



MARYLAND SOCIETY OF ANESTHESIOLOGISTS

December 3, 2020

Maryland Insurance Administration
200 St. Paul Place
Baltimore, MD 21202
Networkadequacy.mia@maryland.gov

RE: COMAR 31.10.44 Network Adequacy Regulations

The Maryland Society of Anesthesiologists (MSA) is a State component society of the American Society of Anesthesiologists (ASA). The MSA is a non-profit physician organization dedicated to promoting the safest and highest standards of the profession of anesthesiology in the State of Maryland. Our purpose is to advocate on behalf of our members for their patients through policy, education, and research.

Anesthesiologists take on diverse roles in healthcare that call for collaboration with many other physician-specialties to deliver patient care, for example, we collaborate with primary care physicians regarding medical clearance; with surgeons regarding intraoperative care; obstetricians regarding pregnancy and childbirth. Also, anesthesiology subspecialists wear other hats such as pain medicine physicians or critical care intensivists or patient safety leaders, to name a few. The expanded involvement of our profession positions anesthesiologists as crucial components of communication with and within a healthcare system.

On behalf of MSA physicians, we thank you for your thorough approach towards development of network adequacy regulations.

In our review of the proposed revisions we noted the following section on page(s) 2 & 3 Section .04(5). This adds a requirement that carriers report on their annual "access plan filing" with the MIA:

"(5) A description of the network access to hospital-based providers, which shall include:

(a) A list of all the hospitals included on the provider panel; and

(b) For each hospital included on the provider panel:

(i) The percentage of on-call physicians practicing in the hospital who are participating providers;

(ii) The percentage of hospital-based physicians practicing in the hospital who are participating providers;

(iii) The percentage of anesthesiologists practicing in the hospital who are participating providers;"

Historically in Maryland, according to research by the Maryland Health Care Commission (MHCC), since the passage of the Assignment of Benefits law in 2010, the percentage of anesthesiologists that are out of network has dropped from 13.6% in 2010 to 1.8% in 2017.

We wanted learn more about the intent for including this language and how this information will be used.

Thank you for your attention to this request and we look forward to working with you on these important regulations.

Sincerely,

Ram Peruvemba

Ramani Peruvemba M.D., President