

December 4, 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 Academy of Nutrition and 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 reviewed the proposed revisions posted to the MIA website and thank the MIA for acknowledging our comments and recommendations outlined in our testimony from August 4, 2020 and December 18, 2019 through inclusion of dietitians and nutritionists as a provider that needs to be taken into account by regulated carriers in Maryland.

The language from the proposed revisions is noted below:

pages 3-5 - Section .05 Travel Distance Standards.

*.... "A.(4) All other providers and facility types included on the carrier's provider panel but not listed in the chart A(5) of this regulation, including physical therapists, **nutritionists, and dietitians**, shall individually be required to meet maximum distance standards of 15 miles for Urban Areas, 40 miles for Suburban Areas, and 90 miles for Rural Areas."*

*.... "B.(4) All other providers and facility types included on the carrier's provider panel but not listed in the chart A(5) of this regulation, including physical therapists, **nutritionists, and dietitians**, shall individually be required to meet maximum distance standards of 15 miles for Urban Areas, 40 miles for Suburban Areas, and 90 miles for Rural Areas."*

We support the language above and offer as a technical amendment replacing "**nutritionists, and dietitians**" with the term "**Licensed Dietitian-Nutritionist**". This is the recognized term as defined in Maryland's **Health Occupations Article §5-102**.

We understand revisions to the network adequacy regulations is ongoing. 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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