

PY2027: Changes in the NA Justification & Monitoring Information template

▼ Meeting details

Event	PY2027: Changes in the NA Justification & Monitoring Information template	
Date	25 Jun 2026 3:00 PM - 3:40 PM Coordinated Universal Time	

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Meeting recap

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(AI Meeting Summary & Notes reviewed/edited by presenters Tonmoy Dasgupta/John Robinson, AID)

Summary AI GENERATED

The meeting reviewed the network adequacy regulatory cycle, upcoming plan certification reports (including new justification reports) and the contested locations process and potential enforcement actions. A new provider location code and visualization/download tools will be available in plan year 2027 to improve accuracy and reduce erroneous contests; justification templates were refined and a new Data Issues tab was added. The department explained how issuer responses will be evidence-tested against a fixed ideal network, outlined PTNP participation and timeline, and provided contact information for follow-up.

Meeting purpose and logistics [0:16](#)

- Meeting is a combined governance and planning session; recording and materials will be posted on the website.
- Presenter noted PTNP process launching soon and that information would be incorporated into this session.
- Meeting will move briskly but aims to preserve meaningful discussion.

Network adequacy regulation cycle and plan certification [2:18](#)

- Overview of the network adequacy regulation cycle and that processes can overlap in timing.
- Provider type definition maintenance is not annual but can be added collaboratively (Department of Health, ACHI, issuers) when needed.
- During plan certification stage, issuers submit templates; department reviews for deficiencies and will return submissions with responses.

New plan year 2027 reports and statuses [3:44](#)

- Justification reports and updated NA templates will generate a Network Adequacy Determination Report per network with three statuses: Accepted, Conditionally accepted, Deficient.
- Plans using networks deemed Deficient, will not be certified.
- Contested locations report will be issued when other issuers contest a reported location; contested locations typically lead to conditional acceptance.

Handling persistent contested locations and enforcement [5:32](#)

- Department will track contested locations across years and may use third-party investigators for persistent contests of the same locations.
- Regulatory action may result from careless contesting or failure to correct erroneous locations.

Provider location code concept and purpose [6:50](#)

- Department developed an alphanumeric provider location code (10–13 characters with a dash) combining NPI and geocoding to uniquely identify provider practicing locations within ~100 meters.
- Intended to enable digital processing in justification templates and other network adequacy dialogue.

Visualizations and provider location code availability [13:05](#)

- Starting plan year 2027, all department visualizations and reports will include provider location codes.
- Issuers can download provider lists (Excel) that include provider location codes to copy/paste into justification templates; some UI quirks were noted regarding default download options in the visualizations accompanying the justification templates.

Changes to the justification template and data issues tab [17:55](#)

- Two main changes: addition of a Data Issues tab and refinement of justification reasons and correspondence/navigation.
- Data Issues tab segregates detailed provider-level responses that are not network development and do not belong to that tab (e.g., contesting a location, provider classification PTNP issues).
- Department refined justification reasons based on one year of field experience: added missing responses, removed unused or inapplicable reasons, and clarified wording.

Learnings from prior year and process improvements [25:12](#)

- Regulators struggled to close the loop on how issuer responses were used and spent manual effort validating justification relevance and validity.
- Department designed an improved, more thorough process for using issuer responses to inform determinations and to reduce manual burden.
- Clarified that informational issues are distinct from objections and should still be reviewed by issuers.

How issuer responses will be evidence-tested and hypothetical network building [26:45](#)

- Broad categories of issuer justifications: providers in development or in-network but unreported, attempts to add existing providers, and claims that suggested improvements are not possible.
- For additions/attempts to contract, department will build a hypothetical network including all claimed provider additions (including PTNP suggestions) and recalculate drive-distance algorithms to measure provisional impact.
- The ideal network remains fixed (aggregated providers from all issuers at cycle start) and will not be altered based on submitted additions when evaluating improvements.
- Coverage improvements from hypothetical tests will be summarized for regulators to use in determinations.

Disputed provider locations and evidentiary requirements [32:15](#)

- Disputed locations will not change the ideal network; PTNP process is the mechanism for removing providers from the ideal network when appropriate.
- Issuers disputing practice or classification must provide sufficient proof (links, facility provider lists, call logs with dates/contacts) for regulators to act on claims.
- Department expects issuers to consider alternative providers that could address deficiencies and to provide evidence of contracting attempts or availability of substitutes.

PTNP process, participation expectations and timeline [36:34](#)

- Issuers that raised PTNP issues in justifications must participate in the PTNP provider classification governance process and abide by outcomes.
- Slides were presented with key dates in the PTNP process.
- Department values evidentiary reasons when issuers disagree since strong evidence can override majority votes.

Next steps, contact information and closing [40:58](#)

- Department invited further questions and feedback; group email RHLDDataOversight@arkansas.gov provided for follow-up and one-on-one assistance.
 - Appendix materials with PTNP guidance for new personnel available; department offered one-on-one support if needed.
 - Meeting closed with encouragement to submit suggestions for justification template improvements and to participate in PTNP timelines.
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