



MSAR #6
2019 Report on the Health Care
Appeals & Grievances Law

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Commissioner

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Background

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

When the Appeals and Grievances Law was enacted, the percentage of the population under the age of 65 with insured health benefits (42.8 percent) slightly exceeded the percentage of the population under the age of 65 with other employment based health benefits (37.9 percent). Other employment based health benefit plans include self-insured health benefit plans and the Federal Employees Health Benefit Plan (FEHBP). By 2019, the percentage of the population under the age of 65 with insured health benefits declined to 17.7 percent.¹

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

The Appeals and Grievances Law gives the Administration the authority to contract with an Independent Review Organization (hereinafter referred to as the “IRO”) to review these medical necessity complaints. When the Administration sends a complaint to an IRO for review, Maryland law requires that the review be performed by an unbiased provider in the same specialty as the area or areas appropriate to the subject of review. In addition, an IRO may not be a subsidiary of, or in any way be owned or controlled by, a health benefit plan, or a trade association of health benefit plans, or a trade association of health care providers. Based on the IRO’s medical opinion, the Administration reaches a decision. If the complainant remains dissatisfied with the Administration’s decision, he or she may make a written request for a hearing to challenge the Administration’s decision.²

¹ Maryland Insurance Administration Administration’s 2019 Report on the number of Insured and Self-Insured Lives.

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.

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 Grievances 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 2019, noting changes in certain areas since 2016 for nonprofit health services plans, insurers, and health maintenance organizations.

Adverse Decisions

Carriers rendered 78,730 adverse decisions in 2019 and 49,237 in 2016, representing an increase of 60.0 percent over the four-year period. Pharmacy services accounted for the majority of this increase. Adverse decisions for pharmacy services increased by 141.9 percent from 2016 to 2019 (13,732 in 2016 to 33,220 in 2019). Adverse decisions for dental services increased by 44 percent from 2016 to 2019 (12,310 in 2016 to 17,774 in 2019). Adverse decisions for physician services increased by 18.3 percent from 2016 to 2019 (5,993 in 2016 to 7,088 in 2019). Also, adverse decisions for the combined categories of physical therapy, occupational therapy and speech therapy increased by 368.3 from 878 in 2016 to 4,112 in 2019.

In 2019, three categories of services accounted for 80.1 percent of all adverse decisions: (1) pharmacy services, (2) dental services, and (3) the combined categories of laboratory, radiology services. In 2016, these same services accounted for 76.3 percent of all adverse decisions. In 2016, pharmacy services ranked first in terms of the percentage of all adverse decisions at 27.9 percent (13,732), while in 2019, again pharmacy services ranked first at 42.2 percent of all adverse decisions (33,220).

Over the years, policymakers have expressed concern about denials of emergency room services and mental health services. While the data provided by carriers indicate that there are still relatively few adverse decisions for these two types of services (0.0 percent and 1.0 percent of all adverse decisions in 2019, respectively), there has been a decrease in the number of adverse decisions for both emergency room services and mental health services from 2016 to 2019. Adverse decisions for emergency room services decreased by 90.6 percent from 2016 to 2019 (139 in 2016 to 13 in 2019). Adverse decisions for mental health services decreased by 30.7 percent from 2016 to 2019 (1,169 in 2016 to 810 in 2019).

Table 1 provides an overview of the number and type of adverse decisions carriers made in 2016 and 2019. More detailed information about adverse decisions made by each carrier is provided in Appendix 1 for 2019.

Table 1: Adverse Decisions

MIA Category/Type of Service	2016		2019		Percent Change 2016-2019
	Number	Percent	Number	Percent	
Inpatient hospital services	1,234	2.5%	1,288	1.6%	4.3%
Emergency room services	139	0.3%	13	0.0%	-90.6%
Mental health services	1,169	2.4%	810	1.0%	-30.7%
Physician services	5,993	12.2%	7,088	9.0%	18.3%
Laboratory, radiology services	11,523	23.4%	12,082	15.3%	4.8%
Pharmacy services	13,732	27.9%	33,220	42.2%	141.9%
PT, OT, ST services (including inpatient rehab)	878	1.8%	4,112	5.2%	368.3%
Skilled nursing facility	52	0.1%	30	0.0%	-42.3%
Durable medical equipment	1,145	2.3%	1,535	1.9%	34.0%
Dental	12,310	25.0%	17,774	22.6%	44.0%
Home health services	403	0.8%	204	0.3%	-49.4%
Obesity, IVF, Podiatry, Hearing and Vision	659	1.3%	574	0.7%	-12.9%
Total	49,237		78,730		60.0%

Grievance Decisions

In 2016, the largest number of grievances reported involved pharmacy services at 1,714, followed by the combined categories of laboratory, radiology services at 1,468, with

dental finishing third with 1,152 grievances reported. By comparison, in 2019, pharmacy services again ranked first with 3,528 grievances reported, while the combined categories of laboratory, radiology services ranked third with 1,081 grievances reported and dental ranked second with 2,155 grievances reported.

The number of grievances reported by carriers increased in four types of services, pharmacy, dental, inpatient hospital services and durable medical equipment. Grievances reported by carriers increased for pharmacy services (1,714 in 2016 to 3,528 in 2019), representing an increase of 105.8 percent. Grievances reported for dental services increased (1,152 in 2016 to 2,155 in 2019), representing an increase of 87.1 percent. Grievances reported for inpatient hospital services increased (137 in 2016 to 190 in 2019) representing an increase of 38.7 percent. Grievances report for durable medical equipment increased (126 in 2016 to 149 in 2019), representing an increase of 18.3 percent. Significant declines reported this same period involved three types of services, mental health services, the combined categories of laboratory, radiology services, and physician services. Grievances reported for mental health services decreased (136 in 2016 to 78 in 2019), representing a decrease of 42.6 percent. Grievances reported for the combined categories of laboratory, radiology services decreased (1,468 in 2016 to 1,081 in 2019), representing a decrease of 26.4 percent. Lastly, grievances reported for physician services decreased (660 in 2016 to 532 in 2019), representing a decrease of 19.4 percent. Please see table 2 for more information.

Table 2 on the following page provides an overview of the number and type of grievances carriers reviewed in 2016 and 2019. In 2016, there were 5,598 grievances, increasing to 8,006 in 2019, representing a 43.0 percent increase.

Table 2: Grievances

MIA Category/Type of Service	2016		2019		Percent Change 2016-2019
	Number	Percent	Number	Percent	
Inpatient hospital services	137	2.4%	190	2.4%	38.7%
Emergency room services	11	0.2%	22	0.3%	1.0%
Mental health services	136	2.4%	78	1.0%	-42.6%
Physician services	660	11.8%	532	6.6%	-19.4%
Laboratory, radiology services	1,468	26.2%	1,081	13.5%	-26.4%
Pharmacy services	1,714	30.6%	3,528	44.1%	105.8%
PT, OT, ST services (including inpatient rehab)	68	1.2%	79	1.0%	16.2%
Skilled nursing facility	13	0.2%	15	0.2%	15.4%
Durable medical equipment	126	2.3%	149	1.9%	18.3%
Dental	1,152	20.6%	2,155	26.9%	87.1%
Home health services	4	0.1%	4	0.0%	0.0%
Obesity, IVF, Podiatry, Hearing and Vision	109	1.9%	173	2.2%	58.7%
Total	5,598		8,006		43.0%

On the following page, Table 3 describes how the number of grievances received by carriers compares to the number of adverse decisions that carriers made in 2016 and 2019. Grievances decreased as a percentage of adverse decisions from 2016 to 2019 (11.4 percent to 10.2 percent). However, the differences varied according to the category of service. In 7 of the 12 categories, individuals were less likely to appeal an adverse decision in 2019 than in 2016, but in 5 of the 12 categories individuals were more likely to appeal the adverse decision in 2019.

Table 3: Grievances as a percent of adverse decisions

MIA Category/Type of Service	2016	MIA Category/Type of Service	2019
Inpatient hospital services	11.1%	Inpatient hospital services	2.4%
Emergency room services	7.9%	Emergency room services	0.3%
Mental health services	11.6%	Mental health services	1.0%
Physician services	11.0%	Physician services	6.6%
Laboratory, radiology services	12.7%	Laboratory, radiology services	13.5%
Pharmacy services	12.5%	Pharmacy services	44.1%
PT, OT, ST services (including inpatient rehab)	7.7%	PT, OT, ST services (including inpatient rehab)	1.0%
Skilled nursing facility	25.0%	Skilled nursing facility	0.2%
Durable medical equipment	11.0%	Durable medical equipment	1.9%
Dental	9.4%	Dental	26.9%
Home health services	1.0%	Home health services	0.0%
Obesity, IVF, Podiatry, Hearing and Vision	16.5%	Obesity, IVF, Podiatry, Hearing and Vision	2.2%
Total	11.4%	Total	10.2%

Table 4, below, compares how often carriers upheld their original decisions in 2016 and in 2019. More detailed information about grievance decisions for each carrier may be found in Appendices 2 and 3 for 2019. Carriers upheld adverse decisions 45.8 percent of the time in 2016 as compared to 44.7 percent in 2019, indicating that carriers were more likely to uphold an adverse decision in 2016 than in 2019.

Table 4: Grievance Decision

	2016		2019	
	Number	Percent	Number	Percent
Carrier upheld adverse decision	2,564	45.8%	3,579	44.7%
Carrier overturned adverse decision	2,697	48.2%	4,014	50.1%
Carrier modified original adverse decision	337	6.0%	413	5.2%
Total	5,598		8,006	

Complaints

While the number of adverse and grievance decisions increased between 2016 and 2019, the number of complaints filed with the Administration decreased in this same time period. The Administration received 1,038 in 2016 and 937 complaints in 2019, representing a decrease of 9.7 percent. As summarized in Table 5, 30.5 percent of the complaints received in 2019 were outside of the Administration's jurisdiction, as were 32.1 percent of the complaints received in 2016. These non-jurisdiction cases included complaints filed by individuals covered under Medicare, Medicaid, the Federal Employee Health Benefit Plan, employer group self-funded plans, and contracts subject to the laws of states other than Maryland.

In 2016, 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 percent of the time. In 2019, data indicates that the Administration reversed or modified the carrier's grievance decision (or the carrier reversed its own grievance decision during the course of the Administration's investigation) 62.9 percent of the time, representing a decrease in reversals of 5.7 percent. All of the reversals of the carriers' grievance decisions resulted in more benefits for Maryland consumers.

In 2019, the Administration issued 2 Orders and Consent Orders based on the medical necessity complaints it received and imposed \$2,500 in administrative penalties. During this same year, the Administration recovered \$718,198 for complainants. By comparison, in 2016, the Administration issued 8 Orders and Consent Orders based on the medical necessity complaints it received, and imposed \$16,500 in administrative penalties. During this same year, the Administration recovered \$1,015,681 for complainants. Since the enactment of the Appeals and Grievances law, the Administration has recovered just over \$11 million dollars (\$11,666,810) 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 2019, 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 586 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 the Administration in 2016 compares to the number of complaints filed in 2019.

Table 5: Complaints

	2016	2019	Percent Change
Total complaints received	1,038	937	-9.7%
No Jurisdiction	333	286	-14.1%
Complaint withdrawn	11	12	9.7%
Insufficient Information to perform investigation	91	66	-27.5%
No action required	106	143	34.9%
Referred to HEAU	68	61	-10.3%
Complaints investigated by MIA	429	369	-14.0%
Percent of total complaints investigated by the MIA	41.3%	39.4%	-4.6%
Number of complaints carrier or MIA reversed or modified grievance decisions	286	232	-18.9%
Percent of total complaints investigated by MIA where carrier or MIA reversed or modified grievance decisions	66.7%	62.9%	-5.7%

Conclusion

Between 2016 and 2019, the number of adverse decisions increased by 60.0 percent, while the number of medical necessity complaints investigated by the Administration decreased by 9.7 percent.

Carriers rendered 78,730 adverse decisions in 2019 and 49,237 in 2016, representing an increase of 60.0 percent over the four-year period. Between 2016 and 2019, there was a decrease in adverse decisions for the following five categories: (1) emergency room services; (2) mental health services; (3) skilled nursing facility; (4) home health services; and (5) the combined categories of obesity, IVF, podiatry, hearing and vision. Between 2016 and 2019, there was an increase in adverse decisions for the following seven categories: (1) inpatient hospital services; (2) physician services; (3) the combined categories of laboratory and radiology services; (4) pharmacy services; (5) the combined categories of physical therapy, occupational therapy and speech therapy services; (6) durable medical equipment; and (7) dental care services. Between 2016 and 2019, the largest decline in the number of adverse decisions was for emergency room services and the largest increase in number of adverse decisions was for pharmacy.

Grievances decreased as a percentage of adverse decisions from 2016 to 2019 (11.4 percent to 10.2 percent) suggesting that consumers were more likely to take advantage of

the carriers' internal grievance process in 2016 than in 2019. When consumers filed grievances regarding initial adverse decisions, carriers upheld their adverse decisions 45.8 percent of the time in 2016 as compared to 44.7 percent in 2019, indicating that carriers were more likely to uphold an adverse decision in 2016 than in 2019.

In 2019, the Administration achieved a carrier reversal percentage of 62.9 percent for complaints that were investigated by the Administration. In 2019, the Administration recovered \$718,198 for complainants under the Appeals and Grievances Law. Since the Appeals and Grievances Law was enacted by the General Assembly, the Administration has recovered over \$11 million dollars for complainants. The Appeals and Grievances Law remains an important protection for Maryland consumers, providing a fair, impartial, and balanced process for resolving disputes regarding the medical necessity of proposed or delivered health care services.

APPENDIX 1- ADVERSE DECISIONS BY CARRIER

COMPANY NAME	ADVERSE DECISIONS		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
	COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Dental, Inc.	576	0.7%	0	0.0%	0	0.0%
Aetna Health Inc. (a Pennsylvania corporation)	216	0.3%	98	45.4%	0	0.0%
Aetna Life Insurance Company	199	0.3%	93	46.7%	0	0.0%
Ameritas Life Insurance Corp.	145	0.2%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	20,323	25.8%	22	0.1%	9	0.0%
CareFirst of Maryland, Inc.	9,149	11.6%	4	0.0%	0	0.0%
CIGNA Dental Health of Maryland, Inc.	33	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	9,824	12.5%	208	2.1%	0	0.0%
Connecticut General Life Insurance Company	3	0.0%	0	0.0%	0	0.0%
Delta Dental Insurance Company	10	0.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	31	0.0%	0	0.0%	0	0.0%
Dentegra Insurance Company	2	0.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	374	0.5%	0	0.0%	0	0.0%
Golden Rule Insurance Company	23	0.0%	0	0.0%	0	0.0%
Group Dental Service of Maryland, Inc.	3,678	4.7%	0	0.0%	0	0.0%
Group Hospitalization and Medical Services, Inc.	7,674	9.7%	4	0.1%	2	0.0%
Guardian Life Insurance Company of America	878	1.1%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	68	0.1%	27	39.7%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	765	1.0%	18	2.4%	0	0.0%
Kaiser Permanente Insurance Company	74	0.1%	17	23.0%	0	0.0%
Lincoln Life and Annuity Company of New York	2	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company	163	0.2%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	1,843	2.3%	109	5.9%	1	0.1%
Metropolitan Life Insurance Company	471	0.6%	0	0.0%	0	0.0%
National Health Life Insurance Company	11	0.0%	3	27.3%	0	0.0%
Optimum Choice, Inc.	3,177	4.0%	181	5.7%	0	0.0%

APPENDIX 1-ADVERSE DECISIONS BY CARRIER

COMPANY NAME	ADVERSE DECISIONS		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
	COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
Philadelphia American Life Insurance Company	5	0.0%	0	0.0%	0	0.0%
Principal Life Insurance Company	440	0.6%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	8	0.0%	0	0.0%	0	0.0%
Standard Insurance Company	23	0.0%	0	0.0%	0	0.0%
Starmount Life Insurance Company	3	0.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	251	0.3%	0	0.0%	0	0.0%
Unicare Life and Health Insurance Company	2	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	520	0.7%	0	0.0%	0	0.0%
United Concordia Insurance Company	783	1.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	14,752	18.7%	469	3.2%	1	0.0%
UnitedHealthcare of the Mid-Atlantic, Inc.	2,231	2.8%	35	1.6%	0	0.0%
Total	78,730	100%	1,288	1.6%	13	0.0%

APPENDIX 1- ADVERSE DECISIONS BY CARRIER

COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Dental, Inc.	0	0.0%	0	0.0%	0	0.0%
Aetna Health Inc. (a Pennsylvania corporation)	5	2.3%	54	25.0%	0	0.0%
Aetna Life Insurance Company	6	3.0%	55	27.6%	0	0.0%
Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	317	1.6%	1,954	9.6%	2,282	11.2%
CareFirst of Maryland, Inc.	93	1.0%	395	4.3%	366	4.0%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	37	0.4%	279	2.8%	3,875	39.4%
Connecticut General Life Insurance Company	0	0.0%	0	0.0%	3	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%
Dentegra Insurance Company	0	0.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	0	0.0%	0	0.0%	0	0.0%
Golden Rule Insurance Company	5	21.7%	4	17.4%	14	60.9%
Group Dental Service of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Services, Inc.	124	1.6%	325	4.2%	351	4.6%
Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	1	1.5%	4	5.9%	20	29.4%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	62	8.1%	209	27.3%	29	3.8%
Kaiser Permanente Insurance Company	0	0.0%	28	37.8%	16	21.6%
Lincoln Life and Annuity Company of New York	0	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	17	0.9%	417	22.6%	272	14.8%
Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
National Health Insurance Company	0	0.0%	7	63.6%	0	0.0%
Optimum Choice, Inc.	22	0.7%	216	6.8%	527	16.6%
Philadelphia American Life Insurance Company	0	0.0%	5	100.0%	0	0.0%
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%
Unicare Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	0	0.0%	0	0.0%	0	0.0%
United Concordia Insurance Company	0	0.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	114	0.8%	2,027	13.7%	3,743	25.4%
UnitedHealthcare of the Mid-Atlantic, Inc.	7	0.3%	1,109	49.7%	584	26.2%
Total	810	1.0%	7,088	9.0%	12,082	15.3%

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)	55	25.5%	4	1.9%	0	0.0%
Aetna Life Insurance Company	40	20.1%	3	1.5%	2	1.0%
Ameritas Life Insurance Corp	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	14,183	69.8%	745	3.7%	10	0.0%
CareFirst of Maryland, Inc.	5,404	59.1%	115	1.3%	0	0.0%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	1,902	19.4%	2,973	30.3%	2	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%
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.	3,968	51.7%	114	1.5%	2	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.	1	0.1%	35	4.6%	7	0.9%
Kaiser Permanente Insurance Company	0	0.0%	9	12.2%	1	1.4%
Lincoln Life and Annuity Company of New York	0	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	794	43.1%	7	0.4%	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%	1	9.1%
Optimum Choice, Inc.	1,904	59.9%	47	1.5%	0	0.0%
Philadelphia American Life Insurance Company	0	0.0%	0	0.0%	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%
Unicare Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	0	0.0%	0	0.0%	0	0.0%
United Concordia Insurance Company	0	0.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	4,545	30.8%	56	0.4%	5	0.0%
UnitedHealthcare of the Mid-Atlantic, Inc.	424	19.0%	4	0.2%	0	0.0%
Total	33,220	42.2%	4,112	5.2%	30	0.0%

APPENDIX 1- ADVERSE DECISIONS BY CARRIER

COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. DENTAL		K. HOME HEALTH SERVICES		L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Dental, Inc.	0	0.0%	576	100.0%	0	0.0%	0	0.0%
Aetna Health Inc. (a Pennsylvania corporation)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Aetna Life Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp.	0	0.0%	145	100.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	560	2.8%	156	0.8%	81	0.4%	4	0.0%
CareFirst of Maryland, Inc.	60	0.7%	2,710	29.6%	2	0.0%	0	0.0%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	33	100.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	332	3.4%	116	1.2%	100	1.0%	0	0.0%
Connecticut General Life Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Delta Dental Insurance Company	0	0.0%	10	100.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	0	0.0%	31	100.0%	0	0.0%	0	0.0%
Dentegra Insurance Company	0	0.0%	2	100.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	0	0.0%	374	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%	3,678	100.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Serv. Inc.	90	1.2%	2,690	35.1%	2	0.0%	2	0.0%
Guardian Life Insurance Company of America	0	0.0%	878	100.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	1	1.5%	0	0.0%	0	0.0%	15	22.1%
Kaiser Foundation Health Plan Mid-Atlantic States, Inc.	115	15.0%	25	3.3%	3	0.4%	261	34.1%
Kaiser Permanente Insurance Company	3	41.1%	0	0.0%	0	0.0%	0	0.0%
Lincoln Life and Annuity Company of New York	0	0.0%	2	100.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company	0	0.0%	163	100.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	37	2.0%	170	9.2%	3	0.2%	16	0.9%
Metropolitan Life Insurance Company	0	0.0%	471	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	1.4%	151	4.8%	4	0.1%	81	2.5%
Philadelphia American Life Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%

APPENDIX 1- ADVERSE DECISIONS BY CARRIER

COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. DENTAL		K. HOME HEALTH SERVICES		L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Principal Life Insurance Company	0	0.0%	440	100.0%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	0	0.0%	8	100.0%	0	0.0%	0	0.0%
Standard Insurance Company	0	0.0%	23	100.0%	0	0.0%	0	0.0%
Starmount Life Insurance Company	0	0.0%	3	100.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	251	100.0%	0	0.0%	0	0.0%
Uicare Life and Health Insurance Company	0	0.0%	2	100.0%	0	0.0%	0	0.0%
Union Security Insurance Company	0	0.0%	520	100.0%	0	0.0%	0	0.0%
United Concordia Insurance Company	0	0.0%	783	100.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	258	1.7%	3,347	22.7%	9	0.1%	178	1.2%
UnitedHealthcare of the Mid-Atlantic, Inc.	35	1.6%	16	0.7%	0	0.0%	17	0.8%
Total	1,535	1.9%	17,774	22.6%	204	0.3%	574	0.7%

APPENDIX 2- GRIEVANCE DECISIONS BY CARRIER

NAIC#	COMPANY NAME	GRIEVANCES FILED		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
		COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	2	0.0%	2	100%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	344	4.3%	45	13.1%	3	0.9%
60054	Aetna Life Insurance Company	206	2.6%	32	15.5%	8	3.9%
61301	Ameritas Life Insurance Corp.	78	1.0%	0	0.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	2,072	25.9%	10	0.5%	2	0.1%
47058	CareFirst of Maryland, Inc.	996	12.4%	0	0.0%	0	0.0%
61832	Chesapeake Life Insurance Company	1	0.0%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Ins Company	508	6.3%	22	4.3%	0	0.0%
62146	Combined Insurance Company of America	1	0.0%	0	0.0%	0	0.0%
52007	Dental Network, Inc. The	40	0.5%	0	0.0%	0	0.0%
95657	Dominion Dental Services, Inc.	72	0.9%	0	0.0%	0	0.0%
62286	Golden Rule Insurance Company	15	0.2%	0	0.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	881	11.0%	2	0.2%	0	0.0%
64211	Guarantee Trust Life Insurance Company	2	0.0%	0	0.0%	2	100.0%
64246	Guardian Life Insurance Company of America	530	6.6%	0	0.0%	0	0.0%
	Johns Hopkins HealthCare LLC	160	2.0%	59	36.9%	0	0.0%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	39	0.5%	2	5.1%	0	0.0%
60053	Kaiser Permanente Insurance Company	14	0.2%	3	21.4%	0	0.0%
60321	MAMSI Life and Health Ins Company	129	1.6%	1	0.8%	0	0.0%
65978	Metropolitan Life Insurance Company	43	0.5%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	188	2.3%	7	3.7%	7	3.7%
67784	Philadelphia American Life Insurance Company	5	0.1%	0	0.0%	0	0.0%
61271	Principal Life Insurance Company	93	1.2%	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
86355	Standard Insurance Company	6	0.1%	0	0.0%	0	0.0%
68985	Starmount Life Insurance Company	4	0.0%	0	0.0%	0	0.0%
80802	Sun Life Assurance Company of Canada	18	0.2%	0	0.0%	0	0.0%
80314	Unicare Life and Health Insurance Company	1	0.0%	0	0.0%	0	0.0%
70408	Union Security Insurance Company	46	0.6%	0	0.0%	0	0.0%
85766	United Concordia Insurance Company	399	5.0%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	1,069	13.4%	5	0.5%	0	0.0%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	41	0.5%	0	0.0%	0	0.0%
	TOTAL	8,006	100%	190	2.4%	22	0.3%

APPENDIX 2- GRIEVANCE DECISIONS BY CARRIER							
NAIC#	COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES	
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	0	0.0%	136	39.5%	97	28.2%
60054	Aetna Life Insurance Company	2	1.0%	68	33.0%	44	21.4%
61301	Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	6	0.3%	89	4.3%	286	13.8%
47058	CareFirst of Maryland, Inc.	0	0.0%	10	1.0%	28	2.8%
61832	Chesapeake Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Insurance Company	22	4.3%	87	17.1%	147	28.9%
32146	Combined Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
52007	Dental Network, Inc. The	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	4	26.7%	1	6.7%	10	66.7%
53007	Group Hospitalization and Medical Services, Inc.	0	0.0%	25	2.8%	64	7.3%
64211	Guarantee Trust Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
64246	Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
	Johns Hopkins HealthCare LLC	0	0.0%	25	15.6%	58	36.3%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	3	7.7%	11	28.2%	3	7.7%
60053	Kaiser Permanente Insurance Company	0	0.0%	7	50.0%	2	14.3%
60321	MAMSI Life and Health Insurance Company	2	1.6%	7	5.4%	15	11.6%
65978	Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	6	3.2%	12	6.4%	24	12.8%
67784	Philadelphia American Life Insurance Company	0	0.0%	5	100.0%	0	0.0%
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%
80314	Unicare Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%

APPENDIX 2- GRIEVANCE DECISIONS BY CARRIER							
NAIC#	COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES	
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
70408	Union Security Insurance Company	0	0.0%	0	0.0%	0	0.0%
85766	United Concordia Insurance Company	0	0.0%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	31	2.9%	46	4.3%	293	27.4%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	2	4.9%	3	7.3%	10	24.4%
	TOTAL	78	1.0%	532	6.6%	1,081	13.5%

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	0	0.0%	0	0.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	47	13.7%	3	0.9%	1	0.3%
60054	Aetna Life Insurance Company	38	18.4%	2	1.0%	1	0.5%
61301	Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	1,573	75.9%	18	0.9%	0	0.0%
47058	CareFirst of Maryland, Inc.	709	71.2%	1	0.1%	4	0.2%
61832	Chesapeake Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Insurance Company	160	31.5%	36	7.1%	0	0.0%
62146	Combined Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
52007	Dental Network, Inc. The	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.	495	56.2%	0	0.0%	2	0.2%
64211	Guarantee Trust Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
64246	Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
	Johns Hopkins HealthCare LLC	0	0.0%	2	1.3%	0	0.0%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	1	2.6%	7	17.9%	4	10.3%
60053	Kaiser Permanente Insurance Company	0	0.0%	1	7.1%	1	7.1%
60321	MAMSI Life and Health Insurance Company	81	62.8%	1	0.8%	0	0.0%
65978	Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	92	48.9%	0	0.0%	1	0.5%
67784	Philadelphia American Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
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%
80314	Unicare Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
70408	Union Security Insurance Company	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%
79413	UnitedHealthcare Insurance Company	311	29.1%	8	0.7%	0	0.0%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	21	51.2%	0	0.0%	1	2.4%
	TOTAL	3,528	44.1%	79	1.0%	15	0.2%

APPENDIX 2-GRIEVANCE DECISIONS BY CARRIER							
NAIC#	COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. DENTAL		K. HOME HEALTH SERVICES	
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	5	1.5%	6	1.7%	1	0.3%
60054	Aetna Life Insurance Company	2	1.0%	9	4.4%	0	0.0%
61301	Ameritas Life Insurance Corp.	0	0.0%	78	100.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	66	3.2%	8	0.4%	2	0.1%
47058	CareFirst of Maryland, Inc.	2	0.2%	246	24.7%	0	0.0%
61832	Chesapeake Life Insurance Company	0	0.0%	1	100.0%	0	0.0%
67369	CIGNA Health and Life Insurance Company	4	0.8%	30	5.9%	0	0.0%
62146	Combined Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
52007	Dental Network, Inc. The	0	0.0%	40	100.0%	0	0.0%
95657	Dominion Dental Services, Inc.	0	0.0%	72	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.	7	0.8%	286	32.5%	0	0.0%
64211	Guarantee Trust Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
64246	Guardian Life Insurance Company of America	0	0.0%	530	100.0%	0	0.0%
	Johns Hopkins HealthCare LLC	11	6.9%	0	0.0%	0	0.0%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	2	5.1%	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	7	5.4%	0	0.0%	0	0.0%
65978	Metropolitan Life Insurance Company	0	0.0%	43	100.0%	0	0.0%
96940	Optimum Choice, Inc.	11	5.9%	3	1.6%	0	0.0%
67784	Philadelphia American Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
61271	Principal Life Insurance Company	0	0.0%	93	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%	6	100.0%	0	0.0%
68985	Starmount Life Insurance Company	0	0.0%	4	100.0%	0	0.0%
80802	Sun Life Assurance Company of Canada	0	0.0%	18	100.0%	0	0.0%
80314	Unicare Life and Health Insurance Company	0	0.0%	1	100.0%	0	0.0%
70408	Union Security Insurance Company	0	0.0%	46	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
85766	United Concordia Insurance Company	0	0.0%	399	100.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	30	2.8%	233	21.8%	1	0.1%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	2	4.9%	0	0.0%	0	0.0%
	TOTAL	149	1.9%	2,155	35.0%	4	0.0%

APPENDIX 2- GRIEVANCE DECISIONS BY CARRIER

NAIC#	COMPANY NAME	L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
		NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	0	0.0%
60054	Aetna Life Insurance Company	0	0.0%
61301	Ameritas Life Insurance Corp.	0	0.0%
96202	CareFirst BlueChoice, Inc.	8	0.4%
47058	CareFirst of Maryland, Inc.	0	0.0%
61832	Chesapeake Life Insurance Company	0	0.0%
67369	CIGNA Health and Life Insurance Company	0	0.0%
62146	Combined Insurance Company of America	1	100.0%
95657	Dominion Dental Services, Inc.	0	0.0%
52007	Dental Network, Inc. The	0	0.0%
62286	Golden Rule Insurance Company	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	0	0.0%
64211	Guarantee Trust Life Insurance Company	0	0.0%
64246	Guardian Life Insurance Company of America	0	0.0%
	Johns Hopkins HealthCare LLC	5	3.1%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	6	15.4%
60053	Kaiser Permanente Insurance Company	0	0.0%
60321	MAMSI Life & Health Insurance Company	15	11.6%
65978	Metropolitan Life Insurance Company	0	0.0%
96940	Optimum Choice, Inc.	25	13.3%
67784	Philadelphia American Life Insurance Company	0	0.0%
61271	Principal Life Ins. Company	0	0.0%
68381	Reliance Standard Life Insurance Company	0	0.0%
86355	Standard Insurance Company	0	0.0%
68985	Starmount Life Insurance Company	0	0.0%
80802	Sun Life Assurance Company of Canada	0	0.0%
80314	Unicare Life and Health Insurance Company	0	0.0%
70408	Union Security Insurance Company	0	0.0%
85766	United Concordia Insurance Company	0	0.0%

APPENDIX 2- GRIEVANCE DECISIONS BY CARRIER

NAIC#	COMPANY NAME	L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
		NUMBER	% TOTAL
79413	UnitedHealthcare Insurance Company	111	10.4%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	2	4.9%
	TOTAL	173	2.2%

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	2	0.0%	0	0.0%	0	0.0%	2	100.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	344	4.3%	182	52.9%	156	45.3%	6	1.7%
60054	Aetna Life Insurance Company	206	2.6%	93	45.1%	100	48.5%	13	6.3%
61301	Ameritas Life Insurance Corp.	78	1.0%	43	55.1%	30	38.5%	5	6.4%
96202	CareFirst BlueChoice, Inc.	2,072	25.9%	979	47.2%	1,087	52.5%	6	0.3%
47058	CareFirst of Maryland, Inc.	996	12.4%	414	41.6%	564	56.6%	18	1.8%
61832	Chesapeake Life Insurance Co.	1	0.0%	1	100.0%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Ins. Co.	508	6.3%	268	52.8%	220	43.3%	20	3.9%
62146	Combined Ins. Co. of America	1	0.0%	0	0.0%	1	100.0%	0	0.0%
52007	Dental Network, Inc. The	40	0.5%	8	20.0%	29	72.5%	3	7.5%
95657	Dominion Dental Services, Inc.	72	0.9%	39	54.2%	31	43.1%	2	2.8%
62286	Golden Rule Insurance Co. Company	15	0.2%	14	93.3%	1	6.7%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	881	11.0%	348	39.5%	510	57.9%	23	2.6%
64211	Guarantee Trust Life Insurance Co.	2	0.0%	2	100.0%	0	0.0%	0	0.0%
64246	Guardian Life Insurance Company of America	530	6.6%	275	51.9%	68	12.8%	187	35.3%
	Johns Hopkins HealthCare LLC	160	2.0%	84	52.5%	73	45.6%	3	1.9%

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	39	0.5%	27	69.2%	12	30.8%	0	0.0%
60053	Kaiser Permanente Insurance Co.	14	0.2%	9	64.3%	5	35.7%	0	0.0%
60321	MAMSI Life and Health Ins. Co.	129	1.6%	50	38.8%	74	57.4%	5	3.9%
65978	Metropolitan Life Ins. Company	43	0.5%	24	55.8%	13	30.2%	6	14.0%
96940	Optimum Choice, Inc.	188	2.3%	86	45.7%	95	50.5%	7	3.7%
67784	Philadelphia American Ins. Co.	5	0.1%	4	80.0%	1	20.0%	0	0.0%
61271	Principal Life Insurance Company	93	1.2%	80	86.0%	12	12.9%	1	1.1%
68381	Reliance Standard Life Ins. Co.	3	0.0%	3	100.0%	0	0.0%	0	0.0%
69019	Standard Insurance Company	6	0.1%	3	50.0%	3	50.0%	0	0.0%
68985	Starmount Life Insurance Co.	4	0.0%	1	25.0%	1	25.0%	2	50.0%
80802	Sun Life Assurance Co. of Canada	18	0.2%	11	61.1%	7	38.9%	0	0.0%
80314	Unicare Life and Health Ins. Co.	1	0.0%	1	100.0%	0	0.0%	0	0.0%
70408	Union Security Insurance Co.	46	0.6%	24	52.2%	20	43.5%	2	4.3%
85766	United Concordia Insurance Co.	399	5.0%	97	24.3%	255	63.9%	47	11.8%
79413	UnitedHealthcare Insurance Co.	1,069	13.4%	394	36.9%	620	58.0%	55	5.1%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	41	0.5%	15	36.6%	26	63.4%	0	0.0%
	Total	8,006	100%	3,579	44.7%	4,014	50.1%	413	5.2%

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
95109	Aetna Health Inc. (a Pennsylvania corporation)	4	4	2	50.0%	2	50.0%	0	0.0%
60054	Aetna Life Insurance Company	2	2	1	50.0%	1	50.0%	0	0.0%
47058	CareFirst BlueChoice, Inc.	11	2	0	0.0%	2	100.0%	0	0.0%
67369	CIGNA Health and Life Insurance Co.	22	4	1	25.0%	3	75.0%	0	0.0%
53007	Group Hospitalization and Med Serv Inc.	1	1	0	0.0%	1	100.0%	0	0.0%
	Johns Hopkins HealthCare LLC	59	6	2	33.3%	3	50.0%	1	16.7%
95639	Kaiser Fndtn Health Plan Mid-Atlantic	2	1	1	100.0%	0	0.0%	0	0.0%
60053	Kaiser Permanente Insurance Company	5	2	1	50.0%	1	50.0%	0	0.0%
96940	Optimum Choice, Inc.	3	1	1	100.0%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	6	2	2	100.0%	0	0.0%	0	0.0%

* This chart only includes those carriers who received grievances involving hospital length of stay during calendar year 2019.

** Represents the number of grievances that were resolved in calendar year 2019.

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	30.4	11.1	31.4	20.3
53007	Group Hospitalization and Medical Services, Inc.	24	24	24	24
95639	Kaiser Foundation Health Plan-Mid-Atlantic	7.1	18	0	18
60321	MAMSI Life and Health Ins. Company	12	21	10	11
96940	Optimum Choice, Inc.	43	25	10	98
79413	UnitedHealthcare Insurance Company	29	21	14	37
95025	UnitedHealthcare of the Mid-Atlantic	19	18	18	8

**** This report only includes carriers who had grievances which were considered emergency cases during calendar year 2019.**

*** 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	0	0	5	5
95109	Aetna Health Inc. (a Pennsylvania corporation)	18.7	18.5	20.9	23.8
60054	Aetna Life Insurance Company	18.4	15.6	22.8	24.3
61301	Ameritas Life Insurance Corporation	18	24	28	25
96202	CareFirst BlueChoice, Inc.	19.5	22	21.1	18.2
47058	CareFirst of Maryland, Inc.	23.8	19.4	16.6	18.2
61832	Chesapeake Life Insurance Company	15	0	0	0
67369	CIGNA Health and Life Insurance Company	27.1	27.7	21.8	20.8
62146	Combined Insurance Company of America	0	28	0	0
52007	Dental Network, Inc. The	0	0	11	8
95657	Dominion Dental Services, Inc.	17	19	25.8	28.5
62286	Golden Rule Insurance Company	44	52	55	27
53007	Group Hospitalization and Medical Services, Inc.	28.9	35.7	25.6	21.8
64211	Guarantee Trust Life Insurance Company	0	30	0	0
64246	Guardian Life Insurance Company of America	3	3	3	3
	Johns Hopkins HealthCare LLC	25.9	17.3	14.7	25.6
95639	Kaiser Foundation Health Plan-Mid-Atlantic	23.4	19.5	20.8	26
60053	Kaiser Permanente Insurance Company	2	6	7	8
60321	MAMSI Life and Health Insurance Company	32	33	31	41
65978	Metropolitan Life Insurance Company	8.2	12.5	14.9	16.4
96940	Optimum Choice, Inc.	33	29	31	33
67784	Philadelphia American Life Insurance Company	0	0	0	20
61271	Principal Life Insurance Company	11.3	15.9	22.3	24
68381	Reliance Standard Life Insurance Company	32	0	120	0
68985	Starmount Life Insurance Company	0	43	30	21

APPENDIX 6- TIME FRAME FOR RENDERING A GRIEVANCE DECISION BY CARRIER, NON-EMERGENCY CASES					
NAIC#	COMPANY	NON-EMERGENCY CASES – RESOLUTION TIME*			
	NAME	1ST Quarter	2ND Quarter	3RD Quarter	4TH Quarter
69019	Standard Insurance Company	27	9	0	8
80802	Sun Life Assurance Company of Canada	0	0	9	0
80314	Unicare Life and Health Insurance Company	0	9	9	0
70408	Union Security Insurance Company	18.4	12	13	6
85766	United Concordia Insurance Company	5.4	5.4	6.2	5.5
79413	United Healthcare Insurance Company	37	37	42	36
95025	United Healthcare of the Mid-Atlantic, Inc.	36	30	28	33

***Reported as Calendar Days**

APPENDIX 7-INTERNAL GRIEVANCES FILED CONSIDERED EMERGENCY CASES AS REPORTED BY CARRIER									
NAIC#	COMPANY* NAME	TOTAL NUMBER OF "EMERGENCIES" CASES	"EMERGENCIES" OUTCOME**	UPHELD		OVERTURNED		MODIFIED	
				Number	Percent	Number	Percent	Number	Percent
96202	CareFirst Blue Choice, Inc.	249	102	48	47.1%	54	52.9%	0	0.0%
47058	CareFirst of Maryland, Inc.	62	62	15	24.2%	47	75.8%	0	0.0%
67369	CIGNA Health and Life Ins. Co.	24	24	13	54.2%	11	45.8%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	219	48	23	47.9%	25	52.1%	0	0.0%
95639	Kaiser Fndtn Health Plan Mid-Atl	8	8	8	100.0%	0	0.0%	0	0.0%
60321	MAMSI Life and Health Ins. Co.	40	40	10	25.0%	27	67.5%	3	7.5%
96940	Optimum Choice, Inc.	54	54	15	27.8%	33	61.1%	6	11.1%
79413	United Healthcare Ins. Company	225	212	73	34.4%	132	62.3%	7	3.3%
95025	United Healthcare of the Mid-Atl	19	19	4	21.1%	15	78.9%	0	0.0%
	Total	900	569	209	36.7%	344	60.5%	16	2.8%

*This chart only includes carriers who had grievances which were considered emergency cases during calendar year 2019.

** Represents the number of grievances that were resolved in calendar year 2019.

APPENDIX 8- ADMINISTRATION COMPLAINTS

Appeals and Grievance Statistics
Totals for Complaints Filed
January 1, 2019 – December 31, 2019

COMPLAINTS	937
NO JURISDICTION	286
Referred to DBM/Cecil County	16
Referred to Department of Labor (ERISA plans)	133
Referred to Office of Personnel Management (Federal employee health benefit plans)	35
Referred to Medicaid	22
Referred to Medicare	19
Out of State Plan	61
COMPLAINT WITHDRAWN	12
INSUFFICIENT INFORMATION TO COMPLETE INVESTIGATION	66
NO ACTION REQUIRED (includes non-medical necessity complaint cases cloned to Life and Health Complaint Unit, duplicate files, inquiries)	143
REFERRED TO HEALTH, EDUCATION AND ADVOCACY UNIT (for complainants who had not exhausted the carrier's internal appeal process)	61
MIA CONDUCTED INVESTIGATION	369
MIA Decision Upheld Carrier	137
Carrier Reversed Itself During Investigation	172
MIA Reversed Carrier Decision	57
MIA Reversed Carrier Decision in Part and Upheld Carrier Decision in Part	3

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)	13	4%	8	62%	1	8%	0	0%	4	31%
Aetna Life Insurance Company	8	2%	3	38%	3	38%	1	13%	1	13%
CareFirst BlueChoice, Inc.	80	22%	32	40%	9	11%	0	0%	39	49%
CareFirst of Maryland, Inc.	93	25%	33	35%	18	19%	0	0%	42	45%
CaremarkPCS Health L.L.C.	18	5%	3	17%	0	0%	0	0%	15	83%
CIGNA Health and Life Insurance Co.	20	5%	10	50%	5	25%	0	0%	5	25%
Delta Dental Insurance Company	1	0%	0	0%	0	0%	0	0%	1	100%
Delta Dental of Pennsylvania	3	1%	1	33%	0	0%	0	0%	2	67%
Dominion Dental Services, Inc.	1	0%	0	0%	0	0%	0	0%	1	100%
Express Scripts Insurance Company	1	0%	0	0%	1	100%	0	0%	0	0%
Express Scripts, Inc.	1	0%	0	0%	0	0%	0	0%	1	100%
Golden Rule Insurance Company	2	1%	1	50%	0	0%	1	50%	0	0%
Group Hospitalization and Medical Services, Inc.	13	4%	7	54%	2	15%	0	0%	4	31%
Guardian Life Ins. Co. of America	13	4%	6	46%	2	15%	0	0%	5	38%
Humana Dental Insurance Company	1	0%	0	0%	0	0%	0	0%	1	100%
Johns Hopkins University	1	0%	1	100%	0	0%	0	0%	0	0%
Kaiser Foundation Health Plan Mid-Atlantic	10	3%	7	70%	1	10%	0	0%	2	20%
Kaiser Permanente Insurance Company	3	1%	0	0%	0	0%	0	0%	3	100%
MAMSI Life and Health Insurance Co.	6	2%	3	50%	0	0%	0	0%	3	50%
Metropolitan Life Insurance Company	1	0%	0	0%	0	0%	0	0%	1	100%
Optimum Choice, Inc.	7	2%	1	14%	1	14%	0	0%	5	71%
Principal Life Insurance Company	3	1%	0	0%	1	33%	0	0%	2	67%
Unicare Life and Health Insurance Co.	1	0%	1	100%	0	0%	0	0%	0	0%
United Behavioral Health	1	0%	1	100%	0	0%	0	0%	0	0%
United Concordia Insurance Company	2	1%	0	0%	1	50%	0	0%	1	50%
United Concordia Life and Health Ins. Co.	4	1%	3	75%	0	0%	0	0%	1	25%
United Healthcare Ins. Company	59	16%	16	27%	11	19%	1	2%	31	53%
United Healthcare of the Mid-Atlantic, Inc.	3	1%	0	0%	1	33%	0	0%	2	67%
TOTAL	369	100%	137	37%	57	15%	3	1%	172	47%

Administration Complaints (Continued)

Type of Procedure	Carrier Code**	Total	Carrier Upheld by MIA		Carrier Reversed by MIA		Carrier Modified by MIA		Carrier Reversed Itself During Investigation	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Air Ambulance	B	5	2	40%	3	60%	0	0%	0	0%
Chiropractic Care Services	G	1	0	0%	0	0%	0	0%	1	100%
Cosmetic	D	6	1	17%	2	33%	0	0%	3	50%
Denial of Hospital Days	A	5	3	60%	1	20%	0	0%	1	20%
Dental Care Services	J	72	29	40%	7	10%	0	0%	36	50%
Durable Medical Equipment	I	11	4	36%	1	9%	0	0%	6	55%
Emergency Room Denial	B	2	0	0%	0	0%	0	0%	2	100%
Experimental	D	40	28	70%	8	20%	0	0%	4	10%
Home Care Services	K	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	33	17	52%	3	9%	0	0%	13	39%
Mental Health Partial Hospitalization	L	1	1	100%	0	0%	1	100%	0	0%
Mental Health/Substance (Inpatient) Services	C	7	2	29%	4	57%	1	14%	0	0%
Mental Health/Substance (Outpatient) Services	C	3	1	33%	0	0%	0	0%	1	33%
Morbid Obesity	L	1	1	100%	0	0%	0	0%	0	0%
Obesity Services	L	1	1	100%	0	0%	0	0%	0	0%
Opioid Use Disorders	F	3	0	0%	0	0%	0	0%	3	100%
Pharmacy Benefits	F	3	0	0%	0	0%	0	0%	3	100%
Pharmacy Services/Formulary Issues	F	132	27	20%	18	14%	0	0%	87	66%
Physician Services	D	38	19	50%	10	26%	1	3%	8	21%
PT, OT, ST Services	G	2	1	50%	0	0%	0	0%	1	50%
TOTAL		369	137		57		3		172	

APPENDIX 9- SUMMARY OF APPEALS AND GRIEVANCE ORDER

CareFirst BlueChoice, Inc.

Case No.: MIA-2018-11-011

Effective Date: January 9, 2019

Penalty: \$2,500.00

Consent Order

The Consent Order required BlueChoice to pay an administrative penalty of \$2,500 for its violation of § 15-10B-09.1 of the Insurance Article, and therefore of § 19-729(a)(11) of the Health-General Article.

CareFirst BlueChoice, Inc.

Case Number: MIA-2019-08-016

Effective Date: August 13, 2019

The MIA ordered BlueChoice to provide documentation to the Commissioner showing that it is no longer relying on private review criteria and standards for the surgical implantation of upper airway stimulation device for the hypoglossal nerve, for members with the complainant's condition that are not objective, not clinically valid, not compatible with established principles of healthcare, and not flexible enough to allow for deviations from norms when justified on a case by case basis.