

May 5, 2017

VIA E-MAIL (networkadequacy.mia@maryland.gov)
Lisa Larson, Assistant Director of Regulatory Affairs
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, MD 21202

Re: Draft Network Adequacy Regulation 31.10.44

Dear Ms. Larson:

Magellan Healthcare, Inc., (Magellan) appreciates the opportunity to respond to these draft regulations regarding network adequacy.

As an experienced behavioral health specialty organization, Magellan manages and administers mental health and substance use disorder treatment and services on behalf of its customers. Magellan Healthcare contracts with health plans nationwide and some state Medicaid programs in order to perform case management and care coordination, utilization review, utilization management, network management, and/or claims adjudication functions on their behalf.

Magellan offers the following two comments on this proposed regulation.

In the section .04 Geographic Accessibility of Providers we propose that the Psychiatry and Psychology standards be revised to reflect the standard noted below. This mirrors the standard for licensed clinical social workers and is aligned to the CMS Federally Facilitated Marketplace (FFM) standards for behavioral health providers. Most of the standards reflected in this proposed regulation reflect those FFM standards for many of the other specialties, including primary care.

Large Metro – 10
Metro – 30
Micro – 45
Rural 60

In the section .06 Provider to Enrollee Ratios, in section B we request that you change the reference to physician to refer to practitioner. For sections (4) and (5) in particular we have

many other non physician practitioner types that provide services. These providers should be included in these ratios.

Should you have any questions or wish to discuss our comments, please contact me at TMBERMAN@magellanhealth.com or 410-953-4710.

Sincerely,



Teresa Berman

Vice President and Deputy Corporate Compliance Officer