental Inc. | 0 | 0 | 0 | 22 |
| 95109 | Aetna Health Inc. (a Pennsylvania corporation) | 20.4 | 19.2 | 24.6 | 23.9 |
| 60054 | Aetna Life Insurance Company | 17.3 | 21.7 | 22.3 | 22 |
| 95163 | Alpha Dental Programs, Inc. | 22 | 25.6 | 28 | 33.3 |
| 61301 | Ameritas Life Insurance Corporation | 34 | 28 | 24 | 26 |
| 96202 | CareFirst BlueChoice, Inc. | 16.5 | 22.3 | 23.4 | 14.1 |
| 47058 | CareFirst of Maryland, Inc. | 15 | 15.5 | 19.8 | 17.1 |
| 67369 | CIGNA Health and Life Insurance Company | 20.9 | 25.3 | 23.4 | 25.7 |
| 62146 | Combined Insurance Company of America | 29 | 29 | 0 | 0 |
| 81396 | Delta Dental Insurance Company | 20 | 21.5 | 31 | 49 |
| 54798 | Delta Dental of Pennsylvania | 20 | 20 | 33 | 35.6 |
| 52007 | Dental Network, Inc. The | 0 | 117 | 100.5 | 150 |
| 73474 | Dentegra Insurance Company | 0 | 22.5 | 38 | 35.6 |
| 95657 | Dominion Dental Services, Inc. | 29 | 29 | 28.5 | 27.4 |
| 62286 | Golden Rule Insurance Company | 0 | 20 | 0 | 38 |
| 53007 | Group Hospitalization and Medical Services, Inc. | 19.8 | 25.4 | 27.2 | 0 |
| 64246 | Guardian Life Insurance Company of America | 3 | 3 | 3 | 20.3 |
| | Johns Hopkins HealthCare LLC | 16 | 0 | 0 | 23 |
| 95639 | Kaiser Foundation Health Plan-Mid-Atlantic | 16.2 | 28.5 | 21.7 | 16.5 |
| 60053 | Kaiser Permanente Insurance Company | 9.8 | 7 | 2 | 7 |
| 60321 | MAMSI Life and Health Insurance Company | 37 | 33 | 25 | 32 |
| 65978 | Metropolitan Life Insurance Company | 11.2 | 18.6 | 15.3 | 12.6 |
| 82538 | National Health Insurance Company | 6 | 5 | 0 | 6 |
| 96940 | Optimum Choice, Inc. | 35 | 34 | 32 | 35 |
| 61271 | Principal Life Insurance Company | 6 | 7 | 10 | 11 |
| 68381 | Reliance Standard Life Insurance Company | 56 | 0 | 32 | 0 |
| 69019 | Standard Insurance Company | 8 | 28 | 26 | 22 |

**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 |
| 68985 | Starmount Life Insurance Company | 5 | 20 | 30 | 28 |
| 80802 | Sun Life Assurance Company of Canada | 30 | 12.3 | 12 | 7 |
| 85766 | United Concordia Insurance Company | 6.7 | 7.3 | 7.2 | 7.8 |
| 69868 | United of Omaha Life Insurance Company | 4.4 | 3.2 | 5.6 | 4 |
| 79413 | UnitedHealthcare Insurance Company | 38 | 37 | 35 | 33 |
| 95025 | UnitedHealthcare of the Mid-Atlantic, Inc. | 32 | 33 | 29 | 40 |
| | Wellfleet Group LLC | 33 | 10 | 10 | 0 |
| 32280 | Wellfleet Insurance Company | 0 | 0 | 0 | 8 |

*Reported as Calendar Days 7

**APPENDIX 7
INTERNAL GRIEVANCES FILED CONSIDERED EMERGENCY CASES AS REPORTED BY CARRIER**

| NAIC # | COMPANY* NAME | *TOTAL NUMBER OF "EMERGENCIES " CASES | "EMERGENCIES " OUTCOME** | UPHELD | | OVERTURNED | | MODIFIED | |
|--------|--|--|--------------------------------|------------|--------------|------------|--------------|----------|-------------|
| | | | | Number | Percent | Number | Percent | Number | Percent |
| 80985 | 4 Ever Life Insurance Company | 2 | 2 | 0 | 0.0% | 2 | 100.0% | 0 | 0.0% |
| 96202 | CareFirst BlueChoice, Inc. | 535 | 180 | 41 | 22.8% | 139 | 77.2% | 0 | 0.0% |
| 47058 | CareFirst of Maryland, Inc. | 264 | 86 | 18 | 20.9% | 68 | 79.1% | 0 | 0.0% |
| 67369 | CIGNA Health and Life Ins. Co. | 19 | 19 | 12 | 63.2% | 6 | 31.6% | 1 | 5.3% |
| 53007 | Group Hospitalization and Medical Services, Inc. | 218 | 65 | 32 | 49.2% | 33 | 50.8% | 0 | 0.0% |
| 95639 | Kaiser Fndtn Health Plan Mid-Atl | 12 | 12 | 9 | 75.0% | 3 | 25.0% | 0 | 0.0% |
| 60321 | MAMSI Life and Health Ins. Co. | 31 | 31 | 10 | 32.3% | 21 | 67.7% | 0 | 0.0% |
| 96940 | Optimum Choice, Inc. | 34 | 34 | 12 | 35.3% | 22 | 64.7% | 0 | 0.0% |
| 79413 | UnitedHealthcare Ins. Company | 189 | 168 | 52 | 31.0% | 112 | 66.7% | 4 | 2.4% |
| 95025 | UnitedHealthcare of the Mid-Atl | 11 | 11 | 0 | 0.0% | 10 | 90.9% | 1 | 9.1% |
| | Total | 1,335 | 608 | 186 | 30.6% | 416 | 68.4% | 6 | 1.0% |

*This chart only includes carriers who had grievances which were considered emergency cases during calendar year 2021.

** Represents the number of grievances that were resolved in calendar year 2021.

**APPENDIX 8
ADMINISTRATION COMPLAINTS**

Appeals and Grievance Statistics
Totals for Complaints Filed
January 1, 2021 – December 31, 2021

| | |
|---|------------|
| COMPLAINTS | 839 |
| NO JURISDICTION | 247 |
| Referred to DBM/Cecil County | 7 |
| Referred to Department of Labor (ERISA plans) | 121 |
| Referred to Office of Personnel Management (Federal employee health benefit plans) | 36 |
| Referred to Medicaid | 28 |
| Referred to Medicare | 19 |
| Out of State Plan | 36 |
| COMPLAINT WITHDRAWN | 6 |
| INSUFFICIENT INFORMATION TO COMPLETE INVESTIGATION | 74 |
| NO ACTION REQUIRED (includes non-medical necessity complaint cases cloned to Life and Health Complaint Unit, duplicate files, inquiries) | 152 |
| REFERRED TO HEALTH, EDUCATION AND ADVOCACY UNIT (for complainants who had not exhausted the carrier's internal appeal process) | 52 |
| MIA CONDUCTED INVESTIGATION | 308 |
| MIA Decision Upheld Carrier | 91 |
| Carrier Reversed Itself During Investigation | 144 |
| MIA Reversed Carrier Decision | 68 |
| MIA Reversed Carrier Decision in Part and Upheld Carrier Decision in Part | 5 |

Administration Complaints (Continued)

| Carrier | COMPLAINTS INVESTIGATED | | Carrier Upheld by MIA | | Carrier Reversed by MIA | | Carrier Modified by MIA | | Carrier Reversed Itself During Investigation | |
|---|-------------------------|-------------|-----------------------|------------|-------------------------|------------|-------------------------|-----------|--|------------|
| | Total | Percent | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| Aetna Health, Inc. (a Pennsylvania corporation) | 8 | 3% | 3 | 38% | 1 | 13% | 0 | 0% | 4 | 50% |
| Aetna Health Insurance Company | 1 | 0% | 0 | 0% | 1 | 100% | 0 | 0% | 0 | 0% |
| Aetna Life Insurance Company | 3 | 0% | 1 | 33% | 1 | 100% | 0 | 0% | 1 | 33% |
| Ameritas Life Insurance Corp. | 1 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 100% |
| CareFirst BlueChoice, Inc. | 71 | 23% | 27 | 38% | 19 | 27% | 1 | 1% | 24 | 34% |
| CareFirst of Maryland, Inc. | 69 | 23% | 16 | 23% | 19 | 28% | 1 | 1% | 33 | 48% |
| CaremarkPCS Health L.L.C. | 6 | 2% | 1 | 17% | 1 | 17% | 0 | 0% | 4 | 67% |
| CIGNA Health and Life Insurance Co. | 17 | 6% | 7 | 41% | 5 | 29% | 0 | 0% | 5 | 29% |
| Delta Dental Insurance Company | 2 | 1% | 0 | 0% | 0 | 0% | 1 | 100% | 1 | 50% |
| Express Scripts Insurance Company | 1 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 100% |
| Group Hospitalization and Medical Services, Inc. | 16 | 5% | 7 | 44% | 3 | 19% | 0 | 0% | 6 | 38% |
| Guardian Life Ins. Co. of America | 13 | 4% | 5 | 38% | 2 | 15% | 0 | 0% | 6 | 46% |
| Kaiser Foundation Health Plan Mid-Atlantic | 13 | 4% | 3 | 23% | 3 | 23% | 0 | 0% | 7 | 54% |
| MAMSI Life and Health Ins. Company | 5 | 2% | 0 | 0% | 1 | 20% | 0 | 0% | 4 | 80% |
| Metropolitan Life Insurance Company | 2 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 2 | 100% |
| Optimum Choice, Inc. | 5 | 2% | 0 | 0% | 1 | 20% | 0 | 0% | 4 | 80% |
| Principal Life Insurance Company | 2 | 1% | 0 | 0% | 1 | 50% | 0 | 0% | 1 | 50% |
| UnitedHealthcare Ins. Company | 68 | 22% | 18 | 26% | 10 | 15% | 2 | 3% | 37 | 54% |
| UnitedHealthcare of the Mid-Atlantic, Inc. | 5 | 1% | 2 | 40% | 0 | 0% | 0 | 0% | 3 | 60% |
| TOTAL | 308 | 100% | 91 | 30% | 68 | 22% | 5 | 2% | 144 | 47% |

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 |
| | | | | | | | | | | |
| Air Ambulance | B | 2 | 2 | 100% | 0 | 0% | 0 | 0% | 0 | 0% |
| Cosmetic | D | 3 | 0 | 0% | 2 | 67% | 1 | 33% | 0 | 0% |
| Dental Care Services | J | 32 | 10 | 31% | 4 | 13% | 1 | 3% | 17 | 53% |
| Durable Medical Equipment | I | 7 | 2 | 29% | 3 | 43% | 0 | 0% | 2 | 29% |
| Emergency Room Denial | B | 2 | 0 | 0% | 0 | 0% | 0 | 0% | 2 | 100% |
| Experimental | D | 6 | 4 | 67% | 1 | 17% | 0 | 0% | 1 | 17% |
| Eye Care | L | 1 | 0 | 0% | 1 | 100% | 0 | 0% | 0 | 0% |
| In-Patient Rehabilitation Services | G | 2 | 2 | 100% | 0 | 0% | 0 | 0% | 0 | 0% |
| Lab, Imaging, Test Services | E | 45 | 27 | 60% | 11 | 24% | 0 | 0% | 7 | 16% |
| Laboratory Services | E | 1 | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 100% |
| Mental Health/Substance (Inpatient) Services | C | 2 | 0 | 0% | 0 | 0% | 0 | 0% | 2 | 100% |
| Mental Health/Substance (Outpatient) Services | C | 8 | 1 | 13% | 2 | 25% | 0 | 0% | 5 | 63% |
| Opioid Use Disorders | F | 1 | 1 | 100% | 0 | 0% | 0 | 0% | 0 | 0% |
| PCP Referrals | D | 1 | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 100% |
| Pharmacy Benefits | F | 1 | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 100% |
| Pharmacy Services/Formulary Issues | F | 157 | 31 | 20% | 37 | 24% | 1 | 1% | 88 | 56% |
| Physician Services | D | 35 | 9 | 26% | 6 | 17% | 2 | 6% | 17 | 49% |
| PT, OT, ST | G | 2 | 1 | 50% | 1 | 50% | 0 | 0% | 0 | 0% |
| TOTAL | | 308 | 91 | | 68 | | 5 | | 144 | |

INTENDED TO BE LEFT BLANK