Re: Recommendations for Changes to NAIC’s Network Adequacy Model Act

Mr. J.P. Wieske  
Wisconsin Office of the Commissioner of Insurance  
Chair, NAIC Network Adequacy Model Review (B) Subgroup  
c/o National Association of Insurance Commissioners (NAIC)  
444 North Capitol Street, N.W., Suite 701  
Washington, D.C. 20001

ATTN: Jolie Matthews, NAIC Senior Health and Life Policy Counsel  
JMatthews@naic.org.

Dear Mr. Wieske, Ms. Matthews, and Network Adequacy Model Review (B) Subgroup Members:

The American Association on Health and Disability (AAHD) (www.aahd.us) is a national non-profit organization of public health professionals, both practitioners and academics, with a primary concern for persons with disabilities. The AAHD mission is to advance health promotion and wellness initiatives for persons with disabilities.

AAHD acknowledges, appreciates, and supports the NAIC consumer representatives’ report, *Ensuring Consumers’ Access to Care: Network Adequacy State Insurance Survey Findings and Recommendations for Regulatory Reforms in a Changing Insurance Market.*” AAHD belongs to numerous Washington, DC based health, disability, and behavioral health policy coalitions. In these coalitions we work closely with NAIC member consumer representatives - the American Heart Association, Autism Speaks, Community Catalyst, and Georgetown University Health Policy Institute. We appreciate the NAIC commitment to a formal ongoing role to hear and integrate the consumer voice and we further appreciate the NAIC practice of full transparency through its communications, including its website. Thank you.

AAHD has reviewed the most current draft of the proposed technical amendments to the network adequacy model. We appreciate and support those technical amendments proposed by the NAIC consumer representatives.
AAHD proposes two additional technical amendments to the network adequacy model. These are:

**Section 3 - Definitions; Subsection G - Essential Community Provider; Subsection K - Health Care Provider; and Subsection R – Participating Provider.**

In addition to the proposed healthcare professional, pharmacy, and facility: please add “community based organization” and “peer provider”. These providers should be “appropriately credentialed”.

Many persons with disabilities rely on community-based organizations for their health-related services and supports. Increasingly, persons with disabilities, including persons with a history of mental illness, are important members of services and supports teams, particularly in community-based organizations. Information is available from the following federal agencies - Administration for Community Living (ACL) and Substance Abuse and Mental Health Services Administration (SAMHSA). A related category of provider is “community health workers;” information is available from HRSA (Health Resources and Services Administration). AAHD has resource materials defining these providers and their scope of practice. AAHD has names of contact individuals in these federal agencies. Peer providers are increasingly recognized and financed through Medicaid programs, Medicaid managed behavioral health programs, and “independent living” and “home and community-based services.”

**Section 5 - Network Adequacy**

Introductory Paragraph

Please add the following sentence: “networks must include providers with documented experience and expertise in treating, serving, and supporting those with discrete health care needs, including those with chronic conditions and disabilities.”

There are numerous examples across the country documented by organizations serving a population with a discrete chronic condition or disability that existing health insurance plan networks do not have providers experienced and expert in treating these conditions and disabilities. The intent of the sentence is to emphasize a network’s capacity and capability in providing such experienced expertise.

Thank you for considering our views.

Sincerely,

E. Clarke Ross, D.P.A.
Public Policy Director
American Association on Health and Disability
1718 Reynolds Street
Crofton, MD 21114
clarkeross10@comcast.net
410-451-4295
Cell: 301-821-5410

Roberta S. Carlin, MS, JD
Executive Director
American Association on Health and Disability
110 N. Washington Street, Suite 328J
Rockville, MD 20850
301-545-6140 ext. 206
301 545-6144 (fax)
carlin@aahd.us

c.c.
Stephanie Mohl, American Heart Association
Stuart Spielman, Autism Speaks
Christine Barber, Community Catalyst
Sabrina Corlette, Georgetown University Health Policy Institute