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DAVID COONEY  
Associate Commissioner  
Life and Health

200 St. Paul Place, Suite 2700, Baltimore, Maryland 21202  
Direct Dial: 410-468-2170 Fax: 410-468-2204  
Email: david.cooney@maryland.gov  
410-468-2000 1-800-492-6116  
TTY: 1-800-735-2258  
[www.insurance.maryland.gov](http://www.insurance.maryland.gov)

December 20, 2021

Ms. Christina Stecki  
MHA National Regulatory Affairs  
UnitedHealthcare Employer & Individual  
5701 Katella Ave, Mailstop CA120-0353  
Cypress, California 90630

Re: Golden Rule Insurance Company ("GRIC")  
Network Adequacy Filing 2020

Dear Ms. Stecki:

The Maryland Insurance Administration ("Administration") has completed its review of the GRIC 2020 Network Adequacy Access Plan (the "GRIC 2020 Access Plan") filed on July 1, 2020, supplemented with additional information and documentation on September 30, 2020, March 1, 2021, May 7, 2021, August 6, 2021, and November 29, 2021. This filing was made pursuant to § 15-112(c)(2)(i) of the Insurance Article and COMAR 31.10.44.

***GRIC 2020 Access Plan.***

The Administration's review of the GRIC 2020 Access Plan has found that the access standards in COMAR 31.10.44.04 were not met for the following, based on the data self-reported by GRIC. All other access standards in COMAR 31.10.44 were met.

Travel Distance Standards

1. Allergy and Immunology providers met the required standard for 99.6% of suburban enrollees, leaving 3 members outside the travel distance standard of thirty miles in one zip code.
2. Applied behavioral analyst providers met the required standard for 99.2% of suburban enrollees, leaving 6 members outside the travel distance standard of thirty miles in two zip codes. The standard was met for 99.3% of rural enrollees, leaving 7 members outside the travel distance standard of sixty miles in two zip codes.

3. Gynecology, OB/GYN providers met the required standard for 99.6% of suburban enrollees, leaving 3 members outside the travel distance standard of ten miles in one zip code.
4. Inpatient psychiatric facilities met the required standard for 99.2% of suburban enrollees, leaving 6 members outside the travel distance standard of forty-five miles in two zip codes.
5. Other behavioral health/substance abuse facilities met the required standard for 99.8% of urban enrollees, leaving 1 member outside the travel distance standard of ten miles in one zip code.

### ***GRIC 2019 Access Plan Consent Order***

On April 19, 2021, the Administration and GRIC entered into a Consent Order to resolve matters related to the GRIC 2019 Access Plan. The Administration had concluded in the Consent Order that GRIC violated § 15-112 of the Insurance Article and COMAR 31.10.44.03C by filing an access plan that failed to comply with certain required travel distance standards and appointment waiting time standards and by failing to demonstrate that at least thirty percent of the available essential community providers in each of the urban, rural, and suburban areas are included in the network. The Administration imposed an administrative penalty on GRIC of \$40,000 for the violations, but suspended the penalty pending the Administration's (i) review of the access plan submitted by GRIC in 2021, including a consideration of any waiver requested by GRIC as permitted by COMAR 31.10.44.07; (ii) determination as to whether the 2021 access plan substantiates representations made by GRIC related to its intent to improve its compliance with the access standards; (iii) review of all evidence submitted by GRIC demonstrating good faith efforts to meet all applicable standards; and (iv) based on such review and determination, decision on whether the administrative penalty should be paid, reduced, or rescinded. The Consent Order also provided that a waiver granted to GRIC related to the 2021 access plan may be considered a demonstration of GRIC's improvement of the same standard when the Administration makes its decision on whether the administrative penalty should be paid, reduced, or rescinded.

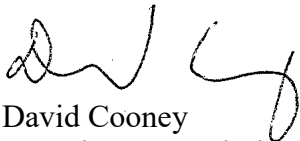
The data reported in the GRIC 2020 Access Plan demonstrated that GRIC met the requirement that at least 30 percent of the available essential community providers in each of the urban, rural, and suburban areas are included in the network and this information was included in the executive summary. GRIC improved compliance with the appointment waiting time standards. The 72-hour standard for urgent care was met for only 92% of enrollees in 2019 and improved to being met for 100% of enrollees in 2020. The GRIC 2020 Access Plan data also showed improvement in compliance with the travel distance standards. In 2019, GRIC reported twenty-three categories where the standards were not met. In the 2020 Access Plan, the standards were met in all but six categories.

The GRIC 2020 Access Plan shows improvement in compliance with the access standards, but there continue to be areas where the travel distance standards are not met, as noted above.

Additionally, GRIC's description of its methodology for measuring the appointment waiting time standard, including how telehealth appointments were accounted for in the calculation, lacked detail and specificity in certain areas. Further clarification of the methodology will be expected with respect to the GRIC 2021 Access Plan, which was submitted on July 1, 2021, and is currently under review by the Administration. Upon completion of the review, a determination will be made on whether the administrative penalty should be paid, reduced, or rescinded.

GRIC has the right to request a hearing on this determination letter in accordance with § 2-210 of the Insurance Article. A request for a hearing must be made in writing and received by the Administration within thirty (30) days of the date of this letter. The rules for requesting a hearing are set forth in COMAR 31.02.01.

Very truly yours,

A handwritten signature in black ink, appearing to read 'David Cooney', written over a horizontal line.

David Cooney  
Associate Commissioner  
Life and Health