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Governor

BOYD K. RUTHERFORD
Lt. Governor



Maryland

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KATHLEEN A. BIRRANE
Commissioner

GREGORY M. DERWART
Deputy Commissioner

November 30, 2022

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

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

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

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

Dear Governor Hogan, President Ferguson and Speaker Jones:

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

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

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

Sincerely,

Kathleen A. Birrane
Insurance Commissioner

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



MSAR #6

2021 Report on the Healthcare
Appeals & Grievances Law

Kathleen Birrane
Commissioner

November 30, 2022

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Background

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

When the Appeals and Grievance Law was enacted, the percentage of the population under the age of 65 with insured health benefits (42.8%) slightly exceeded the percentage of the population under the age of 65 with other employment based health benefits (37.9%). Other employment based health benefit plans include self-insured health benefit plans and the Federal Employees Health Benefit Plan (FEHBP). By 2021, the percentage of the population under the age of 65 with insured health benefits declined to 17.7%.¹

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

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

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

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

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

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

These quarterly reports, coupled with the Administration's data regarding complaints, allows for a comprehensive year-over-year review of this process. This report summarizes the statistical information the Administration has compiled for adverse decisions, grievance decisions and complaints for 2021, noting changes in certain areas since 2018 for nonprofit health services plans, insurers, and health maintenance organizations.

Adverse Decisions

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

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

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

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

Over the years, policymakers have expressed concern about denials of emergency room services and mental health services. While the data provided by carriers indicate that there are still relatively few adverse decisions for emergency room services and mental health services when compared to adverse decisions for dental and pharmacy services, it is unclear from the data why this continues to be the case.

Table 1: Adverse Decisions

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

Grievance Decisions

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

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

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

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

Table 2: Grievances

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

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

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

Table 3: Grievances as a % of Adverse Decisions

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

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

Table 4: Grievance Decision

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

Complaints

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

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

Consumers of insurance who have filed complaints with this Administration continue to benefit financially when a carrier’s grievance decision was either reversed or modified in favor of the complainant. In 2018, the Administration recovered \$348,612 for complainants when the carrier’s grievance decision was either reversed or modified in the complainant’s favor. In 2021, the Administration recovered \$470,824 for complainants when the carrier’s grievance decision was either reversed or modified in the complainant’s favor. Since the enactment of the Appeals and Grievance law, the Administration has recovered over \$12 million (\$12,605,603) for complainants.

As noted above, in 2011, the Administration entered into an agreement with the Maryland Department of Budget and Management to perform the external review for the medical necessity type complaints filed by state employees. In 2013, the Administration entered

into a similar agreement with Cecil County Public Schools to perform the same function. This meant that during 2021, state employees and Cecil County Public School employees could use the Administration’s external review process for their medical necessity type complaints. Since 2011, the Administration has received 600 complaints, which involved denials based on medical necessity from state and Cecil County Public School employees.

Table 5 describes how the number of complaints filed with Administration in 2018 compares to the number of complaints filed in 2021. The number of complaints received by the Administration decreased from 2018 to 2021 (1,039 to 839), representing a decrease of 19.2%.

Table 5: Complaints

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

Conclusion

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

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

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

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	ADVERSE DECISIONS		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
	COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
4 Ever Life Insurance Company	1	0.0%	1	100.0%	0	0.0%
Aetna Dental, Inc.	693	0.9%	0	0.0%	0	0.0%
Aetna Health Inc. (a Pennsylvania corporation)	115	0.1%	39	33.9%	0	0.0%
Aetna Life Insurance Company	188	0.2%	69	36.7%	0	0.0%
Ameritas Life Insurance Corp.	285	0.4%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	21,128	26.0%	12	0.1%	0	0.0%
CareFirst of Maryland, Inc.	7,057	8.7%	2	0.0%	1	0.0%
CIGNA Dental Health of Maryland, Inc.	47	0.1%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	17,081	21.1%	284	1.7%	0	0.0%
Connecticut General Life Insurance Company	7	0.0%	0	0.0%	0	0.0%
Delta Dental Insurance Company	8	0.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	55	0.1%	0	0.0%	0	0.0%
Dentegra Insurance Company	9	0.0%	0	0.0%	0	0.0%
Dental Network, Inc. The	8	0.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	1,111	1.4%	0	0.0%	0	0.0%
Golden Rule Insurance Company	12	0.0%	0	0.0%	0	0.0%
Group Dental Service of Maryland, Inc.	1,922	2.4%	0	0.0%	0	0.0%
Group Hospitalization and Medical Services, Inc.	5,515	6.8%	6	0.1%	0	0.0%
Guardian Life Insurance Company of America	1,263	1.6%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	90	0.1%	16	17.8%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	812	1.0%	33	4.1%	0	0.0%
Kaiser Permanente Insurance Company	61	0.1%	24	39.3%	0	0.0%
Lincoln Life and Annuity Company of New York	1	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company	117	0.1%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	916	1.1%	7	0.8%	0	0.0%
Metropolitan Life Insurance Company	668	0.8%	0	0.0%	0	0.0%
National Health Life Insurance Company	5	0.0%	2	40.0%	0	0.0%
Optimum Choice, Inc.	2,376	2.9%	101	4.3%	1	0.0%

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ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	ADVERSE DECISIONS		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
	COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
Principal Life Insurance Company	695	0.9%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	13	0.0%	0	0.0%	0	0.0%
Standard Insurance Company	71	0.1%	0	0.0%	0	0.0%
Starmount Life Insurance Company	28	0.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	709	0.9%	0	0.0%	0	0.0%
United Concordia Insurance Company	725	0.9%	0	0.0%	0	0.0%
United of Omaha Life Insurance Company	89	0.1%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	15,630	19.3%	447	2.9%	4	0.0%
UnitedHealthcare of the Mid-Atlantic, Inc.	1,547	1.9%	39	2.5%	3	0.2%
Wellfleet Group LLC	67	0.1%	10	14.9%	1	1.5%
Wellfleet Insurance Company	18	0.0%	0	0.0%	0	0.0%
Total	81,143	100%	1,092	1.3%	10	0.0%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
.4 Ever Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Aetna Dental, Inc	0	0.0%	0	0.0%	0	0.0%
Aetna Health Inc. (a Pennsylvania corporation)	4	3.5%	42	36.5%	2	1.7%
Aetna Life Insurance Company	11	5.9%	68	36.2%	8	4.3%
Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	298	1.4%	1,182	5.6%	3,015	14.3%
CareFirst of Maryland, Inc.	31	0.4%	184	2.6%	239	3.4%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	65	0.4%	737	4.3%	6,699	39.2%
Connecticut General Life Insurance Company	0	0.0%	0	0.0%	4	57.1%
Delta Dental Insurance Company	0	0.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	0	0.0%	0	0.0%	0	0.0%
Dental Network, Inc. The	0	0.0%	0	0.0%	0	0.0%
Dentegra Insurance Company	0	0.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	0	0.0%	0	0.0%	0	0.0%
Golden Rule Insurance Company	5	41.7%	0	0.0%	6	50.0%
Group Dental Service of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Services, Inc.	39	0.7%	199	3.6%	273	5.0%
Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	1	1.1%	19	21.1%	15	16.7%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	37	4.6%	165	20.3%	21	2.6%
Kaiser Permanente Insurance Company	0	0.0%	18	29.5%	4	6.6%
Lincoln Life and Annuity Company of New York	0	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	9	1.0%	92	10.0%	81	8.8%
Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
National Health Insurance Company	0	0.0%	2	40.0%	0	0.0%
Optimum Choice, Inc.	5	0.2%	218	9.2%	291	12.2%
Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Reliance Standard Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Standard Insurance Company	0	0.0%	0	0.0%	0	0.0%
Starmount Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	0	0.0%	0	0.0%
United Concordia Insurance Company	0	0.0%	0	0.0%	0	0.0%
United of Omaha Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	56	0.4%	1,296	8.3%	3,466	22.2%
UnitedHealthcare of the Mid-Atlantic, Inc.	7	0.5%	357	23.1%	530	34.3%
Wellfleet Group LLC	1	1.5%	10	14.9%	11	16.4%
Wellfleet Insurance Company	1	5.6%	0	0.0%	8	44.4%
Total	570	0.7%	4,589	5.7%	14,673	18.1%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	F. PHARMACY SERVICES		G. PT, OT, ST SERVICES (incl INPAT REHAB)		H. SKILLED NURS FAC, Sub Acute, Nursing Home	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
4 Ever Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Aetna Dental, Inc.	0	0.0%	0	0.0%	0	0.0%
Aetna Health Inc. (a Pennsylvania corporation)	15	13.0%	4	3.5%	2	1.7%
Aetna Life Insurance Company	19	10.1%	5	2.7%	2	1.1%
Ameritas Life Insurance Corp	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	15,727	74.4%	85	0.4%	6	0.0%
CareFirst of Maryland, Inc.	5,810	82.3%	14	0.2%	2	0.0%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	5,464	32.0%	3,499	20.5%	3	0.0%
Connecticut General Life Insurance Company	0	0.0%	3	42.9%	0	0.0%
Delta Dental Insurance Company	0	0.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	0	0.0%	0	0.0%	0	0.0%
Dental Network, Inc. The	0	0.0%	0	0.0%	0	0.0%
Dentegra Insurance Company	0	0.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	0	0.0%	0	0.0%	0	0.0%
Golden Rule Insurance Company	0	0.0%	0	0.0%	0	0.0%
Group Dental Service of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Services, Inc.	4,522	82.0%	19	0.3%	0	0.0%
Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	4	4.4%	0	0.0%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	0	0.0%	0	0.0%	0	0.0%
Kaiser Permanente Insurance Company	0	0.0%	0	0.0%	0	0.0%
Lincoln Life and Annuity Company of New York	0	0.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	613	66.9%	2	0.0%	0	0.0%
Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
National Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	1,544	65.0%	26	1.1%	1	0.0%
Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	0	0.0%	0	0.0%	0	0.0%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	F. PHARMACY SERVICES		G. PT, OT, ST SERVICES (incl INPAT REHAB)		H. SKILLED NURS FAC, Sub Acute, Nursing Home	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Standard Insurance Company	0	0.0%	0	0.0%	0	0.0%
Starmount Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	0	0.0%	0	0.0%
United Concordia Insurance Company	0	0.0%	0	0.0%	0	0.0%
United of Omaha Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	4,597	29.4%	42	0.3%	9	0.1%
UnitedHealthcare of the Mid-Atlantic, Inc.	554	35.8%	4	0.3%	0	0.0%
Wellfleet Group LLC	23	34.3%	9	13.4%	0	0.0%
Wellfleet Insurance Company	1	5.6%	8	44.4%	0	0.0%
Total	38,893	47.9%	3,819	4.7%	32	0.0%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. DENTAL		K. HOME HEALTH SERVICES		L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
4 Ever Life Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Aetna Dental, Inc.	0	0.0%	693	100.0%	0	0.0%	0	0.0%
Aetna Health Inc. (a Pennsylvania corporation)	2	1.7%	0	0.0%	0	0.0%	5	4.3%
Aetna Life Insurance Company	2	1.1%	0	0.0%	1	0.5%	3	1.6%
Ameritas Life Insurance Corp.	0	0.0%	285	100.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	786	3.7%	4	0.0%	9	0.0%	4	0.0%
CareFirst of Maryland, Inc.	111	1.6%	659	9.3%	4	0.1%	0	0.0%
CIGNA Dental Health of Maryland, Inc.	0	0.0%	47	100.0%	0	0.0%	0	0.0%
CIGNA Health and Life Insurance Company	48	0.3%	162	0.9%	85	0.5%	35	0.2%
Connecticut General Life Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Delta Dental Insurance Company	0	0.0%	8	100.0%	0	0.0%	0	0.0%
Delta Dental of Pennsylvania	0	0.0%	55	100.0%	0	0.0%	0	0.0%
Dental Network, Inc. The	0	0.0%	8	100.0%	0	0.0%	0	0.0%
Dentegra Insurance Company	0	0.0%	9	100.0%	0	0.0%	0	0.0%
Dominion Dental Services, Inc.	0	0.0%	1,111	100.0%	0	0.0%	0	0.0%
Golden Rule Insurance Company	0	0.0%	0	0.0%	0	0.0%	1	8.3%
Group Dental Service of Maryland, Inc.	0	0.0%	1,922	100.0%	0	0.0%	0	0.0%
Group Hospitalization and Medical Serv. Inc.	80	1.5%	373	6.8%	4	0.1%	0	0.0%
Guardian Life Insurance Company of America	0	0.0%	1,263	100.0%	0	0.0%	0	0.0%
Johns Hopkins HealthCare LLC	4	4.4%	0	0.0%	0	0.0%	31	34.4%
Kaiser Foundation Health Plan Mid-Atlantic States, Inc.	133	16.4%	10	1.2%	11	1.4%	311	38.3%
Kaiser Permanente Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Lincoln Life and Annuity Company of New York	0	0.0%	1	100.0%	0	0.0%	0	0.0%
Lincoln National Life Insurance Company	0	0.0%	117	100.0%	0	0.0%	0	0.0%
MAMSI Life and Health Insurance Company	25	2.7%	73	8.0%	6	0.7%	8	0.9%
Metropolitan Life Insurance Company	0	0.0%	668	100.0%	0	0.0%	0	0.0%
National Health Insurance Company	0	0.0%	1	20.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	35	1.5%	62	2.6%	6	0.3%	86	3.6%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. DENTAL		K. HOME HEALTH SERVICES		L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Principal Life Insurance Company	0	0.0%	695	100.0%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	0	0.0%	13	100.0%	0	0.0%	0	0.0%
Standard Insurance Company	0	0.0%	71	100.0%	0	0.0%	0	0.0%
Starmount Life Insurance Company	0	0.0%	28	100.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	709	100.0%	0	0.0%	0	0.0%
United Concordia Insurance Company	0	0.0%	725	100.0%	0	0.0%	0	0.0%
United of Omaha Life Insurance Company	0	0.0%	89	100.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	122	0.8%	5,263	33.7%	13	0.1%	315	2.0%
UnitedHealthcare of the Mid-Atlantic, Inc.	16	1.0%	9	0.6%	4	0.3%	24	1.6%
Wellfleet Group LLC	0	0.0%	0	0.0%	0	0.0%	2	3.0%
Wellfleet Insurance Company	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,364	1.7%	15,133	18.6%	143	0.2%	825	1.0%15

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC #	COMPANY NAME	GRIEVANCES FILED		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
		COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	10	0.1%	2	20.0%	2	20.0%
95910	Aetna Dental Inc.	1	0.0%	0	0.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	217	2.7%	23	10.6%	5	2.3%
60054	Aetna Life Insurance Company	143	1.8%	18	12.6%	1	0.7%
95183	Alpha Dental Programs, Inc.	174	2.2%	0	0.0%	0	0.0%
61301	Ameritas Life Insurance Corp.	134	1.7%	0	0.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	1,738	21.5%	8	0.5%	2	0.1%
47058	CareFirst of Maryland, Inc.	901	11.2%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Ins Company	590	7.3%	15	2.5%	0	0.0%
62146	Combined Insurance Company of America	7	0.1%	0	0.0%	0	0.0%
81396	Delta Dental Insurance Company	75	0.9%	0	0.0%	0	0.0%
54798	Delta Dental of Pennsylvania	419	5.2%	0	0.0%	0	0.0%
73474	Dentegra Insurance Company	39	0.5%	0	0.0%	0	0.0%
95657	Dominion Dental Services, Inc.	153	1.9%	0	0.0%	0	0.0%
62286	Golden Rule Insurance Company	4	0.0%	0	0.0%	0	0.0%
95846	Group Dental Service of Maryland, Inc.	1	0.0%	0	0.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	787	9.7%	1	0.1%	2	0.3%
64246	Guardian Life Insurance Company of America	548	6.8%	0	0.0%	0	0.0%
	Johns Hopkins HealthCare LLC	40	0.5%	9	22.5%	3	7.5%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	80	1.0%	8	10.0%	0	0.0%
60053	Kaiser Permanente Insurance Company	8	0.1%	3	37.5%	0	0.0%
60321	MAMSI Life and Health Ins Company	104	1.3%	1	1.0%	0	0.0%
65978	Metropolitan Life Insurance Company	21	0.3%	0	0.0%	0	0.0%
82538	National Health Insurance Company	1	0.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	227	2.8%	4	1.8%	5	2.2%
61271	Principal Life Insurance Company	13	0.2%	0	0.0%	0	0.0%
68381	Reliance Standard Life Insurance Company	2	0.0%	0	0.0%	0	0.0%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC#	COMPANY NAME	GRIEVANCES FILED		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
		COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
69019	Standard Insurance Company	14	0.2%	0	0.0%	0	0.0%
68985	Starmount Life Insurance Company	25	0.3%	0	0.0%	0	0.0%
80802	Sun Life Assurance Company of Canada	38	0.5%	0	0.0%	0	0.0%
85766	United Concordia Insurance Company	301	3.7%	0	0.0%	0	0.0%
69868	United of Omaha Life Insurance Company	37	0.5%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	1,151	14.3%	10	0.9%	0	0.0%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	54	0.7%	1	1.9%	0	0.0%
	Wellfleet Group LLC	15	0.2%	2	13.3%	0	0.0%
32280	Wellfleet Insurance Company	1	0.0%	0	0.0%	0	0.0%
	TOTAL	8,073	100%	105	1.3%	20	0.2%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC#	COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES	
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	0	0.0%	2	20.0%	4	40.0%
95910	Aetna Dental Inc.	0	0.0%	0	0.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	0	0.0%	96	44.2%	34	15.7%
60054	Aetna Life Insurance Company	3	1.4%	53	37.1%	26	18.2%
95183	Alpha Dental Programs, Inc.	3	2.1%	0	0.0%	0	0.0%
61301	Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	8	0.5%	38	2.2%	112	6.4%
47058	CareFirst of Maryland, Inc.	1	0.1%	6	0.7%	16	1.8%
67369	CIGNA Health and Life Insurance Company	18	3.1%	65	11.0%	198	33.6%
32146	Combined Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
81396	Delta Dental Insurance Company	0	0.0%	0	0.0%	0	0.0%
54798	Delta Dental of Pennsylvania	0	0.0%	0	0.0%	0	0.0%
73474	Dentegra Insurance Company	0	0.0%	0	0.0%	0	0.0%
95657	Dominion Dental Services, Inc.	0	0.0%	1	25.0%	2	50.0%
62286	Golden Rule Insurance Company	1	25.0%	0	0.0%	0	0.0%
95846	Group Dental Service of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	4	0.5%	24	3.0%	30	3.8%
64246	Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
	Johns Hopkins HealthCare LLC	0	0.0%	5	12.5%	12	30.0%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	18	22.5%	22	27.5%	1	1.3%
60053	Kaiser Permanente Insurance Company	0	0.0%	3	37.5%	0	0.0%
60321	MAMSI Life and Health Insurance Company	4	3.8%	8	7.7%	7	6.7%
65978	Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
82538	National Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	1	0.4%	18	7.9%	43	18.9%
61271	Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
68381	Reliance Standard Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
86355	Standard Insurance Company	0	0.0%	0	0.0%	0	0.0%
68985	Starmount Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
80802	Sun Life Assurance Company of Canada	0	0.0%	0	0.0%	0	0.0%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC#	COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES	
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
		85766	United Concordia Insurance Company	0	0.0%	0	0.0%
69868	United of Omaha Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	10	0.9%	106	9.2%	302	26.2%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	0	0.0%	5	9.3%	19	35.2%
	Wellfleet Group LLC	0	0.0%	0	0.0%	2	13.3%
32280	Wellfleet Insurance Company	0	0.0%	0	0.0%	0	0.0%
	TOTAL	71	0.9%	452	5.6%	808	10%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC #	COMPANY NAME	F. PHARMACY SERVICES		G. PT. OT, ST SERVICES		H. SKILLED NURSING FACILITY, Sub Acute, Nursing Home	
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
95910	Aetna Dental Inc.	0	0.0%	0	0.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	46	21.2%	0	0.0%	0	0.0%
60054	Aetna Life Insurance Company	31	21.7%	1	0.7%	0	0.0%
	Alpha Dental Programs, Inc.	0	0.0%	0	0.0%	0	0.0%
61301	Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	1,476	84.9%	6	0.3%	2	0.1%
47058	CareFirst of Maryland, Inc.	796	88.3%	0	0.0%	0	0.0%
67369	CIGNA Health and Life Insurance Company	201	34.1%	44	7.5%	0	0.0%
062146	Combined Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
81396	Delta Dental Insurance Company	0	0.0%	0	0.0%	0	0.0%
54798	Delta Dental of Pennsylvania	0	0.0%	0	0.0%	0	0.0%
73474	Dentegra Insurance Company	0	0.0%	0	0.0%	0	0.0%
95657	Dominion Dental Services, Inc.	0	0.0%	0	0.0%	0	0.0%
62286	Golden Rule Insurance Company	0	0.0%	0	0.0%	0	0.0%
95846	Group Dental Service of Maryland, Inc.	0	0.0%	0	0.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	605	76.9%	1	0.1%	0	0.0%
64246	Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
	Johns Hopkins HealthCare LLC	10	25.0%	0	0.0%	0	0.0%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	1	1.3%	13	16.3%	1	1.3%
60053	Kaiser Permanente Insurance Company	0	0.0%	2	25.0%	0	0.0%
60321	MAMSI Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
65978	Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
82538	National Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	101	44.5%	7	3.1%	1	0.4%
61271	Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
68381	Reliance Standard Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
86355	Standard Insurance Company	0	0.0%	0	0.0%	0	0.0%
68985	Starmount Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
80802	Sun Life Assurance Company of Canada	0	0.0%	0	0.0%	0	0.0%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC #	COMPANY NAME	F. PHARMACY SERVICES		G. PT. OT, ST SERVICES		H. SKILLED NURSING FACILITY, Sub Acute, Nursing Home	
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
85766	United Concordia Insurance Company	0	0.0%	0	0.0%	0	0.0%
69868	United of Omaha Life Ins. Company	0	0.0%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	413	35.9%	3	0.3%	1	0.1%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	24	44.4%	0	0.0%	0	0.0%
	Wellfleet Group LLC	11	73.3%	0	0.0%	0	0.0%
32280	Wellfleet Insurance Company	1	100.0%	0	0.0%	0	0.0%
	TOTAL	3,716	46.9%	77	1.0%	5	0.1%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC #	COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. DENTAL		K. HOME HEALTH SERVICES	
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
95910	Aetna Dental Inc.	0	0.0%	1	100.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	0	0.0%	0	0.0%	1	0.5%
60054	Aetna Life Insurance Company	1	0.7%	3	2.1%	1	0.7%
	Alpha Dental Programs, Inc.	0	0.0%	174	100.0%	0	0.0%
61301	Ameritas Life Insurance Corp.	0	0.0%	134	100.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	83	4.8%	3	0.2%	0	0.0%
47058	CareFirst of Maryland, Inc.	4	0.4%	78	8.7%	0	0.0%
67369	CIGNA Health and Life Insurance Company	2	0.3%	45	7.6%	1	0.2%
62146	Combined Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
81396	Delta Dental Insurance Company	0	0.0%	75	100.0%	0	0.0%
54798	Delta Dental of Pennsylvania	0	0.0%	419	100.0%	0	0.0%
73474	Dentegra Insurance Company	0	0.0%	39	100.0%	0	0.0%
95657	Dominion Dental Services, Inc.	0	0.0%	153	100.0%	0	0.0%
62286	Golden Rule Insurance Company	0	0.0%	0	0.0%	0	0.0%
95846	Group Dental Service of Maryland, Inc.	0	0.0%	1	100.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	25	3.2%	95	12.1%	0	0.0%
64246	Guardian Life Insurance Company of America	0	0.0%	548	100.0%	0	0.0%
	Johns Hopkins HealthCare LLC	1	2.5%	0	0.0%	0	0.0%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	1	1.3%	1	1.3%	0	0.0%
60053	Kaiser Permanente Insurance Company	0	0.0%	0	0.0%	0	0.0%
60321	MAMSI Life and Health Insurance Company	2	1.9%	0	0.0%	0	0.0%
65978	Metropolitan Life Insurance Company	0	0.0%	21	100.0%	0	0.0%
82538	National Health Insurance Company	0	0.0%	1	100.0%	0	0.0%
96940	Optimum Choice, Inc.	4	1.8%	0	0.0%	0	0.0%
61271	Principal Life Insurance Company	0	0.0%	13	100.0%	0	0.0%
68381	Reliance Standard Life Insurance Company	0	0.0%	2	100.0%	0	0.0%
86355	Standard Insurance Company	0	0.0%	14	100.0%	0	0.0%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

NAIC #	COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. DENTAL		K. HOME HEALTH SERVICES	
		NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
		68985	Starmount Life Insurance Company	0	0.0%	25	100.0%
80802	Sun Life Assurance Company of Canada	0	0.0%	38	100.0%	0	0.0%
85766	United Concordia Insurance Company	0	0.0%	301	100.0%	0	0.0%
69868	United of Omaha Insurance Company	0	0.0%	37	100.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	0	0.0%	154	13.4%	0	0.0%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	0	0.0%	0	0.0%	0	0.0%
	Wellfleet Group LLC	0	0.0%	0	0.0%	0	0.0%
	TOTAL	143	1.8%	2,429	29.4%	3	0.0%

APPENDIX 2 GRIEVANCE DECISIONS BY CARRIER

NAIC #	COMPANY NAME	L. OBESITY, IVF, PODIATRY, HEARING AND VISION	
		NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	0	0.0%
95910	Aetna Dental Inc.	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	9	4.1%
60054	Aetna Life Insurance Company	5	3.5%
95163	Alpha Dental Programs, Inc.	0	0.0%
61301	Ameritas Life Insurance Corp.	0	0.0%
96202	CareFirst BlueChoice, Inc.	0	0.0%
47058	CareFirst of Maryland, Inc.	0	0.0%
67369	CIGNA Health and Life Insurance Company	1	0.2%
62146	Combined Insurance Company of America	7	100.0%
81396	Delta Dental Insurance Company	0	0.0%
54798	Delta Dental of Pennsylvania	0	0.0%
73474	Dentegra Insurance Company	0	0.0%
95657	Dominion Dental Services, Inc.	0	0.0%
62286	Golden Rule Insurance Company	0	0.0%
95846	Group Dental Service of Maryland, Inc.	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	0	0.0%
64246	Guardian Life Insurance Company of America	0	0.0%
	Johns Hopkins HealthCare LLC	0	0.0%
95639	Kaiser Foundation Health Plan-Mid-Atlantic States, Inc.	14	17.5%
60053	Kaiser Permanente Insurance Company	0	0.0%
60321	MAMSI Life & Health Insurance Company	9	8.7%
65978	Metropolitan Life Insurance Company	0	0.0%
82538	National Health Insurance Company	0	0.0%
96940	Optimum Choice, Inc.	0	0.0%
61271	Principal Life Ins. Company	0	0.0%
68381	Reliance Standard Life Insurance Company	0	0.0%
86355	Standard Insurance Company	0	0.0%
68985	Starmount Life Insurance Company	0	0.0%
80802	Sun Life Assurance Company of Canada	0	0.0%

APPENDIX 2 GRIEVANCE DECISIONS BY CARRIER

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

**APPENDIX 3
DISPOSITION OF CARRIER GRIEVANCE DECISIONS**

NAIC #	COMPANY NAME	GRIEVANCES FILED		ORIGINAL DECISION OF INSURANCE COMPANY WAS...					
		COMPANY TOTAL	% OF ALL COMPANIES	UPHELD		OVERTURNED		MODIFIED	
				NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
80985	4 Ever Life Insurance Company	10	0.1%	3	30.0%	7	70.0%	0	0.0%
95910	Aetna Dental Inc.	1	0.0%	0	0.0%	1	100.0%	0	0.0%
95109	Aetna Health Inc. (a Pennsylvania corporation)	217	2.7%	110	50.7%	94	43.3%	13	6.0%
60054	Aetna Life Insurance Company	143	1.8%	80	55.9%	62	43.4%	1	0.7%
95163	Alpha Dental Programs, Inc.	174	2.2%	79	45.4%	71	40.8%	24	13.8%
61301	Ameritas Life Insurance Corp.	134	1.7%	76	56.7%	46	34.3%	12	9.0%
96202	CareFirst BlueChoice, Inc.	1,738	21.7%	648	37.3%	1,088	62.6%	2	0.1%
47058	CareFirst of Maryland, Inc.	901	11.2%	288	32.0%	608	67.5%	5	0.6%
67369	CIGNA Health and Life Ins. Co.	590	7.4%	311	52.7%	259	43.9%	20	3.4%
62146	Combined Ins. Co. of America	7	0.1%	2	28.6%	5	71.4%	0	0.0%
81396	Delta Dental Ins. Company	75	0.9%	46	61.3%	22	29.3%	7	9.3%
54798	Delta Dental of Pennsylvania	419	5.2%	285	68.0%	87	20.8%	47	11.2%
73474	Dentegra Insurance Company	39	0.5%	21	53.8%	17	43.6%	1	2.6%
95657	Dominion Dental Services, Inc.	153	1.9%	79	51.6%	60	39.2%	14	9.2%
62286	Golden Rule Insurance Co.	4	0.0%	2	50.0%	2	50.0%	0	0.0%
95846	Group Dental Service of Md., Inc.	1	0.0%	1	100.0%	0	0.0%	0	0.0%
53007	Group Hospitalization and Medical Services, Inc.	787	9.8%	297	37.7%	481	61.1%	9	1.1%
64246	Guardian Life Insurance Company of America	548	6.8%	338	61.7%	94	17.2%	116	21.2%
	Johns Hopkins HealthCare LLC	40	0.5%	31	77.5%	9	22.5%	0	0.0%

**APPENDIX 3
DISPOSITION OF CARRIER GRIEVANCE DECISIONS**

NAIC #	COMPANY NAME	GRIEVANCES FILED		ORIGINAL DECISION OF INSURANCE COMPANY WAS...					
		COMPANY TOTAL	% OF ALL COMPANIES	UPHELD		OVERTURNED		MODIFIED	
				NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
95639	Kaiser Fndtn Health Plan Mid-Atlantic	80	1.0%	65	81.3%	15	18.8%	0	0.0%
60053	Kaiser Permanente Insurance Co.	8	0.1%	6	75.0%	2	25.0%	0	0.0%
60321	MAMSI Life and Health Ins. Co.	104	1.3%	52	50.0%	51	49.0%	1	1.0%
65978	Metropolitan Life Ins. Company	21	0.3%	21	100.0%	0	0.0%	0	0.0%
85238	National Health Insurance Co.	1	0.0%	1	100.0%	0	0.0%	0	0.0%
96940	Optimum Choice, Inc.	227	2.8%	109	48.0%	112	49.3%	6	2.6%
61271	Principal Life Insurance Company	13	0.2%	10	76.9%	1	7.7%	2	15.4%
68381	Reliance Standard Life Ins. Co.	2	0.0%	2	100.0%	0	0.0%	0	0.0%
69019	Standard Insurance Company	14	0.2%	6	42.9%	4	28.6%	4	28.6%
68985	Starmount Life Insurance Co.	25	0.3%	20	52.6%	5	20.0%	0	0.0%
80802	Sun Life Assurance Co. of Canada	38	0.5%	20	52.6%	15	39.5%	3	7.9%
69868	United of Omaha Life Ins. Co.	37	0.5%	8	21.6%	29	78.4%	0	0.0%
85766	United Concordia Insurance Co.	301	3.7%	79	26.2%	158	52.5%	64	21.3%
79413	UnitedHealthcare Insurance Co.	1,106	13.8%	431	39.0%	647	58.5%	28	2.5%
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	54	0.7%	14	25.9%	37	68.5%	3	5.6%
	Wellfleet Group LLC	15	0.2%	6	35.7%	9	64.3%	0	0.0%
32280	Wellfleet Insurance Company	1	0.0%	0	0.0%	1	100.0%	0	0.0%
	Total	8,073	100%	3,560	44.1%	4,127	51.1%	386	4.8%

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

NAIC #	COMPANY* NAME	HOSPITAL LOS	HOSPITAL LOS	UPHELD		OVERTURNED		MODIFIED	
		TOTAL*	OUTCOME**	Number	Percent	Number	Percent	Number	Percent
80985	4 Ever Life Insurance Company	4	2	2	100.0%	0	0.0%	0	0.0%
96202	CareFirst BlueChoice, Inc.	8	3	2	66.7%	1	33.3%	0	0.0%
67369	CIGNA Health and Life Insurance Co.	15	5	3	60.0%	1	20.0%	1	20.0%
53007	Group Hospitalization and Med Serv Inc.	1	1	1	100.0%	0	0.0%	0	0.0%
	Johns Hopkins HealthCare LLC	9	3	1	33.3%	2	66.7%	0	0.0%
60053	Kaiser Permanente Insurance Company	1	1	1	100.0%	0	0.0%	0	0.0%
79413	UnitedHealthcare Insurance Company	2	2	2	100.0%	0	0.0%	0	0.0%
	Wellfleet Group LLC	1	1	0	0.0%	1	100.0%	0	0.0%

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

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

APPENDIX 5					
TIME FRAME FOR RENDERING A GRIEVANCE DECISION BY CARRIER EMERGENCY CASES					
NAIC #	COMPANY ** NAME	EMERGENCY CASES - RESOLUTION TIME*			
		1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
80895	4 Ever Life Insurance Company	432	0	0	0
96202	CareFirst BlueChoice, Inc.	24	24	24	24
47058	CareFirst of Maryland, Inc.	24	24	24	24
67369	CIGNA Health and Life Insurance Company	10.1	34.8	21.8	29
53007	Group Hospitalization and Medical Services, Inc.	24	24	24	24
95639	Kaiser Foundation Health Plan-Mid-Atlantic	73	230.6	312	41.3
60321	MAMSI Life and Health Ins. Company	2	60	14	9
96940	Optimum Choice, Inc.	20	60	14	7
79413	UnitedHealthcare Insurance Company	22	42	20	43
95025	UnitedHealthcare of the Mid-Atlantic	29	28	17	12
	Wellfleet Group LLC	0	0	24	0

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

*** Reported as hours**

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

NAIC#	COMPANY NAME	NON-EMERGENCY CASES - RESOLUTION TIME*			
		1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
80985	4 Ever Life Insurance Company	3.0	1.0	0	0
95910	Aetna Dental Inc.	0	0	0	22
95109	Aetna Health Inc. (a Pennsylvania corporation)	20.4	19.2	24.6	23.9
60054	Aetna Life Insurance Company	17.3	21.7	22.3	22
95163	Alpha Dental Programs, Inc.	22	25.6	28	33.3
61301	Ameritas Life Insurance Corporation	34	28	24	26
96202	CareFirst BlueChoice, Inc.	16.5	22.3	23.4	14.1
47058	CareFirst of Maryland, Inc.	15	15.5	19.8	17.1
67369	CIGNA Health and Life Insurance Company	20.9	25.3	23.4	25.7
62146	Combined Insurance Company of America	29	29	0	0
81396	Delta Dental Insurance Company	20	21.5	31	49
54798	Delta Dental of Pennsylvania	20	20	33	35.6
52007	Dental Network, Inc. The	0	117	100.5	150
73474	Dentegra Insurance Company	0	22.5	38	35.6
95657	Dominion Dental Services, Inc.	29	29	28.5	27.4
62286	Golden Rule Insurance Company	0	20	0	38
53007	Group Hospitalization and Medical Services, Inc.	19.8	25.4	27.2	0
64246	Guardian Life Insurance Company of America	3	3	3	20.3
	Johns Hopkins HealthCare LLC	16	0	0	23
95639	Kaiser Foundation Health Plan-Mid-Atlantic	16.2	28.5	21.7	16.5
60053	Kaiser Permanente Insurance Company	9.8	7	2	7
60321	MAMSI Life and Health Insurance Company	37	33	25	32
65978	Metropolitan Life Insurance Company	11.2	18.6	15.3	12.6
82538	National Health Insurance Company	6	5	0	6
96940	Optimum Choice, Inc.	35	34	32	35
61271	Principal Life Insurance Company	6	7	10	11
68381	Reliance Standard Life Insurance Company	56	0	32	0
69019	Standard Insurance Company	8	28	26	22

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

NAIC #	COMPANY NAME	NON-EMERGENCY CASES – RESOLUTION TIME*			
		1 ST Quarter	2 ND Quarter	3 RD Quarter	4 TH Quarter
68985	Starmount Life Insurance Company	5	20	30	28
80802	Sun Life Assurance Company of Canada	30	12.3	12	7
85766	United Concordia Insurance Company	6.7	7.3	7.2	7.8
69868	United of Omaha Life Insurance Company	4.4	3.2	5.6	4
79413	UnitedHealthcare Insurance Company	38	37	35	33
95025	UnitedHealthcare of the Mid-Atlantic, Inc.	32	33	29	40
	Wellfleet Group LLC	33	10	10	0
32280	Wellfleet Insurance Company	0	0	0	8

*Reported as Calendar Days 7

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

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

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

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

**APPENDIX 8
ADMINISTRATION COMPLAINTS**

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

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

Administration Complaints (Continued)

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

Administration Complaints (Continued)

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

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