Rules based, data driven

Network Adequacy

Review and Regulation

9:30 am-11:00 am Central
May 18, 2017
Regulatory Health Link Division,
Arkansas Insurance Department

Agenda

- **Introductions & housekeeping**
- **Updates**
- **Explanation of the following**
  - Mid-year PTNP data maintenance and implications
  - AID's expectation from issuers in the mid-Year PTNP data maintenance rounds with timelines.
  - Common errors to avoid.
- **Next Steps**

Introductions

REGULATORY HEALTH LINK Division
Arkansas Insurance Department

- 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

REGULATORY HEALTH LINK Division
Arkansas Insurance Department

- 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* seeking certification.

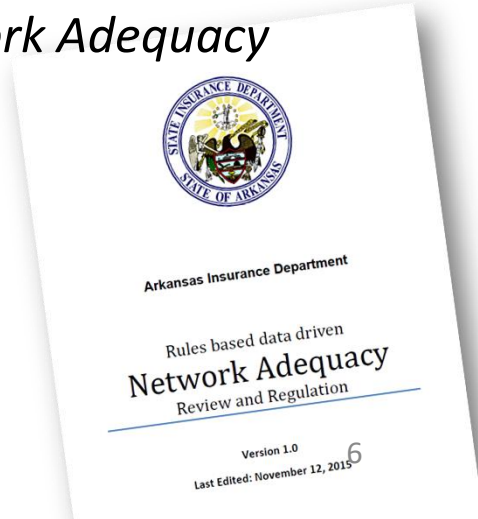
Industry Actors -2

REGULATORY HEALTH LINK Division
Arkansas Insurance Department

- *Network Adequacy Industry Contact List* updated on our NA website http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy
- Contacts known to AID are listed and grouped by organizations using network(s) that need to have an independent communication stream.
- AID attempts to cover contacts from three areas for NA
  - NA Subject Matter Expert (NA SME).
  - Associated IT personnel.
  - Associated 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
  - Overview document *"Arkansas Network Adequacy Architecture"*
  - Meeting slides and notes maintained in chronological order
- Data specifications & templates updated at http://rhld.insurance.arkansas.gov/Info/Public/Templates
  - For data submission requirements refer *"SERFF Network Adequacy Data Submission Instructions"*



Update

REGULATORY HEALTH LINK Division
Arkansas Insurance Department

- The "mid-year" PY2017 Network Adequacy review process required PY2017 marketplace issuers to submit two updated templates on October 1, 2017
  - Updated *AR Specialty Access Template*
  - Updated *ECP/NA Template*

This "mid-year" Network Adequacy review process has been delayed. The updated template submissions are not required in 2017.

(Please do not confuse mid-year Network Adequacy Review with mid-year PTNP data maintenance. The mid-year PTNP data maintenance will continue per schedule)

PTNP data maintenance

PTNP Data Maintenance

REGULATORY HEALTH LINK Division
Arkansas Insurance Department

What are Provider-Type-NPI-Pools (PTNPs)?

- A common industry understanding of the classification(s) of each provider serving Arkansans.
- Involves two rounds of data maintenance a year
  - Early in the year, before certification filings
  - Mid-year (New, starting in calendar year 2017)
- Each round involves two rounds of feedback from the issuers
  - Suggestion for changes (aka "Add-Delete" phase).
  - Industry agreement or rejection on those changes (aka "Voting" phase).

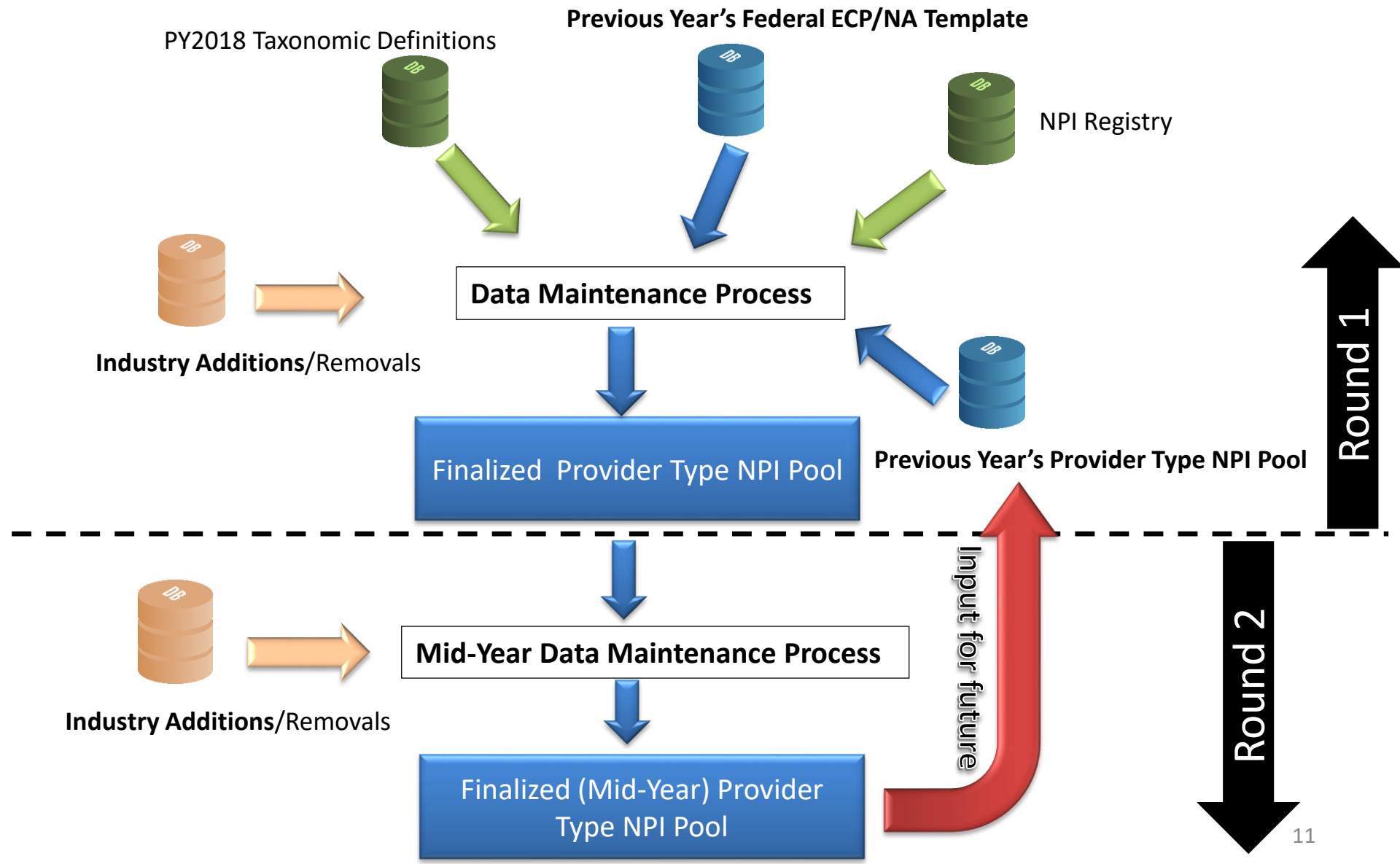
Why mid-year PTNP Data Maintenance?

REGULATORY HEALTH LINK Division
Arkansas Insurance Department

- Opportunity to correct NPI-"C-Bucket" omissions or erroneous inclusions discovered while preparing SERFF Network Adequacy data filings in May 2017. Opportunity to correct errors while still fresh in issuer minds.

A side benefit is providing AID with an updated lens in certain analysis of detailed provider data within ECP/NA template.

Difference in Mid-Year PTNP data maintenance (Round 1 vs Round 2)



PTNP Data Maintenance versus NA Data Submissions & Review

REGULATORY HEALTH LINK Division
Arkansas Insurance Department

PTNP Data Maintenance	NA Data Submission & Review in SERFF
Regulatory data pre-planning. Not regulatory data by itself.	Regulatory Data.
Not mandatory. But is highly recommended because it has direct bearing on the regulatory data submitted (Arkansas templates) and on analysis done by AID (on Federal ECP/NA templates).	Mandatory.
SERFF not used for data interactions. Data exchanges through AID public website and Issuer data submissions to AID's secure FTP server.	Only SERFF used.
Industry information drives outcomes.	Regulatory requirements drives outcomes.

Expectations from issuers

Expectations from Issuers on mid-Year PTNP update

REGULATORY HEALTH LINK Division
Arkansas Insurance Department

- Refer *"Process 2 Cycle 2 (Provider Type-NPI Pool maintenance): June, 2017-August, 2017"* within pdf document *NA Review Process* located in http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy (NA website)
  - **Issuers provides suggestions for change.** Due on June 1, 2017. AID collects these suggestions and posts the consolidated information on NA website on June 15, 2017.
  - **Issuers vote their agreement or opposition to suggested changes by others**. Due on July 15, 2017. AID processes votes and updates the PTNPs on NA website on August 15, 2017.

How is data exchanged?

- **From AID to issuers:**

AID's Network Adequacy (NA) webpage (http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy)

For file names refer *Network Adequacy Review Process.pdf* located in the same webpage.

- **From issuers to AID:**

Delivery to AID's secure FTP servers following instructions in "General Data Submission Process to RHLD" located at http://rhld.insurance.arkansas.gov/Info/Public/Templates. For file naming conventions during the two stages of issuer feedback refer *Network Adequacy Review Process.pdf* located in AID's NA webpage.

Data submissions from issuers explained with examples in the following slides.

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

"Initial PY2018 Mid-Year Provider Type-NPI Pool"

Blue Cross Experts

"20170601_83470_BCBS_Provider_Type_NPI_AddDelete.csv"

AID Secure FTP Server

"Suggestion for changes" stage using BCBS as an example

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

"Mid-Year PY2018 Industry Provider Type Addition Deletion suggestions"

To agree or not to agree on this addition and that removal?

Ambetter Experts

"20170715_80799_Ambetter_ObjectionVote.csv"

AID Secure FTP Server

Voting stage using Ambetter as an example

REGULATORY HEALTH LINK Division
Arkansas Insurance Department

Errors to avoid

Errors to avoid during "Suggestions for change" (1 of 2)

REGULATORY HEALTH LINK Division
Arkansas Insurance Department

- Use template "Mid-Year PY2018 Industry Provider Type Addition Deletion suggestions" to suggest changes. This template was made available in the NA website on March 2017.
- Please remember we are communicating about correcting classifications of NPIs (i.e. Providers). Not whether a NPI (i.e. Provider) exists or is valid. Each line communicates either **addition of an NPI to a "C-bucket" –**OR- **removal of an NPI from a "C-bucket".**
- A misclassified NPI ***may*** require two or more suggestions. One would be a **removal** from the incorrect "C-bucket" **and if not already assigned to the applicable "C-bucket(s)", addition(s)** to the correct "C-bucket(s)". Sometimes a misclassification may require only one suggestion- a removal from a "C-bucket" with no concomitant addition suggestions, since an appropriate "C-bucket" does not exist for the NPI.
- AID has observed significant objection feedback in past voting stages with a reason saying that a particular NPI should belong to some other bucket. Please remember that this is the stage to add or remove from an classification. The voting stage that comes later, is not the place to make addition or removal suggestions.
- Try not to approach the PTNP data maintenance with an inclination towards one type of action (say an inclination towards either addition or deletion). AID tends to compare competitor networks before issuing an objection. Just focusing on say additions and not on removal of inaccurate NPI classifications may not help you in AID's comparative analysis. Please approach the PTNP data maintenance as an effort towards accurate classification.

Errors to avoid during "Suggestions for change" (2 of 2)

REGULATORY HEALTH LINK Division
Arkansas Insurance Department

- While adding a NPI to a "C-bucket", please pay heed to the taxonomic definition of the "C-bucket". Same consideration applies when looking for removals.
  - For instance the current definition of C260 (Access to Dental Specialists) does not include oral surgeons, so do not add them to "Dental Specialists". Similarly if you know an NPI listed is an oral surgeon who does not practice what is taxonomically defined, ask for its removal.
- Do provide your most compelling reason for an addition or deletion. Each issuer's reasons behind an addition or removal is shown to all issuers during the voting round and may influence their feedback. During vote processing AID may overrule the direction of a vote based on the strength of an issuer's reason.
  - An example of a compelling reason for removal of a PCP can be a brief "Works only in emergency medicine in our 2016 claims data".
- While adding bordering state providers, please remember that AID does not have any "contiguous county" requirement. But bear in mind though that adding providers very far from the borders may not help with your average distance calculations. Add providers in bordering states that Arkansans do avail – because your consumers are probably the best judge.

Errors to avoid during "Voting" stage (1 of 1)

REGULATORY HEALTH LINK Division
Arkansas Insurance Department

- Please use the recommended template.
- Please remember that this stage in only to communicate your agreement or rejection of a suggested change of provider classification. It is not about communicating whether a NPI (i.e. Provider) exists or is valid. While rejecting an addition suggestion, if you realize that the NPI belongs to a different C-bucket, your opportunity for suggesting the addition to the appropriate C-bucket(s) will be in future PTNP data maintenance rounds. Suggestion to add to a different C-bucket cannot be handled at this stage.
- Most network data considerations during the add-remove stage also apply here- Taxonomic definitions, Out-of-state provider distance considerations, etc.
  - For example, before objecting to some other issuer's removal of an apparently valid NPI-"C bucket" combination, consider if the provider out of state, and if all practicing locations are far from the border.
- Do provide your most compelling reason behind rejecting an addition or deletion. AID may use the strength of your reason to settle a tie or even reverse the direction of a vote.
  - An example of a compelling reason for rejecting addition of a NPI as a PCP can be a terse "Works only in emergency rooms per 2016 claims data".

Next steps for industry

- Suggestions for change due June 1, 2017.
- Vote agreement or opposition to suggested due by July 15, 2017.

Please feel free to contact AID on any questions you may have.
(Primary contact on the PTNP process: Jim.Gonzalez@arkansas.gov)

Contact

tonmoy.dasgupta@arkansas.gov

501-773-0420