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From: **Barbara Hoffstein**

Date: Tue, Aug 4, 2020 at 2:36 PM

Subject: Comar 31.10.44 Network Adequacy Regulations Update from MAND

To: <networkadequacy.mia@maryland.gov>



August 4, 2019

Maryland Insurance Administration

200 St. Paul Place

Baltimore, MD. 21202

Networkadequacy.mia@maryland.gov

RE: Comar 31.10.44 Network Adequacy Regulations

The Maryland Academy of Nutrition & Dietetics (MAND), is an organization representing approximately 1,200 licensed dietitians and nutritionists, dietetic interns and students within the state of Maryland.

The opportunity to present our perspective on how Network Adequacy affects the work of dietitians and nutritionists before the MIA and key stakeholders is greatly appreciated. We offer the following as a supplement to the earlier statement submitted on [December 18, 2019](#)

Impact of the COVID-19 Pandemic and Network Adequacy

In light of the challenges to our health care delivery system brought about by the COVID-19 Pandemic, Licensed Dietitians and Nutritionists are more important than ever in creating positive outcomes and should not be limited in Networks. Licensed Dietitians and Nutritionists are on the front lines providing public health services. Studies have shown that Licensed Dietitian Nutritionists have the best outcomes teaching clients to adapt to their diets for diabetes, heart disease and obesity—the comorbidities that increase susceptibility to COVID-19.(1) Improving populations' health, eliminating barriers to care, and addressing social determinants of health will help Maryland citizens now and in the future, not to mention decrease healthcare costs.

COVID-19 has shown the effectiveness of telemedicine in its ability to maintain continuity of care, quality of care and efficiency. For patients able to take advantage of these services they have been able to improve health and quality of life while staying safe at home and limiting risk to exposure for themselves and health care providers. Let us be clear, telemedicine should be viewed as a complement—but not a substitute—to network adequacy standards and an important tool to provide specialized care for patients and care for remotely located patients.

Eliminating barriers to healthcare begins with ensuring that insurers maintain adequate, transparent and accurate networks. These issues were addressed in detail in our previous letter. We do wish to reiterate our recommendation that licensed dietitians and nutritionists be delineated as a provider type in the travel distance standards chart. **This will require insurers to maintain an adequate network of licensed dietitians and nutritionists, providing a benefit to our patients to be better able to access our services.**

We appreciate the time and effort on the part of the MIA in reaching out and soliciting input from a multitude of stakeholders. Through these comments and our December 2019 comments, we hope to raise awareness of the services and benefits Licensed Dietitians and Nutritionists bring to the health care system overall.

We understand additional work is needed in the revisions to the network adequacy regulations. MAND stands ready as a resource and partner in this important undertaking. Thank you for your consideration of our comments.

Sincerely,

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1. Position of the Academy of Nutrition & Dietetics: The Role of Medical Nutrition Therapy and Registered Dietitian Nutritionists in the Prevention and Treatment of Prediabetes and Type II Diabetes, J of Acad. of Nutr & Diet, Feb. 2018, 118 (2).