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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 12, 2022

Ms. Laurie Beebe  
Provider Network Manager  
Wellfleet Insurance Company  
P.O. Box 15369  
Springfield, MA 01115

Re: MIA v. Wellfleet Insurance Company  
Case No.: MIA-2021-12-015  
2019 Network Adequacy Filing

Dear Ms. Beebe:

The Maryland Insurance Administration (“Administration”) and the Wellfleet Insurance Company (“Wellfleet”) entered into an Amended Consent Order on December 7, 2022 (the “Consent Order”) to resolve matters related to the Wellfleet 2019 access plan.

In the Consent Order, the Administration concluded that Wellfleet violated § 15-112 of the Insurance Article and COMAR 31.10.44.03C by submitting an access plan that:

- failed to comply with certain required travel distance standards and appointment waiting time standards;
- failed to include in the executive summary plan form the required information regarding certified registered nurse practitioners; and
- failed to comply with 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.

The Administration imposed an administrative penalty on Wellfleet of \$40,000 for the violations, but suspended the penalty pending the Administration’s (i) review of the access plan submitted by Wellfleet in 2021; (ii) determination as to whether the 2021 access plan substantiates representations made by Wellfleet related to its intent to adjust record keeping methodologies and to improve its compliance with the access standards; and (iii) based on such review and

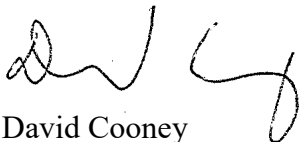
determination, decision on whether the administrative penalty should be paid, reduced, or rescinded.

The Administration has completed its review of the Wellfleet 2021 access plan filed on July 1, 2021, supplemented with additional information and documentation on November 9, 2021, January 28, 2022, and April 8, 2022. This filing was made pursuant to § 15-112(c)(2)(i) of the Insurance Article and COMAR 31.10.44, and the Administration issued a determination summarizing its review on December 12, 2022

The Wellfleet 2021 access plan demonstrated to the satisfaction of the Administration that all of the deficiencies reported in the Wellfleet 2019 access plan were resolved. The Administration has therefore determined that the Wellfleet 2021 access plan substantiates representations made by Wellfleet related to its intent to improve its compliance with the required travel distance and appointment waiting time standards, to include in the executive summary plan form the required information regarding certified registered nurse practitioners, and to comply with 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. The \$40,000 penalty is hereby rescinded in its entirety, in accordance with the terms of the Consent Order.

This determination letter is limited to the Wellfleet 2019 Access Plan, and is independent of the Administration's review of any other Network Adequacy Access Plans and submissions in connection thereof which are filed by Wellfleet.

Very truly yours,

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

David Cooney  
Associate Commissioner  
Life and Health