EVOLVING NETWORK ADEQUACY REQUIREMENTS TO CLOSE HEALTH EQUITY GAPS

July 26, 2022

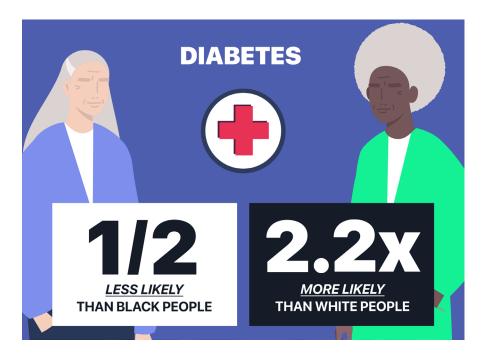
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Prepared for NAIC, R&I Workstream #5





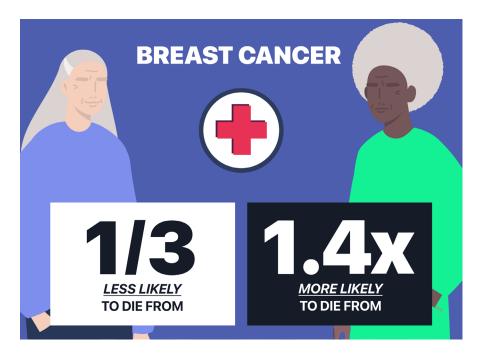
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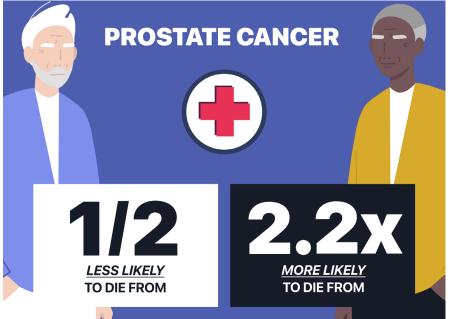






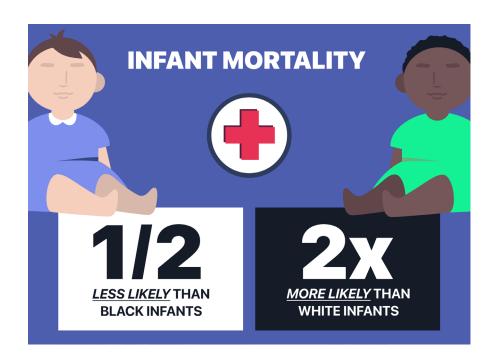
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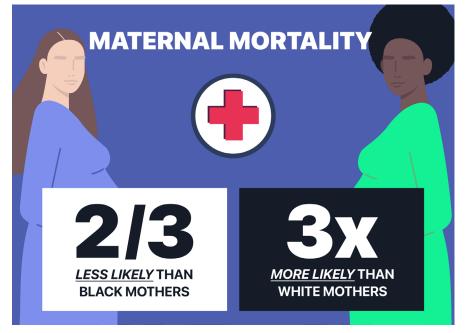






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Health Equity Network Adequacy

- Quest Analytics is developing a framework to measure and monitor progress toward improving the health equity standing of health plan beneficiaries
- New standards will help to ensure issuers offer provider networks that meet the critical health equity needs of the population
- The framework has two pillars: (1) A <u>health equity</u> county type designation and (2) <u>provider characteristic types</u>, including race, that are critical to meeting the health equity needs of the community served
- The framework builds off existing concepts around network adequacy requirements utilized by CMS



Adding a Health Equity Lens to Network Adequacy

Population and Density County Type Designation

Provider Types Critical to Meet <u>Health Care</u> Needs Health Equity County Type Designation Provider
Characteristic Types
Critical to Meet
Health Equity Needs

Time & Distance Standards

Today

- Many requirements to ensure consumers have access to provider and facility types within time and distance metrics
- Based on a population/density county type designation

Time & Distance Standards

Tomorrow

- Network standards ensure consumers have access to provider and facility health equity characteristic types within time and distance metrics
- Vary based on a health equity designation



County Type Designations

County	Population	Density
Large Metro	≥ 1,000,000	≥ 1,000/mi2
Metro	≥ 1,000,000	10-999.9/mi2
Micro	50k-199,999	10-99.9 /mi2
Rural	10k-49,999	10-49.9/mi2
CEAC	Any	<10/mi2

County	Foreign Language % of Population*	% of Providers within 1 mile of public transportation*
HE 1	10%	50%+
HE 2	20%	40%
HE 3	30%	30%
HE 4	40%	20%
HE 5	50%+	10%

Today

 Network adequacy is assessed at the county level, and counties are classified into five county type designations based on population and density parameters

Tomorrow

- Health equity assessed at the county level with counties being classified into various county type designations
- Beneficiary files configured to direct health equity access measures based on need rather than population density



Establish Provider Types to Measure

Provider Types

001 - General Practice

002 – Family Practice

003 - Internal Medicine

004 – Geriatrics

005 – Primary Care – Physician Assistants

Today

 Typical standards measure provider specialty types and facility specialty types that critical to meeting the <u>health care</u> needs of the population

Provider and Facility Characteristics

001 – Provider Language

002 – Provider Proximity to Public Transit

003 – Facility Mortality Score

004 – In-home Services Provided by Provider

005 – Provider Ethnicity

Tomorrow

 Network standards measure provider and specialty characteristic types that are critical to meeting the <u>health equity</u> needs of the population



Time and Distance Measurements

Primary Care/Large Metro		
Time	Distance	
10 minutes	5 miles	

Provider Language/County Ranking 1		
Time	Distance	
10 minutes	5 miles	
Facility Attributes		
75% contracted	High performing facilities	

Today

 Many standards demonstrate networks do not unduly burden consumers in terms of travel time and distance to the provider types

Tomorrow

- Standards designed to demonstrate networks do not unduly burden consumers in terms of travel time and distance to the provider characteristic types
- Requiring contracting percentages against supply builds of precedent (e.g.: ECP on Exchange)

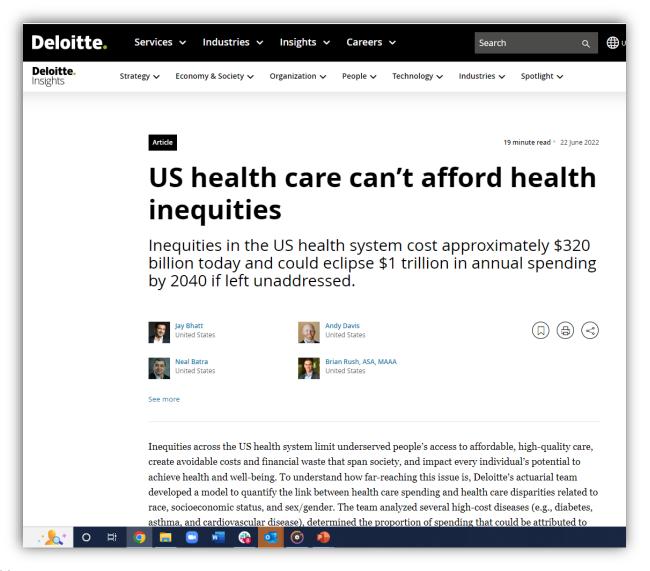


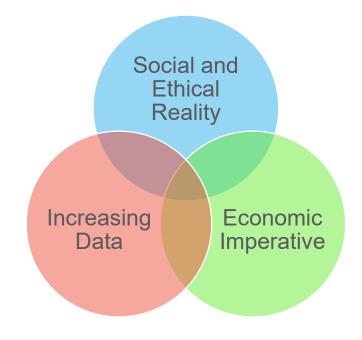
We can't do that!

- We don't have the data
- Clinicians aren't available
- Providers won't contract
- Special interests are too strong
- The data is too sensitive



But We Must





What standards would address deficiencies in provider networks, and improve access to INN benefits, for plan enrollees of color?

