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December 12, 2022

Ms. Teresa Howard
Cigna Legal, U.S. Compliance Operations – Regulatory Reporting
Cigna Health and Life Insurance Company
900 Cottage Grove Rd
Bloomfield, CT 06152

Re: MIA v. Cigna Health and Life Insurance Company
Case No.: MIA-2021-04-029
2019 Network Adequacy Access Plan Filing

Dear Ms. Howard:

The Maryland Insurance Administration (“Administration”) and Cigna Health and Life Insurance Company (“CHLIC”) entered into a Consent Order on April 27, 2021 (the “Consent Order”) to resolve matters related to the CHLIC 2019 access plan.

In the Consent Order, the Administration concluded that CHLIC violated § 15-112 of the Insurance Article and COMAR 31.10.44.03C by submitting an access plan that:

- failed to comply with required travel distance standards and appointment waiting time standards;
- failed to include in the executive summary plan form the required information regarding certified registered nurse practitioners; and
- failed to comply with the requirement that at least 30 percent of the available essential community providers in each of the urban, rural, and suburban areas are included in the network.

The Administration imposed an administrative penalty on CHLIC of \$100,000 for the violations, but suspended the penalty pending the Administration’s (i) review of the access plan submitted by CHLIC in 2021; (ii) determination as to whether the 2021 access plan substantiates representations made by CHLIC related to its intent to adjust record keeping methodologies and to improve its compliance with the access standards; and (iii) based on such review and

determination, decision on whether the administrative penalty should be paid, reduced, or rescinded.

The Administration has completed its review of the CHLIC 2021 access plan filed on July 1, 2021, supplemented with additional information and documentation on October 29, 2021, January 21, 2022, March 28, 2022, and May 9, 2022. This filing was made pursuant to § 15-112(c)(2)(i) of the Insurance Article and COMAR 31.10.44, and the Administration issued a determination summarizing its review on December 12, 2022.

The CHLIC 2021 access plan demonstrated to the satisfaction of the Administration that all of the deficiencies reported in the CHLIC 2019 access plan were either resolved, or were the result of circumstances that merited the granting of a waiver by the Administration of the otherwise applicable standard, as detailed in the determination letter issued by the Administration on December 12, 2022. The Administration has therefore determined that the CHLIC 2021 access plan substantiates representations made by CHLIC related to its intent to improve its compliance with the required travel distance and appointment waiting time standards, to include in the executive summary plan form the required information regarding certified registered nurse practitioners, and to comply with the requirement that at least 30 percent of the available essential community providers in each of the urban, rural, and suburban areas are included in the network. The \$100,000 penalty is hereby rescinded in its entirety.

This determination letter is limited to the CHLIC 2019 Access Plan, and is independent of the Administration's review of any other Network Adequacy Access Plans and submissions in connection thereof which are filed by CHLIC.

Very truly yours,

A handwritten signature in black ink, appearing to read 'David Cooney', written over a faint horizontal line.

David Cooney
Associate Commissioner
Life and Health