



August 18, 2020

Kathleen Birrane
Commissioner, Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, Maryland 21202
By email: networkadequacy.mia@maryland.gov

Comment on Network Adequacy of mental health and substance use services.

Dear Commissioner Birrane,

We appreciate the MIA's efforts to advance enforcement of network adequacy standards for mental health and substance use services.

We feel that it is very important, in measuring network adequacy, to ensure that regulations and procedures are in place to disaggregate substance use disorders services from mental health services. Also, greater granularity is needed so that it is possible to understand whether networks include the full range of ASAM levels of care as required, so that any needed corrective measures can be taken.

We also believe it is very important to establish transparent, standardized methodologies for calculating compliance with the quantitative metrics of wait time and distance. Without standardized methodologies it is difficult or impossible for the MIA or the public to interpret network adequacy reports.

In addition, a waiver request from commercial carriers who do not comply with network adequacy standards should be mandatory, and should include, in a transparent manner, methods used to attempt to achieve adequate behavioral health networks.

Thank you for your engagement with stakeholders and for the opportunity to provide input.

Sincerely,

Joseph Adams, M.D.
Chair, Public Policy Committee, the Maryland-DC Society of Addiction Medicine (MDDCSAM)
