

WES MOORE  
Governor

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MARIE GRANT  
Acting Commissioner

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December 1, 2024

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 2023 *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 2023, noting changes in certain areas since 2020 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 Associate Commissioner of External Affairs and Policy Initiatives, Jamie Sexton, at [Jamie.Sexton@Maryland.gov](mailto:Jamie.Sexton@Maryland.gov).

Sincerely,

Marie Grant  
Acting Insurance Commissioner

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



2023 Report on the Health Care  
Appeals & Grievance Law  
Insurance Article § 15-10A-06

Marie Grant  
Acting Commissioner

December 1, 2024

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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.

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 a hearing to challenge the Administration's decision.<sup>1</sup> 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;

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<sup>1</sup> 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 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 2023, noting changes in certain areas since 2020 for nonprofit health services plans, insurers, and health maintenance organizations. **Please be advised that since 2020 was impacted by the COVID Pandemic, information regarding the year 2019 is also included with this report.**

### **Adverse Decisions**

Table 1 provides an overview of the number and type of adverse decisions carriers made in 2020 and 2023. More detailed information about adverse decisions made by each carrier is provided in Appendix 1 for 2023.

Carriers rendered 109,123 adverse decisions in 2023 compared to 74,361 in 2020, representing an increase 46.7%% over the four-year period. By comparison, in 2019, and pre-pandemic, carriers rendered 78,730, representing an increase of 38.6% over the five year period. Pharmacy services accounted for the highest number of adverse decisions rendered during the period between 2020 and 2023. Adverse decisions for pharmacy services increased by 72.2% from 2020 to 2023, (36,132 in 2020 to 62,210 in 2023). Adverse decisions for the combined categories of laboratory and radiology testing increased by 71.6% from 2020 to 2023, (9,693 in 2020 to 16,634 in 2023). Adverse decisions for physician services increased by 20.5% from 2020 to 2023, (3,693 in 2020 to 4,449 in 2023). Adverse decisions for dental services decreased by 4.8% from 2020 to 2023, (17,576 in 2020 to 16,732 in 2023).

In 2023, three categories of services accounted for 87.5% of all adverse decisions and they were pharmacy services, which ranked first, followed by dental care services with the combined categories of laboratory and radiology services ranking third. In 2020, these same services accounted for 85.2% of all adverse decisions. In 2020, pharmacy services ranked first in terms of the percentage of all adverse decisions at 48.6% (36,132) followed by dental services at 23.6% (17,576), with the combined categories of laboratory and radiology services ranking third at 13% (9,693).

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 Appeals and Grievances process in Maryland. In addition, the Administration will be working with the Maryland Hospital Association, who have expressed concerns regarding the low number of self-reported adverse decisions provided by carriers for emergency room services.

**Table 1: Adverse Decisions**

MIA Category/Type of Service	2020		2023		Percent Change 2020- 2023
	Number	Percent	Number	Percent	
<b>Inpatient hospital services</b>	<b>1,050</b>	<b>1.4%</b>	<b>1,539</b>	<b>1.4%</b>	<b>46.6%</b>
<b>Emergency room services</b>	<b>17</b>	<b>0.0%</b>	<b>199</b>	<b>0.1%</b>	<b>1070.1%</b>
<b>Mental health services</b>	<b>735</b>	<b>1.0%</b>	<b>652</b>	<b>0.6%</b>	<b>-11.3%</b>
<b>Physician services</b>	<b>3,693</b>	<b>5.0%</b>	<b>4,449</b>	<b>4.1%</b>	<b>20.5%</b>
<b>Laboratory, radiology services</b>	<b>9,693</b>	<b>13.0%</b>	<b>16,634</b>	<b>15.2%</b>	<b>71.6%</b>
<b>Pharmacy services</b>	<b>36,132</b>	<b>48.6%</b>	<b>62,210</b>	<b>57.0%</b>	<b>72.2%</b>
<b>PT, OT, ST services (including inpatient rehab)</b>	<b>3,358</b>	<b>4.5%</b>	<b>3,630</b>	<b>3.3%</b>	<b>8.1%</b>
<b>Skilled nursing facility</b>	<b>31</b>	<b>0.0%</b>	<b>135</b>	<b>0.1%</b>	<b>335.5%</b>
<b>Durable medical equipment</b>	<b>1,435</b>	<b>1.9%</b>	<b>1,668</b>	<b>1.5%</b>	<b>16.2%</b>
<b>Dental</b>	<b>17,576</b>	<b>23.6%</b>	<b>16,732</b>	<b>15.3%</b>	<b>-4.8%</b>
<b>Home health services</b>	<b>155</b>	<b>0.2%</b>	<b>120</b>	<b>0.1%</b>	<b>-22.6%</b>
<b>Obesity, IVF, Podiatry, Hearing and Vision</b>	<b>486</b>	<b>0.7%</b>	<b>1,155</b>	<b>1.1%</b>	<b>137.7%</b>
<b>Total</b>	<b>74,361</b>	<b>100.0%</b>	<b>109,123</b>	<b>100%</b>	<b>46.7%</b>

## **Grievance Decisions**

Table 2 provides an overview of the number and type of grievance carriers rendered in 2020 and 2023. 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 7,119 grievances in 2020 compared to 10,577 received in 2023, representing an increase of 48.6%. In 2019, carriers received 8,006 grievances, representing an increase of 32.1 over the five year period.

In 2020, the largest number of grievances reported involved pharmacy services at 3,771, followed by dental care services at 1,554 and the combined categories of laboratory/radiology services finishing third with 571 grievances reported. By comparison, in 2023, pharmacy services ranked first with 5,253 grievances reported followed by dental care services at 2,160 with the combined categories of laboratory/radiology services ranked third with 1,524 grievances reported.

The number of grievances reported by carriers increased in eight types of services as noted in Table 2 and they were physician services, the combined categories of laboratory/radiology services, pharmacy services, skilled nursing facility care, durable medical equipment, dental care 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, emergency room services along with the combined categories of physical, occupational and speech therapies.

Some of the largest percentage increases in grievances reported by carriers involved pharmacy services (3,771 in 2020 to 5,253 in 2023.), representing an increase of 39.3% and dental care services (1,554 in 2020 to 2,160 in 2023), representing an increase of 39.0% and the combined categories laboratory/radiology services (571 in 2020 to 1,524 in 2023), representing an increase of 166.9%. Some of the largest percentage decreases in grievances reported by carriers involved inpatient hospital services (160 in 2020 to 104 in 2023), representing a decrease of 35.0% along with mental health services (111 in 2020 to 69 in 2023), representing a decrease of 37.8%.



**Table 2: Grievances**

<b>MIA Category/Type of Service</b>	<b>2020</b>		<b>2023</b>		<b>Percent Change 2020 - 2023</b>
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>	
<b>Inpatient hospital services</b>	<b>160</b>	<b>2.2%</b>	<b>104</b>	<b>1.0%</b>	<b>-35.0%</b>
<b>Emergency room services</b>	<b>36</b>	<b>0.5%</b>	<b>27</b>	<b>0.2%</b>	<b>-25.0%</b>
<b>Mental health services</b>	<b>111</b>	<b>1.6%</b>	<b>69</b>	<b>0.7%</b>	<b>-37.8%</b>
<b>Physician services</b>	<b>482</b>	<b>6.8%</b>	<b>659</b>	<b>6.2%</b>	<b>36.7%</b>
<b>Laboratory, radiology services</b>	<b>571</b>	<b>8.0%</b>	<b>1,524</b>	<b>14.4%</b>	<b>166.9%</b>
<b>Pharmacy services</b>	<b>3,771</b>	<b>53.0%</b>	<b>5,253</b>	<b>49.7%</b>	<b>39.3%</b>
<b>PT, OT, ST services (including inpatient rehab)</b>	<b>77</b>	<b>1.1%</b>	<b>65</b>	<b>0.6%</b>	<b>-15.6%</b>
<b>Skilled nursing facility</b>	<b>15</b>	<b>0.2%</b>	<b>35</b>	<b>0.3%</b>	<b>133.3%</b>
<b>Durable medical equipment</b>	<b>143</b>	<b>2.0%</b>	<b>196</b>	<b>1.9%</b>	<b>37.1%</b>
<b>Dental</b>	<b>1,554</b>	<b>21.8%</b>	<b>2,160</b>	<b>20.4%</b>	<b>39.0%</b>
<b>Home health services</b>	<b>1</b>	<b>0.0%</b>	<b>2</b>	<b>0.01%</b>	<b>100.0%</b>
<b>Obesity, IVF, Podiatry, Hearing and Vision</b>	<b>198</b>	<b>2.8%</b>	<b>483</b>	<b>4.6%</b>	<b>144.0%</b>
<b>Total</b>	<b>7,119</b>		<b>10,577</b>		<b>48.6%</b>

Table 3 describes how the number of grievances received by carriers compares to the number of adverse decisions that carriers made in 2020 and 2023. Grievances decreased as a percentage of adverse decisions from 2020 to 2023 (9.6% to 7.4%), in all categories with exception of durable medical equipment, dental care services, and home health services.

**Table 3: Grievances as a percent of adverse decisions**

<b>MIA Category/Type of Service</b>	<b>2020</b>	<b>MIA Category/Type of Service</b>	<b>2023</b>
<b>Inpatient hospital services</b>	<b>15.2%</b>	<b>Inpatient hospital services</b>	<b>7.2%</b>
<b>Emergency room services</b>	<b>11.8%</b>	<b>Emergency room services</b>	<b>13.9%</b>
<b>Mental health services</b>	<b>15.1%</b>	<b>Mental health services</b>	<b>10.6%</b>
<b>Physician services</b>	<b>13.1%</b>	<b>Physician services</b>	<b>2.6%</b>
<b>Laboratory, radiology services</b>	<b>5.9%</b>	<b>Laboratory, radiology services</b>	<b>5.2%</b>
<b>Pharmacy services</b>	<b>10.4%</b>	<b>Pharmacy services</b>	<b>8.4%</b>
<b>PT, OT, ST services (including inpatient rehab)</b>	<b>2.3%</b>	<b>PT, OT, ST services (including inpatient rehab)</b>	<b>1.8%</b>
<b>Skilled nursing facility</b>	<b>48.4%</b>	<b>Skilled nursing facility</b>	<b>25.9%</b>
<b>Durable medical equipment</b>	<b>10.0%</b>	<b>Durable medical equipment</b>	<b>11.7%</b>
<b>Dental</b>	<b>8.8%</b>	<b>Dental</b>	<b>12.9%</b>
<b>Home health services</b>	<b>0.6%</b>	<b>Home health services</b>	<b>1.7%</b>
<b>Obesity, IVF, Podiatry, Hearing and Vision</b>	<b>40.7%</b>	<b>Obesity, IVF, Podiatry, Hearing and Vision</b>	<b>18.3%</b>
<b>Total</b>	<b>9.6%</b>	<b>Total</b>	<b>7.4%</b>

Table 4 compares how often carriers upheld their original decisions in 2020 and 2023. More detailed information about grievance decisions for each carrier may be found in Appendices 2 and 3. Carriers upheld adverse decisions 43.0% of the time in 2020 and compared to 46.5% in 2023, indicating that carriers were slightly more likely to uphold an adverse decision in 2023 than in 2020. In 2019, carriers upheld adverse decisions 44.7 % of the time.

**Table 4: Grievance Decision**

	<b>2020</b>		<b>2023</b>	
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
<b>Carrier upheld adverse decision</b>	<b>3,062</b>	<b>43.0%</b>	<b>4,918</b>	<b>46.5%</b>
<b>Carrier overturned adverse decision</b>	<b>3,804</b>	<b>53.4%</b>	<b>5,271</b>	<b>49.8%</b>
<b>Carrier modified original adverse decision</b>	<b>253</b>	<b>3.6%</b>	<b>388</b>	<b>3.7%</b>
<b>Total</b>	<b>7,119</b>	<b>100.0%</b>	<b>10,577</b>	<b>100%</b>

## **Complaints**

Just as the numbers of adverse and grievance decisions increased between 2020 and 2023, so did the number of complaints filed with this Administration during that same time frame. The Administration received 772 complaints in 2020 compared to 956 complaints received in 2023, representing an increase of 23.8 percent. While it is difficult to determine the exact cause for the increase in the number of complaints filed, it is important to note that, in 2023, the Administration increased its social media presence along with consumer outreach efforts in an attempt to improve consumer awareness of the appeals and grievance process in Maryland. For example, a podcast on the MIA website regarding “medical necessity and emergency appeals” received over 1,207 views. Consumer complaints are up as compared to the same time in 2022 (853 in 2022 to 956 in 2023), and the number of complaints received in 2024 is projected to exceed the number of complaints received in 2023.

As summarized in Table 5, 31.9% of the complaints received in 2023 were outside of the Administration’s jurisdiction, compared to 27.8% of the complaints received in 2020. In 2019, 30.5 % of the complaints received were outside of the Administration’s jurisdiction. 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 2020, 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), 64.4% of the time. In 2023, complaint data indicates that the Administration reversed or modified the carrier’s grievance decision 69.7% of the time, representing an increase in reversals of 5.3%. 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 2020, the Administration recovered \$467,969 for complainants. By comparison, in 2023, the Administration recovered \$1,298,418 for complainants. In 2019, the Administration recovered \$718,198 for consumers of insurance in Maryland. Since the enactment of the Appeals and Grievance law, the Administration has recovered more than \$14 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 2020, the Administration received 39 complaints involving State of Maryland employees regarding the denial based on medical necessity. By comparison, in 2023, the Administration received 66 complaints involving State of Maryland employees regarding a denial based on medical necessity. In 2019, the Administration received 54 complaints filed by State of Maryland employees. Table 5 describes how the number of complaints filed with the Administration in 2020 compares to the number of complaints filed in 2023. The number of complaints received by the Administration increased from 2020 to 2023 (772 to 956), representing an

increase of 23.8%.

**Table 5: Complaints**

	<b>2020</b>	<b>2023</b>	<b>Percent Change</b>
<b>Total complaints received</b>	<b>772</b>	<b>956</b>	<b>23.8%</b>
<b>No Jurisdiction</b>	<b>215</b>	<b>305</b>	<b>41.9%</b>
<b>Complaint withdrawn</b>	<b>5</b>	<b>6</b>	<b>0.2%</b>
<b>Insufficient Information to perform investigation</b>	<b>77</b>	<b>109</b>	<b>41.6%</b>
<b>No action required</b>	<b>137</b>	<b>175</b>	<b>27.7%</b>
<b>Referred to HEAU</b>	<b>35</b>	<b>44</b>	<b>25.7%</b>
<b>Complaints investigated by MIA</b>	<b>303</b>	<b>317</b>	<b>46.2%</b>
<b>Percent of total complaints investigated by the MIA</b>	<b>39.2%</b>	<b>33.2%</b>	<b>-15.3%</b>
<b>Number of complaints carrier or MIA reversed or modified grievance decisions</b>	<b>195</b>	<b>221</b>	<b>13.3%</b>
<b>Percent of total complaints investigated by MIA where carrier or MIA reversed or modified grievance decisions</b>	<b>64.4%</b>	<b>69.7%</b>	<b>5.3%</b>

## **Conclusion**

Carriers rendered 109,123 adverse decisions in 2023 compared to 74,361 in 2020, representing an increase of 46.7% over the four-year period. Pharmacy services accounted for the highest number of adverse decisions rendered during the period between 2020 and 2023, adverse decisions for pharmacy services increased by 72.2% from 2020 to 2023, (36,132 in 2020 to 62,210 in 2023), while the number of adverse decisions for dental services decreased by 4.8% from 2020 to 2023, (17,576 in 2020 to 16,732 in 2023).

Carriers received 7,119 grievances in 2020, compared to 10,577 received in 2023, representing an increase of 48.6%. In 2020, the largest number of grievances reported involved pharmacy services and dental care services. In 2023, again, the highest number of grievances reported were for pharmacy services and dental care services. Some of the

largest percentage decreases in grievances reported by carriers involved inpatient hospital services along with mental health services.

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 2020, the Administration recovered \$467,969 for complainants. By comparison, in 2023, the Administration recovered \$1,298,418 for complainants when the carrier's grievance decisions was either reversed for modified. Since the enactment of the Appeals and Grievance law, the Administration has recovered over \$14 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.	526	0.4%	0	0.0%	0	0.0%
Aetna Health Inc. ( a Pennsylvania corporation )	152	0.1%	59	38.8%	0	0.0%
Aetna Life Insurance Company	310	0.2%	147	47.4%	0	0.0%
Alpha Dental Programs, Inc.	7	0.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp.	432	0.3%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	30,314	21.1%	24	0.1%	9	0.0%
CareFirst of Maryland, Inc.	11,231	7.8%	5	0.0%	0	0.0%
CIGNA Dental Health of Maryland, Inc.	43	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	19,639	13.7%	322	1.6%	172	0.9%
Connecticut General Life Insurance Company	1	0.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	35	0.0%	0	0.0%	0	0.0%
Dental Network, Inc. The	5	0.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	2,765	1.9%	0	0.0%	0	0.0%
Golden Rule Insurance Company	8	0.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Services, Inc.	8,563	6.0%	3	0.0%	7	0.1%
Guardian Life Insurance Company of America	1,307	0.9%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	27	0.0%	1	3.7%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	1,707	1.2%	323	18.9%	0	0.0%
Kaiser Permanente Insurance Company	9	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company, The	83	0.1%	0	0.0%	0	0.0%
Lincoln Life and Annuity Company of New York	3	0.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	1,093	1.0%	11	1.0%	0	0.0%
Metropolitan Life Insurance Company	719	0.5%	0	0.0%	0	0.0%
National Health Life Insurance Company	1	0.0%	1	100.0%	0	0.0%
Optimum Choice, Inc.	2,929	2.7%	81	2.8%	5	0.2%

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**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	1,017	0.7%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	27	0.0%	0	0.0%	0	0.0%
Standard Insurance Company	284	0.2%	0	0.0%	0	0.0%
Starmount Life Insurance Company	5	0.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	644	0.4%	0	0.0%	0	0.0%
United Concordia Insurance Company	618	0.4%	0	0.0%	0	0.0%
United of Omaha Life Insurance Company	469	0.3%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	22,492	20.6%	514	2.3%	5	0.0%
UnitedHealthcare of the Mid-Atlantic, Inc.	1,421	1.3%	20	1.4%	1	0.1%
Wellfleet Group LLC	229	0.2%	27	11.8%	0	0.0%
Wellfleet Insurance Company	8	0.0%	1	12.5%	0	0.0%
Total	109,123	100%	1,539	1.4%	199	0.2%



**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 )	6	3.9%	54	35.5%	0	0.0%
Aetna Life Insurance Company	10	3.2%	64	20.6%	9	2.9%
Alpha Dental Programs, Inc.	0	0.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	222	0.7%	1,029	3.4%	6,118	20.2%
CareFirst of Maryland, Inc.	37	0.3%	209	1.9%	622	5.5%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	44	0.2%	1,021	5.2%	4,649	23.7%
Connecticut General Life Insurance Company	0	0.0%	0	0.0%	1	100.0%
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%
Dominion Dental Services, Inc.	0	0.0%	0	0.0%	0	0.0%
Golden Rule Insurance Company	2	25.0%	2	25.0%	2	25.0%
Group Hospitalization and Medical Services, Inc.	39	0.5%	274	3.2%	682	8.0%
Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	0	0.0%	3	11.1%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	223	13.1%	186	10.9%	18	1.1%
Kaiser Permanente Insurance Company	0	0.0%	1	11.1%	7	77.8%
Lincoln National Life Insurance Company, The	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%
MAMSI Life and Health Insurance Company	3	0.3%	91	8.3%	55	5.0%
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.	0	0.0%	207	7.1%	783	26.7%
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	64	0.3%	1,243	5.5%	3,493	15.5%
UnitedHealthcare of the Mid-Atlantic, Inc.	2	0.1%	50	3.5%	174	12.2%
Wellfleet Group LLC	0	0.0%	15	6.6%	18	7.9%
Wellfleet Insurance Company	0	0.0%	0	0.0%	3	37.5%
<b>Total</b>	<b>652</b>	<b>0.6%</b>	<b>4,449</b>	<b>4.1%</b>	<b>16,634</b>	<b>15.2%</b>

**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 )	14	9.2%	3	2.0%	5	3.3%
Aetna Life Insurance Company	29	9.4%	4	1.3%	12	3.9%
Alpha Dental Programs, Inc.	0	0.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	22,110	72.9%	88	0.3%	13	0.0%
CareFirst of Maryland, Inc.	9,786	87.1%	8	0.1%	1	0.0%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	9,703	49.4%	3,234	16.5%	3	0.0%
Connecticut General Life 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%
Dominion Dental Services, Inc.	0	0.0%	0	0.0%	0	0.0%
Golden Rule Insurance Company	2	25.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Services, Inc.	7,197	84.0%	7	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.	22	1.3%	154	9.0%	96	5.6%
Kaiser Permanente Insurance Company	0	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company, The	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%
MAMSI Life and Health Insurance Company	842	77.0%	5	0.5%	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.	1,462	49.9%	36	1.2%	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	9,700	43.5%	44	0.2%	4	0.0%
UnitedHealthcare of the Mid-Atlantic, Inc.	1,127	79.3%	9	0.6%	0	0.0%
Wellfleet Group LLC	124	54.1%	36	15.7%	0	0.0%
Wellfleet Insurance Company	2	25.0%	2	25.0%	0	0.0%
<b>Total</b>	<b>62,210</b>	<b>57.0%</b>	<b>3,630</b>	<b>3.3%</b>	<b>135</b>	<b>0.1%</b>

**APPENDIX 1  
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. DENTAL		K. HOME HEALTH SERVICES		L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Dental, Inc.	0	0.0%	526	100.0%	0	0.0%	0	0.0%
Aetna Health Inc. ( a Pennsylvania corporation )	0	0.0%	0	0.0%	1	0.7%	10	6.6%
Aetna Life Insurance Company	3	1.0%	0	0.0%	3	1.0%	29	9.4%
Alpha Dental Programs, Inc.	0	0.0%	7	100.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp.	0	0.0%	432	100.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	662	2.2%	7	0.0%	13	0.0%	19	0.1%
CareFirst of Maryland, Inc.	135	1.2%	424	3.8%	2	0.0%	2	0.0%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	43	100.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	29	0.1%	391	2.0%	47	0.2%	24	0.1%
Connecticut General Life Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	0	0.0%	35	100.0%	0	0.0%	0	0.0%
Dental Network, Inc. The	0	0.0%	5	100.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	0	0.0%	2,765	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 Hospitalization and Medical Serv. Inc.	141	1.6%	209	2.4%	1	0.0%	3	0.0%
Guardian Life Insurance Company of America	0	0.0%	1,307	100.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	4	14.8%	0	0.0%	1	3.7%	18	66.7%
Kaiser Foundation Health Plan Mid-Atlantic States, Inc.	338	19.8%	15	0.9%	13	0.8%	319	18.7%
Kaiser Permanente Insurance Company	1	11.1%	0	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company, The	0	0.0%	3	100.0%	0	0.0%	0	0.0%
Lincoln Life and Annuity Company of New York	0	0.0%	83	100.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	17	1.6%	38	3.5%	2	0.2%	29	2.7%
Metropolitan Life Insurance Company	0	0.0%	719	100.0%	0	0.0%	0	0.0%
National Health Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	44	1.5%	170	5.8%	7	0.2%	133	4.5%

**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%	1,017	100.0%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	0	0.0%	27	100.0%	0	0.0%	0	0.0%
Standard Insurance Company	0	0.0%	284	100.0%	0	0.0%	0	0.0%
Starmount Life Insurance Company	0	0.0%	5	100.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	644	100.0%	0	0.0%	0	0.0%
United Concordia Insurance Company	0	0.0%	618	100.0%	0	0.0%	0	0.0%
United of Omaha Life Insurance Company	0	0.0%	469	100.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	285	1.3%	6,482	28.8%	20	0.1%	548	2.4%
UnitedHealthcare of the Mid-Atlantic, Inc.	9	0.6%	7	0.5%	1	0.1%	21	1.5%
Wellfleet Group LLC	0	0.0%	0	0.0%	9	3.9%	0	0.0%
Wellfleet Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>1.668</b>	<b>1.5%</b>	<b>16,732</b>	<b>15.3%</b>	<b>120</b>	<b>0.1%</b>	<b>1,155</b>	<b>1.1%</b>

	<b>APPENDIX 2</b> <b>GRIEVANCE DECISIONS BY CARRIER</b>						
NAIC#	COMPANY NAME	GRIEVANCES FILED		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
		COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
95109	Aetna Health Inc. ( a Pennsylvania corporation)	246	2.3%	15	6.1%	5	2.0%
60054	Aetna Life Insurance Company	279	2.6%	30	10.8%	12	4.3%
61301	Ameritas Life Insurance Corp.	282	2.7%	0	0.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	2,955	27.9%	17	0.6%	5	0.2%
47058	CareFirst of Maryland, Inc.	1,136	10.7%	1	0.1%	0	0.0%
61832	Chesapeake Life Insurance Company	2	0.0%	0	0.0%	0	0.0%
67369	CIGNA Dental Health of Maryland, Inc.	3	0.0%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Insurance Company	610	5.8%	11	1.8%	0	0.0%
81396	Delta Dental Insurance Company	2	0.0%	0	0.0%	0	0.0%
54798	Delta Dental of Pennsylvania	13	0.1%	0	0.0%	0	0.0%
73474	Dentegra Insurance Company	1	0.0%	0	0.0%	0	0.0%
95657	Dominion Dental Services, Inc.	273	2.6%	0	0.0%	0	0.0%
62286	Golden Rule Insurance Company	4	0.0%	0	0.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	921	8.7%	2	0.2%	0	0.0%
64246	Guardian Life Insurance Company of America	732	6.9%	0	0.0%	0	0.0%
	Johns Hopkins HealthCare LLC	3	0.0%	0	0.0%	2	66.7%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	97	0.9%	9	9.3%	1	1.0%
60053	Kaiser Permanente Insurance Company	4	0.0%	3	75.0%	0	0.0%
60321	MAMSI Life and Health Ins Company	101	1.0%	0	0.0%	0	0.0%
65978	Metropolitan Life Insurance Company	55	0.5%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	684	6.5%	5	0.7%	2	0.3%
61271	Principal Life Insurance Company	44	0.4%	0	0.0%	0	0.0%
68241	Prudential Insurance Company of America	1	0.0%	0	0.0%	0	0.0%
68381	Reliance Standard Life Insurance Company	3	0.0%	0	0.0%	0	0.0%

	<b>APPENDIX 2</b> <b>GRIEVANCE DECISIONS BY CARRIER</b>						
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	58	0.5%	0	0.0%	0	0.0%
68985	Starmount Life Insurance Company	12	0.1%	0	0.0%	0	0.0%
80802	Sun Life Assurance Company of Canada	37	0.3%	0	0.0%	0	0.0%
85766	United Concordia Insurance Company	252	2.4%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	1,661	15.7%	6	0.4%	0	0.0%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	56	0.5%	1	1.8%	0	0.0%
	Wellfleet Group LLC	48	0.5%	4	8.3%	0	0.0%
32280	Wellfleet Insurance Company	2	0.0%	0	0.0%	0	0.0%
	<b>TOTAL</b>	<b>10,577</b>	<b>100%</b>	<b>104</b>	<b>1.0%</b>	<b>27</b>	<b>0.3%</b>



	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
95109	Aetna Health Inc. ( a Pennsylvania corporation )	4	1.6%	91	37.0%	49	19.9%
60054	Aetna Life Insurance Company	5	1.8%	84	30.1%	47	16.8%
61301	Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	1	0.0%	156	5.3%	418	14.1%
47058	CareFirst of Maryland, Inc.	0	0.0%	3	0.3%	31	2.7%
61832	Chesapeake Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
48119	CIGNA Dental Health of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Insurance Company	22	3.6%	62	10.2%	207	33.9%
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%	3	75.0%	1	25.0%
53007	Group Hospitalization and Medical Services, Inc.	1	0.1%	37	4.0%	63	6.8%
64246	Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
	Johns Hopkins HealthCare LLC	0	0.0%	1	33.3%	0	0.0%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	13	13.4%	26	26.8%	2	2.1%
60053	Kaiser Permanente Insurance Company	0	0.0%	1	25.0%	0	0.0%
60321	MAMSI Life and Health Insurance Company	1	1.0%	3	3.0%	33	32.7%
65978	Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	1	0.1%	73	10.7%	102	14.9%
61271	Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
68241	Prudential Insurance Company of America	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%

	<b>APPENDIX 2</b> <b>GRIEVANCE DECISIONS BY</b> <b>CARRIER</b>						
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%
79413	UnitedHealthcare Insurance Company	19	1.1%	108	6.5%	539	32.5%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	0	0.0%	2	3.6%	28	50.0%
	Wellfleet Group LLC	2	4.2%	8	16.7%	3	6.3%
32280	Wellfleet Insurance Company	0	0.0%	1	50.0%	0	0.0%
	<b>TOTAL</b>	<b>69</b>	<b>0.7%</b>	<b>659</b>	<b>6.2%</b>	<b>1,524</b>	<b>14.4%</b>

	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
95109	Aetna Health Inc. ( a Pennsylvania corporation )	79	32.1%	1	0.4%	1	0.4%
60054	Aetna Life Insurance Company	77	27.6%	14	5.0%	0	0.0%
61301	Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	2,198	74.4%	12	0.4%	19	0.6%
47058	CareFirst of Maryland, Inc.	1,050	92.4%	0	0.0%	0	0.0%
61832	Chesapeake Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
48119	CIGNA Dental Health of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Insurance Company	239	39.2%	19	3.1%	2	0.3%
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%
53007	Group Hospitalization and Medical Services, Inc.	736	79.9%	2	0.2%	1	0.1%
64246	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%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	5	5.2%	11	11.3%	6	6.2%
60053	Kaiser Permanente Insurance Company	0	0.0%	0	0.0%	0	0.0%
60321	MAMSI Life and Health Insurance Company	45	44.6%	0	0.0%	0	0.0%
65978	Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	272	39.8%	3	0.4%	3	0.4%
61271	Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
68241	Prudential Insurance Company of Americaa	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%

	<b>APPENDIX 2</b> <b>GRIEVANCE DECISIONS BY</b> <b>CARRIER</b>						
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%
79413	UnitedHealthcare Insurance Company	505	30.4%	3	0.2%	3	0.2%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	16	28.6%	0	0.0%	0	0.0%
	Wellfleet Group LLC	30	62.5%	0	0.0%	0	0.0%
32280	Wellfleet Insurance Company	1	50.0%	0	0.0%	0	0.0%
	<b>TOTAL</b>	<b>5,253</b>	<b>49.7%</b>	<b>65</b>	<b>0.6%</b>	<b>35</b>	<b>0.3%</b>

**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
95109	Aetna Health Inc. ( a Pennsylvania corporation )	1	0.4%	0	0.0%	0	0.0%
60054	Aetna Life Insurance Company	0	0.0%	4	1.4%	0	0.0%
61301	Ameritas Life Insurance Corp.	0	0.0%	282	100.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	119	4.0%	4	0.1%	1	0.0%
47058	CareFirst of Maryland, Inc.	4	0.4%	47	4.1%	0	0.0%
61832	Chesapeake Life Insurance Company	0	0.0%	2	100.0%	0	0.0%
48119	CIGNA Dental Health of Maryland, Inc.	0	0.0%	3	100.0%	0	0.0%
67369	CIGNA Health and Life Insurance Company	0	0.0%	48	7.9%	0	0.0%
81396	Delta Dental Insurance Company	0	0.0%	2	100.0%	0	0.0%
54798	Delta Dental of Pennsylvania	0	0.0%	13	100.0%	0	0.0%
73474	Dentegra Insurance Company	0	0.0%	1	100.0%	0	0.0%
95657	Dominion Dental Services, Inc.	0	0.0%	273	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.	18	2.0%	59	6.4%	0	0.0%
64246	Guardian Life Insurance Company of America	0	0.0%	732	100.0%	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.	9	9.3%	3	3.1%	0	0.0%
60053	Kaiser Permanente Insurance Company	0	0.0%	0	0.0%	0	0.0%
60321	MAMSI Life and Health Insurance Company	1	1.0%	0	0.0%	0	0.0%
65978	Metropolitan Life Insurance Company	0	0.0%	55	100.0%	0	0.0%
96940	Optimum Choice, Inc.	5	0.7%	0	0.0%	1	0.1%
61271	Principal Life Insurance Company	0	0.0%	44	100.0%	0	0.0%
68241	Prudential Insurance Company of America	0	0.0%	0	0.0%	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%	58	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%	12	100.0%	0	0.0%
80802	Sun Life Assurance Company of Canada	0	0.0%	37	100.0%	0	0.0%
85766	United Concordia Insurance Company	0	0.0%	252	100.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	35	2.1%	226	13.6%	0	0.0%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	3	5.4%	0	0.0%	0	0.0%
	Wellfleet Group LLC	1	2.1%	0	0.0%	0	0.0%
32280	Wellfleet Insurance Company	0	0.0%	0	0.0%	0	0.0%
	<b>TOTAL</b>	<b>196</b>	<b>1.9%</b>	<b>2,160</b>	<b>20.4%</b>	<b>2</b>	<b>0.1%</b>

**APPENDIX 2  
GRIEVANCE DECISIONS BY CARRIER**

NAIC#	COMPANY NAME	L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
		NUMBER	% TOTAL
95109	Aetna Health Inc. ( a Pennsylvania corporation )	0	0.0%
60054	Aetna Life Insurance Company	6	2.2%
61301	Ameritas Life Insurance Corp.	0	0.0%
96202	CareFirst BlueChoice, Inc.	5	0.2%
47058	CareFirst of Maryland, Inc.	0	0.0%
62832	Chesapeake	0	0.0%
48119	CIGNA Dental Health of Maryland, Inc.	0	0.0%
67369	CIGNA Health and Life Insurance Company	0	0.0%
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%
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.	12	12.4%
60053	Kaiser Permanente Insurance Company	0	0.0%
60321	MAMSI Life & Health Insurance Company	18	17.8%
65978	Metropolitan Life Insurance Company	0	0.0%
96940	Optimum Choice, Inc.	217	31.7%
61271	Principal Life Ins. Company	0	0.0%
68241	Prudential Insurance Company of America	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%
79413	UnitedHealthcare Insurance Company	217	13.1%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	6	10.7%
	Wellfleet Group LLC	0	0.0%
32280	Wellfleet Insurance Company	0	0.0%
	<b>TOTAL</b>	<b>483</b>	<b>4.6%</b>



**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
95109	Aetna Health Inc. ( a Pennsylvania corporation )	246	2.3%	122	49.6%	116	47.2%	8	3.3%
60054	Aetna Life Insurance Company	279	2.6%	176	63.1%	96	34.4%	7	2.5%
61301	Ameritas Life Insurance Corp.	282	2.7%	151	53.5%	94	33.3%	37	13.1%
96202	CareFirst BlueChoice, Inc.	2,955	27.9%	1,306	44.2%	1,647	55.7%	2	0.1%
47058	CareFirst of Maryland, Inc.	1,136	10.7%	412	36.3%	722	63.6%	2	0.2%
61832	Chesapeake Life Ins. Company	2	0.0%	1	50.0%	1	50.0%	0	0.0%
48119	CIGNA Dental of Maryland, Inc.	3	0.0%	3	100.0%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Ins. Co.	610	5.8%	316	51.8%	286	46.9%	8	1.3%
81396	Delta Dental Ins. Company	2	0.0%	1	50.0%	1	50.0%	0	0.0%
54798	Delta Dental of Pennsylvania	13	0.1%	7	53.8%	6	46.2%	0	0.0%
73474	Dentegra Insurance Company	1	0.0%	1	100.0%	0	0.0%	0	0.0%
95657	Dominion Dental Services, Inc.	273	2.6%	194	71.1%	75	27.5%	4	1.5%
62286	Golden Rule Insurance Co.	4	0.0%	4	100.0%	0	0.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	921	8.7%	370	40.2%	550	59.7%	1	0.1%
64246	Guardian Life Insurance Company of America	732	6.9%	400	54.6%	134	18.3%	198	27.0%
	Johns Hopkins HealthCare LLC	3	0.0%	2	66.7%	1	33.3%	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	97	0.9%	66	68.0%	31	32.0%	0	0.0%
60053	Kaiser Permanente Insurance Co.	4	0.0%	4	100.0%	0	0.0%	0	0.0%
60321	MAMSI Life and Health Ins. Co.	101	1.0%	47	46.5%	50	49.5%	4	4.0%
65978	Metropolitan Life Ins. Company	55	0.5%	16	29.1%	27	49.1%	12	21.8%
96940	Optimum Choice, Inc.	684	6.5%	379	55.4%	291	42.5%	14	2.0%
61271	Principal Life Insurance Company	44	0.4%	35	79.5%	4	9.1%	5	11.4%
68241	Prudential Ins. Co. of America	1	0.0%	0	0.0%	1	100.0%	0	0.0%
68381	Reliance Standard Life Ins. Co.	3	0.0%	3	100.0%	0	0.0%	0	0.0%
69019	Standard Insurance Company	58	0.5%	24	41.4%	28	48.3%	6	10.3%
68985	Starmount Life Insurance Co.	12	0.1%	10	83.3%	2	16.7%	0	0.0%
80802	Sun Life Assurance Co. of Canada	37	0.3%	24	64.9%	11	29.7%	2	5.4%
85766	United Concordia Insurance Co.	252	2.4%	98	38.9%	128	50.8%	26	10.3%
79413	UnitedHealthcare Insurance Co.	1,661	15.7%	683	41.1%	926	55.7%	52	3.1%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	56	0.5%	36	64.3%	20	35.7%	0	0.0%
	Wellfleet Group LLC	48	0.5%	26	54.2%	22	45.8%	0	0.0%
32280	Wellfleet Insurance Company	2	0.0%	1	50.0%	1	50.0%	0	0.0%
	<b>Total</b>	<b>10,577</b>	<b>100%</b>	<b>4,918</b>	<b>46.5%</b>	<b>5,271</b>	<b>49.8%</b>	<b>388</b>	<b>3.7%</b>

**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.	19	7	5	71.4%	2	28.6%	0	0.0%
47058	CareFirst of Maryland, Inc.	1	1	1	100.0%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Insurance Co.	10	4	3	75.0%	1	25.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	2	2	0	0.0%	2	100.0%	0	0.0%
60053	Kaiser Permanente Insurance Company	4	1	1	100.0%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	1	1	0	0.0%	1	100.0%	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 2023

\*\* Represents the number of grievances that were resolved in calendar year 2023.

	<b>APPENDIX 5</b> <b>TIME FRAME FOR RENDERING A GRIEVANCE DECISION BY CARRIER EMERGENCY CASES</b>				
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	23	27	56	16.4
53007	Group Hospitalization and Medical Services, Inc.	24	24	24	24
95639	Kaiser Foundation Health Plan-Mid-Atlantic	62.8	67.5	47	101
60321	MAMSI Life and Health Ins. Company	115	30	21	26
96940	Optimum Choice, Inc.	16	25	26	28
79413	UnitedHealthcare Insurance Company	31	57	41	30
95025	UnitedHealthcare of the Mid-Atlantic	16	17	29	14

**\*\* This report only includes carriers who had grievances which were considered emergency cases during calendar year 2023.**

**\* Reported as hours**

	<b>APPENDIX 6</b> <b>TIME FRAME FOR RENDERING A GRIEVANCE DECISION BY CARRIER, NON-EMERGENCY CASES</b>				
NAIC#	COMPANY NAME	NON-EMERGENCY CASES - RESOLUTION TIME*			
		1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
95109	Aetna Health Inc. ( a Pennsylvania corporation )	19.2	21.6	23	18.1
60054	Aetna Life Insurance Company	21.3	22.7	23	19.7
61301	Ameritas Life Insurance Corporation	26	21	16	13
96202	CareFirst BlueChoice, Inc.	29.9	21	18.2	21
47058	CareFirst of Maryland, Inc.	17.2	11.3	15.8	12.9
61832	Chesapeake Life Insurance Company	21	0	0	26
48119	CIGNA Dental Health of Maryland, Inc.	28	0	0	14
67369	CIGNA Health and Life Insurance Company	41.3	55.8	60.7	50.9
81396	Delta Dental Insurance Company	0	0	0	3
54798	Delta Dental of Pennsylvania	23	22.5	28	10
52007	Dental Network, Inc. The	0	72	6	0
73474	Dentegra Insurance Company	0	29	0	0
95657	Dominion Dental Services, Inc.	61	47.5	38.8	46.3
62286	Golden Rule Insurance Company	30	30	0	58
53007	Group Hospitalization and Medical Services, Inc.	28	23.3	13.3	16.1
64246	Guardian Life Insurance Company of America	3	3	3	3
	Johns Hopkins HealthCare LLC	16	0	0	0
95639	Kaiser Foundation Health Plan-Mid-Atlantic	25.3	30.3	21.8	24.6
60053	Kaiser Permanente Insurance Company	1.3	2.1	0	1
60321	MAMSI Life and Health Insurance Company	40	40	39	31
65978	Metropolitan Life Insurance Company	12.6	26	13	9
96940	Optimum Choice, Inc.	27	28	31	36
61271	Principal Life Insurance Company	16	15.5	15.1	6.7
68241	Prudential Insurance Company of America	0	27	0	0
68381	Reliance Standard Life Insurance Company	25	33	0	0
69019	Standard Insurance Company	24	24	14	10

	<b>APPENDIX 6</b> <b>TIME FRAME FOR RENDERING A GRIEVANCE DECISION BY CARRIER, NON-EMERGENCY CASES</b>				
NAIC#	COMPANY	NON-EMERGENCY CASES – RESOLUTION TIME*			
	NAME	1 <sup>ST</sup> Quarter	2 <sup>ND</sup> Quarter	3 <sup>RD</sup> Quarter	4 <sup>TH</sup> Quarter
68985	Starmount Life Insurance Company	15	10	21	16
80802	Sun Life Assurance Company of Canada	21	21	14	9.7
85766	United Concordia Insurance Company	5.4	5.4	5.4	3.4
79413	UnitedHealthcare Insurance Company	37	36	36	33
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	47	43	41	34
	Wellfleet Group LLC	27	0	14	30
32280	Wellfleet Insurance Company	1	1.0	0	0

\*Reported as Calendar Days 7

	<b>APPENDIX 7</b> <b>INTERNAL GRIEVANCES FILED CONSIDERED EMERGENCY CASES AS REPORTED BY CARRIER</b>								
NAIC#	COMPANY*  NAME	*TOTAL NUMBER OF "EMERGENCIES" CASES	"EMERGENCIES"	UPHELD		OVERTURNED		MODIFIED	
			OUTCOME**	Number	Percent	Number	Percent	Number	Percent
96202	CareFirst BlueChoice, Inc.	253	114	46	40.4%	68	59.6%	0	0.0%
47058	CareFirst of Maryland, Inc.	373	82	22	26.8%	60	73.2%	0	0.0%
67369	CIGNA Health and Life Ins. Co.	53	36	24	66.7%	12	33.3%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	301	61	30	49.2%	31	50.8%	0	0.0%
95639	Kaiser Fndtn Health Plan Mid-Atl	23	19	14	73.7%	5	26.3%	0	0.0%
60321	MAMSI Life and Health Ins. Co.	20	20	5	25.0%	14	70.0%	1	5.0%
96940	Optimum Choice, Inc.	169	163	74	45.4%	87	53.4%	2	1.2%
79413	UnitedHealthcare Ins. Company	336	250	58	23.2%	188	75.2%	4	1.6%
95025	UnitedHealthcare of the Mid-Atl	10	10	6	60.0%	4	40.0%	0	0.0%
	<b>Total</b>	<b>1,538</b>	<b>755</b>	<b>279</b>	<b>37.0%</b>	<b>469</b>	<b>62.1%</b>	<b>7</b>	<b>0.9%</b>

\*This chart only includes carriers who had grievances which were considered emergency cases during calendar year 2023.

\*\* Represents the number of grievances that were resolved in calendar year 2023.

**APPENDIX 8**  
**ADMINISTRATION COMPLAINTS**  
Appeals and Grievance Statistics  
Totals for Complaints Filed  
January 1, 2023 – December 31, 2023

<b>COMPLAINTS</b>	<b>956</b>
<b>NO JURISDICTION</b>	<b>305</b>
Referred to DBM/Cecil County	27
Referred to Department of Labor (ERISA plans)	142
Referred to Office of Personnel Management (Federal employee health benefit plans)	29
Referred to Medicaid	24
Referred to Medicare	29
Out of State Plan	54
<b>COMPLAINT WITHDRAWN</b>	<b>6</b>
<b>INSUFFICIENT INFORMATION TO COMPLETE INVESTIGATION</b>	<b>109</b>
<b>NO ACTION REQUIRED</b> (includes non-medical necessity complaint cases cloned to Life and Health Complaint Unit, duplicate files, inquiries)	<b>175</b>
<b>REFERRED TO HEALTH, EDUCATION AND ADVOCACY UNIT</b> (for complainants who had not exhausted the carrier's internal appeal process)	<b>44</b>
<b>MIA CONDUCTED INVESTIGATION</b>	<b>317</b>
MIA Decision Upheld Carrier	96
Carrier Reversed Itself During Investigation	128
MIA Reversed Carrier Decision	91
MIA Reversed Carrier Decision in Part and Upheld Carrier Decision in Part	2



**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	3	1%	0	0%	0	0%	0	0%	3	100%
Aetna Life Insurance Company	6	2%	1	17%	1	17%	1	17%	3	50%
CareFirst BlueChoice, Inc.	125	39%	46	37%	40	32%	0	0%	39	31%
CareFirst of Maryland, Inc.	56	18%	11	20%	18	32%	0	0%	27	48%
CIGNA Health and Life Insurance Co.	11	3%	4	36%	1	9%	0	0%	6	55%
Delta Dental of Pennsylvania	1	0%	1	100%	0	0%	0	0%	0	0%
Delta Dental Insurance Company	1	0%	1	100%	0	0%	0	0%	0	0%
Dominion Dental Services, Inc.	1	0%	1	100%	2	200%	0	0%	2	0%
Golden Rule Insurance Company	5	2%	1	20%	1	20%	0	0%	0	0%
Group Hospitalization and Medical Services, Inc.	1	0%	6	600%	6	600%	0	0%	8	800%
Guardian Life Ins. Co. of America	20	6%	5	25%	1	5%	0	0%	3	15%
Kaiser Foundation Health Plan Mid-Atlantic	9	3%	3	33%	1	11%	0	0%	4	44%
Kaiser Permanente Insurance Company	9	3%	0	0%	0	0%	0	0%	1	11%
MAMSI Life and Health Ins. Company	1	0%	0	0%	0	0%	0	0%	1	100%
Optimum Choice, Inc.	1	0%	2	200%	5	500%	0	0%	1	100%
United Concordia Dental Plans, Inc.	8	3%	0	0%	0	0%	0	0%	1	13%
United Concordia Insurance Company	1	0%	1	100%	0	0%	0	0%	0	0%
UnitedHealthcare Ins. Company	56	18%	12	21%	15	27%	0	0%	29	52%
UnitedHealthcare of the Mid-Atlantic, Inc.	1	0%	0	0%	0	0%	1	100%	0	0%
<b>TOTAL</b>	<b>317</b>	<b>100%</b>	<b>96</b>	<b>30%</b>	<b>91</b>	<b>29%</b>	<b>2</b>	<b>1%</b>	<b>128</b>	<b>40%</b>



**Administration Complaints (Continued)**

Type of Procedure	Carrier Code**	Total	Carrier Upheld by MIA		Carrier Reversed by MIA		Carrier Modified by MIA		Carrier Reversed Itself During Investigation	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Acupuncture	D	1	0	0%	0	0%	0	0%	1	100%
Air Ambulance	B	1	1	100%	0	0%	0	0%	0	0%
Cosmetic	D	1	1	100%	0	0%	0	0%	0	0%
Dental Care Services	J	27	13	48%	3	11%	0	0%	11	41%
Durable Medical Equipment	I	9	6	67%	1	11%	0	0%	2	22%
Experimental	D	11	7	64%	3	27%	0	0%	1	9%
Home Care Services	K	1	0	0%	0	0%	0	0%	1	100%
Hospitalization	A	1	0	0%	0	0%	0	0%	1	100%
In-Patient Rehabilitation Services	G	2	1	50%	1	50%	0	0%	0	0%
Lab, Imaging, Test Services	E	89	34	38%	42	47%	1	1%	12	13%
Mental Health/Substance (Inpatient) Services	C	1	0	0%	0	0%	0	0%	1	100%
Mental Health/Substance (Outpatient) Services	C	4	0	0%	0	0%	0	0%	4	100%
Opioid Use Disorders	F	2	0	0%	0	0%	0	0%	2	100%
Out Patient Services		2	1	50%	1	50%	0	0%	0	0%
Pharmacy Services/Formulary Issues	F	136	25	18%	33	24%	0	0%	78	57%
Physician Services	D	28	7	25%	7	25%	1	4%	13	46%
PT, OT, ST	G	1	0	0%	0	0%	0	0%	1	100%
<b>TOTAL</b>		<b>317</b>	<b>96</b>		<b>91</b>		<b>2</b>		<b>128</b>	

**INTENDED TO BE LEFT BLANK**