Rules based, data driven
Network Adequacy
Review and Regulation

9:30 am-10:30 am
November 29, 2016
Regulatory Health Link Division,
Arkansas Insurance Department

REGULATORY
HEALTH LINK
Division
Arkansas Insurance Department

STATE INSURANCE DEPARTMENT
STATE OF ARKANSAS

Agenda

- **Introductions & housekeeping**
- **Data submission details**
- **Observations on "Initial PY2018 Provider Type NPI List"**
- **2018 Letter to the Issuer - Draft**
- **Next step in the process**
- **Other discussions**

Introductions

- If you are not on the original invitation list but need to be added for future events, please email Compliance Officer Jim.Gonzalez@arkansas.gov

- Conversely, if you need to be removed, please email him accordingly.
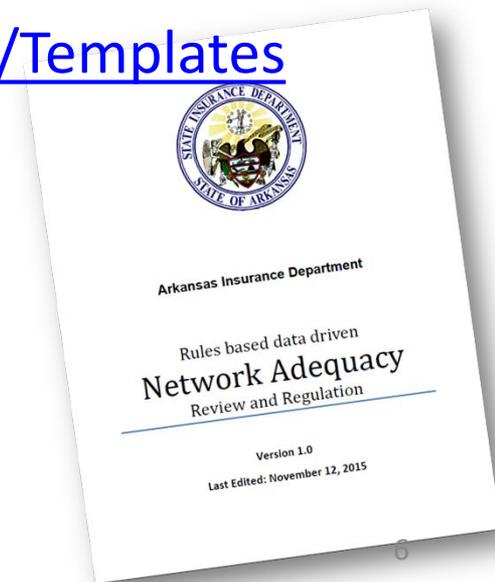
Industry Actors -1

- These meetings on Network Adequacy apply to all health and dental insurance carriers *covered under Rule 106*.

- These meetings do not apply to Dental Plans that are
  - *Not* in the Marketplace or *not* seeking certification.

Industry Actors -2

- *Network Adequacy Industry Contact List* published on our website http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy

- List will have the contacts known to AID and grouped by organizations using the same network that need to have an independent communication stream.

- AID will attempt to list the NA Subject Matter Experts as well as associated IT and Compliance personnel.

- The contact person for maintenance of this list is Jim.Gonzalez@arkansas.gov

New to Arkansas NA Regulation Program?

- Program details available at http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy

  - A good document to start with is "Arkansas Network Adequacy Architecture"

  - Past meeting slides and notes are relevant and maintained in chronological order

- Data specifications & templates available at http://rhld.insurance.arkansas.gov/Info/Public/Templates

Arkansas Insurance Department

Rules based data driven

Network Adequacy

Review and Regulation

Version 1.0
Last Edited: November 12, 2015

Where are we?

Finalized PY2018 Provider Taxonomic Descriptions

AID data preprartion

Initial PY 2018 Provider Type NPI List

Industry Review and Addition/Deletion

PY 2018 Industry Provider Type Addition-Deletion Suggestions

Published November 15, 2016

Industry Objection and RHLD Finalization

This is where we are. Data due December 15, 2016

Finalized PY2018 Provider Type -NPI List

Scheduled January 15, 2017

Reminder on why are we doing this

- **These Provider Type NPI lists is an input for the average distance calculation programs that generate the reports required for submission to AID.**

- **AID has observed justifications that come later in the process stating that provider(s) has been mis-classified with the argument that the access statistics is actually better than it appears.**

  This is your chance to avoid the need for such justifications.

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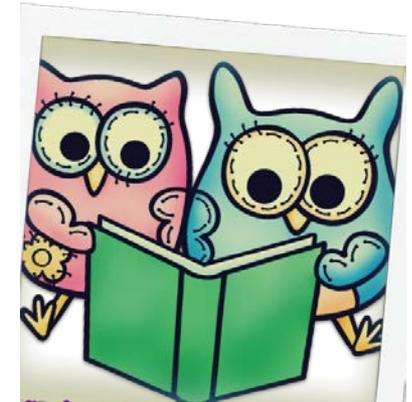
Data submission details

- Industry to work on this spreadsheet and submit feedback to AID's secure FTP server.
  - Use document "General Data Submission Process to RHLD" within http://rhld.insurance.arkansas.gov/Info/Public/Templates for FTP Server details.
  - Use document "PY2018 NA Review Process" within http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy for filenames
- Feedback due by December 15, 2016

http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy

REGULATORY HEALTH LINK Division — Arkansas Insurance Department

"PY2018 Industry Provider Type Addition-Deletion Suggestions"

Do we agree???

Ameritas Experts

"20161215_61301_Ameritas_ObjectionVote.csv"

AID Secure FTP Server

A recap of what is needed now using Ameritas as an example

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Sample of industry initiated changes

Provider Group ID	PY2018 Initial NPI List and Feedback Totals					
		Starting Total	Suggested Additions	Suggested Removals	Ending Total	Change
C010	Adult/Geriatric Primary Care Providers	10548	479	5415	5612	-47%
C020	Pediatric Primary Care Providers	2428	275	1582	1121	-54%
C030	Mental Health/Behavioral Health/Substance Use Disorder Facility	216	10	147	79	-63%
C040	Mental Health/Behavioral Health Providers	5920	129	3136	2913	-51%
C050	Substance Use Disorder Providers	119	1	62	58	-51%

Observations

- Provider-Type-NPI-Pools appear to be undergoing aggressive reductions except for the Dental Provider Types

- The PY2017 finalized list included NPI's from issuers who may not be active participants in the ongoing Provider-Type-NPI-Pool data maintenance. It is possible that they may find their contracted NPI's disappearing from the agreed upon list.

- Large majority of removals are in agreement with at least two issuers

- Large majority of removals appear to be of non-Arkansan provider locations

Issuers communication on Additions & Removals

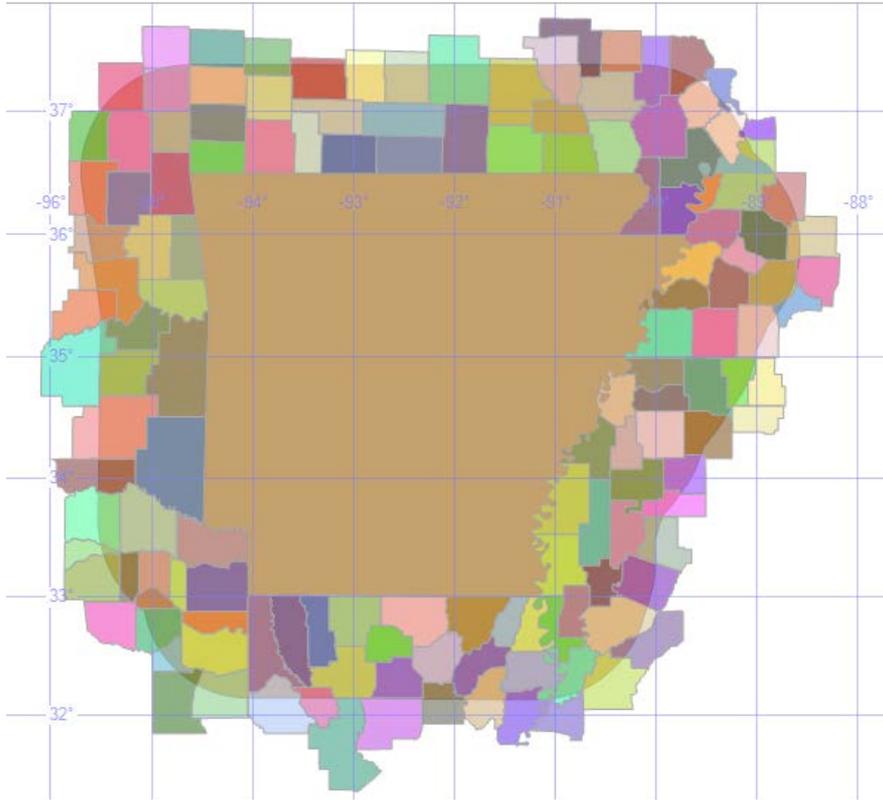**(using "PY2018 Industry Provider Type Addition-Deletion Suggestions" template)**

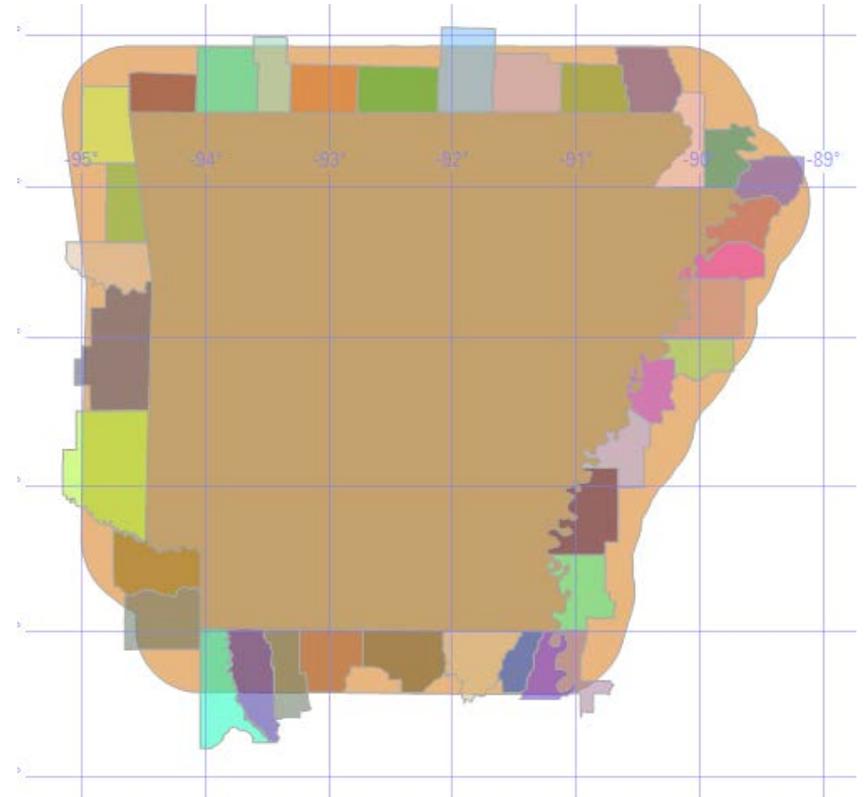| Provider	Provider Type Description	Taxonomy	Taxonomy Description	NPI	Action	# Requesti	Reasons	In AR PY20	NAIC	Objection
Provider type (criteria code) of the provider	Description of the provider type	Taxonomic code which includes provider in the provider type	Description of taxonomy Type : Classification : Specialization	NPI of provider	Proposed action to be taken: Add - add this provider to the type Remove - remove this provider	Number of issuers requesting the proposed action	Reasons supplied by the issuer(s) requesting the proposed action	Y if the NPI was found in Arkansas in PY2017 Federal NA submissions by any issuer	Issuer's NAIC making objection	Brief objection reason, if any. Blank indicates assent to proposed action. Text mandatory if objecting.
C010	Adult/Geriatric Primary Care Providers	207QA0000X	Allopathic & Osteopathic Physicians:Family Medici	5432543254	Remove	3			95446	In contract.
C010	Adult/Geriatric Primary Care Providers	207QA0000X	Allopathic & Osteopathic Physicians:Family Medici	4321432143	Add	1				
C010	Access to Adult/Geriatric Primary Care Provid	207Q00000X	Allopathic & Osteopathic Physicians:Family Medici	003010463	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	207R00000X	Allopathic & Osteopathic Physicians:Internal Medi	003014705	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	207R00000X	Allopathic & Osteopathic Physicians:Internal Medi	003032111	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	207R00000X	Allopathic & Osteopathic Physicians:Internal Medi	003044702	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	363A00000X	Physician Assistants & Advanced Practice Nursing	003054347	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	207Q00000X	Allopathic & Osteopathic Physicians:Family Medici	003053270	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	363LF0000X	Physician Assistants & Advanced Practice Nursing	003066085	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	207R00000X	Allopathic & Osteopathic Physicians:Internal Medi	003074154	Remove	1	Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	207Q00000X	Allopathic & Osteopathic Physicians:Family Medici	003084617	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	207R00000X	Allopathic & Osteopathic Physicians:Internal Medi	003030352	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	207Q00000X	Allopathic & Osteopathic Physicians:Family Medici	003103490	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	363L00000X	Physician Assistants & Advanced Practice Nursing	003113348	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	207Q00000X	Allopathic & Osteopathic Physicians:Family Medici	003127085	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid		Allopathic & Osteopathic Physicians:Family Medici	003128833	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	363LF0000X	Physician Assistants & Advanced Practice Nursing	103162702	Remove	2	Not in cont cnty, Out of Service Area			
C010	Access to Adult/Geriatric Primary Care Provid	363LA2200X	Physician Assistants & Advanced Practice Nursing	10037735	Remove	2	Not in cont cnty, Out of Service Area			

NPI	Action	# Requesting	Reasons	In AR PY2017	NAIC	Objection
1013152461	Remove	2	Not in cont cnty, Out of Service Area			
1013159383	Add	1	New provider			
1013167352	Remove	2	Not in cont cnty, Out of Service Area			
1013181601	Remove	2	Not in cont cnty, Out of Service Area			
1013207836	Remove	2	Not in cont cnty, Out of Service Area			
1013209188	Remove	2	Not in cont cnty, Out of Service Area			
1013222983	Remove	2	Not in cont cnty, Out of Service Area			
1013229251	Remove	2	Not in cont cnty, Out of Service Area			
1013229863	Remove	2	Not in cont cnty, Out of Service Area			
1013245000	Remove	1	Out of Service Area	Y		
1013248004	Remove	2	Not in cont cnty, Out of Service Area			

Enter NAIC # and Objection reason if objecting.

Objection reason mandatory.

Neighboring counties

Neighboring Counties 60 Miles from the border

Contiguous Counties to the border

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2018 Letter to the Issuer- CMS Draft

	Draft	**Final**
PY 2014 Letters to Issuers	01-Mar-13	05-Apr-13
PY 2015 Letters to Issuers	04-Feb-14	14-Mar-14
PY 2016 Letters to Issuers	19-Dec-14	20-Feb-15
PY 2017 Letters to Issuers	23-Dec-15	29-Feb-16
PY 2018 Letters to Issuers	10-Nov-16	N/A
PY 2014 Payment Parameters	07-Dec-12	11-Mar-13
PY 2015 Payment Parameters	02-Dec-13	11-Mar-14
PY 2016 Payment Parameters	26-Nov-14	27-Feb-15
PY 2017 Payment Parameters	02-Dec-15	29-Feb-16
PY 2018 Payment Parameters	09-Sep-16	N/A

2018 Letter to the Issuer- Topics

- Section 3 Network Adequacy
    - i. Network Adequacy Standard and Certification Review
    - ii. Provider Transitions
    - iii. Out-of-Network Cost Sharing for In-Network Settings
    - iv. Network Transparency
    - v. Specialty Access

Distance Standards
(CMS/CCIIO vs Arkansas)

Specialty Area	Maximum Time and Distance Standards (Minutes/Miles)				
	Large	Metro	Micro	Rural	Counties with Extreme Access Considerations (CEAC)
Primary Care	10/5	15/10	30/20	40/30	70/60
Dental	30/15	45/30	80/60	90/75	125/110
Endocrinology	30/15	60/40	100/75	110/90	145/130
Infectious Diseases	30/15	60/40	100/75	110/90	145/130
					110/100
					145/130
					110/100

	Non-rural (Miles)	Rural (Miles)
PCP & General Dentists	30	36
Hospitals (various)	30	36
Specialists	60	72

So what changed in Arkansas NA Program for PY2018?

- Dental Providers data agreement through Provider-Type NPI pools

- Introducing Pharmacy Provider Type NPI Pool

- Adding Hospital Bed to the Provider-Enrollee ratios (details to follow)

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Next steps for industry

1. Review "PY2018 Industry Provider Type Addition-Deletion Suggestions" posted in http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy

2. Objections (if any) on above data due to AID on Thursday, 12/15/2016

3. Review "Finalized PY2018 Provider Type-NPI list" to be posted in http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy on January 15, 2017

Next meeting on NA tentatively on Thursday January 19, 2017, 9:30am – 11:00 am (unless AID calls for an earlier meeting due to problematic data submissions). AID expects to communicate it's PY2018 NA data submission requirements in that meeting.

Contact

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501-773-0420