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## BULLETIN 24-12

Date: April 29, 2024

To: Insurers, Nonprofit Health Service Plans, Health Maintenance Organizations and Dental Plan Organizations (Carriers)

Re: 2024 Network Access Plan Filing Instructions

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The purpose of this bulletin is to notify insurance carriers and those entities that use provider panels for health benefit plans and dental plans of the filing deadlines and changes to the filing process for 2024.

### Health Benefit Plan Filings

On April 24, 2023, the Maryland Insurance Administration (MIA) adopted revised network adequacy regulations for health benefit plans under Code of Maryland Regulations (“COMAR”) 31.10.44. Notice of this Final Action was published in the May 5, 2023 issue of the Maryland Register. Many of the new regulatory requirements became effective on May 15, 2023, but as indicated in COMAR 31.10.44.04H, the new data reporting requirements described in §§C(3) – (12) and D – G of Regulation .04 apply only to annual access plans submitted on or after July 1, 2024.

In accordance with COMAR 31.10.44.04, carriers that issue or renew health benefit plans in Maryland and use a provider panel for a health benefit plan offered in Maryland are required to file the annual access plan with the MIA on or before July 1 of each year. However, COMAR 31.10.44.04I provides that the Commissioner may issue a bulletin designating a later filing deadline than July 1 for the information described in §§C(3), (4), and (12) of Regulation .04.

Pursuant to COMAR 31.10.44.04, the MIA is directing carriers to submit the annual access plan filings for health benefit plans through SERFF in accordance with the Annual Filing Instructions posted on the [Network Adequacy Regulations Information](#) page of the MIA website. With the

exception of the information described in COMAR 31.10.44.04C(3), (4), and (12), the filings must be submitted by July 1, 2024. The additional information required by COMAR 31.10.44.04C(3), (4), and (12) must be submitted, in the same SERFF filing as the annual access plan, by October 1, 2024.

The Annual Filing Instructions on the MIA website provide detailed guidance on filing content and format, and should be reviewed in full prior to preparing and submitting a filing. A separate SERFF filing must be submitted for each distinct provider panel or network when the same carrier uses multiple networks for health benefit plans in Maryland. Carriers are expected to annotate all confidential information within the report, and, as necessary, utilize the available functionality in SERFF to request confidentiality for specific parts of the filing.

The MIA has also updated the filing template forms available in SERFF, and has developed new template forms for the data requirements described in COMAR 31.10.44.04C(3) – (12) and D – G. These template forms are designed to collect from all carriers in a uniform manner the specific data and information needed by the MIA to complete its reviews of the annual access plans. While use of these template forms was optional in prior filing years, carriers are required to use all applicable template forms for the 2024 access plan filings. The MIA continues to solicit feedback from carriers on how to improve the efficiency and utility of the templates. Suggestions for improvement should be emailed to [networkadequacy.mia@maryland.gov](mailto:networkadequacy.mia@maryland.gov).

#### Dental Plan Filings

Carriers that issue or renew dental plans in Maryland and use a provider panel for a dental plan offered in Maryland should file the executive summary form described in COMAR 31.10.45.06 by December 2, 2024 through SERFF. The Annual Filing Instructions posted on the Network Adequacy Regulations Information page of the MIA website provide specific guidance for submitting access plan filings through SERFF. A separate SERFF filing must be submitted for each distinct provider panel or network when the same carrier uses multiple networks for dental plans in Maryland. Filing template forms for the executive summary and waiver requests, if applicable, are available in SERFF. As a reminder, the executive summary form does not contain confidential information.

Questions about this Bulletin may be directed to the Life & Health Unit of the Maryland Insurance Administration at 410-468-2170.

KATHLEEN A. BIRRANE  
Commissioner

By:  
**Signature on Original**  
David Cooney  
Associate Commissioner  
Life and Health