



The
Maryland Insurance Administration's
2014 Report
on
The Health Care Appeals & Grievance Law
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Executive Summary

In 1998, the Appeals and Grievance Law was enacted by the General Assembly to provide a fair process for resolving disputes regarding the medical necessity of a proposed or delivered health care service (See Title 15, Subtitle 10A of the Insurance Article). Until July 1, 2011, the Appeals and Grievance law applied only to individuals with insured health benefits.¹ However, effective July 1, 2011, the Department of Budget and Management for the State of Maryland and effective June 28, 2013, Cecil County Public Schools voluntarily elected to use the Maryland Insurance Administration's external review process to provide external review for their self-funded employee health benefit plans.

Under the Appeals and Grievance Law, nonprofit health service plans, insurers, health maintenance organizations and dental plan organizations are required to provide quarterly reports to the Maryland Insurance Administration ("Administration") regarding adverse decisions and grievance decisions. These quarterly reports, coupled with the Administration's complaint data, allow for a comprehensive year over year review of this dispute resolution process. This report summarizes the statistical information the Administration has for adverse decisions, grievance decisions and complaints for 2014, noting changes in certain areas since 2011 for nonprofit health service plans, insurers and health maintenance organizations (hereinafter referred to as "carriers"²).

Carriers rendered 31,391 adverse decisions in 2014 and 43,537 in 2011, a decrease of 27.9 percent over the four year period. Inpatient hospital services, physician services, and pharmacy services accounted for the majority of this decrease. Adverse decisions for inpatient hospital services decreased by 73.7 percent from 2011 to 2014 (4,745 in 2011 to 1,246 in 2014). Adverse decisions for physician services decreased by 68.4 percent from 2011 to 2014 (15,313 in 2011 to 4,841 in 2014). Adverse decisions for pharmacy services decreased by 49.2 percent from 2011 to 2014 (5,051 in 2011 to 2,568 in 2014).

In 2014, three categories of services accounted for 72 percent of all adverse decisions: (1) physician services, (2) laboratory and radiology services and (3) the combined categories of podiatry, dental, optometry and chiropractic services. In 2011, these same services accounted for only 64.0 percent of all adverse decisions. In 2011, physician services ranked first in terms of the percentage of all adverse decisions at 35.2 percent (15,313), while in 2014, laboratory, radiology services ranked first at 37.9 percent of all adverse decisions (11,900).

Over the years, policymakers have expressed concern about denials of emergency room services and mental health services. The data provided by carriers indicate that there are still relatively few adverse decisions for these two types of services (0.5 percent and 2.4 percent of all adverse decisions in 2014, respectively) and

¹ The Maryland Insurance Administration's 2014 Health Benefit Plan Covered Lives Report indicates that in 2014, 20.5 percent of the population under the age of 65, or a little over 1 million individuals, had insured health benefits.

² Although dental plan organizations are required to follow Title 15, Subtitle 10A of the Insurance Article, the number of complaints attributable to these companies is very small. Because of the small volume of complaints, this report is limited to medical type coverage, and does not include plans issued by dental plan organizations.

that there has been a decrease in the number of adverse decisions for these services from 2011 to 2014. Adverse decisions for emergency room services decreased by 56.2 percent from 2011 to 2014 (354 in 2011 and 155 in 2014) and adverse decisions for mental health services decreased by 6.9 percent from 2011 to 2014 (814 in 2011 and 758 in 2014).

The number of grievances (the appeal by consumers to carriers of the carriers' adverse decisions) increased 5.6 percent between 2011 and 2014, despite a large decrease in the number of grievances filed regarding inpatient hospital services (743 in 2011 and 335 in 2014). The increase in the number of grievances were related primarily to the categories of laboratory, radiology services (451 in 2011 and 992 in 2014) and podiatry, dental, optometry, chiropractic services (841 in 2011 and 1169 in 2014).

Grievances increased as a percentage of adverse decisions from 2011 to 2014 (11.2 percent to 16.4 percent). Carriers were more likely to reverse themselves during the internal grievance process in 2011 than in 2014. Carriers upheld adverse decisions 52.6 percent of the time in 2014 as compared to 41.9 percent in 2011, representing an increase of 10.7 percent in carriers upholding their original adverse decisions at the grievance level.

Consistent with the increase in the number of grievances filed with carriers by individuals between 2011 and 2014, the number of medical necessity complaints filed with the Administration increased between 2011 and 2014. The Administration received 825 complaints in 2011 and 898 complaints in 2014, representing an increase of 8.8 percent. The number of reversals of the grievance decisions by the Administration or by the carrier during the investigation process decreased to 58.2 percent in 2014 from 66.7 percent in 2011.

In 2014, the Administration issued 3 Orders based on medical necessity complaints which it received and imposed \$2,500 in administrative penalties. During this same year, the Administration recovered \$410,589 for complainants under the Appeals and Grievance law. By comparison, in 2011 the Administration issued 8 Orders and Consent Orders based on the medical necessity complaints it received, imposed \$14,500 in administrative penalties and recovered \$509,089 for complainants. Since the enactment of the Appeals and Grievance law, the Administration has recovered over 7.9 million dollars for complainants. These recoveries demonstrate that the Appeals and Grievance law remains an important protection for Maryland consumers providing a fair process for resolving disputes regarding the medical necessity of proposed or delivered health care services.

Background

In 1998, the Appeals and Grievance Law was enacted by the General Assembly to provide a full and fair process for resolving disputes regarding the medical necessity of a proposed or delivered health care services.³ The Appeals and Grievance law applies to individuals with insured health benefits.

When the Appeals and Grievance Law was enacted, the percentage of the population under the age of 65 with insured health benefits (42.8 percent) slightly exceeded the percentage of the population under the age of 65 with other employment based health benefits (37.9 percent). By 2014, the percentage of the population under the age of 65 with insured health benefits declined to 20.5 percent.⁴

The Appeals and Grievance process begins when a carrier makes an “adverse decision,” a determination that a proposed or delivered health care service is not medically necessary. The member, the member’s representative, or the treating provider on behalf of the member has the right to protest this decision through the carrier’s internal review process. When the member files a protest with the carrier, this is a “grievance.” If the carrier again concludes the proposed or delivered health care service is not medically necessary, the member may ask the Maryland Insurance Administration (“Administration”) to review the carrier’s grievance decision by filing a “complaint”.

The Appeals and Grievance Law gives the Administration the authority to contract with independent review organizations to review these medical necessity complaints. When the Administration sends a complaint to an independent review organization for review, Maryland law requires that the review be performed by an unbiased provider in the same specialty as the area or areas appropriate to the subject of review. In addition, an independent review organization may not be a subsidiary of, or in any way be owned or controlled by, a health benefit plan, or a trade association of health benefit plans, or a trade association of health care providers. Based on the independent review organization’s medical opinion, the Administration reaches a decision. If the complainant remains dissatisfied with the Administration’s decision, the complainant may request, in writing, a hearing to challenge the Administration’s decision.⁵

The Appeals and Grievance Law also requires carriers to submit quarterly reports about their adverse decisions and grievance decisions. Specifically, carriers must provide to the Administration:

- The number of adverse decisions issued by the carrier;
- The outcome of each grievance filed with the carrier;
- The number and outcomes of cases that were considered emergency cases;
- The time within which the carrier made a grievance decision on all other cases that were not considered emergency cases;

³ Title 15, Subtitle 10A, Insurance Article, Annotated Code of Maryland.

⁴ Maryland Insurance Administration’s 2014 Health Benefit Plan Covered Lives Report.

⁵ The Memorandum of Understanding between the Maryland Department of Budget and Management does not provide State employees who are covered under a State of Maryland health benefit plan the right to a hearing to appeal the Maryland Insurance Administration’s decision.

- The number of grievances filed with the carrier that resulted from an adverse decision involving length of stay for inpatient hospitalization as related to the medical procedure involved; and
- The number and outcome of all other cases that resulted from an adverse decision involving the length of stay for inpatient hospitalization.

These quarterly reports, coupled with the Administration's data regarding complaints, allows for a comprehensive year over year review of this process. This report summarizes the statistical information the Administration has for adverse decisions, grievance decisions and complaints for 2014, noting changes in certain areas since 2011 for nonprofit health services plans, insurers and health maintenance organizations.

Adverse Decisions

Table 1 provides an overview of the number and type of adverse decisions carriers made in 2011 and 2014. More detailed information about adverse decisions made by each carrier is provided in Appendix 1 for 2014.

Carriers rendered 31,391 adverse decisions in 2014 and 43,537 in 2011, representing a decrease of 27.9 percent over the four year period. Inpatient hospital services, physician services, and pharmacy services accounted for the majority of this decrease. Adverse decisions for inpatient hospital services decreased by 73.7 percent from 2011 to 2014 (4,745 in 2011 to 1,246 in 2014). Adverse decisions for physician services decreased by 68.4 percent from 2011 to 2014 (15,313 in 2011 to 4,841 in 2014). Adverse decisions for pharmacy services decreased by 49.2 percent from 2011 to 2014 (5,051 in 2011 to 2,568 in 2014).

Between 2011 and 2014, adverse decisions for laboratory and radiology services increased by 68.6 percent (7,057 in 2011 to 11,900 in 2014). Adverse decisions for durable medical equipment also increased by 15.4 percent (2,135 in 2011 to 2,464 in 2014). Adverse decisions for the combined categories of podiatry, dental, optometry and chiropractic services increased by 7.2 percent (5,499 in 2011 to 5,896 in 2014).

In 2014, three categories of services accounted for 72 percent of all adverse decisions: (1) physician services, (2) laboratory and radiology services and (3) the combined categories of podiatry, dental, optometry and chiropractic services. In 2011, these same services accounted for 64.0 percent of all adverse decisions. In 2011, physician services ranked first in terms of the percentage of all adverse decisions at 35.2 percent (15,313), while in 2014, laboratory, radiology services ranked first at 37.9 percent of all adverse decisions (11,900).

Over the years, policymakers have expressed concern about the denials of emergency room services and mental health services. The data provided by carriers indicate that there are still relatively few adverse decisions for these two types of services (0.5 percent and 2.4 percent of all adverse decisions in 2014, respectively) and that there has been a decrease in the number of adverse decisions for these services from 2011 to 2014. Adverse decisions for emergency room services decreased by 56.2 percent from 2011 to 2014 (354 in 2011 and 155 in 2014) and adverse decisions for mental health services decreased by 6.9 percent from 2011 to 2014 (814 in 2011 and 758 in 2014).

Table 1: Adverse Decisions

	2011		2014		Percent Change 2011-2014
	Number	Percent	Number	Percent	
Inpatient hospital services	4,745	10.9%	1,246	4.0%	-73.7%
Emergency room services	354	0.8%	155	0.5%	-56.2%
Mental health services	814	1.9%	758	2.4%	-6.9%
Physician services	15,313	35.2%	4,841	15.4%	-68.4%
Laboratory, radiology services	7,057	16.2%	11,900	37.9%	68.6%
Pharmacy services	5,051	11.6%	2,568	8.2%	-49.2%
PT, OT, ST services (including inpatient rehab)	2,049	4.7%	1,199	3.8%	-41.5%
Skilled nursing facility	101	0.2%	62	0.2%	-38.6%
Durable medical equipment	2,135	4.9%	2,464	7.8%	15.4%
Podiatry, dental, optometry, chiropractic	5,499	12.6%	5,896	18.8%	7.2%
Home health services	224	0.5%	145	0.5%	-35.3%
Other⁶	195	0.4%	157	0.5%	-19.5%
Total	43,537	100.0%	31,391	100.0%	-27.9%

⁶ Outpatient hospital services, education services, and transportation.

Grievance Decisions

Table 2 provides an overview of the number and type of grievances carriers reviewed in 2011 and 2014. In 2011, there were 4,865 grievances, increasing to 5,138 in 2014, representing a 5.6 percent increase.

In 2011, the largest number of grievances reported involved physician services with a total of 1,173, while in 2014, physician services ranked second in terms of grievances filed with a total of 1,026 behind the combined categories of podiatry, dental, optometry, and chiropractic services with a total of 1,169.

The number of grievances reported by carriers increased for emergency room services (147 in 2011 to 360 in 2014), representing an increase of 144.9 percent. Also, grievances reported by carriers increased dramatically for laboratory and radiology services (451 in 2011 to 992 in 2014), representing an increase of 120 percent. Significant declines reported during this same period involved inpatient hospital services (743 in 2011 to 335 in 2014), representing a decrease of 54.9 percent and mental health services (299 in 2011 to 159 in 2014), representing a decrease of 46.8 percent.

Table 2: Grievances

	2011		2014		Percent Change 2011-2014
	Number	Percent	Number	Percent	
Inpatient hospital services	743	15.3%	335	6.5%	-54.9%
Emergency room services	147	3.0%	360	7.0%	144.9%
Mental health services	299	6.1%	159	3.1%	-46.8%
Physician services	1,173	24.1%	1,026	20.0%	-12.5%
Laboratory, radiology services	451	9.3%	992	19.3%	120.0%
Pharmacy services	727	14.9%	654	12.7%	-10.0%
PT, OT, ST services (including inpatient rehab)	83	1.7%	110	2.1%	32.5%
Skilled nursing facility	11	0.2%	14	0.3%	27.3%
Durable medical equipment	168	3.5%	157	3.1%	-6.5%
Podiatry, dental, optometry, chiropractic	841	17.3%	1,169	22.8%	39.0%
Home health services	14	0.3%	25	0.5%	78.6%
Other	208	4.3%	137	2.7%	-34.1%
Total	4,865	100.0%	5,138	100.0%	5.6%

Table 3 describes how the number of grievances received by carriers compares to the number of adverse decisions that carriers made in 2011 and 2014. Grievances increased as a percentage of adverse decisions from 2011 to 2014 (11.2 percent to 16.4 percent). However, the differences varied according to the category of service. In 9 of the 12 categories, individuals were more likely to appeal an adverse decision in 2014 than in 2011, but in 3 of the 12 categories individuals were less likely to appeal the adverse decision in 2014.

Table 3: Grievances as a percent of adverse decisions

	2011	2014
Inpatient hospital services	15.7%	26.9%
Emergency room services	41.5%	232.3%
Mental health services	36.7%	20.9%
Physician services	7.7%	21.2%
Laboratory, radiology services	6.4%	8.3%
Pharmacy services	14.4%	25.5%
PT, OT, ST services (including inpatient rehab)	4.1%	9.2%
Skilled nursing facility	10.9%	22.6%
Durable medical equipment	7.9%	6.4%
Podiatry, dental, optometry, chiropractic	15.3%	19.8%
Home health services	6.3%	17.2%
Other	106.7%	87.3%
Total	11.2%	16.4%

Table 4 compares how often carriers upheld their original decisions in 2011 and in 2014. More detailed information about grievance decisions for each carrier may be found in Appendices 2 and 3 for 2014. Carriers upheld adverse decisions 52.6 percent of the time in 2014 as compared to 41.9 percent in 2011, indicating that carriers were 10.7 percent more likely to uphold an adverse decision in 2014 than in 2011.

Table 4: Grievance Decision

	2011		2014	
	Number	Percent	Number	Percent
Carrier upheld adverse decision	2039	41.9%	2702	52.6%
Carrier overturned adverse decision	2640	54.3%	2139	41.6%
Carrier modified original adverse decision	186	3.8%	297	5.8%
Total	4865		5138	

Complaints

Just as the number of grievance decisions increased between 2011 and 2014, the number of complaints filed with the Administration also increased in this time period. The Administration received 825 complaints in 2011 and 898 complaints in 2014, representing an increase of 8.8 percent. As summarized in Table 5, 33.9 percent of the complaints received in 2014 were outside of the Administration's jurisdiction, as were 36 percent of the complaints received in 2011. These non-jurisdiction cases included complaints filed by individuals covered under Medicare, Medicaid, the Federal Employee Health Benefit Plan, employer group self-funded plans, and contracts subject to the laws of states other than Maryland.

In 2011, the Administration modified or reversed the carrier's grievance decision (or the carrier reversed its own grievance decision during the course of the Administration's investigation), 66.7 percent of the time. In 2014, data indicates that the Administration reversed or modified the carrier's grievance decision (or the carrier reversed or modified their grievance decisions during the investigation) 58.2 percent of the time, representing a decrease in reversals of 8.5 percent. All of the reversals of the carriers' grievance decisions resulted in more benefits for Maryland consumers.

In 2014, the Administration issued 3 Orders based on the medical necessity complaints which it received and imposed \$2,500 in administrative penalties. During this same year, the Administration recovered \$410,589 for complainants. By comparison, in 2011, the Administration issued 8 Orders and Consent Orders based on medical necessity complaints it received, imposed \$14,500 in administrative penalties and recovered \$509,089 for complainants. Since the enactment of the Appeals and Grievance law, the Administration has recovered more than 7.9 million dollars for complainants. Summaries of the Orders for 2014 are found in Appendix 9.

Table 5: Complaints

	2011	2014	Percent Change
Total complaints received	825	898	8.8%
No Jurisdiction	297	304	2.4%
Complaint withdrawn	2	3	50.0%
Insufficient Information to perform investigation	53	60	13.2%
No action required	92	57	-38.0%
Referred to HEAU	81	71	-12.3%
Complaints investigated by MIA	300	364	21.3%
Percent of total complaints investigated by the MIA	36.4%	40.5%	4.1%
Number of complaints carrier or MIA reversed or modified grievance decision	200	212	6.0%
Percent of total complaints investigated by MIA where carrier or MIA reversed or modified grievance decision	66.7%	58.2%	-8.5%

Conclusions

Between 2011 and 2014, the number of adverse decisions decreased by 27.9 percent, the number of grievance decisions increased by 5.6 percent and the number of medical necessity complaints investigated by the Administration increased by 8.8 percent.

Carriers rendered 31,391 adverse decisions in 2014 and 43,537 in 2011, representing a decrease of 27.9 percent over the four year period. Between 2011 and 2014, there was a decrease in adverse decisions for the following eight categories: (1) inpatient hospital services; (2) emergency room services; (3) mental health services; (4) physician services; (5) pharmacy services; (6) physical therapy, occupational therapy and speech therapy services; (7) skilled nursing facility services; and (8) home health services. Between 2011 and 2014, there was an increase in adverse decisions for the following three categories of services: (1) laboratory and radiology services; (2) durable medical equipment, and (3) the combined categories of podiatry, dental, optometry and chiropractic services. Between 2011 and 2014, the largest decline in the number of adverse decisions was for inpatient hospital services and the largest increase in the number of adverse decisions was laboratory and radiology services.

Grievances increased as a percentage of adverse decisions from 2011 to 2014 (11.2 percent to 16.4 percent), suggesting that consumers were more likely to take advantage of the carriers' internal grievance process in 2014 than in 2011. When consumers filed grievances regarding initial adverse decision, carriers overturned their adverse decision 47.4 percent of the time in 2014, compared to 58.1 percent in 2011. This suggests that carriers were less likely to reverse their original decision when consumers filed a grievance in 2014 than in 2011.

In 2014, the Administration achieved a carrier reversal of 58.2 percent for complaints that were investigated by the Administration. In 2014, the Administration recovered \$410,589 for complainants under the Appeals and Grievance Law. Since the Appeals and Grievance Law was enacted by the General Assembly, the Administration has recovered over 7.9 million dollars for complainants. The Appeals and Grievance Law remains an important protection for Maryland consumers, providing a fair and balanced process for resolving disputes regarding the medical necessity of proposed or delivered health care services.

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	ADVERSE DECISIONS		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
	COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
	Aetna Health Inc.	267	0.9%	125	46.8%	0
Aetna Life Insurance Company	401	1.3%	190	47.4%	0	0.0%
All Savers Insurance Company	9	0.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp.	145	0.5%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	7544	24.0%	39	0.5%	1	0.0%
CareFirst of Maryland, Inc.	3212	10.2%	8	0.2%	1	0.0%
Cigna Health and Life Insurance Company	4765	15.2%	187	3.9%	0	0.0%
Connecticut General Life Insurance Company	58	0.2%	6	10.3%	0	0.0%
Coventry Health Care of Delaware, Inc.	565	1.8%	58	10.3%	61	10.8%
Coventry Health and Life Insurance Company	742	2.4%	52	7.0%	85	11.5%
Evergreen Health Cooperative Inc.	164	0.5%	7	4.3%	0	0.0%
Golden Rule Insurance Company	69	0.2%	8	11.6%	0	0.0%
Group Hospitalization & Medical Services, Inc.	5409	17.2%	48	0.9%	6	0.1%
Guardian Life Ins Company of America	732	2.3%	0	0.0%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic	1196	3.8%	8	0.7%	0	0.0%
Kaiser Permanente Insurance Company	65	0.2%	3	4.6%	0	0.0%
Lincoln National Life Insurance Company	45	0.1%	0	0.0%	0	0.0%
MAMSI Life & Health Insurance Company	98	0.3%	55	56.1%	0	0.0%
Metropolitan Life Insurance Company	299	1.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	924	2.9%	214	23.2%	0	0.0%
Principal Life Insurance Company	41	0.1%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	58	0.2%	0	0.0%	0	0.0%
Standard Insurance Company	29	0.1%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	98	0.3%	0	0.0%	0	0.0%
Time Insurance Company	10	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	364	1.2%	0	0.0%	0	0.0%
United Concordia Life and Health Insurance Company	1727	5.5%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	1849	5.9%	227	12.3%	1	0.1%
UnitedHealthcare of the Mid-Atlantic, Inc.	505	1.6%	11	2.2%	0	0.0%
United States Life Ins. Co. in the City of NY	1	0.0%	0	0.0%	0	0.0%
Total	31391	100.0%	1246	4.0%	155	0.5%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Health Inc.	20	5.4%	65	24.3%	0	0.0%
Aetna Life Insurance Company	22	5.5%	75	18.7%	0	0.0%
All Savers Insurance Company	0	0.0%	0	0.0%	7	77.8%
Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	142	1.9%	1290	17.1%	2890	38.3%
CareFirst of Maryland, Inc.	46	1.4%	476	14.8%	1124	35.0%
Cigna Health and Life Insurance Company	23	0.5%	279	5.9%	3809	79.9%
Connecticut General Life Insurance Company	7	12.1%	9	15.5%	31	53.4%
Coventry Health Care of Delaware, Inc.	9	1.6%	198	35.0%	68	12.0%
Coventry Health and Life Insurance Company	32	4.3%	238	32.1%	62	8.4%
Evergreen Health Cooperative Inc.	0	0.0%	4	2.4%	30	18.3%
Golden Rule Insurance Company	0	0.0%	2	2.9%	38	55.1%
Group Hospitalization & Medical Services, Inc.	246	4.5%	775	14.3%	2042	37.8%
Guardian Life Ins Company of America	0	0.0%	0	0.0%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic States	10	0.8%	830	69.4%	30	2.5%
Kaiser Permanente Insurance Company	2	3.1%	24	36.9%	4	6.2%
Lincoln National Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
MAMSI Life & Health Insurance Company	0	0.0%	18	18.4%	2	2.0%
Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	13	1.4%	192	20.8%	369	39.9%
Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Reliance Standard Life Ins Company	0	0.0%	0	0.0%	0	0.0%
Standard Insurance Company	0	0.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	0	0.0%	0	0.0%
Time Insurance Company	0	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	0	0.0%	0	0.0%	0	0.0%
United Concordia Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	0	0.0%	273	14.8%	1197	64.7%
UnitedHealthcare of the Mid-Atlantic, Inc.	186	36.8%	93	18.4%	197	39.0%
United States Life Ins. Co. in the City of NY	0	0.0%	0	0.0%	0	0.0%
Total	758	2.4%	4841	15.4%	11900	37.9%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	F. PHARMACY SERVICES		G. PT, OT, ST SERVICES (incl INPAT REHAB)		H. SKILLED NURS FAC, Sub Acute, Nurs Home	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Health Inc.	44	16.5%	2	0.7%	7	2.6%
Aetna Life Insurance Company	89	22.2%	3	0.7%	19	4.7%
All Savers Insurance Company	0	0.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	1095	14.5%	537	7.1%	13	0.2%
CareFirst of Maryland, Inc.	286	8.9%	240	7.5%	1	0.0%
Cigna Health and Life Insurance Company	269	5.6%	27	0.6%	0	0.0%
Connecticut General Life Insurance Company	0	0.0%	2	3.4%	1	1.7%
Coventry Health Care of Delaware, Inc.	90	15.9%	26	4.6%	1	0.2%
Coventry Health and Life Insurance Company	211	28.4%	15	2.0%	1	0.1%
Evergreen Health Cooperative Inc.	86	52.4%	18	11.0%	1	0.6%
Golden Rule Insurance Company	0	0.0%	9	13.0%	8	11.6%
Group Hospitalization & Medical Services, Inc.	398	7.4%	210	3.9%	3	0.1%
Guardian Life Ins Company of America	0	0.0%	0	0.0%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic States	0	0.0%	51	4.3%	3	0.3%
Kaiser Permanente Insurance Company	0	0.0%	14	21.5%	1	1.5%
Lincoln National Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
MAMSI Life & Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	0	0.0%	40	4.3%	0	0.0%
Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Standard Insurance Company	0	0.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	0	0.0%	0	0.0%
Time Insurance Company	0	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	0	0.0%	0	0.0%	0	0.0%
United Concordia Life and Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	0	0.0%	5	0.3%	2	0.1%
UnitedHealthcare of the Mid-Atlantic, Inc.	0	0.0%	0	0.0%	1	0.2%
United States Life Ins. Co. in the City of NY	0	0.0%	0	0.0%	0	0.0%
Total	2568	8.2%	1199	3.8%	62	0.2%

**APPENDIX 1
ADVERSE DECISIONS BY CARRIER**

COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. PODIATRY, DENTAL, OPTOMETRY, CHIRO		K. HOME HEALTH SERVICES		*L. OTHER	
	NUMBER	%TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Health Inc.	2	0.7%	0	0.0%	2	0.7%	0	0.0%
Aetna Life Insurance Company	1	0.2%	0	0.0%	2	0.5%	0	0.0%
All Savers Insurance Company	2	22.2%	0	0.0%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp.	0	0.0%	145	100.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	1293	17.1%	182	2.4%	45	0.6%	17	0.2%
CareFirst of Maryland, Inc.	296	9.2%	722	22.5%	5	0.2%	7	0.2%
Cigna Health and Life Insurance Company	118	2.5%	34	0.7%	19	0.4%	0	0.0%
Connecticut General Life Insurance Co	2	3.4%	0	0.0%	0	0.0%	0	0.0%
Coventry Health Care of Delaware, Inc.	49	8.7%	4	0.7%	1	0.2%	0	0.0%
Coventry Health and Life Ins. Company	45	6.1%	0	0.0%	1	0.1%	0	0.0%
Evergreen Health Cooperative Inc.	4	2.4%	5	3.0%	2	1.2%	7	4.3%
Golden Rule Insurance Company	0	0.0%	0	0.0%	0	0.0%	4	5.8%
Group Hospitalization & Medical Serv. Inc.	379	7.0%	1259	23.3%	37	0.7%	6	0.1%
Guardian Life Insurance Co. of America	0	0.0%	732	100.0%	0	0.0%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic	112	9.4%	129	10.8%	11	0.9%	12	1.0%
Kaiser Permanente Insurance Company	3	4.6%	0	0.0%	0	0.0%	14	21.5%
Lincoln National Life Insurance Company	0	0.0%	45	100.0%	0	0.0%	0	0.0%
MAMSI Life & Health Insurance Company	7	7.1%	2	2.0%	4	4.1%	10	10.2%
Metropolitan Life Insurance Company	0	0.0%	299	100.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	39	4.2%	18	1.9%	2	0.2%	37	4.0%
Principal Life Insurance Company	0	0.0%	41	100.0%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Co.	0	0.0%	58	100.0%	0	0.0%	0	0.0%
Standard Insurance Company	0	0.0%	29	100.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	98	100.0%	0	0.0%	0	0.0%
Time Insurance Company	1	10.0%	2	20.0%	0	0.0%	7	70.0%
Union Security Insurance Company	0	0.0%	364	100.0%	0	0.0%	0	0.0%
United Concordia Life and Health Ins. Co.	0	0.0%	1727	100.0%	0	0.0%	0	0.0%
UnitedHealthcare Insurance Company	101	5.5%	0	0.0%	13	0.7%	30	1.6%
UnitedHealthcare of the Mid-Atlantic, Inc.	9	1.8%	1	0.2%	1	0.2%	6	1.2%
United States Life Ins. Co. in the City of NY	1	100.0%	0	0.0%	0	0.0%	0	0.0%
Total	2464	7.8%	5896	18.8%	145	0.5%	157	0.5%

*L=Outpatient Hospital Services, Education Services, and Transportation

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

COMPANY NAME	GRIEVANCES FILED		A. INPATIENT HOSPITAL SERVICES		B. EMERGENCY ROOM SERVICES	
	COMPANY TOTAL	% OF ALL COMPANIES	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Health Inc.	325	6.3%	24	7.4%	0	0.0%
Aetna Life Insurance Company	305	5.9%	20	6.6%	0	0.0%
Ameritas Life Insurance Corp.	36	0.7%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	689	13.4%	10	1.5%	9	1.3%
CareFirst of Maryland, Inc.	330	6.4%	6	1.8%	3	0.9%
Cigna Health and Life Ins Company	209	4.1%	35	16.7%	0	0.0%
Connecticut General Life Ins Company	41	0.8%	10	24.4%	0	0.0%
Coventry Health Care of Delaware, Inc.	491	9.6%	67	13.6%	265	54.0%
Coventry Health and Life Ins. Company	404	7.9%	128	31.7%	51	12.0%
Evergreen Health Cooperative Inc.	39	0.8%	3	7.7%	0	0.0%
Golden Rule Insurance Company	25	0.5%	8	32.0%	0	0.0%
Group Hospitalization & Medical Services, Inc.	476	9.3%	7	1.5%	5	1.1%
Guardian Life Insurance Company of America	362	7.0%	0	0.0%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic	33	0.6%	1	3.0%	0	0.0%
Kaiser Permanente Insurance Company	15	0.3%	1	6.7%	0	0.0%
Madison National Life Insurance Company	2	0.0%	0	0.0%	0	0.0%
MAMSI Life & Health Ins Company	1	0.0%	0	0.0%	0	0.0%
MD-Individual Practice Association, Inc.	112	2.2%	6	5.4%	15	13.4%
Metropolitan Life Insurance Company	5	0.1%	0	0.0%	0	0.0%
Optimum Choice, Inc.	158	3.1%	2	1.3%	11	7.0%
Principal Life Insurance Company	8	0.2%	0	0.0%	0	0.0%
Reliance Standard Life Ins. Company	4	0.1%	0	0.0%	0	0.0%
Standard Insurance Company	5	0.1%	0	0.0%	0	0.0%
Standard Security Life Ins. Co. of New York	19	0.4%	2	10.5%	1	5.3%
Sun Life Assurance Company of Canada	20	0.4%	0	0.0%	0	0.0%
Time Insurance Company	2	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	28	0.5%	0	0.0%	0	0.0%
United Concordia Life & Health Insurance Co.	409	8.0%	0	0.0%	0	0.0%
UnitedHealthCare Insurance Company	495	9.6%	3	0.6%	0	0.0%
UnitedHealthCare of the Mid-Atlantic, Inc.	88	1.7%	2	2.3%	0	0.0%
United States Life Ins. Co. in the City of NY	2	0.0%	0	0.0%	0	0.0%
TOTAL	5138	100.00%	335	6.5%	360	7.0%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

COMPANY NAME	C. MENTAL HEALTH SERVICES		D. PHYSICIAN SERVICES		E. LABORATORY, RADIOLOGY SERVICES	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Health Inc.	20	6.2%	218	67.1%	45	13.8%
Aetna Life Insurance Company	33	10.8%	197	64.6%	31	10.2%
Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	32	4.6%	138	20.0%	232	33.7%
CareFirst of Maryland, Inc.	1	0.3%	24	7.3%	91	27.6%
Cigna Health and Life Insurance Company	1	0.5%	73	34.9%	58	27.8%
Connecticut General Life Insurance Company	4	9.8%	17	41.5%	4	9.8%
Coventry Health Care of Delaware, Inc.	0	0.0%	62	12.6%	65	13.2%
Coventry Health and Life Insurance Company	0	0.0%	90	22.3%	79	19.6%
Evergreen Health Cooperative Inc.	1	2.6%	2	5.1%	5	12.8%
Golden Rule Insurance Company	0	0.0%	2	8.0%	12	48.0%
Group Hospitalization & Medical Services, Inc.	12	2.5%	50	10.5%	156	32.8%
Guardian Life Insurance Company of America	0	0.0%	0	0.0%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic	8	24.2%	12	36.4%	2	6.1%
Kaiser Permanente Insurance Company	0	0.0%	7	46.7%	0	0.0%
Madison National Life Insurance Company	0	0.0%	2	100.0%	0	0.0%
MAMSI Life & Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
MD-Individual Practice Association, Inc.	0	0.0%	17	15.2%	23	20.5%
Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	4	2.5%	14	8.9%	41	25.9%
Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Reliance Standard Life Ins. Company	0	0.0%	0	0.0%	0	0.0%
Standard Insurance Company	0	0.0%	0	0.0%	0	0.0%
Standard Security Life Ins. Co. of New York	0	0.0%	11	57.9%	5	26.3%
Sun Life Assurance Company of Canada	0	0.0%	0	0.0%	0	0.0%
Time Insurance Company	0	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	0	0.0%	0	0.0%	0	0.0%
United Concordia Life & Health Insurance Co.	0	0.0%	0	0.0%	0	0.0%
UnitedHealthCare Insurance Company	0	0.0%	85	17.2%	135	27.3%
UnitedHealthCare of the Mid-Atlantic, Inc.	43	48.9%	5	5.7%	8	9.1%
United States Life Ins. Co. in the City of NY	0	0.0%	0	0.0%	0	0.0%
TOTAL	159	3.1%	1026	20.0%	992	19.3%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

COMPANY NAME	F. PHARMACY SERVICES		G. PT. OT, ST SERVICES		H. SKILLED NURSING FACILITY, Sub Acute, Nursing Home	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Health Inc.	6	1.8%	4	1.2%	3	0.9%
Aetna Life Insurance Company	10	3.3%	0	0.0%	0	0.0%
Ameritas Life Insurance Corp.	0	0.0%	0	0.0%	0	0.0%
CareFirst BlueChoice, Inc.	193	28.0%	16	2.3%	2	0.3%
CareFirst of Maryland, Inc.	63	19.1%	6	1.8%	2	0.6%
Cigna Health and Life Insurance Company	20	9.6%	6	2.9%	0	0.0%
Connecticut General Life Insurance Company	3	7.3%	1	2.4%	0	0.0%
Coventry Health Care of Delaware, Inc.	5	1.0%	10	2.0%	1	0.2%
Coventry Health and Life Ins. Company	14	3.5%	18	4.5%	1	0.2%
Evergreen Health Cooperative Inc.	14	35.9%	7	17.9%	0	0.0%
Golden Rule Insurance Company	0	0.0%	3	12.0%	0	0.0%
Group Hospitalization & Medical Services, Inc.	95	20.0%	17	3.6%	2	0.4%
Guardian Life Insurance Co. of America	0	0.0%	0	0.0%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic	0	0.0%	1	3.0%	2	6.1%
Kaiser Permanente Insurance Company	0	0.0%	5	33.3%	0	0.0%
Madison National Life Ins. Company	0	0.0%	0	0.0%	0	0.0%
MAMSI Life & Health Insurance Company	1	100.0%	0	0.0%	0	0.0%
MD-Individual Practice Association, Inc.	4	3.6%	0	0.0%	0	0.0%
Metropolitan Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	23	14.6%	3	1.9%	0	0.0%
Principal Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Reliance Standard Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
Standard Insurance Company	0	0.0%	0	0.0%	0	0.0%
Standard Security Life Ins. Co. of New York	0	0.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	0	0.0%	0	0.0%
Time Insurance Company	0	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	0	0.0%	0	0.0%	0	0.0%
United Concordia Life & Health Ins Co.	0	0.0%	0	0.0%	0	0.0%
UnitedHealthCare Insurance Company	187	37.8%	7	1.4%	1	0.2%
UnitedHealthCare of the Mid-Atlantic, Inc.	16	18.2%	6	6.8%	0	0.0%
United States Life Ins. Co. in the City of NY	0	0.0%	0	0.0%	0	0.0%
TOTAL	654	12.7%	110	2.1%	14	0.3%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

COMPANY NAME	I. DURABLE MEDICAL EQUIPMENT SERVICES		J. PODIATRY, DENTAL, OPTOMETRY, CHIROPRACTIC		K. HOME HEALTH SERVICES	
	NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Health Inc.	1	0.3%	4	1.2%	0	0.0%
Aetna Life Insurance Company	2	0.7%	10	3.3%	2	0.7%
Ameritas Life Insurance Corp.	0	0.0%	36	100.0%	0	0.0%
CareFirst BlueChoice, Inc.	48	7.0%	4	0.6%	4	0.6%
CareFirst of Maryland, Inc.	17	5.2%	114	34.5%	1	0.3%
Cigna Health and Life Insurance Company	9	4.3%	7	3.3%	0	0.0%
Connecticut General Life Insurance Company	0	0.0%	2	4.9%	0	0.0%
Coventry Health Care of Delaware, Inc.	9	1.8%	4	0.8%	3	0.6%
Coventry Health and Life Insurance Company	11	2.7%	1	0.2%	11	2.7%
Evergreen Health Cooperative Inc.	2	5.1%	4	10.3%	0	0.0%
Golden Rule Insurance Company	0	0.0%	0	0.0%	0	0.0%
Group Hospitalization & Medical Services, Inc.	18	3.8%	114	23.9%	0	0.0%
Guardian Life Insurance Company of America	0	0.0%	362	100.0%	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic	1	3.0%	4	12.1%	1	3.0%
Kaiser Permanente Insurance Company	0	0.0%	0	0.0%	0	0.0%
Madison National Life Insurance Company	0	0.0%	0	0.0%	0	0.0%
MAMSI Life & Health Insurance Company	0	0.0%	0	0.0%	0	0.0%
MD-Individual Practice Association, Inc.	5	4.5%	0	0.0%	0	0.0%
Metropolitan Life Insurance Company	0	0.0%	5	100.0%	0	0.0%
Optimum Choice, Inc.	5	3.2%	1	0.6%	0	0.0%
Principal Life Insurance Company	0	0.0%	8	100.0%	0	0.0%
Reliance Standard Life Ins. Company	0	0.0%	4	100.0%	0	0.0%
Standard Insurance Company	0	0.0%	5	100.0%	0	0.0%
Standard Security Life Ins. Co. of New York	0	0.0%	0	0.0%	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%	20	100.0%	0	0.0%
Time Insurance Company	0	0.0%	0	0.0%	0	0.0%
Union Security Insurance Company	0	0.0%	28	100.0%	0	0.0%
United Concordia Life & Health Insurance Co.	0	0.0%	409	100.0%	0	0.0%
UnitedHealthCare Insurance Company	27	5.5%	22	4.4%	3	0.6%
UnitedHealthCare of the Mid-Atlantic, Inc.	1	1.1%	1	1.1%	0	0.0%
United States Life Ins. Co. in the City of NY	1	50.0%	0	0.0%	0	0.0%
TOTAL	157	3.1%	1169	22.8%	25	0.5%

**APPENDIX 2
GRIEVANCE DECISIONS BY CARRIER**

COMPANY NAME	L. OTHER (Outpatient Hospital Services, Education Services and Transportation)	
	NUMBER	% TOTAL
Aetna Health Inc.	0	0.0%
Aetna Life Insurance Company	0	0.0%
Ameritas Life Insurance Corp.	0	0.0%
CareFirst BlueChoice, Inc.	1	0.1%
CareFirst of Maryland, Inc.	2	0.6%
Cigna Health and Life Insurance Company	0	0.0%
Connecticut General Life Insurance Company	0	0.0%
Coventry Health Care of Delaware, Inc.	0	0.0%
Coventry Health and Life Insurance Company	0	0.0%
Evergreen Health Cooperative Inc.	1	2.6%
Golden Rule Insurance Company	0	0.0%
Group Hospitalization & Medical Services, Inc.	0	0.0%
Guardian Life Insurance Company of America	0	0.0%
Kaiser Foundation Health Plan-Mid-Atlantic	1	3.0%
Kaiser Permanente Insurance Company	2	13.3%
Madison National Life Ins. Company	0	0.0%
MAMSI Life & Health Insurance Company	0	0.0%
MD-Individual Practice Association, Inc.	42	37.5%
Metropolitan Life Insurance Company	0	0.0%
Optimum Choice, Inc.	54	34.2%
Principal Life Ins. Company	0	0.0%
Reliance Standard Life Ins. Company	0	0.0%
Standard Insurance Company	0	0.0%
Standard Security Life Ins. Co. of New York	0	0.0%
Sun Life Assurance Company of Canada	0	0.0%
Time Insurance Company	2	100.0%
Union Security Insurance Company	0	0.0%
United Concordia Life & Health Insurance Co.	0	0.0%
UnitedHealthCare Insurance Company	25	5.1%
UnitedHealthCare of the Mid-Atlantic, Inc.	6	6.8%
United States Life Ins. Co. in the City of NY	1	50.0%
TOTAL	137	2.7%

**APPENDIX 3
DISPOSITION OF CARRIER GRIEVANCE DECISIONS**

COMPANY NAME	GRIEVANCES FILED		ORIGINAL DECISION OF INSURANCE COMPANY WAS...					
	COMPANY TOTAL	% OF ALL COMPANIES	UPHELD		OVERTURNED		MODIFIED	
			NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Aetna Health Inc.	325	6.3%	205	63.1%	108	33.2%	12	3.7%
Aetna Life Insurance Company	305	5.9%	179	58.7%	115	37.7%	11	3.6%
Ameritas Life Insurance Corp.	36	0.7%	25	69.4%	8	22.2%	3	8.3%
CareFirst BlueChoice, Inc.	689	13.4%	215	31.2%	462	67.1%	12	1.7%
CareFirst of Maryland, Inc.	330	6.4%	119	36.1%	199	60.3%	12	3.6%
Cigna Health and Life Ins. Co.	209	4.1%	123	58.9%	82	39.2%	4	1.9%
Connecticut General Life Ins. Co.	41	0.8%	25	61.0%	16	39.0%	0	0.0%
Coventry Health Care of Delaware, Inc.	491	9.6%	445	90.6%	46	9.4%	0	0.0%
Coventry Health and Life Ins. Co.	404	7.9%	339	83.9%	65	16.1%	0	0.0%
Evergreen Health Cooperative Inc.	39	0.8%	12	30.8%	24	61.5%	3	7.7%
Golden Rule Insurance Company	25	0.5%	19	76.0%	3	12.0%	3	12.0%
Group Hospitalization & Medical Services, Inc.	476	9.3%	202	42.4%	263	55.3%	11	2.3%
Guardian Life Ins. Co. of America	362	7.0%	134	37.0%	83	22.9%	145	40.1%
Kaiser Fndtn Health Plan Mid-Atl	33	0.6%	19	57.6%	14	42.4%	0	0.0%
Kaiser Permanente Insurance Co.	15	0.3%	6	40.0%	9	60.0%	0	0.0%
Madison National Life Ins. Co., Inc.	2	0.0%	0	0.0%	2	100.0%	0	0.0%
MAMSI Life & Health Ins. Co.	1	0.0%	1	100.0%	0	0.0%	0	0.0%
MD-Individual Practice Association, Inc.	112	2.2%	55	49.1%	51	45.5%	6	5.4%

**APPENDIX 3
DISPOSITION OF CARRIER GRIEVANCE DECISIONS**

COMPANY NAME	GRIEVANCES FILED		ORIGINAL DECISION OF INSURANCE COMPANY WAS...					
	COMPANY TOTAL	% OF ALL COMPANIES	UPHELD		OVERTURNED		MODIFIED	
			NUMBER	% TOTAL	NUMBER	% TOTAL	NUMBER	% TOTAL
Metropolitan Life Ins. Company	5	0.1%	1	20.0%	1	20.0%	3	60.0%
Optimum Choice, Inc.	158	3.1%	72	45.6%	84	53.2%	2	1.3%
Principal Life Insurance Company	8	0.2%	5	62.5%	1	12.5%	2	25.0%
Reliance Standard Life Ins. Co.	4	0.1%	4	100.0%	0	0.0%	0	0.0%
Standard Insurance Company	5	0.1%	3	60.0%	0	0.0%	2	40.0%
Standard Security Life Ins. Co. in the City of New York	19	0.4%	15	78.9%	3	15.8%	1	5.3%
Sun Life Assurance Co. of Canada	20	0.4%	14	70.0%	6	30.0%	0	0.0%
Time Insurance Company	2	0.0%	1	50.0%	0	0.0%	1	50.0%
Union Security Insurance Co.	28	0.5%	3	10.7%	15	53.6%	10	35.7%
United Concordia Life & Health Ins. Co.	409	8.0%	208	50.9%	167	40.8%	34	8.3%
United States Life Ins. in the City of New York	2	0.0%	1	50.0%	1	50.0%	0	0.0%
UnitedHealthcare Insurance Co.	495	9.6%	201	40.6%	277	56.0%	17	3.4%
UnitedHealthcare of the Mid- Atlantic, Inc.	88	1.7%	51	58.0%	34	38.6%	3	3.4%
Total	5138	100%	2702	52.6%	2139	41.6%	297	5.8%

**APPENDIX 4
GRIEVANCE DECISIONS BY CARRIER FOR HOSPITAL LENGTH OF STAY (“LOS”)**

COMPANY* NAME	HOSPITAL LOS	HOSPITAL LOS	UPHELD		OVERTURNED		MODIFIED	
	TOTAL*	OUTCOME**	Number	Percent	Number	Percent	Number	Percent
CareFirst BlueChoice, Inc.	63	28	14	50.00%	11	39.29%	3	10.71%
CareFirst of Maryland, Inc.	12	2	0	0.00%	2	100.00%	0	0.00%
Cigna Health and Life Insurance Co.	39	19	8	42.11%	9	47.37%	2	10.53%
Connecticut General Life Insurance Co.	2	8	1	12.50%	7	87.50%	0	0.00%
Coventry Health Care of Delaware, Inc.	28	8	8	100.00%	0	0.00%	0	0.00%
Coventry Health and Life Ins. Company	4	4	2	50.00%	2	50.00%	0	0.00%
Evergreen Health Cooperative Inc.	11	4	1	25.00%	2	50.00%	1	25.00%
Golden Rule Insurance Company	8	7	4	57.14%	2	28.57%	1	14.29%
Group Hosp & MedServ, Inc.	26	4	2	50.00%	2	50.00%	0	0.00%
Kaiser Fndtn Health Plan Mid-Atlantic	3	5	4	80.00%	1	20.00%	0	0.00%
Kaiser Permanente Insurance Company	1	4	3	75.00%	1	25.00%	0	0.00%
Optimum Choice, Inc.	4	4	3	75.00%	1	25.00%	0	0.00%
UnitedHealthcare of the Mid-Atlantic, Inc.	20	13	5	38.46%	7	53.85%	1	7.69%

* This chart only includes those carriers who received grievances involving hospital length of stay during calendar year 2014.

** Represents the number of grievances that were resolved in calendar year 2014.

**APPENDIX 5
TIME FRAME FOR RENDERING A GRIEVANCE DECISION BY CARRIER EMERGENCY CASES**

COMPANY** NAME	EMERGENCY CASES - RESOLUTION TIME*			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
CareFirst BlueChoice, Inc.	24	24	24	24
CareFirst of Maryland, Inc.	24	24	24	24
Cigna Health & Life Insurance Company	24	24	24	60
Evergreen Health Cooperative Inc.	0	0	0	80
Golden Rule Ins. Company	72	72	0	0
Group Hospitalization & Medical Services, Inc.	24	24	25	0
Kaiser Foundation Health Plan-Mid-Atlantic	9.1	23.9	6.3	23.8
MAMSI Life and Health Ins. Company	0	0	49.3	0
MD-Individual Practice Association, Inc.	198	24	34	54
Optimum Choice, Inc.	20	18	63.3	23.1
United States Life Ins. Co. in the City of New York	24	24	24	24
UnitedHealthcare Insurance Company	47	35	37.5	59
UnitedHealthcare of the Mid-Atlantic	37	22	26.6	14.4

**** This report only includes carriers who had grievances which were considered emergency cases during calendar year 2014.**

*** Reported as hours**

**APPENDIX 6
TIME FRAME FOR RENDERING A GRIEVANCE DECISION BY CARRIER, NON-
EMERGENCY CASES**

COMPANY NAME	NON-EMERGENCY CASES - RESOLUTION TIME*			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Aetna Health Inc.	21	29.7	30	24.2
Aetna Life Insurance Company	23	27	28	28
Ameritas Life Insurance Company	12.5	9.5	13.5	13
CareFirst BlueChoice, Inc.	22.2	25.9	24.6	24.4
CareFirst of Maryland, Inc.	33	39.2	29.2	31.1
Cigna Health and Life Insurance Company	23	27	28	27
Connecticut General Life Insurance Company	52	27	20	44
Coventry Health and Life Insurance Company	23	25	26	27
Coventry Health Care of Delaware, Inc.	23	25	25	44
Evergreen Health Cooperative Inc.	0	1	7	6
Golden Rule Insurance Company	28	22	27	0
Group Hospitalization & Medical Services, Inc.	34.7	36.2	37.9	31.5
Guardian Life Insurance Company of America	3	3	3	3
Kaiser Foundation Health Plan-Mid-Atlantic	31.1	19	30	30
Madison National Life Insurance Company	0	11	10	0
MD-Individual Practice Association, Inc.	55	16	20.6	22
Metropolitan Life Insurance Company	11.5	15.2	8.8	7.4
Optimum Choice, Inc.	21	17	18.9	22
Reliance Standard Life Insurance Company	12	16	7	4
Standard Insurance Company	20	0	20.6	16

**APPENDIX 6
TIME FRAME FOR RENDERING A GRIEVANCE DECISION BY CARRIER, NON-EMERGENCY CASES**

COMPANY	NON-EMERGENCY CASES – RESOLUTION TIME*			
NAME	1 ST Quarter	2 ND Quarter	3 RD Quarter	4 TH Quarter
Standard Security Life Ins. Co. of New York	15	10	11	9
Sun Life Assurance Co. of Canada	21	21	24	38
Time Insurance Company	6	21	0	3.3
Union Security Insurance Company	13	12	7	7
United Concordia Life and Health Insurance Co.	8	9.4	11.5	16.9
UnitedHealthcare Insurance Company	19	22	21.8	27
UnitedHealthcare of the Mid-Atlantic, Inc.	27	37	18.4	2.8

*Reported as Calendar Days

APPENDIX 7

INTERNAL GRIEVANCES FILED CONSIDERED EMERGENCY CASES AS REPORTED BY CARRIER

COMPANY* NAME	*TOTAL NUMBER OF "EMERGENCIES" CASES	"EMERGENCIES"	UPHELD		OVERTURNED		MODIFIED	
		OUTCOME**	Number	Percent	Number	Percent	Number	Percent
CareFirst BlueChoice, Inc.	10	9	1	11.1%	8	88.9%	0	0.0%
CareFirst of Maryland, Inc.	5	5	1	20.0%	4	80.0%	0	0.0%
Cigna Health & Life Ins. Co.	25	10	6	60.0%	4	40.0%	0	0.0%
Coventry Health Care of Delaware	13	13	13	100.0%	0	0.0%	0	0.0%
Coventry Health and Life Ins. Co.	7	7	4	57.1%	3	42.9%	0	0.0%
Evergreen Health Cooperative Inc.	1	1	1	100.0%	0	0.0%	0	0.0%
Group Hosp & Med Serv, Inc.	6	4	1	25.0%	3	75.0%	0	0.0%
Kaiser Fndtn Health Plan Mid-Atl	30	9	8	88.9%	1	11.1%	0	0.0%
MAMSI Life and Health Ins. Co.	20	1	1	100.0%	0	0.0%	0	0.0%
Optimum Choice, Inc.	55	6	5	83.3%	1	16.7%	0	0.0%
UnitedHealthcare Ins. Company	49	65	22	33.8%	37	56.9%	6	9.2%
UnitedHealthcare of the Mid-Atl	92	30	20	66.7%	9	30.0%	1	3.3%
Total	313	160	83	51.88%	70	43.75%	7	4.38%

*This chart only includes carriers who had grievances which were considered emergency cases during calendar year 2014.

** Represents the number of grievances that were resolved in calendar year 2014.

**APPENDIX 8
ADMINISTRATION COMPLAINTS**

Appeals and Grievance Statistics
Totals for Complaints Filed
January 1, 2014 – December 31, 2014

COMPLAINTS FILED	898
NO JURISDICTION	304
Referred to DBM/Cecil County	14
Referred to Department of Labor (ERISA plans)	116
Referred to Office of Personnel Management (Federal employee health benefit plans)	51
Referred to Medicaid	18
Referred to Medicare	18
Referred to Insurance Department in Another State	82
Referred to Other (includes complaints referred to Workers Compensation Commission or other State agencies)	5
COMPLAINT WITHDRAWN	3
INSUFFICIENT INFORMATION TO COMPLETE INVESTIGATION	60
NO ACTION REQUIRED (includes non-medical necessity complaint cases transferred to Complaint Unit, duplicate files, inquiries)	96
REFERRED TO HEALTH, EDUCATION AND ADVOCACY UNIT (for complainants who had not exhausted the carrier's internal appeal process)	71
MIA CONDUCTED INVESTIGATION	364
MIA Decision Upheld Carrier	152
Carrier Reversed Itself During Investigation	136
MIA Reversed Carrier Decision	62
MIA Reversed Carrier Decision in Part and Upheld Carrier Decision in Part	14

Administration Complaints (Continued)

Carrier	COMPLAINTS INVESTIGATED		Carrier Upheld by MIA		Carrier Reversed by MIA		Carrier Modified by MIA		Carrier Reversed Itself During Investigation	
	Total	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Aetna Health, Inc.	1	0%	1	100%	0	0%	0	0%	0	0%
Aetna Life Insurance Company	25	7%	6	24%	8	32%	0	0%	11	44%
All Savers Insurance Company	3	1%	1	33%	0	0%	0	0%	2	67%
APS Healthcare	8	2%	3	38%	0	0%	4	50%	1	13%
Carefirst BlueChoice, Inc.	68	19%	16	24%	15	22%	3	4%	34	50%
Carefirst of Maryland, Inc.	53	15%	25	47%	9	17%	0	0%	19	36%
Cigna Health & Life Insurance Co.	9	2%	2	22%	2	22%	0	0%	5	56%
Coventry Health and Life Ins. Co.	9	2%	4	44%	2	22%	0	0%	3	33%
Coventry Health Care of DE, Inc.	8	2%	4	50%	2	25%	0	0%	2	25%
DentaQuest of Mid-Atlantic, Inc.	1	0%	1	100%	0	0%	0	0%	0	0%
Express Scripts, Inc.	3	1%	0	0%	0	0%	0	0%	3	100%
Express Scripts Insurance Company	3	1%	0	0%	0	0%	0	0%	3	100%
Golden Rule Insurance Company	3	1%	1	33%	0	0%	0	0%	2	67%
Group Dental Service of Md, Inc.	1	0%	1	100%	0	0%	0	0%	0	0%
Group Hosp & Medical Services, Inc.	23	6%	9	39%	4	17%	0	0%	10	43%
Guardian Life Ins. Co. of America	13	4%	6	46%	4	31%	1	8%	2	15%
Guardian Insurance & Annuity Co. Inc.	1	0%	0	0%	0	0%	0	0%	1	100%
Kaiser Foundation Health Plan	10	3%	5	50%	0	0%	1	10%	4	40%
MAMSI Life and Health Insurance Co.	11	3%	6	55%	2	18%	0	0%	3	27%
Maryland Health Insurance Plan	4	1%	3	75%	1	25%	0	0%	0	0%
Metropolitan Life Insurance Company	4	1%	0	0%	0	0%	0	0%	4	100%
Optimum Choice, Inc.	14	4%	5	36%	1	7%	0	0%	8	57%
Principal Life Insurance Company	3	1%	3	100%	0	0%	0	0%	0	0%
Sun Life Assurance Co. of Canada	1	0%	0	0%	0	0%	0	0%	1	100%
Union Security Insurance Company	1	0%	0	0%	0	0%	0	0%	1	100%
United Concordia Life & Health Ins. Co.	23	6%	10	43%	3	13%	2	9%	8	35%
UnitedHealthcare Ins. Company	44	12%	16	36%	8	18%	1	2%	19	43%
UnitedHealthcare of the Mid-Atlantic, Inc.	8	2%	2	25%	1	13%	2	25%	3	38%
UnitedHealthcare Services, Inc.	9	2%	6	67%	0	0%	0	0%	3	33%
TOTAL	364	100%	136	37%	62	17%	14	4%	152	42%

Administration Complaints (Continued)

Type of Procedure	Carrier Code**	Total	Carrier Upheld by MIA		Carrier Reversed by MIA		Carrier Modified by MIA		Carrier Reversed Itself During Investigation	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Cosmetic	D	8	2	25%	2	25%	0	0%	4	50%
Denial of Hospital Days	A	6	3	50%	3	50%	0	0%	0	0%
Dental Care Services	J	73	30	41%	11	15%	3	4%	29	40%
Durable Medical Equipment	I	16	5	31%	5	31%	0	0%	6	38%
Emergency Room Denial	B	1	1	100%	0	0%	0	0%	0	0%
Experimental	D	67	32	48%	22	33%	1	1%	12	18%
In-Patient Rehabilitation	G	1	0	0%	1	100%	0	0%	0	0%
Lab, Imaging, Testing	E	24	9	38%	4	17%	0	0%	11	46%
Maternity and Newborn Care	A	1	1	100%	0	0%	0	0%	0	0%
Medical Food	L	1	0	0%	0	0%	0	0%	1	100%
Mental Health Partial Hospitalization	C	5	2	40%	0	0%	0	0%	3	60%
Mental Health (Inpatient) Services	C	21	9	43%	2	10%	5	24%	5	24%
Mental Health (Outpatient) Services	C	16	7	44%	0	0%	1	6%	8	50%
Morbid Obesity	L	3	1	33%	0	0%	0	0%	2	67%
No Preauthorization	L	1	0	0%	0	0%	0	0%	1	100%
Out-of-Network Benefits	L	1	1	100%	0	0%	0	0%	0	0%
Pharmacy Benefits	F	5	0	0%	0	0%	1	20%	4	80%
Pharmacy Services/Formulary Issues	F	60	8	13%	4	7%	1	2%	47	78%
Physician Services	D	35	18	51%	4	11%	2	6%	11	31%
Preventive Care	D	3	1	33%	0	0%	0	0%	2	67%
PT, OT, Speech Therapy	G	8	3	38%	2	25%	0	0%	3	38%
Skilled Nursing Facility Care Services	G	2	1	50%	1	50%	0	0%	0	0%
Transportation Services	L	6	2	33%	1	17%	0	0%	3	50%
TOTAL		364	136		62		14		152	

** All carrier data is divided into categories A-L. The MIA's data is more specific in nature. All charts which compare Carrier and MIA data have combined the MIA categories to fit within the carrier's A-L categories. The letters above identify which MIA category corresponds to the carrier code.

Appendix 9

Summaries of Appeals and Grievance Orders

UnitedHealth Insurance Company (“UnitedHealthcare”)

Case No.: 2014-04-004

Effective Date: April 14, 2014

The Administration ordered UnitedHealthcare to provide documentation to the Commissioner showing that it is no longer relying on private review criteria and standards regarding procedure code E0652/Flexitouch Pneumatic Compression System that are not clinically valid, not compatible with established principles of health care and not flexible enough to allow for deviations from norms when justified on a case by case basis in accordance with § 15-10A-02(l) of the Insurance Article.

Group Hospitalization and Medical Services, Inc. (“GHMSI”)

Case No.: 2014-05-030

Effective Date: May 20, 2014

Penalty: \$2,500.00

The Administration ordered GHMSI to pay an administrative penalty of \$2,500.00 for violation of § 15-10A-02(b)(2)(iv) for failing to render a final decision in writing on a grievance within 45 working days after the date on which the grievance was filed when the grievance involved a retrospective denial. The Administration also ordered GHMSI to provide documentation to the Commissioner showing that it is no longer relying on private review criteria regarding HCPCS code E0483 High Frequency Chest Wall Oscillation Air-Pulse Generator System that are not objective, not clinically valid, not compatible with established principles of health care and not flexible enough to allow for deviations from norms when justified on a case by case basis in accordance with § 15-10A-02(l) of the Insurance Article.

Aetna Life Insurance Company (“Aetna”)

Case No.: 2014-07-035

Effective Date: July 16, 2014

The Administration ordered Aetna to provide documentation to the Commissioner showing that it is no longer relying on private review criteria and standards regarding the use of Parathyroid SPECT and CT for anatomical localization for members with a history of prior thyroidectomy and iodine allergy, that are not objective, not clinically valid, not compatible with established principles of health care and not flexible enough to allow for deviations from norms when justified on a case by case basis in accordance with § 15-10A-02(l) of the Insurance Article.