

WES MOORE
Governor

ARUNA MILLER
Lt. Governor

KATHLEEN A. BIRRANE
Commissioner

TAMMY R. J. LONGAN
Acting Deputy Commissioner



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December 1, 2023

The Honorable Wes Moore
Governor
State of Maryland
State House
100 State Circle
Annapolis, Maryland 21401

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)

Governor Moore, President Ferguson, and Speaker Jones:

On behalf of the Maryland Insurance Administration (MIA), I am pleased to submit the *2022 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 2022, 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 Legislative and Regulatory Policy, Jamie Sexton, at Jamie.Sexton@Maryland.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kathleen A. Birrane".

Kathleen A. Birrane
Insurance Commissioner

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



Maryland

INSURANCE ADMINISTRATION

2022 Report on the Health Care

Appeals & Grievance Law

Insurance Article § 15-10A-06

(MSAR #6)

Kathleen Birrane
Commissioner

December 1, 2023

For further information concerning this document, please contact:

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This document is available in alternative format upon request
from a qualified individual with a disability.
TTY 1.800.735.2258

The Administration's website address: insurance.maryland.gov

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Background

In 1998, the Appeals and Grievance 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 Grievance 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 (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 2022, the percentage of the population under the age of 65 with insured health benefits declined to 17.3 percent.¹

The Appeals and Grievance process begins when a carrier renders an “adverse decision,” which includes 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 Grievance 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 health care 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 hearing to challenge

¹ Maryland Insurance Administration Administration’s 2022 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 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 2022, noting changes in certain areas since 2019 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 2019 and 2022. More detailed information about adverse decisions made by each carrier is provided in Appendix 1 for 2022.

Carriers rendered 95,327 adverse decisions in 2022 compared to 78,730 in 2019, representing an increase of 21.1% over the four-year period. Pharmacy services and dental services accounted for the highest number of adverse decisions rendered during the period between 2019 and 2022. Adverse decisions for pharmacy services increased by 58.6% from 2019 to 2022, (33,220 in 2019 to 52,674 in 2022). Adverse decisions for dental services decreased by 15.2% from 2019 to 2022, (17,774 in 2019 and 15,065 in 2022). Adverse decisions for physician services decreased by 35.9% from 2019 to 2022, (7,088 in 2019 to 4,545 in 2022). However, adverse decisions for the combined categories of laboratory and radiology services increased by 20.2% from 2019 to 2022, (12,082 in 2019 to 14,526 in 2022).

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. The Maryland Insurance Administration must be granted permission by the Department of Budget and Management to investigate a medical necessity complaint involving a State employee.

In 2022, three categories of services accounted for 86.3% of all adverse decisions and they were pharmacy services, which ranked first, followed by dental services with the combined categories of laboratory and radiology services ranking third. In 2019, these same services accounted for 80.1% of all adverse decisions. In 2019, pharmacy services ranked first in terms of the percentage of all adverse decisions at 42.2% (33,220) followed by dental services at 22.6% (17,774) with the combined categories of laboratory and radiology services ranking third at 15.3% (12,082).

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, the Administration has responded to this challenge by increasing its social media presence and consumer outreach efforts in an attempt to improve consumer awareness of the health benefits available to them.

Table 1: Adverse Decisions

MIA Category/Type of Service	2019		2022		Percent Change 2019-2022
	Number	Percent	Number	Percent	
Inpatient hospital services	1,288	1.6%	1,455	1.5%	13.0%
Emergency room services	13	0.0%	112	0.1%	761.5%
Mental health services	810	1.0%	771	0.8%	-4.8%
Physician services	7,088	9.0%	4,545	4.8%	-35.9%
Laboratory, radiology services	12,082	15.3%	14,526	15.2%	20.2%
Pharmacy services	33,220	42.2%	52,674	55.3%	58.6%
PT, OT, ST services (including inpatient rehab)	4,112	5.2%	3,915	4.1%	4.8%
Skilled nursing facility	30	0.0%	99	0.1%	230.0%
Durable medical equipment	1,535	1.9%	1,161	1.2%	-24.4%
Dental	17,774	22.6%	15,065	15.8%	-15.2%
Home health services	204	0.3%	97	0.1%	-52.5%
Obesity, IVF, Podiatry, Hearing and Vision	574	0.7%	907	1.0%	58.0%
Total	78,730	100.0%	95,327	100.0%	21.1%

Grievance Decisions

Table 2 provides an overview of the number and type of grievance carriers rendered in 2019 and 2022. Just as the number of adverse decisions reported by carriers increased during the aforementioned period, so did the number of grievances self-reported by carriers over the same period. According to the data, carriers received 8,006 grievances in 2019 compared to 10,305 received in 2022, representing an increase of 28.7%.

In 2019, the largest number of grievances reported involved pharmacy services at 3,528, followed by dental care services at 2,155 and the combined categories of laboratory/radiology services finishing third with 1,081 grievances reported. By comparison, in 2022, pharmacy services ranked first with 4,469 grievances reported followed by dental care services at 3,169 with the combined categories of laboratory/radiology services ranked third with 1,284 grievances reported.

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

Some of the largest percentage increases in grievances reported by carriers involved pharmacy services (3,528 in 2019 to 4,469 in 2022), representing an increase of 26.7% and dental care services (2,155 in 2019 to 3,169 in 2022), representing an increase of 47.1%. Some of the largest percentage decreases in grievances reported by carriers involved inpatient hospital services (190 in 2019 to 102 in 2022), representing a decrease of 46.3% and the combined categories of physical, occupational and speech therapies (79 in 2019 to 64 in 2022), representing a decreased of 19%.

Table 2: Grievances

MIA Category/Type of Service	2019		2022		Percent Change 2019 - 2022
	Number	Percent	Number	Percent	
Inpatient hospital services	190	2.4%	102	1.0%	-46.3%
Emergency room services	22	0.3%	30	0.3%	36.4%
Mental health services	78	1.0%	69	0.7%	-11.5%
Physician services	532	6.6%	545	5.3%	2.44%
Laboratory, radiology services	1,081	13.5%	1,284	12.5%	18.8%
Pharmacy services	3,528	44.1%	4,469	43.4%	26.7%
PT, OT, ST services (including inpatient rehab)	79	1.0%	64	0.6%	-19.0%
Skilled nursing facility	15	0.2%	6	0.1%	-60.0%
Durable medical equipment	149	1.9%	216	2.1%	45.0%
Dental	2,155	26.9%	3,169	30.8%	47.1%
Home health services	4	0.0%	6	0.1%	50.0%
Obesity, IVF, Podiatry, Hearing and Vision	173	2.2%	345	3.3%	99.4%
Total	8,006	100.0%	10,305	100.0%	28.7%

Table 3 describes how the number of grievances received by carriers compares to the number of adverse decisions that carriers made in 2019 and 2022. Grievances increased as a percentage of adverse decisions from 2019 to 2022 (10.2% to 10.8%).

Table 3: Grievances as a percent of adverse decisions

MIA Category/Type of Service	2019	MIA Category/Type of Service	2022
Inpatient hospital services	14.8%	Inpatient hospital services	7.0%
	169.2		26.8
Emergency room services	%	Emergency room services	%
Mental health services	9.6%	Mental health services	9.0%
			12.0
Physician services	7.5%	Physician services	%
Laboratory, radiology services	9.0%	Laboratory, radiology services	8.8%
Pharmacy services	10.6%	Pharmacy services	8.5%
PT, OT, ST services (including inpatient rehab)	1.9%	PT, OT, ST services (including inpatient rehab)	1.6%
Skilled nursing facility	50.0%	Skilled nursing facility	6.0%
			18.6
Durable medical equipment	9.7%	Durable medical equipment	%
Dental	12.1%	Dental	21.0
			%
Home health services	2.0%	Home health services	6.2%
Obesity, IVF, Podiatry, Hearing and Vision	30.1%	Obesity, IVF, Podiatry, Hearing and Vision	38.0
			%
Total	10.2%	Total	10.8
			%

Table 4 compares how often carriers upheld their original decisions in 2019 and in 2022. More detailed information about grievance decisions for each carrier may be found in Appendices 2 and 3. Carriers upheld adverse decisions 44.7% of the time in 2019 as compared to 48.0% in 2022, indicating that carriers were more likely to uphold an adverse decision in 2022 than in 2019.

Table 4: Grievance Decision

	2019		2022	
	Number	Percent	Number	Percent
Carrier upheld adverse decision	3,579	44.7%	4,944	48.0%
Carrier overturned adverse decision	4,014	50.1%	4,926	47.8%

Carrier modified original adverse decision	413	5.2%	435	4.2%
Total	8,006	100%	10,305	100%

Complaints

While the number of adverse and grievance decisions increased between 2019 and 2022, that was not the case for the number of complaints filed with this Administration during that same time frame. The Administration received 1,038 complaints in 2019 compared to 853 complaints received in 2022, representing a decrease of 17.8%. While it is difficult to determine the exact cause for the reduction in the number of complaints filed, the Administration has responded to this challenge by increasing its social media presence and consumer outreach efforts in an attempt to improve consumer awareness of the complaint process in Maryland. As a result of these efforts, consumer complaints are up as compared to the same time in 2021 (839 in 2021 and 853 in 2022), and the number of complaints received in 2023 is projected to exceed the number of complaints received in 2022.

As summarized in Table 5, 27.9% of the complaints received in 2022 were outside of the Administration’s jurisdiction, compared to 32.1% of the complaints received in 2019. These non-jurisdictional cases included complaints filed by individuals covered under employer group self-funded plans, Medicaid, Medicare, Uniform Services Family Health Plans, Worker’s Compensation, and insurance contracts issued and delivered to policyholders in states other than Maryland.

In 2019, 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), 66.7% of the time. In 2022, complaint data indicates that the Administration reversed or modified the carrier’s grievance decision 71.0% of the time, representing an increase in reversals of 6.4%. 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 2019, the Administration recovered \$718,198 for complainants. By comparison, in 2022, the Administration recovered \$649,590 for complainants. Since the enactment of the Appeals and Grievance law, the Administration has recovered more than \$13 million 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 2022, 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 more than 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 2019 compares to the number of complaints filed in 2022. The number of complaints received by the Administration decreased from 2019 to 2022 (1,038 to 853), representing a decrease of 17.8%.

Table 5: Complaints

	2019	2022	Percent Change
Total complaints received	1,038	853	-17.8%
No Jurisdiction	333	238	-28.5%
Complaint withdrawn	11	12	9.1%
Insufficient Information to perform investigation	91	106	16.5%
No action required	106	151	42.5%
Referred to HEAU	68	29	-57.4%
Complaints investigated by MIA	429	317	-26.1%
Percent of total complaints investigated by the MIA	41.3%	37.2%	-9.9%
Number of complaints carrier or MIA reversed or modified grievance decisions	286	225	-21.3%
Percent of total complaints investigated by MIA where carrier or MIA reversed or modified grievance decisions	66.7%	71.0%	6.4%

Conclusion

Carriers rendered 95,327 adverse decisions in 2022 compared to 78,730 in 2019, representing an increase of 21.1% over the four-year period. Pharmacy services and dental care services accounted for the highest number of adverse decisions rendered during the period between 2019 and 2022. Adverse decisions for pharmacy services increased by 58.6% from 2019 to 2022, while the number of adverse decisions for dental care services decreased by 15.2% during this same 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. The Administration has expanded its social media presence to make citizens aware of the Administration’s “24/7 Hotline” and of the Appeal

and Grievance Unit's availability to and investigate medically necessity and Emergency Appeals after-hours and on weekends.

Carriers received 8,006 grievances in 2019, compared to 10,305 received in 2022, representing an increase of 28.7%. In 2019, the largest number of grievances reported involved pharmacy and dental care services. In 2022, again, the highest number of grievances reported were for pharmacy services and dental care services. Just as the number of adverse decisions for mental health services decreased during this time, so did the number of grievances received for mental health services from 2019 to 2022.

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 2019, the Administration recovered \$718,198 for complainants when the carrier's grievance decision was either reversed or modified. In 2022, the Administration recovered \$649,590 for complainants when the carrier's grievance decision was either reversed or modified. Since the enactment of the Appeals and Grievance law, the Administration has recovered over \$13 million 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
Aetna Dental, Inc.	672	0.7%	0	0.0%	0	0.0%
Aetna Health Inc. (a Pennsylvania corporation)	116	0.1%	43	37.1%	0	0.0%
Aetna Life Insurance Company	284	0.3%	102	35.9%	0	0.0%
Alpha Dental Programs, Inc.	5	0.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp.	454	0.5%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	25,416	26.7%	9	0.0%	7	0.0%
CareFirst of Maryland, Inc.	9,684	10.0%	0	0.0%	1	0.0%
CIGNA Dental Health of Maryland, Inc.	32	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	17,818	18.7%	294	1.7%	93	0.5%
Connecticut General Life Insurance Company	8	0.0%	0	0.0%	0	0.0%
Delta Dental Insurance Company	9	0.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	67	0.1%	0	0.0%	0	0.0%
Dentegra Insurance Company	4	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.	2,551	2.7%	0	0.0%	0	0.0%
Golden Rule Insurance Company	14	0.0%	2	14.3%	0	0.0%
Group Dental Service of Maryland, Inc.	21	0.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Services, Inc.	7,604	8.0%	3	0.0%	1	0.0%
Guardian Life Insurance Company of America	1,535	1.6%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	79	0.1%	26	32.9%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	1,432	1.5%	298	20.8%	0	0.0%
Kaiser Permanente Insurance Company	42	0.0%	15	35.7%	0	0.0%
Lincoln National Life Insurance Company, The	98	0.1%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	1,229	1.3%	9	0.7%	0	0.0%
Metropolitan Life Insurance Company	528	0.6%	0	0.0%	0	0.0%
National Health Life Insurance Company	2	0.0%	1	50.0%	0	0.0%
Optimum Choice, Inc.	3,056	3.2%	114	3.7%	3	0.1%

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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	752	0.8%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	9	0.0%	0	0.0%	0	0.0%
Standard Insurance Company	118	0.1%	0	0.0%	0	0.0%
Starmount Life Insurance Company	12	0.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	545	0.6%	0	0.0%	0	0.0%
United Concordia Insurance Company	576	0.6%	0	0.0%	0	0.0%
United of Omaha Life Insurance Company	208	0.2%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	16,264	17.1%	485	3.0%	7	0.0%
UnitedHealthcare of the Mid-Atlantic, Inc.	3,833	4.0%	18	0.5%	0	0.0%
Wellfleet Group LLC	183	0.2%	35	19.1%	0	0.0%
Wellfleet Insurance Company	59	0.1%	1	1.7%	0	0.0%
Total	95,327	100%	1,455	1.5%	112	0.1%

**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)	15	12.9%	27	23.3%	0	0.0%
Aetna Life Insurance Company	32	11.3%	94	33.1%	12	4.2%
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.	347	1.4%	1,063	4.2%	4,284	16.9%
CareFirst of Maryland, Inc.	64	0.7%	140	1.4%	407	4.2%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	85	0.5%	867	4.9%	4,946	27.8%
Connecticut General Life Insurance Company	0	0.0%	0	0.0%	8	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 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%	5	35.7%	7	50.0%
Group Dental Service of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Services, Inc.	42	0.6%	171	2.2%	426	5.6%
Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	0	0.0%	9	11.4%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	125	8.7%	204	14.2%	23	1.6%
Kaiser Permanente Insurance Company	0	0.0%	8	19.0%	14	33.3%
Lincoln National Life Insurance Company, The	0	0.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	1	0.1%	134	10.9%	93	7.6%
Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
National Health Insurance Company	0	0.0%	1	50.0%	0	0.0%
Optimum Choice, Inc.	0	0.0%	212	6.9%	351	11.5%
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	59	0.4%	1,189	7.3%	2,981	18.3%
UnitedHealthcare of the Mid-Atlantic, Inc.	0	0.0%	409	10.7%	950	24.8%
Wellfleet Group LLC	1	0.5%	10	5.5%	3	1.6%
Wellfleet Insurance Company	0	0.0%	2	3.4%	21	35.6%
Total	771	0.8%	4,545	4.8%	14,526	15.2%

**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)	0	0.0%	0	0.0%	0	0.0%
Aetna Life Insurance Company	27	23.3%	0	0.0%	0	0.0%
Alpha Dental Programs, Inc.	36	12.7%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	19,065	75.0%	65	0.3%	5	0.0%
CareFirst of Maryland, Inc.	8,004	82.7%	31	0.3%	1	0.0%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	7,623	42.8%	3,568	20.0%	4	0.0%
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 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.	6,344	83.4%	8	0.1%	0	0.0%
Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	0	0.0%	0	0.0%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	11	0.8%	110	7.7%	82	5.7%
Kaiser Permanente Insurance Company	0	0.0%	2	4.8%	0	0.0%
Lincoln National Life Insurance Company, The	0	0.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	905	73.6%	2	0.2%	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.	2,122	69.4%	20	0.7%	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%

**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	6,032	37.1%	26	0.2%	6	0.0%
UnitedHealthcare of the Mid-Atlantic, Inc.	2,416	63.0%	4	0.1%	1	0.0%
Wellfleet Group LLC	84	45.9%	49	26.8%	0	0.0%
Wellfleet Insurance Company	5	8.5%	30	50.8%	0	0.0%
Total	52,674	55.3%	3,915	4.1%	99	0.1%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY

J. DENTAL

NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES				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%	672	100.0%	0	0.0%	0	0.0%
Aetna Health Inc. (a Pennsylvania corporation)	0	0.0%	0	0.0%	2	1.7%	2	1.7%
Aetna Life Insurance Company	0	0.0%	0	0.0%	4	1.4%	4	1.4%
Alpha Dental Programs, Inc.	0	0.0%	5	100.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp.	0	0.0%	454	100.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	537	2.1%	8	0.0%	12	0.0%	14	0.1%
CareFirst of Maryland, Inc.	126	1.3%	903	9.3%	1	0.0%	6	0.1%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	32	100.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	29	0.2%	247	1.4%	42	0.2%	20	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%	9	100.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	0	0.0%	67	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%	4	100.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	0	0.0%	2,551	100.0%	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%	21	100.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Serv. Inc.	103	1.4%	496	6.5%	2	0.0%	8	0.1%
Guardian Life Insurance Company of America	0	0.0%	1,535	100.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	5	6.3%	0	0.0%	0	0.0%	39	49.1%
Kaiser Foundation Health Plan Mid-Atlantic States, Inc.	146	10.2%	14	1.0%	18	1.3%	401	28.0%
Kaiser Permanente Insurance Company	3	7.1%	0	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company, The	0	0.0%	98	100.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	22	1.8%	44	3.6%	2	0.2%	17	1.4%
Metropolitan Life Insurance Company	0	0.0%	528	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.	28	0.9%	110	3.6%	4	0.1%	92	3.0%

**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
Principal Life Insurance Company	0	0.0%	752	100.0%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	0	0.0%	9	100.0%	0	0.0%	0	0.0%
Standard Insurance Company	0	0.0%	118	100.0%	0	0.0%	0	0.0%
Starmount Life Insurance Company	0	0.0%	12	100.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	545	100.0%	0	0.0%	0	0.0%
United Concordia Insurance Company	0	0.0%	576	100.0%	0	0.0%	0	0.0%
United of Omaha Life Insurance Company	0	0.0%	208	100.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	149	0.9%	5,030	30.9%	9	0.1%	291	1.8%
UnitedHealthcare of the Mid-Atlantic, Inc.	13	0.3%	9	0.2%	0	0.0%	13	0.3%
Wellfleet Group LLC	0	0.0%	0	0.0%	1	0.5%	0	0.0%
Wellfleet Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,161	1.2%	15,065	15.8%	97	0.1%	907	0.1%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

COMPANY NAME	GRIEVANCES FILED	A. INPATIENT HOSPITAL SERVICES	B. EMERGENCY ROOM SERVICES
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NAIC #		COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	9	0.1%	0	0.0%	1	11.1%
95109	Aetna Health Inc. (a Pennsylvania corporation)	240	2.2%	17	7.1%	12	5.0%
60054	Aetna Life Insurance Company	183	1.7%	10	5.5%	11	6.0%
95183	Alpha Dental Programs, Inc.	157	1.5%	0	0.0%	0	0.0%
61301	Ameritas Life Insurance Corp.	181	1.7%	0	0.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	2,087	19.4%	4	0.2%	1	0.0%
47058	CareFirst of Maryland, Inc.	1,068	9.9%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Ins Company	667	6.2%	17	2.5%	0	0.0%
81396	Delta Dental Insurance Company	105	1.0%	0	0.0%	0	0.0%
54798	Delta Dental of Pennsylvania	642	6.2%	0	0.0%	0	0.0%
73474	Dentegra Insurance Company	65	0.6%	0	0.0%	0	0.0%
95657	Dominion Dental Services, Inc.	200	1.9%	0	0.0%	0	0.0%
62286	Golden Rule Insurance Company	6	0.1%	0	0.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	988	9.2%	1	0.1%	0	0.0%
64246	Guardian Life Insurance Company of America	938	8.7%	0	0.0%	0	0.0%
26581	Independence American Insurance Company	2	0.0%	0	0.0%	0	0.0%
	Johns Hopkins HealthCare LLC	73	0.7%	28	38.4%	2	2.7%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	92	0.9%	7	7.6%	0	0.0%
60053	Kaiser Permanente Insurance Company	7	0.1%	2	28.6%	0	0.0%
60321	MAMSI Life and Health Ins Company	88	0.8%	0	0.0%	0	0.0%
65978	Metropolitan Life Insurance Company	29	0.3%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	489	4.5%	5	1.0%	3	0.6%
61271	Principal Life Insurance Company	35	0.3%	0	0.0%	0	0.0%
68381	Reliance Standard Life Insurance Company	3	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	27	0.3%	0	0.0%	0	0.0%
68985	Starmount Life Insurance Company	15	0.1%	0	0.0%	0	0.0%
80802	Sun Life Assurance Company of Canada	47	0.4%	0	0.0%	0	0.0%
85766	United Concordia Insurance Company	253	2.4%	0	0.0%	0	0.0%
69868	United of Omaha Life Insurance Company	23	0.2%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	1,500	13.9%	7	0.5%	0	0.0%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	65	0.6%	0	0.0%	0	0.0%
	Wellfleet Group LLC	20	0.2%	4	20.0%	0	0.0%
32280	Wellfleet Insurance Company	1	0.0%	0	0.0%	0	0.0%
	TOTAL	10,305	100%	102	1.0%	30	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%	5	55.6%	1	11.1%

95109	Aetna Health Inc. (a Pennsylvania corporation)	0	0.0%	97	40.4%	55	22.9%
60054	Aetna Life Insurance Company	0	0.0%	66	36.1%	44	24.0%
95183	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	0.0%	64	3.1%	264	12.6%
47058	CareFirst of Maryland, Inc.	0	0.0%	3	0.3%	26	2.4%
67369	CIGNA Health and Life Insurance Company	27	4.0%	77	11.5%	212	31.8%
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%	1	16.7%	4	66.7%
95846	Group Dental Service of Maryland, Inc.	0	0.0%	21	2.1%	54	5.5%
53007	Group Hospitalization and Medical Services, Inc.	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%
26581	Independence American Insurance Company	0	0.0%	1	50.0%	0	0.0%
	Johns Hopkins HealthCare LLC	3	4.1%	7	9.6%	15	20.5%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	18	19.6%	40	43.5%	5	5.4%
60053	Kaiser Permanente Insurance Company	0	0.0%	3	42.9%	1	14.3%
60321	MAMSI Life and Health Insurance Company	1	1.1%	4	4.5%	12	13.6%
65978	Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	0	0.0%	73	14.9%	81	16.6%
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	17	1.1%	72	4.8%	486	32.4%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	1	1.5%	7	10.8%	24	36.9%
	Wellfleet Group LLC	1	5.0%	4	20.0%	0	0.0%
32280	Wellfleet Insurance Company	0	0.0%	0	0.0%	0	0.0%
	TOTAL	69	0.7%	545	5.3%	1,284	12.5%

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	2	22.0%	0	0.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	55	22.9%	1	0.4%	0	0.0%
60054	Aetna Life Insurance Company	38	20.8%	0	0.0%	0	0.0%

95163	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.	1,600	76.7%	10	0.5%	1	0.0%
47058	CareFirst of Maryland, Inc.	968	90.6%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Insurance Company	264	39.6%	21	3.1%	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	1	16.7%	0	0.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	789	79.9%	0	0.0%	0	0.0%
64246	Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
26581	Independence American Insurance Company	0	0.0%	1	50.0%	0	0.0%
	Johns Hopkins HealthCare LLC	18	24.7%	0	0.0%	0	0.0%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	0	0.0%	8	8.7%	3	3.3%
60053	Kaiser Permanente Insurance Company	0	0.0%	1	14.3%	0	0.0%
60321	MAMSI Life and Health Insurance Company	54	61.4%	4	4.5%	0	0.0%
65978	Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	159	32.5%	5	1.0%	1	0.2%
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	483	32.2%	13	0.9%	1	1.5%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	26	40.0%	0	0.0%	0	0.0%
	Wellfleet Group LLC	11	55.0%	0	0.0%	0	0.0%
32280	Wellfleet Insurance Company	1	100.0%	0	0.0%	0	0.0%
	TOTAL	4,469	43.4%	64	0.6%	6	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%
95109	Aetna Health Inc. (a Pennsylvania corporation)	1	0.4%	0	0.0%	0	0.0%

60054	Aetna Life Insurance Company	1	0.5%	4	2.2%	1	0.5%
95163	Alpha Dental Programs, Inc.	0	0.0%	157	100.0%	0	0.0%
61301	Ameritas Life Insurance Corp.	0	0.0%	181	100.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	140	6.7%	1	0.0%	0	0.2%
47058	CareFirst of Maryland, Inc.	4	0.4%	67	6.3%	0	0.0%
67369	CIGNA Health and Life Insurance Company	0	0.0%	48	7.2%	0	0.0%
81396	Delta Dental Insurance Company	0	0.0%	105	100.0%	0	0.0%
54798	Delta Dental of Pennsylvania	0	0.0%	642	100.0%	0	0.0%
73474	Dentegra Insurance Company	0	0.0%	65	100.0%	0	0.0%
95657	Dominion Dental Services, Inc.	0	0.0%	200	100.0%	0	0.0%
62286	Golden Rule Insurance Company	0	0.0%	0	0.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	22	2.2%	99	10.0%	1	0.1%
64246	Guardian Life Insurance Company of America	0	0.0%	938	100.0%	0	0.0%
26581	Independence American Insurance Company	0	0.0%	0	0.0%	0	0.0%
	Johns Hopkins HealthCare LLC	0	0.0%	0	0.0%	0	0.0%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	6	6.5%	0	0.0%	0	0.0%
60053	Kaiser Permanente Insurance Company	0	0.0%	0	0.0%	0	0.0%
60321	MAMSI Life and Health Insurance Company	3	3.4%	0	0.0%	0	0.0%
65978	Metropolitan Life Insurance Company	0	0.0%	29	100.0%	0	0.0%
96940	Optimum Choice, Inc.	2	0.4%	0	0.0%	4	0.8%
61271	Principal Life Insurance Company	0	0.0%	35	100.0%	0	0.0%
68381	Reliance Standard Life Insurance Company	0	0.0%	3	100.0%	0	0.0%
86355	Standard Insurance Company	0	0.0%	27	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%	15	100.0%	0	0.0%

80802	Sun Life Assurance Company of Canada	0	0.0%	47	100.0%	0	0.0%
85766	United Concordia Insurance Company	0	0.0%	253	100.0%	0	0.0%
69868	United of Omaha Insurance Company	0	0.0%	23	100.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	36	2.4%	230	15.3%	0	0.0%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	1	1.5%	0	0.0%	0	0.0%
	Wellfleet Group LLC	0	0.0%	0	0.0%	0	0.0%
	Wellfleet Insurance Company	0	0.0%	0	0.0%	0	0.0%
	TOTAL	216	2.1%	3,169	30.8%	6	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)	2	0.8%
60054	Aetna Life Insurance Company	8	4.4%
95163	Alpha Dental Programs, Inc.	0	0.0%
61301	Ameritas Life Insurance Corp.	0	0.0%
96202	CareFirst BlueChoice, Inc.	1	0.0%
47058	CareFirst of Maryland, Inc.	0	0.0%
67369	CIGNA Health and Life Insurance Company	1	0.1%

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%
53007	Group Hospitalization and Medical Services, Inc.	1	0.1%
64246	Guardian Life Insurance Company of America	0	0.0%
26581	Independence American Insurance Company	0	0.0%
	Johns Hopkins HealthCare LLC	0	0.0%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	5	5.4%
60053	Kaiser Permanente Insurance Company	0	0.0%
60321	MAMSI Life & Health Insurance Company	10	11.4%
65978	Metropolitan Life Insurance Company	0	0.0%
96940	Optimum Choice, Inc.	156	31.9%
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	156	10.4%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	5	7.7%
	Wellfleet Group LLC	0	0.0%

32280	Wellfleet Insurance Company	0	0.0%
	TOTAL	345	3.3%

**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	9	0.1%	0	0.0%	9	100.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	240	2.2%	126	52.5%	109	45.4%	5	2.1%
60054	Aetna Life Insurance Company	183	1.7%	102	55.7%	78	42.6%	3	1.6%
95163	Alpha Dental Programs, Inc.	157	1.5%	98	62.4%	43	27.4%	16	10.2%
61301	Ameritas Life Insurance Corp.	181	1.7%	104	57.5%	62	34.3%	15	8.3%

96202	CareFirst BlueChoice, Inc.	2,087	19.4%	1,001	48.0%	1,083	51.9%	3	0.1%
47058	CareFirst of Maryland, Inc.	1,068	9.9%	412	38.6%	654	61.2%	2	0.2%
67369	CIGNA Health and Life Ins. Co.	667	6.2%	327	49.0%	328	49.2%	12	1.8%
81396	Delta Dental Ins. Company	105	1.0%	73	69.5%	29	27.6%	3	2.9%
54798	Delta Dental of Pennsylvania	642	6.2%	444	69.2%	181	28.2%	17	2.6%
73474	Dentegra Insurance Company	65	0.6%	48	73.8%	16	24.6%	1	1.5%
95657	Dominion Dental Services, Inc.	200	1.9%	102	51.0%	88	44.0%	10	5.0%
62286	Golden Rule Insurance Co.	6	0.1%	3	50.0%	2	33.3%	1	16.7%
53007	Group Hospitalization and Medical Services, Inc.	988	9.2%	399	40.4%	585	59.2%	4	0.4%
64246	Guardian Life Insurance Company of America	938	8.7%	502	53.5%	180	19.2%	256	27.3%
26581	Independence American Insurance Company	2	0.0%	0	0.0%	2	100.0%	0	0.0%
	Johns Hopkins HealthCare LLC	73	0.7%	35	47.9%	35	47.9%	3	4.1%

**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	92	0.9%	62	67.4%	30	32.6%	0	0.0%
60053	Kaiser Permanente Insurance Co.	7	0.1%	4	57.1%	3	42.9%	0	0.0%
60321	MAMSI Life and Health Ins. Co.	88	0.8%	52	59.1%	34	38.6%	2	2.3%
65978	Metropolitan Life Ins. Company	29	0.3%	26	89.7%	0	0.0%	3	10.3%
96940	Optimum Choice, Inc.	489	4.5%	261	53.4%	220	45.0%	8	1.6%

61271	Principal Life Insurance Company	35	0.3%	27	77.1%	6	17.1%	2	5.7%
68381	Reliance Standard Life Ins. Co.	3	0.0%	3	100.0%	0	0.0%	0	0.0%
69019	Standard Insurance Company	27	0.3%	13	48.1%	13	48.1%	1	3.7%
68985	Starmount Life Insurance Co.	15	0.1%	11	73.3%	4	26.7%	0	0.0%
80802	Sun Life Assurance Co. of Canada	47	0.4%	25	53.2%	15	65.2%	7	14.9%
69868	United of Omaha Life Ins. Co.	23	0.2%	99	39.1%	141	55.7%	13	5.1%
85766	United Concordia Insurance Co.	253	2.4%	8	34.8%	15	65.2%	0	0.0%
79413	UnitedHealthcare Insurance Co.	1,500	13.9%	541	36.1%	913	60.9%	46	3.1%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	65	0.6%	27	41.5%	36	55.4%	2	3.1%
	Wellfleet Group LLC	20	0.2%	8	40.0%	12	60.0%	0	0.0%
32280	Wellfleet Insurance Company	1	0.0%	1	100.0%	0	0.0%	0	0.0%
	Total	10,305	100%	4,944	48.0%	4,926	47.8%	435	4.2%

**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
96202	CareFirst BlueChoice, Inc.	3	1	1	100.0%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Insurance Co.	17	4	1	25.0%	3	75.0%	0	0.0%
	Johns Hopkins HealthCare LLC	27	4	0	0.0%	3	75.0%	1	25.0%
60053	Kaiser Permanente Insurance Company	2	1	1	100.0%	0	0.0%	0	0.0%

79413	UnitedHealthcare Insurance Company	1	1	1	100.0%	0	0.0%	0	0.0%
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*** This chart only includes those carriers who received grievances involving hospital length of stay during calendar year 2022**

**** Represents the number of grievances that were resolved in calendar year 2022.**

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	19.6	16.1	27.1	31.3
53007	Group Hospitalization and Medical Services, Inc.	24	24	24	24
	Johns Hopkins HealthCare LLC	265	0	0	0
95639	Kaiser Foundation Health Plan-Mid-Atlantic	19.5	53.7	31.8	48
60321	MAMSI Life and Health Ins. Company	13	12	47	55
96940	Optimum Choice, Inc.	14	13	32	34
79413	UnitedHealthcare Insurance Company	22	18	22	39
95025	UnitedHealthcare of the Mid-Atlantic	13	13	174	19

**** This report only includes carriers who had grievances which were considered emergency cases during calendar year 2022.**

*** 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	7.0	32.0	0	0
95109	Aetna Health Inc. (a Pennsylvania corporation)	18.2	20.9	23.8	21.2
60054	Aetna Life Insurance Company	19.2	22.7	22.7	24.8
95163	Alpha Dental Programs, Inc.	43.8	41.1	49.0	74.5
61301	Ameritas Life Insurance Corporation	32.0	33.0	28.0	28.0
96202	CareFirst BlueChoice, Inc.	16.4	16.9	21.7	21.7
47058	CareFirst of Maryland, Inc.	12.8	14.2	22.0	22.0
67369	CIGNA Health and Life Insurance Company	27.1	26.3	30.1	41.5
81396	Delta Dental Insurance Company	33.6	41.4	39.5	48.0
54798	Delta Dental of Pennsylvania	35.5	35.3	42.7	58.7
52007	Dental Network, Inc. The	0	122.0	164.0	234.0
73474	Dentegra Insurance Company	35.8	34.3	42.1	72.0
95657	Dominion Dental Services, Inc.	28.0	52.8	58.0	75.8
62286	Golden Rule Insurance Company	22.0	30.0	44.0	42.0
53007	Group Hospitalization and Medical Services, Inc.	12.8	19.1	31.8	33.5
64246	Guardian Life Insurance Company of America	3.0	3.0	3.0	3.0
26581	Independence American Insurance Company	1.0	7.0	0	0
	Johns Hopkins HealthCare LLC	24.0	19.0	24.0	20.0
95639	Kaiser Foundation Health Plan-Mid-Atlantic	21.8	27.1	26.0	27.0
60053	Kaiser Permanente Insurance Company	1.7	2.3	1.6	1.6
60321	MAMSI Life and Health Insurance Company	34.0	43.0	32.0	31.0
65978	Metropolitan Life Insurance Company	13.7	20.4	18.4	14.5
82538	National Health Insurance Company	0	8.0	0	0
96940	Optimum Choice, Inc.	34.0	35.0	63.0	50.0
61271	Principal Life Insurance Company	12.0	15.3	15.8	10.2
68381	Reliance Standard Life Insurance Company	0	0	0	28.0
69019	Standard Insurance Company	27.0	17.0	19.0	23.0

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
68985	Starmount Life Insurance Company	15.0	23.0	14.0	15.0
80802	Sun Life Assurance Company of Canada	8.0	8.0	14.0	9.8
85766	United Concordia Insurance Company	4.2	7.5	5.4	4.7
69868	United of Omaha Life Insurance Company	4.4	0	0	0
79413	UnitedHealthcare Insurance Company	35.0	36.0	38.0	36.0
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	26.0	32.0	37.0	33.0
	Wellfleet Group LLC	5.0	10.0	31.0	29.0
32280	Wellfleet Insurance Company	15.0	0	0	0

***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
96202	CareFirst BlueChoice, Inc.	185	185	88	47.6%	97	52.4%	0	0.0%
47058	CareFirst of Maryland, Inc.	322	64	26	40.6%	38	59.4%	0	0.0%
67369	CIGNA Health and Life Ins. Co.	46	31	16	51.6%	13	41.9%	2	6.5%
53007	Group Hospitalization and Medical Services, Inc.	296	65	27	41.5%	38	58.5%	0	0.0%
95639	Kaiser Fndtn Health Plan Mid-Atl	11	11	6	54.5%	5	45.5%	0	0.0%
60321	MAMSI Life and Health Ins. Co.	25	25	12	48.0%	13	52.0%	0	0.0%
96940	Optimum Choice, Inc.	62	62	24	38.7%	38	61.3%	0	0.0%
79413	UnitedHealthcare Ins. Company	237	217	54	24.9%	160	73.7%	3	1.4%
95025	UnitedHealthcare of the Mid-Atl	14	12	6	50.0%	5	41.7%	1	8.3%
	Total	1,198	672	259	38.5%	407	60.6%	6	0.9%

*This chart only includes carriers who had grievances which were considered emergency cases during calendar year 2022.

** Represents the number of grievances that were resolved in calendar year 2022.

APPENDIX 8
ADMINISTRATION COMPLAINTS
Appeals and Grievance Statistics
Totals for Complaints Filed
January 1, 2022 – December 31, 2022

COMPLAINTS	853
NO JURISDICTION	238
Referred to DBM/Cecil County	16
Referred to Department of Labor (ERISA plans)	112
Referred to Office of Personnel Management (Federal employee health benefit plans)	33
Referred to Medicaid	26
Referred to Medicare	13
Out of State Plan	38
COMPLAINT WITHDRAWN	12
INSUFFICIENT INFORMATION TO COMPLETE INVESTIGATION	106
NO ACTION REQUIRED (includes non-medical necessity complaint cases cloned to Life and Health Complaint Unit, duplicate files, inquiries)	151
REFERRED TO HEALTH, EDUCATION AND ADVOCACY UNIT (for complainants who had not exhausted the carrier's internal appeal process)	29
MIA CONDUCTED INVESTIGATION	317
MIA Decision Upheld Carrier	92
Carrier Reversed Itself During Investigation	128
MIA Reversed Carrier Decision	97
MIA Reversed Carrier Decision in Part and Upheld Carrier Decision in Part	0

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)	1	0%	1	100%	0	0%	0	0%	0	0%
Aetna Health Insurance Company	4	1%	3	75%	1	25%	0	0%	0	0%
Aetna Life Insurance Company	6	2%	2	33%	1	17%	0	0%	3	50%
Ameritas Life Insurance Corp.	1	0%	0	0%	0	0%	0	0%	1	100%
CareFirst BlueChoice, Inc.	89	28%	21	24%	31	35%	0	0%	37	42%
CareFirst of Maryland, Inc.	79	25%	21	27%	34	43%	0	0%	24	30%
CaremarkPCS Health L.L.C.	3	1%	1	33%	1	33%	0	0%	1	33%
CIGNA Health and Life Insurance Co.	10	3%	4	40%	3	30%	0	0%	3	30%
Delta Dental Insurance Company	1	0%	0	0%	0	0%	0	0%	1	100%
Delta Dental of Pennsylvania	2	1%	1	50%	0	0%	0	0%	1	50%
Dominion Dental Services, Inc.	2	1%	1	50%	0	0%	0	0%	1	0%
Express Scripts Insurance Company	1	0%	1	100%	0	0%	0	0%	0	12%
Group Hospitalization and Medical Services, Inc.	17	5%	9	53%	6	35%	0	0%	0	12%
Guardian Life Ins. Co. of America	12	4%	5	42%	0	0%	0	0%	2	12%
Kaiser Foundation Health Plan Mid-Atlantic	11	3%	6	55%	0	0%	0	0%	7	58%
MAMSI Life and Health Ins. Company	1	0%	0	0%	4	400%	0	0%	5	45%
Optimum Choice, Inc.	6	2%	0	0%	0	0%	0	0%	0	0%
United Concordia Insurance Company	1	0%	0	0%	14	1400%	0	0%	2	33%
UnitedHealthcare Ins. Company	67	21%	14	21%	0	0%	0	0%	39	58%
UnitedHealthcare of the Mid-Atlantic, Inc.	3	1%	2	67%	2	67%	0	0%	1	33%
TOTAL	317	100%	92	29%	97	31%	0	0%	128	40%

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
Cosmetic	D	3	2	67%	1	33%	0	0%	0	0%
Dental Care Services	J	31	11	35%	2	6%	0	0%	18	58%
Durable Medical Equipment	I	5	1	20%	2	40%	0	0%	2	40%
Emergency Services	B	1	1	100%	0	0%	0	0%	0	0%
Experimental	D	11	7	64%	3	27%	0	0%	1	9%
Home Care Services		1	0	0%	0	0%	0	0%	1	100%
In-Patient Rehabilitation Services	G	2	0	0%	0	0%	0	0%	2	100%
Lab, Imaging, Test Services	E	73	25	34%	35	48%	0	0%	13	18%
Mental Health/Substance (Inpatient) Services	C	3	2	67%	0	0%	0	0%	1	33%
Mental Health/Substance (Outpatient) Services	C	1	0	0%	0	0%	0	0%	1	100%
Opioid Use Disorders	F	1	0	0%	0	0%	0	0%	1	100%
Out-of-Network Benefits	D	1	1	100%	0	0%	0	0%	0	0%
Pharmacy Services/Formulary Issues	F	145	25	17%	46	32%	0	0%	74	51%
Physician Services	D	36	17	47%	8	22%	0	0%	11	31%
PT, OT, ST	G	3	0	0%	0	0%	0	0%	3	100%
TOTAL		317	92		97		0	0%	128	