



August 2017

Lisa Larson, Regulations Manager
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, MD 21202
VIA EMAIL: networkadequacy.mia@maryland.gov

Dear Ms. Larson,

Thank you for the opportunity to provide the following comments on the proposed Network Adequacy regulations 31.10.44 as published in the July 21st issue of the Maryland Register.

We appreciate the Maryland Insurance Administration's (MIA's) efforts to bring together a comprehensive body of regulations to ensure network adequacy standards are in place across all regulated insurers in Maryland for the benefit of patients and the providers who care for them.

As stated in our testimony during the February 2017 workgroup and our comment letter on the draft version of the regulations, Maryland's licensed dietitians and nutritionists are on the front lines of healthcare preventing chronic disease by promoting evidence based lifestyle changes.

In addition to acute disease states, private practice and outpatient dietitians treat thousands of patients every day in a wide variety of settings, providing multiple services to prevent and treat a multitude of chronic diseases and decrease health care costs in the process. This is now considered the future of healthcare. It has been shown that when dietitians have been given the opportunity, they decrease overall healthcare costs.

We offer the following comments, clarification requests and recommendations to strengthen what has been proposed. We have organized the following based on the sections laid out in the draft regulations.

Section .02 Definitions:

Recommendation #1: Clarification requested: The definition for (17) "Provider". Are licensed dietitian and nutritionists intended to be included under this definition? Clarifying this definition will be helpful to recognize that non-physician providers also contract with insurers and serve on provider panels.

If not we ask that "Licensed Dietitian Nutritionists" be specifically included. Refer to the following comment below.

Sections .04 Travel Distance Standards:

Recommendation #2: .04A(4) and B(4): In the charts many specialties are delineated with a catch all titled "Other Medical Provider Not Listed". This is where we presume licensed dietitians and nutritionists would be included.

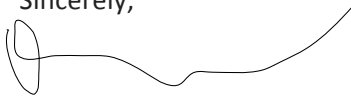
Given the critically important preventive, acute and chronic care services we provide we ask that **LICENSED DIETITIANS AND NUTRITIONISTS** be specifically listed in the charts under .04A and .04B.

We also suggest that the corresponding geographic area distance requirements be similar to those standards for “Physiatry, Rehabilitative Medicine”.

The proposed regulations would benefit from the clarifications and recommendations requested above with respect to the essential health care services licensed dietitians and nutritionists provide. The increasing emphasis on preventive care, wellness, and chronic care is driving healthcare in Maryland. Our recommendations above will help make Maryland provider panels more robust and responsive to the needs of Maryland’s patients and accommodate this shifting focus of healthcare on preventive and chronic care.

Thank you for your attention to these comments and we stand ready to provide any additional information necessary.

Sincerely,

A handwritten signature in black ink, appearing to read 'Harivleen Gill', with a stylized flourish at the end.

Harivleen Gill, MBA, RD, LDN
President, Maryland Academy of Nutrition and Dietetics, MAND