# Rules based, data driven
# Network Adequacy
## Review and Regulation

**9:30 am-11:00 am Central**
**August 24, 2016**
**Regulatory Health Link Division,**
**Arkansas Insurance Department**

# 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

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

- List will be published by 9/15/2016.

- 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
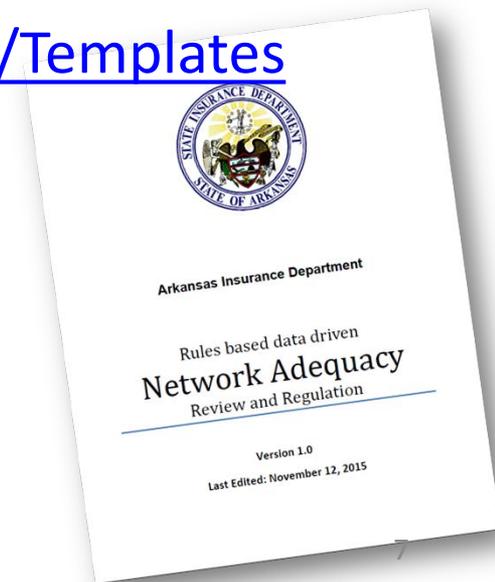
# NA Industry Contact List last year

| Entities under common ownership (Entity required to validate this) | Officially Designated NA SME contacts | AID's internal reference name |
|---|---|---|
| AETNA, Coventry | Darcey Gartner/ Katherine Therrien | ATENA |
| Ambetter, Arkansas Health & Wellness Solutions, Celtic Insurance Company | Bryan Meldrum/Jamie Gilmore | AMBETTER |
| HMO Partners, Health Advantage, USAble Mutual Insurance Company, Arkansas BCBS | Benjamin Butler/Dan Stevens | BCBS |
| Connecticut General Life Insurance Company, CIGNA Health and Life Insurance Company; Federated Mutual Insurance Company; Freedom Life Insurance Company of America | Lea Anna Tonkin | CIGNA |
| Humana Insurance Company | Patty Luther | HUMANA |
| QualChoice Life and Health Insurance Company, QCA Health Plan | Mark Johnson/Karen Green | QUALCHOICE |
| United Health Care Insurance Company, United Health Care of River Valley, United Health Care Life Insurance, United Health Care of Arkansas | Raegnea Thompson | UNITED |

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# Agenda

- Overview of where we are
- Maintenance of the Provider Type-NPI Pool
- Phase1 AID-Industry data exchange protocol
- Average Distance calculation changes
- Other Program Data Specifications
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# 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

# Arkansas NA Progression status as of August 2016

| NA Process Progression | Marketplace QHP | Marketplace Dentals and Off Marketplace | Off Marketplace Medicals |
|---|---|---|---|
| Data Specification | Y | Y | Y |
| Collection | Y | Y | Y |
| Aggregation | Y | Y | Y |
| Analysis | Y | Y | |
| Corrective Feedback | Y | | |
| Monitoring | Y | | |

# What the data revealed in PY2017

- How may times does the same provider appear in different networks?
- Study of 3 networks across PY2016-2017

| Number of Issuers in Common | Providers in PY2016 | | Providers in PY2017 | |
| --- | --- | --- | --- | --- |
| | Total | Percentage of Total | Total | Percentage of Total |
| 1 | 1020 | 3.90% | 1730 | 5.56% |
| 2 | 12767 | 40.59% | 12802 | 33.16% |
| 3 | 6493 | 36.28% | 7922 | 45.80% |

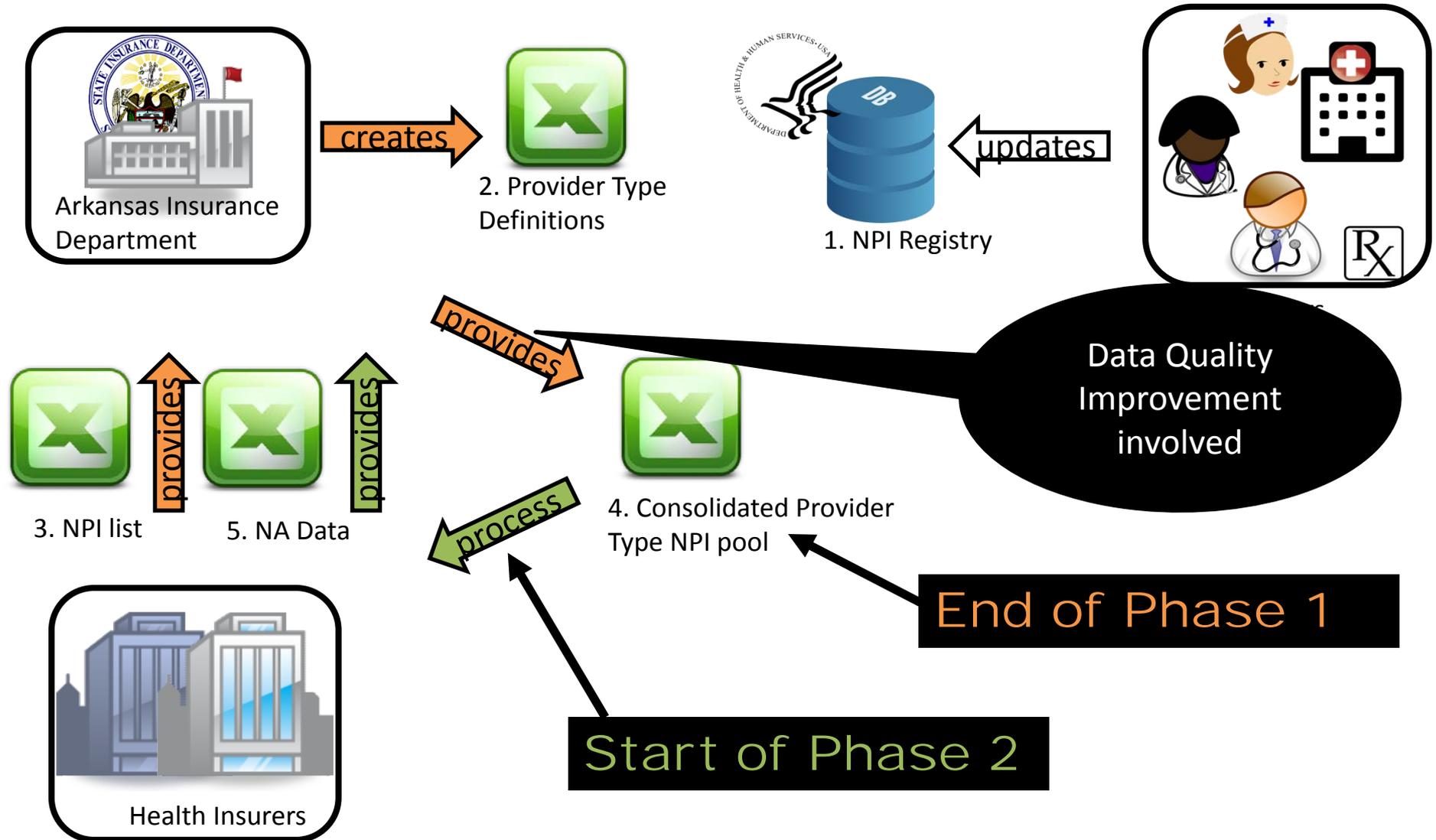# WHAT WE DID THE LAST PLAN YEAR AND WHY

# The (Problem) Prism of Credentialing
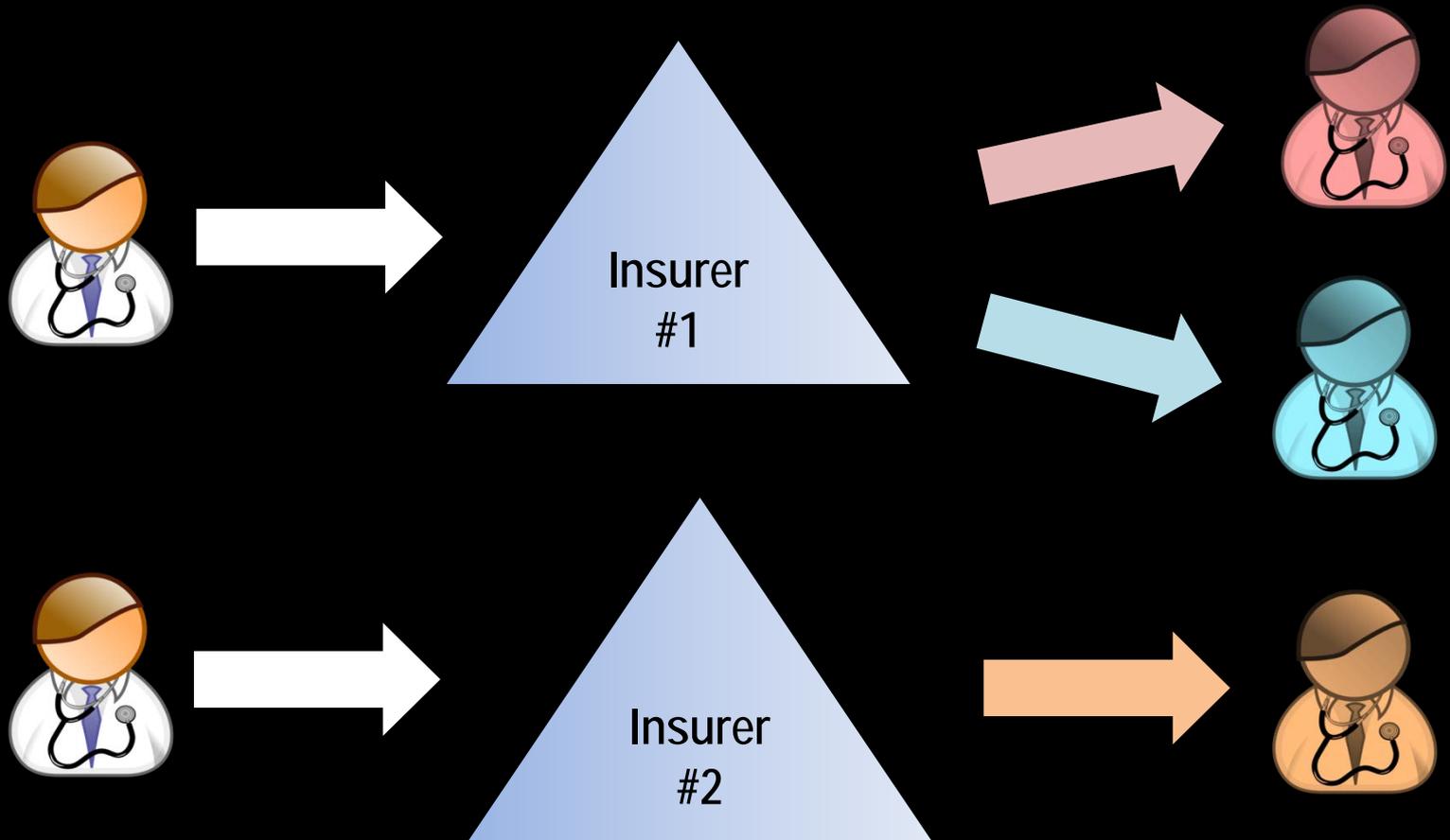
# Provider Type-NPI Pools



Do we agree that these are not Cardiologists?

# How the Provider Type-NPI pools were created in PY2017

REGULATORY
HEALTH LINK
*Division*
Arkansas Insurance Department

Arkansas Insurance Department

**creates**

2. Provider Type Definitions

**provides**

1. NPI Registry

DEPARTMENT OF HEALTH & HUMAN SERVICES • USA

**updates**

**provides**

3. NPI list

**provides**

5. NA Data

**process**

4. Consolidated Provider Type NPI pool

Data Quality Improvement involved

**End of Phase 1**

**Start of Phase 2**

Health Insurers

# Provider Type –NPI Pool
# 2 Stage NPI Data Quality improvement



Arkansas Insurance Department

**B1**

**B2**
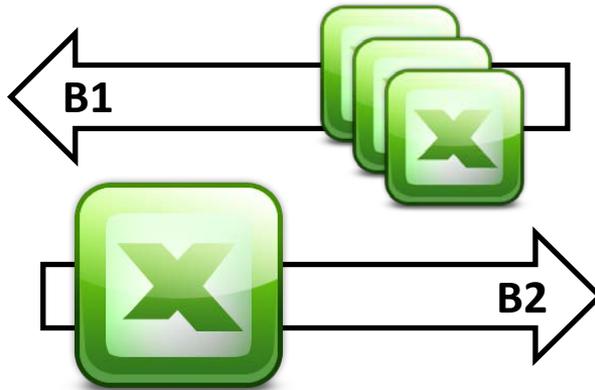
Health Insurers

## Stage 1: Consolidation of feedback

**C1**

**C2**
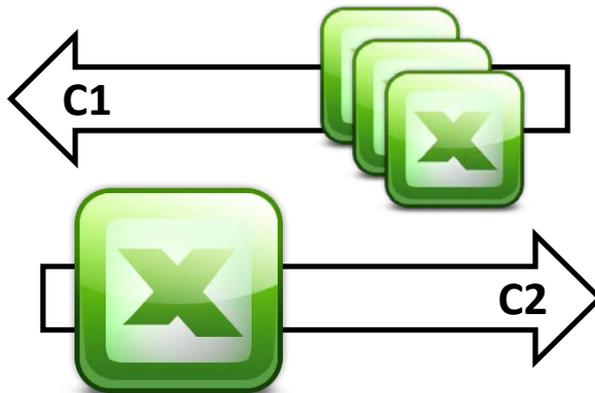
## Stage 2: Consolidation of decisions

| Stage 1: Data Description | |
|---|---|
| B1 | Additions or Deletions to Provider Type-NPI list with reason(s) |
| B2 | Consolidated Objections/ Suggestions with reason(s). Carrier de-identified. |

| Stage 2: Data Description | |
|---|---|
| C1 | Carrier vote on B2 using objections |
| C2 | Final consolidated NPI pool per criteria |

# Types of dialog observed at the County-Provider type level

- Update of Provider type NPI list needed. New contract in place
- Provider type NPI list misclassification
- Missed reporting NPI
- FQHC does not need to be in mileage criteria
- Mileage reported by one of the carriers challenged
- Mileage gap was reported in error.

This dialog should happen during the refinement of the Provider Type-NPI pools. We cannot accommodate this change mid-stream when county level data is analyzed.

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# Maintenance of Provider Type-NPI Pools

- For PY2018 we do not need to recreate the Provider Type-NPI Pools all over again. We do need to maintain it for Data Quality!

- The maintenance process of the Provider Type-NPI Pools is detailed in *PY2018 NA Review Process* within http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy

- The communication traffic for this maintenance between AID and Industry is expected to reduce over the iterations of refinement.

- The maintenance process is repeated twice a year.

- The first data delivery expected from the issuers is November 1, 2016.

# Sample of process specification

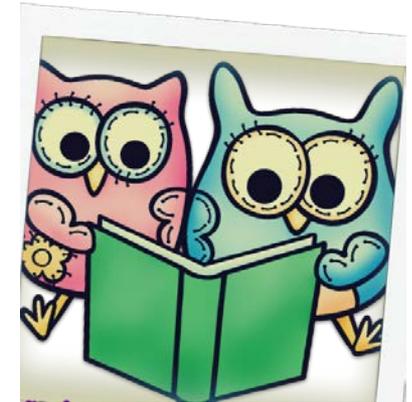| Process# | Actor | Process | Input(s) | Output(s) (Important: See notes 1 & 2) | Tentative Start Date | Tentative End Date | Status |
|---|---|---|---|---|---|---|---|
| 2.20 | Individual Carriers | Carriers communicate changes necessary to the Consolidated Provider Type-NPI *list* through addition/deletion suggestions using template provided by AID. The new template design would require the issuer to list the applicable taxonomy or taxonomies that are behind the suggested change | Output of Process#2.10 | 1) Addition-Deletion suggestions to the Provider Type- NPI list via template provided by AID **(Suggested file name "<Date of submission in YYYYMMDD format>_<Carrier NAIC#>_<Carrier name>_Provider_Type_NPI_A ddDelete.csv")** | | 11/1/2016 | |
| 2.30 | AID | AID consolidates Addition-Deletion suggestions to the Provider Type-NPI list for Industry to vote. | 1) Output of Process#2.20 | 1) Consolidated Addition-Deletion suggestions to the NPI-Taxonomy association information **(AID file name "PY2018 Industry Provider Type Addition-Deletion suggestions")** | | 11/15/2016 | |
| 2.40 | Individual Carriers | Carriers communicate opposition to any Addition-Deletion suggestions in the Provider Type- NPI list via template provided by AID. Absence of communication on any Provider Type-NPI combination signifies issuer acceptance of the change. | 1) Output of Process#2.30 | 1) Individial carrier votes on the Consolidated Addition-Deletion suggestions to the Provider Type-NPI list **(Suggested file name "<Date of submission in YYYYMMDD format>_<Carrier NAIC#>_<Carrier name>_ObjectionVote.csv")** | | 12/15/2016 | |

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AID-RHLD Web Portal

Public Issuer communication

Refer:
1) "General Data submission process to RHLD" located in http://rhld.insurance.arkansas.gov/Info/Public/Templates
2) Filenames from "PY2018 NA Review Process" within http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy

Issuer

Company communication

AID Secure FTP Server

**How data is exchanged in Phase 1 of the NA Regulation Program**

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

REGULATORY HEALTH LINK
Division
Arkansas Insurance Department

"Initial PY2017 Provider Type-NPI list"
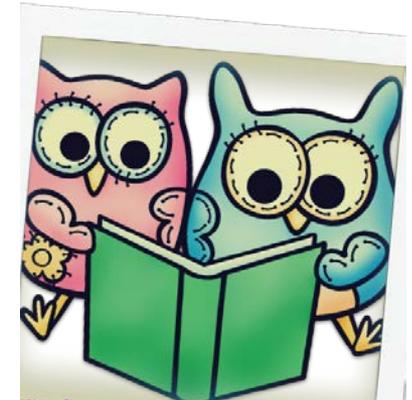
Add? Delete?

Blue Cross Experts

"20160211_83470_BCBS_Provider_Type_NPI_AddDelete.csv"

AID Secure FTP Server

**An example of such a communication using BCBS as an example**

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# Average distance calculation changes

- Issuers to report Average distance to first providers in two ways for each county
  a) Based on actual enrollees irrespective of marketing channel
  b) Based on 0.5% of the *non-elderly population within the county per US Census data*
- New Issuers or existing issuers with no enrollees in a county will have null (or zero) for a) above
- *PY2018 AR Specialty Access Template* will accommodate this reporting

# 0.05% vs 0.5% of Non-elderly

| CountyName | Non-elderly Population | estimated count @0.05% | estimated count @0.5% ✓ |
|---|---|---|---|
| | | 2 | 20 |
| Calhoun | 4034 | 3 | 28 |
| Woodruff | 5598 | 3 | 28 |
| Lafayette | 5631 | 3 | 30 |
| Dallas | 6040 | 3 | 30 |
| Monroe | 6085 | 3 | 31 |
| Searcy | 6141 | 3 | 31 |
| Newton | 6185 | 3 | 32 |
| Prairie | 6473 | 3 | 33 |
| Lee | 6673 | 3 | 34 |
| Montgomery | 6887 | 3 | 35 |
| Cleveland | 6971 | 3 | 35 |
| Nevada | 7065 | 4 | 42 |
| Perry | 8387 | 4 | 43 |
| Chic... | 8542 | | |

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# Changes to Provider Types in Distance Reporting

- Pharmacy will be a new criteria
- For marketplace issuers, we are going to replace
    1) Access to FQHC,
    2) Access to Ryan White,
    3) Access to Family Planning and
    4) Access to Indian Provider

  with
    1) Access to ECP Providers and
    2) Access to ECP Facilities.

- AR Specialty Access Template will be changed to accommodate the above

# Provider Enrollee Ratio change

- Acute care hospitals in terms of beds will be added to the *PY2017 AR Provider-Enrollee Ratio Template*

- Rural vs non-Rural standards will be based on available Medicare data

# Taxonomic Definitions

- Taxonomic definitions for three different criteria will be completed mid-September, 2017

  1. Dental – General

  2. Dental – Specialists

  3. Pharmacy

These definitions would be available as *Finalized Provider Type Taxonomic Descriptions* in
http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy

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# Creation of new Provider Type-NPI Pools

- Initial "Provider-Type NPI Pools" will be created using data available in Federal ECP Network Adequacy templates
    1. Dental – General
    2. Dental – Specialists
    3. Pharmacy

Suitable granularity in provider type classification within Federal Templates enable AID to create these pools without separate engagement of industry

- Industry will get a opportunity to vet these pools using the data refinement process of the past year. This data refinement process would be available as *PY2018 NA Review Process* within the link http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy

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# Provider Directories & Rule 106

- Rule 106 mandates oversight of provider directories towards maintaining data quality fit for use by consumers

- AID is building automation towards reviewing the machine readable online provider directories mandated for marketplace issuers.

- This review is towards
  - Timeliness of updates
  - Degree of correlation with Federal NA Templates

- The first round of this review needs to be completed by November, 2016

# Provider Directories & Rule 106

- Several types of data issues have been observed by AID.

- AID's Greg Freeman, [Greg.Freeman@arkansas.gov](mailto:Greg.Freeman@arkansas.gov) will get in touch with each issuer about data problem(s). Industry is requested to take corrective action expediently to meet the review timelines.

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# Discussions on sharing NA Data

- AID plans on sharing NA data on provider locations through public portals
- Could there be any plausible argument preventing showing the same information that is supposed to be displayed on provider directories?

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# Next steps for industry

1.  Comment on changes proposed in this meeting by 9/20/2016

    1.  Using meeting notes and slides

    2.  *PY2018 NA Review Process* document within http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy

    3.  *Finalized Provider Type Taxonomic Descriptions* in http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy

2.  Review *NA Industry Contact List on Network Adequacy* published on AID website http://rhld.insurance.arkansas.gov/Default/NetworkAdequacy and provide corrective feedback if any by 9/20/2016

Next meeting on NA on September 27, 2016, 9:30am – 11:00

# Question & Answer Session

# Contact

tonmoy.dasgupta@arkansas.gov

501-773-0420