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May 4, 2017

Lisa Larson  
Assistant Director of Regulatory Affairs  
Maryland Insurance Administration  
200 St. Paul Place  
Baltimore, MD 21202

Submitted by email to: [Networkadequacy.mia@maryland.gov](mailto:Networkadequacy.mia@maryland.gov)

RE: Draft Network Adequacy Regulations

Dear Ms. Larson:

DaVita appreciates this opportunity to comment on the Administration's draft regulations regarding Network Access Standards that were developed through the collaborative process managed under MIA's leadership following the passage of House Bill 1318 / Senate Bill 929 in 2016. DaVita was pleased to be able to participate in that process and offer suggestions on how to protect access for vulnerable patients with end-stage renal disease (ESRD). DaVita has the privilege of providing dialysis treatment for over 5746 individuals with kidney failure throughout our 62 centers across Maryland. Our comprehensive, in-center care team includes nephrologists, nephrology nurses, patient care technicians, pharmacists, clinical researchers, dieticians, social workers, and other highly-trained kidney care specialists.

We strongly support the draft regulations which utilize quantitative metrics for outpatient dialysis. We believe such standards will help to protect the vulnerable ESRD patient population in Maryland. We also believe the regulations will help further standardize Federal and State markets which will reduce confusion for beneficiaries and providers and be easier to administer for insurers and regulators. DaVita urges the adoption of the regulations as proposed.

Please do not hesitate to contact me at (404) 352-5004 or [Jennifer.mcmullen@davita.com](mailto:Jennifer.mcmullen@davita.com) if you would like to discuss these recommendations in detail or have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer McMullen".

Jennifer McMullen  
Director State Government Affairs