



August 19, 2022

Mr. David Cooney  
Assistant Commissioner, Life and Health  
Maryland Insurance Administration  
200 St. Paul Place, Suite 2700  
Baltimore, MD 21202

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

**Re: Draft 31.10.44, Network Adequacy**

Dear Mr. Cooney,

The Maryland Dermatologic Society (“MDS”), which represents nearly 200 dermatologists, appreciates the opportunity to provide feedback on draft network adequacy regulations, 31.10.44. Dermatologists evaluate and treat more than 3,000 diseases, including skin cancer, psoriasis, immunologic diseases, and many genetic disorders. One in four Americans suffers or will suffer from a skin disease.

MDS believes provider networks exist to serve patient needs, specifically by ensuring that patients have adequate and timely access to providers with appropriate training and specialty or subspecialty expertise. We recommend that carriers not abandon maximum time and distance standards when determining physician network adequacy, as access to in-person visits, when necessary, is a critical component of safe and effective telecare. Carriers should not offer virtual access alone without an option to obtain in-person care. Patients must always have covered network access to a board-certified dermatologist in-person when needed. We recommend that the Maryland Insurance Administration (MIA) incorporate these policies into the rules, which are reflected in the American Academy of Dermatology’s Teledermatology Standards.<sup>1</sup>

Finally, MDS does not support telehealth services that prioritize business interests over the quality and safety of patient care, such as platforms that do not offer any option for patients to be seen in-person by a board-certified dermatologist when needed. We emphasize the

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<sup>1</sup><https://assets.ctfassets.net/1ny4yoivrqia/595kopCF5IW6B72fXh06Bj/685491f27cb07488b2e54c347e28bacb/AAD-Teledermatology-Standards.pdf>

importance of full transparency for-profit business models offering telehealth directly to consumers, including full disclosure of credentials of the physician, or non-physician practitioner, who is advising the patient, and asks that MIA explicitly address this critical issue.

As the nation emerges from the COVID-19 public health emergency, it is critical that we protect patients from the financial impact of unanticipated medical bills as result of network inadequacy. This can be achieved when patients have the option to be seen in-person by a board-certified dermatologist when needed. Should you have any questions, please contact Russ Kujan, executive director for the Maryland Dermatological Society, at [mds@medchi.org](mailto:mds@medchi.org) or 410-539-0872, x3317.

Sincerely,

Chikoti Wheat, MD, FAAD  
President  
Maryland Dermatologic Society

CC. Maryland Health Care Commission, Christine Karayinopulos: [christine.karayinopulos@maryland.gov](mailto:christine.karayinopulos@maryland.gov)