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December 12, 2022

Ms. Laurie Beebe  
Provider Network Manager  
Wellfleet Insurance Company  
P.O. Box 15369  
Springfield, MA 01115

Re: Wellfleet 2021 Network Adequacy Access Plan Filing

Dear Ms. Beebe:

The Maryland Insurance Administration (“Administration”) has completed its review of the Wellfleet Insurance Company (“Wellfleet”) 2021 Network Adequacy Access Plan (the “Wellfleet 2021 Access Plan”) filed on July 1, 2021, supplemented with additional information and documentation on November 9, 2021, January 28, 2022, and April 8, 2022. This filing was made pursuant to § 15-112(c)(2)(i) of the Insurance Article and COMAR 31.10.44.

In Maryland, Wellfleet offers Student Health Insurance Plans (“SHIP”) to colleges and universities and contracts for network provider services through Cigna Health and Life Insurance Company (CHLIC)’s Preferred Provider Organization (PPO) and Open Access Plus (OAP) plan provider networks. Separate network adequacy access plans were filed for each of these provider networks.

The Administration’s review of the Wellfleet 2021 Access Plan filing has found that all of the access standards in COMAR 31.10.44 were met for both the PPO network and the OAP network, based on the data self-reported by Wellfleet. However, please be advised that the Administration has the following concerns regarding Wellfleet’s compliance with certain access standards that should be addressed in future filings.

### ***Travel Distance Standards***

The student demographic data Wellfleet used to create the access reports included addresses reported by students. However, under specific circumstances, Wellfleet used the college’s or

university's administrative address as a proxy. Wellfleet noted that plan enrollment occurs for students before they have a local address and if the cost of insurance is bundled with fees and paid by parents, Wellfleet has no easy way to determine actual student residence addresses. Wellfleet stated that they are working with school officials to find a way to obtain this information.

The Administration requires a rationale whenever a school's address is given as proxy for a student's residence when determining compliance with the travel distance standards in COMAR 31.10.44.04, along with the number of students for which each reason applies.

In the Wellfleet 2021 Access Plan for the PPO network, Wellfleet reported that it used the school's administrative address as a proxy for a student's address under the following circumstances:

- for 258 students who reported an out-of-state home address at the time of enrollment and for whom an updated school resident address was not available;
- for 65 students who reported the school's address at the time of enrollment and for whom an updated address was not available.

In the Wellfleet 2021 Access Plan for the OAP network, Wellfleet stated that it used the school's administrative address as a proxy for a student's address in the following circumstances:

- for 30 students who reported an out-of-state home address at the time of enrollment and for whom an updated address was not provided;
- for 46 students who reported the school's address at the time of enrollment and for whom an updated address was not available;
- for 12 students whose Maryland address at the time of enrollment was greater than an hour's distance from the school and presumed to be a permanent home address.

The Administration notes that in accordance with COMAR 31.10.44.04A(1), "*The distances listed in §A(5) of this regulation shall be measured from the enrollee's place of residence.*" The Administration expects Wellfleet to demonstrate an effort to obtain the resident addresses of students throughout their period of enrollment and to use those addresses as the basis for travel distance compliance measurement in future access plan filings.

### ***Appointment Waiting Time Standards***

CHLIC administered the provider surveys that measured Wellfleet's compliance with the appointment waiting time standards. These metrics as reported by Wellfleet demonstrated compliance in all categories specified by COMAR 31.10.44.05 for both the OAP and PPO networks. While the Administration has determined that Wellfleet provided sufficient explanation and documentation to demonstrate that the urgent care standard of 95% was met for 2021, it is expected that if Wellfleet intends to combine telehealth claims with provider survey results when measuring appointment waiting time in future access plan filings, Wellfleet will

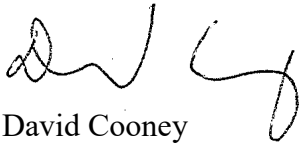
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utilize a methodology that ensures a proportional, representative balance of surveys and actual claims data.

This determination letter is limited to review of the Wellfleet 2021 Access Plans for the PPO and OAP networks, and is independent of the Administration's review of any other Network Adequacy Access Plans and submissions in connection thereof which are filed by Wellfleet.

Wellfleet has the right to request a hearing on this determination letter in accordance with § 2-210 of the Insurance Article. A request for a hearing must be made in writing and received by the Administration within thirty (30) days of the date of this letter. The rules for requesting a hearing are set forth in COMAR 31.02.01.

Very truly yours,

A handwritten signature in black ink, appearing to read 'David Cooney', written in a cursive style.

David Cooney  
Associate Commissioner  
Life and Health