

# Division of Health Care Financing and Policy Nevada Medicaid Managed Care

# State Fiscal Year 2019–20 Network Adequacy Validation

October 2020





# **Table of Contents**

1.	Overview and Methodology	1-1
	Overview	
	Methodology	1-1
	Data Collection	1-1
	Data Processing.	1-2
	Provider Capacity Analysis	1-2
	Geographic Network Distribution Analysis	1-2
	Study Limitations	1-5
2.	NAV Findings—MCO	2-1
	Network Capacity Analysis	
	Geographic Network Distribution Analysis	
	Adherence to Time-Distance Standards	
3.	NAV Findings—DBA/PAHP	3-1
	Network Capacity Analysis	
	Geographic Network Distribution Analysis	3-2
	Adherence to Time-Distance Standards	3-2
4.	Discussion	4-1
	Conclusions.	
	Recommendations	4-2
An	pendix A. Medicaid Catchment Areas	A-1
Ap	opendix B. Geographic Distribution Analysis	
	Average Travel Distances and Travel Times	
Ap	ppendix C. MCO Responses	
	Anthem Response	
	HPN Response	
	SilverSummit Response	C-7



## 1. Overview and Methodology

#### **Overview**

Under the contract for external quality review (EQR), the State of Nevada Department of Health and Human Services, Division of Health Care Financing and Policy (DHCFP) requested that Health Services Advisory Group, Inc. (HSAG), conduct a baseline network adequacy validation (NAV) of the Medicaid provider network for all managed care organizations (MCOs) and the dental benefits administrator (DBA)/prepaid ambulatory health plan (PAHP) during state fiscal year (SFY) 2019–2020. According to the federal regulations for managed care that were released in May 2016, the activity related to 42 CFR §438.358(b)(1)(iv), validation of network adequacy, shall commence no later than one year from the issuance of the associated EQR protocol. In preparation for the release of the protocol, during SFY 2018–2019, HSAG, in collaboration with the DHCFP, prepared a provider crosswalk file which served as the MCOs' and DBA's guidance to classifying all ordering, referring, and servicing providers contracted to provide care through one of Nevada's Medicaid MCOs or the DBA into selected provider categories. The MCOs and DBA, collectively referred to as plans, included in the analysis are listed below:

- Anthem Blue Cross and Blue Shield (Anthem)
- Health Plan of Nevada (HPN)
- SilverSummit Healthplan, Inc. (SilverSummit)
- LIBERTY Dental Plan of Nevada, Inc. (LIBERTY)

Out-of-state providers were included in the NAV if they practice in one of the catchment areas. Please refer to Appendix A for a list of the ZIP Codes for the Nevada Medicaid catchment areas. Many of these providers are geographically closer to recipients living near the Nevada border than some providers practicing within the State. Contracted providers in these catchment areas are subject to the same requirements as in-state providers regarding covered services and prior authorization requirements.

The baseline NAV for SFY 2019–2020 includes network capacity and geographic distribution analyses assessed after applying the provider crosswalk to the plans' provider networks.

# Methodology

#### **Data Collection**

The DHCFP and plans provided Medicaid member demographic information and provider network files, respectively, to HSAG for use in the baseline NAV analysis. HSAG provided detailed data requirements documents to the DHCFP and the plans for the requested data, in alignment with the following criteria:



#### Member Files

- Member enrollment and demographic files including all members served by one or more MCOs or the DBA as of October 1, 2019.
- Provider Data
  - Provider data for providers actively enrolled in an MCO or DBA as of October 1, 2019. The
    plans classified providers to selected provider categories in alignment with the provider
    crosswalk, which detailed the methods for classifying each provider category.

#### **Data Processing**

HSAG cleaned, processed, and defined the unique lists of providers, provider locations, and members for inclusion in the analysis. HSAG then standardized and geo-coded all Medicaid member and provider files using Quest Analytics Suite software. For all analyses, adults were defined as those members ages 18 years or older, and children were defined as members younger than 18 years of age. Analyses for obstetrics and gynecology (OB/GYN) providers were limited to female members ages 18 years and older.

Similarly, provider networks were restricted based on the type of analysis. Ratio analyses were based on unique providers, deduplicated by National Provider Identifier (NPI) and restricted to provider offices located in the State of Nevada or within Nevada Medicaid catchment areas. Each MCO's and DBA's full provider network was included in time-distance analyses regardless of provider office location. Individual providers with multiple practice locations were only counted once in the ratio analysis; however, each individual office location was counted in the time-distance analysis.

#### **Provider Capacity Analysis**

To assess the capacity of a given MCO's or DBA's provider network, HSAG calculated the member-to-provider ratio (provider ratio) by provider category (e.g., primary care providers [PCPs], cardiologists) relative to the number of members. The provider ratio represents a summary statistic used to highlight the overall capacity of an MCO's or DBA's provider network to deliver services to Medicaid recipients. A lower provider ratio suggests the potential for greater network access since a larger pool of providers is available to render services to individuals. Provider counts for this analysis were based on unique providers and not provider locations.

#### **Geographic Network Distribution Analysis**

The second dimension of this study evaluated the geographic distribution of providers relative to MCO or DBA enrollees. While the previously described provider capacity analysis identified the degree to which each MCO's or DBA's provider network infrastructure was sufficient in both number of providers and variety of specialties, the geographic network distribution analysis evaluated whether or not the number of provider locations in an MCO's or DBA's provider network was appropriately distributed for the plans' Medicaid population.



To provide a comprehensive view of geographic access, HSAG calculated the following two spatially derived metrics for the provider categories identified in the provider crosswalks:

- Percentage of members within predefined access standards: A higher percentage of members
  meeting access standards indicates a better geographic distribution of MCO providers relative to
  Medicaid members.
- Average travel distances (driving distances in miles) and travel times (driving times in minutes) to
  the nearest three providers: A shorter driving distance or travel time indicates greater accessibility to
  providers since members must travel fewer miles or minutes to access care.

HSAG used Quest Analytics software to calculate the duration of travel time or physical distance between the addresses of specific members and their nearest one-to-three providers for all provider categories identified in the provider crosswalks. All study results are stratified by MCO and DBA.

Table 1-2 shows the provider categories used to assess the MCOs' and DBA's compliance with the provider ratio standards. Additional provider types outlined in the provider crosswalk were included in the provider ratio analyses and average travel time analyses.

Provider Category	Provider to Member Ratio Standard
Primary Care Providers	1:1,500*
Physician Specialists	1:1,500
Dental Primary Care	1:1,500

Table 1-1—Provider Categories and Provider Ratio Standards

1:1,500

Table 1-2 shows the provider categories used to assess the MCOs' and DBA's compliance with the time-distance standards. Additional provider types outlined in the provider crosswalk were included in the provider ratio analyses and average travel time analyses.

Table 1-2—Provider Categories, Member Criteria, and Time-Distance Standards
---

Provider Category	Member Criteria	Time-Distance Access Standard
Primary Care Providers		
Federally Qualified Health Center (FQHC)/Rural Health Clinic (RHC)	Adults	30 minutes or 20 miles
Family Practice	Adults	30 minutes or 20 miles
Internal Medicine	Adults	30 minutes or 20 miles
General Practitioner	Adults	30 minutes or 20 miles
Nurse Practitioner (NP)	Adults	30 minutes or 20 miles

**Dental Specialists** 

<sup>\*</sup> If the PCP practices in conjunction with a health care professional, the ratio is increased to one (1) FTE PCP for every 1,800 members.



Provider Category	Member Criteria	Time-Distance Access Standard
Physician Assistant (PA)	Adults	30 minutes or 20 miles
OB/GYN	Adult Females	30 minutes or 20 miles
Pediatrician	Children	30 minutes or 20 miles
Specialty Providers		•
Endocrinologists	Adults	100 minutes or 75 miles
Endocrinologists, Pediatric	Children	100 minutes or 75 miles
Infectious Disease	Adults	100 minutes or 75 miles
Infectious Disease, Pediatric	Children	100 minutes or 75 miles
Rheumatologist	Adults	100 minutes or 75 miles
Rheumatologist, Pediatric	Children	100 minutes or 75 miles
Oncologist/Hematologist	Adults	100 minutes or 75 miles
Oncologist/Hematologist, Pediatric	Children	100 minutes or 75 miles
Oncologist/Radiologist*	Adults	100 minutes or 75 miles
Behavioral Health Providers		
Psychologist	Adults	60 minutes or 45 miles
Pediatric Psychologist	Children	60 minutes or 45 miles
Psychiatrist	Adults	60 minutes or 45 miles
Pediatric Psychiatrist	Children	60 minutes or 45 miles
Licensed Clinical Social Worker (LCSW)	Adults	60 minutes or 45 miles
Facility Level Providers		
Inpatient Hospital	Adults	80 minutes or 60 miles
Psychiatry Inpatient Hospital	Adults	80 minutes or 60 miles
Pediatric Hospital	Children	80 minutes or 60 miles
Dialysis/End Stage Renal Disease (ESRD) Facility	Adults	80 minutes or 60 miles
Dental Providers		
General Dentist	Adults	30 minutes or 20 miles
Pediatric Dentist	Children	30 minutes or 20 miles
Endodontist	Adults	30 minutes or 20 miles
Periodontist	Adults	30 minutes or 20 miles
Prosthodontist	Adults	30 minutes or 20 miles
Oral Surgeon	Adults	30 minutes or 20 miles
Orthodontist	Adults	30 minutes or 20 miles



Provider Category	Member Criteria	Time-Distance Access Standard
Dental Hygienist	Adults	30 minutes or 20 miles
Dental Therapist	Adults	30 minutes or 20 miles

<sup>\*</sup> Note: The Oncologist/Radiologist provider category was not included in the provider crosswalk, and providers in this group were identified using taxonomy codes 2085R0001X-Radiation Oncology and 261QX0203X-Oncology, Radiation.

#### **Study Limitations**

The following limitations should be considered when reviewing the provider network analysis results presented in this report. Variation in results may be affected by one or more of these factors.

- Provider ratios represent high-level, aggregate measures of capacity based on the number of unique providers relative to members. This raw count of capacity does not account for the individual status of a provider's panel (i.e., accepting or not accepting new patients) or how active the provider is in the Medicaid program. Further, it is likely that a portion of providers are contracted to provide services for all three MCOs. As such, the provider ratio represents a potential capacity and may not directly reflect the availability of providers at any point in time.
- Time-distance metrics represent high-level measures of the similarity in geographic distribution of providers relative to members. These raw, comparative statistics do not account for the individual status of a provider's panel (i.e., accepting or not accepting new patients) at a specific location or how active the provider is in the Medicaid program. As previously mentioned, it is likely that a portion of providers are contracted to provide services for all three MCOs. As such, the time-distance results only highlight the geographic distribution of a provider network and may not directly reflect the availability of providers at given office locations.
- No national distance- or time-based access standards have been established for Medicaid. While
  these standards are defined for the Nevada Medicaid provider categories noted in the methodology,
  network adequacy cannot be measured against national benchmarks.
- Additionally, no national provider ratios have been established for Medicaid, and Nevada Medicaid
  also has not yet defined such ratios. The lack of national or contractual standards makes monitoring
  access and availability difficult and limited to relative performance comparisons that may or may not
  be appropriate.
- When evaluating the results of these analyses, it is important to note that the reported, average drive time may not mirror driver experience based on varying traffic conditions. Instead, average drive time should be interpreted as a standardized measure of the geographic distribution of providers relative to Medicaid members; the shorter the average drive time, the more similar the distribution of providers is relative to enrollees.
- When evaluating the results presented in this report, note that provider data supplied by the plans do not include providers contracted with the plans under limited use contracts or single case agreements. A larger number of members may have access to providers if plans contract with selected providers under these limited use agreements versus standard contract agreements.



#### 2. NAV Findings—MCO

HSAG calculated the ratio of members to providers for each MCO to assess the capacity of Nevada's provider network and to establish baseline ratios. This provider capacity analysis is coupled with a geographic network distribution analysis to identify areas of provider need and to compare the provider networks maintained by each MCO.

#### **Network Capacity Analysis**

Table 2-1 enumerates the member populations for each of the three Nevada MCOs. Provider ratios for adult specialists are calculated for the adult member population only; similarly, provider ratios for child specialists are calculated for the child member population only. The provider ratios for OB/GYN providers to members are based on the adult female population only.

**SilverSummit Member Category Anthem HPN Member Demographics** Adults 79,381 103,558 24,475 64.276 Adult Females 48,778 13.748 Children 83.044 106,011 16,726 **Total Population** 162,425 209,569 41,201

Table 2-1—Populations of Eligible Members

Note: "Adult Females" are a subset of "Adults." Therefore, the "Total Population" row contains the sum of the "Adults" and "Children" rows and not the sum of all displayed rows.

Member populations were similar for Anthem and HPN, with approximately 51 percent of members 17 years of age and younger. For SilverSummit, the percentage of members 17 years of age and younger was approximately 41 percent. Additionally, approximately one-third of each MCO's members were adult females. HPN had the largest member population (n=209,569), and SilverSummit had the smallest member population (n=41,201).

When interpreting the provider ratio results, it should be considered that not all members require routine care by all provider types; therefore, higher ratio thresholds may be appropriate for certain specialty providers. Additionally, ratio results are not adjusted to account for the distribution of demographic and clinical member characteristics represented within each MCO. An MCO with a greater number of members with comorbidities may require a greater number of specialty providers. Lastly, the provider ratio standards are limited to the broad categories of PCPs and physician specialist providers, not to specific specialise within those categories. For example, an MCO must maintain a network of one physician specialist to 1,500 members but is not required to maintain that ratio for each identified specialty category (e.g., pulmonologists). For the purposes of this report, ratios for the individual



specialty groups are shown for informational purposes, but only the standards shown in Table 1-1 were assessed for compliance.

Table 2-2 through Table 2-6 present provider ratio analysis results including out-of-state providers from the catchment areas, since members may travel outside the State for medical services. Provider ratios are a measure of provider capacity based on the number of providers in the MCO network and the number of Medicaid members enrolled in the MCO. For example, in Table 2-2, Anthem has 1,343 PCPs and 121 members per PCP (i.e., 1:121). For the provider categories assessed according to the standards in Table 1-1, the provider ratios are shown in red if they did not comply with the standard.

Table 2-2—Summary of Ratio Analysis Results for Primary Care Providers

Duovidos Catagoss	Anthem		HPN		SilverSummit	
Provider Category	Providers	Ratio	Providers	Ratio	Providers	Ratio
Primary Care Providers		_				
Primary Care Providers (1:1,500)	1,343	1:121	2,676	1:78	1,916	1:22
FQHCs/RHCs	1	1:79,381	NA	NA	NA	NA
Family Practice	378	1:210	NA	NA	684	1:36
Internal Medicine	475	1:167	1,978	1:52	780	1:31
General Practitioner	11	1:7,216	55	1:1,883	81	1:302
OB/GYN	240	1:203	280	1:230	159	1:86
Pediatrician	238	1:349	412	1:257	212	1:79
<b>PCP Extenders (1:1,800)</b>	1,362	1:119	NA	NA	1,346	1:31
NP	914	1:87	NA	NA	887	1:28
PA	448	1:177	NA	NA	459	1:53

NA (Not Applicable) indicates that the MCO did not report providers in the provider category.

Anthem, HPN, and SilverSummit met the required provider ratios for PCPs, while Anthem and SilverSummit met the requirement for PCP Extenders. HPN did not report PCP Extenders in its submitted data.

Anthem reported providers in every PCP category, whereas HPN did not report providers in the following PCP categories: FQHC/RHC, Family Practice, NP, and PA. Additionally, SilverSummit did not report FQHC/RHC providers. SilverSummit consistently reported lower provider ratios even for provider types with fewer providers compared to Anthem and HPN, which is due to SilverSummit having fewer enrolled members.



Table 2-3—Summary of Ratio Analysis Results for Specialty Care Providers

	Anth	nem	HP	'N	SilverSummit		
Provider Category	Providers	Ratio	Providers	Ratio	Providers	Ratio	
Specialty Providers							
Physician Specialist Providers (1:1,500)	1,412	1:112	1,884	1:111	1,150	1:36	
Allergists & Immunologists	9	1:8,820	16	1:6,472	3	1:8,158	
Allergists & Immunologists, Pediatric	NA	NA	NA	NA	2	1:8,363	
Cardiologists	136	1:584	243	1:426	141	1:174	
Cardiologists, Pediatric	15	1:5,536	16	1:6,626	15	1:1,115	
Dermatologists	38	1:2,089	63	1:1,644	29	1:844	
Dermatologists, Pediatric	NA	NA	NA	NA	NA	NA	
Endocrinologists	19	1:4,178	31	1:3,341	15	1:1,632	
Endocrinologists, Pediatric	7	1:11,863	8	1:13,251	4	1:4,182	
Gastroenterologists	55	1:1,443	93	1:1,114	61	1:401	
Gastroenterologists, Pediatric	8	1:10,381	8	1:13,251	8	1:2,091	
General Surgery	117	1:678	163	1:635	133	1:184	
Pediatric Surgery	8	1:10,381	7	1:15,144	7	1:2,389	
Geriatrics	15	1:5,292	10	1:10,356	NA	NA	
Infectious Disease	30	1:2,646	48	1:2,157	36	1:680	
Infectious Disease, Pediatric	2	1:41,522	4	1:26,503	3	1:5,575	
Maternal/Fetal Medicine	103	1:474	111	1:579	54	1:255	
Nephrologists	87	1:912	105	1:986	73	1:335	
Nephrologists, Pediatric	4	1:20,761	4	1:26,503	2	1:8,363	
Neurologists	101	1:786	138	1:750	74	1:331	
Neurologists, Pediatric	10	1:8,304	10	1:10,601	6	1:2,788	
Oncologist/Hematologist	56	1:1,418	85	1:1,218	73	1:335	
Oncologist/Hematologist, Pediatric	12	1:6,920	14	1:7,572	6	1:2,788	
Oncologist/Radiologist	NA	NA	NA	NA	NA	NA	
Orthopedic Surgeons	129	1:615	179	1:579	77	1:318	
Orthopedic Surgeons, Pediatric	1	1:83,044	6	1:17,669	1	1:16,726	
Otolaryngologists (ENTs)	38	1:2,089	75	1:1,381	35	1:699	
Otolaryngologists (ENTs), Pediatric	NA	NA	NA	NA	1	1:16,726	
Physical Medicine Specialists	7	1:11,340	133	1:779	44	1:556	
Physical Medicine Specialists, Pediatric	NA	NA	NA	NA	86	1:194	
Pulmonologists	46	1:1,726	97	1:1,068	22	1:1,113	
Pulmonologists, Pediatric	5	1:16,609	6	1:17,669	4	1:4,182	
Rheumatologist	10	1:7,938	17	1:6,092	21	1:1,165	



Provider Category	Anthem		HPN		SilverSummit	
Frovider Category	Providers	Ratio	Providers	Ratio	Providers	Ratio
Rheumatologist, Pediatric	3	1:27,681	3	1:35,337	1	1:16,726
Urologists	29	1:2,737	34	1:3,046	24	1:1,020
Urologists, Pediatric	4	1:20,761	7	1:15,144	7	1:2,389
Vision Care Provider	307	1:259	157	1:660	64	1:382
Vision Care Provider, Pediatric	2	1:41,522	8	1:13,251	NA	NA

NA indicates that the MCO did not report providers in the provider category.

All MCOs met the provider ratio standard for the physician specialist providers. Anthem and HPN did not report providers in the following specialty areas: Allergists & Immunologists, Pediatric; Dermatologists, Pediatric; Oncologist/Radiologist; Otolaryngologists (ENTs), Pediatric; and Physical Medicine Specialists, Pediatric. SilverSummit did not report providers in the following specialty areas: Dermatologists, Pediatric; Oncologist/Radiologist; Geriatrics; and Vision Care Provider, Pediatric. Provider ratios are dependent on both the number of providers and the number of members served by the plan, as evidenced with the provider ratio for pulmonologists. HPN and SilverSummit maintained similar provider ratios, 1:1,068 and 1:1,113, respectively, but HPN was contracted with 97 pulmonologists, whereas SilverSummit was contracted with 22.

Table 2-4—Summary of Ratio Analysis Results for Behavioral Health Providers

Duovidos Catagoms	Antl	Anthem		HPN		SilverSummit	
Provider Category	Providers	Ratio	Providers	Ratio	Providers	Ratio	
Behavioral Health Providers							
Outpatient Mental Health Facilities	29	1:2,737	NA	NA	48	1:510	
Behavior Analyst/Technician	388	1:205	425	1:244	226	1:108	
Counselor	529	1:150	80	1:1,294	898	1:27	
Substance Abuse Counselor	205	1:387	157	1:660	117	1:209	
Marriage and Family Therapist	494	1:161	263	1:394	372	1:66	
Psychologist	104	1:763	75	1:1,381	72	1:340	
Pediatric Psychologist	7	1:11,863	NA	NA	5	1:3,345	
Social Worker	655	1:121	266	1:389	812	1:30	
Psychiatrist	222	1:358	300	1:345	182	1:134	
Pediatric Psychiatrist	25	1:3,322	NA	NA	32	1:523	
Substance Abuse Facilities/Clinics	2	1:39,691	9	1:11,506	NA	NA	

NA indicates that the MCO did not report providers in the provider category.

<sup>\*</sup>ENT = ear, nose, and throat



Anthem reported providers in all behavioral health provider categories. HPN did not report Outpatient Mental Health Facilities, Pediatric Psychologist, or Pediatric Psychiatrist providers; and SilverSummit did not report Substance Abuse Facilities/Clinics providers.

Table 2-5—Summary of Ratio Analysis Results for Ancillary Providers

Provider Category	Anthem		HPN		SilverSummit	
	Providers	Ratio	Providers	Ratio	Providers	Ratio
Ancillary Providers						
Audiologists	26	1:3,053	36	1:2,877	28	1:874
Occupational Therapists	152	1:522	137	1:756	232	1:105
Podiatrists	30	1:2,646	36	1:2,877	18	1:1,360
Physical Therapists	350	1:227	297	1:349	452	1:54
Speech Therapists	208	1:382	154	1:672	181	1:135

All three MCOs reported providers in all Ancillary Provider categories, and the number of providers contracted by the MCOs was fairly consistent across the MCOs. However, the provider ratios varied substantially due to the variation in member population size for each MCO.

Table 2-6—Summary of Ratio Analysis Results for Facility Level Providers

Duovidas Catagons	Anthem		HPN		SilverSummit		
Provider Category	Providers	Ratio	Providers	Ratio	Providers	Ratio	
Facility Level Providers	Facility Level Providers						
Inpatient Hospital	19	1:4,178	35	1:2,959	20	1:1,224	
Pediatric Hospital	2	1:41,522	NA	NA	NA	NA	
Psychiatry Inpatient Hospital	9	1:8,820	10	1:10,356	12	1:2,040	
Ambulatory Surgical Centers/Outpatient Hospitals	35	1:2,268	58	1:1,785	28	1:874	
Radiology (Facilities/Clinics)	3	1:26,460	313	1:331	132	1:185	
Hospice	NA	NA	16	1:6,472	5	1:4,895	
Intermediate Care Facility for Individuals with Developmental Disability (ICF/IID)	NA	NA	NA	NA	NA	NA	
Home Health Facility	17	1:4,669	44	1:2,354	57	1:429	
Skilled Nursing Facility	30	1:2,646	28	1:3,699	19	1:1,288	
Dialysis/ESRD Facility	26	1:3,053	14	1:7,397	28	1:874	
Pharmacy	6	1:13,230	454	1:228	2	1:12,238	

NA indicates that the MCO did not report providers in the provider category.



None of the MCOs reported ICF/IID facilities in their submitted data. Anthem also did not report Hospice providers, while HPN and SilverSummit did not report Pediatric Hospital providers.

#### **Geographic Network Distribution Analysis**

Geographic network distribution analyses assess whether members experience undue burden related to either excessive travel time or distance required to reach the nearest provider. The State of Nevada has established contract standards by provider category for the maximum allowable distance a member will travel to receive care (previously presented in Table 1-2).

#### Adherence to Time-Distance Standards

Table 2-7 through Table 2-10 list the percentages of members within the contract standards for each provider type by MCO. While the contract standards vary by provider category, each contract standard requires that 90 percent of an MCO's members reside within the standard time or distance. Provider categories with results below 90 percent are shown in red.

Table 2-7—Percentages of Members Residing Within Access Standard Areas for Primary Care Providers

Provider Category	Time-Distance Standard	Anthem	HPN	SilverSummit
Primary Care Providers				
Primary Care (Adult Total)	20 miles/30 mins	99.2%	99.4%	99.0%
FQHC/RHC	20 miles/30 mins	84.5%	NA	NA
Family Practice	20 miles/30 mins	99.0%	NA	99.0%
Internal Medicine	20 miles/30 mins	99.0%	99.4%	99.0%
General Practitioner	20 miles/30 mins	98.8%	99.3%	98.8%
NP	20 miles/30 mins	99.0%	NA	99.0%
PA	20 miles/30 mins	99.0%	NA	99.0%
OB/GYN	20 miles/30 mins	98.9%	99.2%	98.7%
Pediatrician	20 miles/30 mins	99.2%	99.4%	98.7%

NA indicates that the MCO did not report providers in the provider category.

All MCOs met the contract standards for summary PCP categories (i.e., Primary Care [Adult Total], OB/GYN, and Pediatrician). However, at a more granular assessment, HPN did not report any FQHC/RHC, Family Practice, NP, or PA providers. Additionally, SilverSummit did not report any FQHC/RHC providers.



Table 2-8—Percentages of Members Residing Within Access Standard Areas for Specialty Providers

Provider Category	Time-Distance Standard	Anthem	HPN	SilverSummit
Specialty Providers				
Endocrinologists	75 miles/100 mins	99.2%	99.4%	99.1%
Endocrinologists, Pediatric	75 miles/100 mins	99.3%	99.4%	99.0%
Infectious Disease	75 miles/100 mins	99.2%	99.4%	99.1%
Infectious Disease, Pediatric	75 miles/100 mins	99.3%	99.4%	99.0%
Rheumatologist	75 miles/100 mins	99.2%	99.4%	99.1%
Rheumatologist, Pediatric	75 miles/100 mins	88.6%	86.8%	87.1%

All three MCOs met the contract standards for five of the six Specialty Provider categories for 99 percent or more of the population. None of the MCOs met the contract standard for pediatric rheumatologists.

Table 2-9—Percentages of Members Residing Within Access Standard Areas for Facility Level Providers

Provider Category	Time-Distance Standard	Anthem	HPN	SilverSummit
Facility Level Providers				
Hospital (Total)	60 miles/80 mins	99.3%	99.4%	99.1%
Inpatient Hospital	60 miles/80 mins	99.2%	99.4%	99.1%
Pediatric Hospital	60 miles/80 mins	88.6%	NA	NA
Psychiatry Inpatient Hospital	60 miles/80 mins	99.1%	99.4%	99.1%
Dialysis/ESRD Facility	60 miles/80 mins	99.1%	99.4%	99.1%
Oncologist/Hematologist	75 miles/100 mins	99.2%	99.4%	99.1%
Oncologist/Hematologist, Pediatric	75 miles/100 mins	99.3%	99.4%	99.0%
Oncologist/Radiologist	75 miles/100 mins	99.2%	NA	99.1%

NA indicates that the MCO did not report providers in the provider category.

HPN and SilverSummit met the contract standards for all available facility level providers in their networks. Anthem met the contract standards for all facility level providers except Pediatric Hospital, with 88.6 percent of members residing within the standard. However, Anthem was the only MCO to report contracting with a pediatric hospital.



Table 2-10—Percentages of Members Residing Within Access Standard Areas for Behavioral Health Providers

Provider Category	Time-Distance Standard	Anthem	HPN	SilverSummit	
Behavioral Health Providers					
Psychologist	45 miles/60 mins	99.1%	99.4%	99.1%	
Pediatric Psychologist	45 miles/60 mins	88.6%	NA	87.1%	
Licensed Clinical Social Worker (LCSW)	45 miles/60 mins	99.1%	99.4%	99.1%	
Psychiatrist	45 miles/60 mins	99.1%	99.4%	99.1%	
Pediatric Psychiatrist	45 miles/60 mins	99.3%	NA	99.0%	

NA indicates that the MCO did not report providers in the provider category.

Two MCOs, Anthem and SilverSummit, met the contract standards for four of the five behavioral health provider categories. HPN met the contract standards in its three reported categories but did not report any pediatric psychologists or psychiatrists. The MCOs generally met the contract standards for 99 percent or more of the population.

Additional detailed information on the travel time and travel distance to the nearest three providers by urbanicity for all provider categories included in the provider crosswalk is shown in Appendix B.



### 3. NAV Findings—DBA/PAHP

HSAG calculated the ratio of members to providers for the DBA to assess the capacity of Nevada's provider network and to establish baseline ratios. This provider capacity analysis is coupled with a geographic network distribution analysis to identify areas of provider need and to compare the provider networks maintained by the DBA.

#### **Network Capacity Analysis**

Table 3-1 presents the member populations for the DBA. Provider ratios for adult dental providers are calculated for the adult member population only; similarly, provider ratios for pediatric dental providers are calculated for the child member population only.

Member Category
LIBERTY
Member Demographics
Adults
Children
238,084
Children
240,469
Total Population
478,553

Table 3-1—Populations of Eligible Members

Similar to when interpreting the MCO provider ratio results, it should be considered that not all members require routine care by all dental provider types; therefore, higher ratio thresholds may be appropriate for certain dental specialty providers. Additionally, ratio results are not adjusted to account for the distribution of demographic and clinical member characteristics represented within the DBA. Lastly, the provider ratio standards are limited to the broad categories of dental primary care and dental specialists, not to specific specialties within those categories. For example, the DBA must maintain a network of one dental specialist to 1,500 members but is not required to maintain that ratio for each identified specialty category (e.g., endodontist). For the purposes of this report, ratios for the individual specialty groups are shown for informational purposes, while only the standards shown in Table 1-1 were assessed for compliance.

Table 3-2 presents provider ratio analysis results including out-of-state providers from the catchment areas, since members may travel outside the State for medical services. Provider categories with provider ratios above 1,500 members per provider are shown in red.



Table 3-2—Summary of Ratio Analysis Results for Dental Providers

Duovides Catagos	L	IBERTY				
Provider Category	Providers	Ratio				
General Dental Providers						
<b>Dental Primary Care Providers (1:1,500)</b>	338	1:1,416				
General Dentists	271	1:879				
Pediatric Dentists	67	1:3,589				
Specialty Dental Providers						
Dental Specialists Providers (1:1,500)	18	1:26,586				
Endodontists	4	1:59,521				
Periodontists	1	1:238,084				
Prosthodontists	1	1:238,084				
Oral Surgeons	12	1:19,840				
Orthodontists	NA	NA				
Mid-Level Dental Providers						
Dental Hygienists	NA	NA				
Dental Therapists	NA	NA				

NA indicates that the DBA did not report providers in the provider category.

# **Geographic Network Distribution Analysis**

Geographic network distribution analyses assess whether members experience undue burden related to either excessive travel time or distance required to reach the nearest provider. The State of Nevada has established contract standards by provider category for the maximum allowable distance a member will travel to receive care (previously presented in Table 1-2).

#### Adherence to Time-Distance Standards

Table 3-3 lists the percentages of members within the contract standards for dental providers in the DBA. While the contract standards vary by provider category, each contract standard requires that 90 percent of a DBA's members reside within the standard time or distance. Provider categories with results below 90 percent are shown in red.



Table 3-3—Percentages of Members Residing Within Access Standard Areas for Dental Providers

Provider Category	Time-Distance Standard	LIBERTY
General Dental Providers		
General Dentists	20 miles/30 mins	99.4%
Pediatric Dentists	20 miles/30 mins	99.4%
Specialty Dental Providers		
Endodontists	20 miles/30 mins	98.9%
Periodontists	20 miles/30 mins	86.1%
Prosthodontists	20 miles/30 mins	87.1%
Oral Surgeons	20 miles/30 mins	99.2%
Orthodontists	20 miles/30 mins	NA
Mid-Level Dental Providers		
Dental Hygienists	20 miles/30 mins	NA
Dental Therapists	20 miles/30 mins	NA

NA indicates that the DBA did not report providers in the provider category.

LIBERTY met the contract standards for both general dental providers and two of four specialty dental providers.

Additional detailed information on the travel time and travel distance to the nearest three providers by urbanicity for all provider categories included in the provider crosswalk is shown in Appendix B.





#### **Conclusions**

Overall, the Nevada SFY 2019–2020 Network Adequacy Validation results suggest that the MCOs and DBA have comprehensive provider networks, with some opportunities for improvement around pediatric specialists. Nevada's Medicaid MCOs and DBA have generally contracted with a variety of providers to ensure that Medicaid members have access to a broad range of healthcare services within geographic time and distance standards.

Ratio analysis results indicate that MCOs are meeting the provider ratio standards for the PCPs and physician specialist providers. In reviewing the detailed provider specialties, SilverSummit exhibited the lowest provider ratios across most provider categories, wherein lower ratios indicate a higher number of providers contracted to serve Medicaid members. SilverSummit's smaller member population compared to Anthem and HPN may contribute to its lower provider ratios. Conversely, Anthem exhibited the highest provider ratios of the three MCOs across the greatest number of provider categories. While Anthem's member population was larger than SilverSummit's member population, HPN had the greatest member population and lower overall provider ratios compared to Anthem. Overall, many of the largest provider ratios are seen among the pediatric specialty providers; this is consistent with the time-distance analyses where the majority of provider categories that do not meet the time and distance standards serve the pediatric population.

Ratio analyses also indicate that the DBA was meeting the provider ratio standard for the dental primary care providers but not meeting the provider ratio standard for the dental specialty providers. This is consistent with the time-distance analysis highlighting the lower percentage of members with access to some dental specialists within the time-distance standards.

Geographic network distribution analysis results indicate that each MCO generally maintained a geographically accessible network, with greater than 99.0 percent of members residing within time and distance standards for most provider categories. The contract standards require geographic accessibility for all members; however, none of the three MCOs met all contract standards in any provider category. For MCOs, several pediatric provider categories did not meet time and distance standards. Anthem did not meet time and distance standards for three provider categories: Rheumatologist, Pediatric; Pediatric Hospital; and Pediatric Psychologist. Neither HPN nor SilverSummit met time and distance standards for one provider category: Rheumatologist, Pediatric; and SilverSummit did not meet the time and distance standard for Pediatric Psychologist providers. Additionally, Anthem did not meet time and distance standards for primary care FQHC/RHC providers, and LIBERTY did not meet time and distance standards for the Periodontists and Prosthodontists dental provider categories.



#### Recommendations

Based on the results and conclusions presented in this report, HSAG recommends the following for DHCFP and the MCOs and DBA to strengthen the Medicaid managed care provider networks and ensure members' timely access to healthcare services:

- As the provider ratios and geographic distribution represent the potential capacity and distribution of contracted providers and may not directly reflect the availability of providers at any point in time, DHCFP should use appointment availability and utilization analyses to evaluate providers' availability and members' use of services. Future studies may incorporate encounter data or secret shopper telephone survey results to assess members' utilization of services, as well as potential gaps in access to care resulting from inadequate provider availability.
- In addition to assessing the number, distribution, and availability of providers, DHCFP should review patient satisfaction survey results and grievance and appeals data to evaluate the degree to which members are satisfied with the care they have received.
- DHCFP should conduct an in-depth review of provider categories in which each MCO or DBA did not meet either the provider ratio or time-distance contract standards, with the goal of determining whether or not the failure of the MCO or DBA to meet the contract standard(s) was the result of a lack of providers or an inability to contract providers in the geographic area. Future analyses should evaluate the extent to which the MCOs or DBA have requested exemptions from DHCFP for provider categories in which providers may not be available or willing to contract with the MCO(s) or DBA.



# **Appendix A. Medicaid Catchment Areas**

Table A-1 identifies the Nevada Medicaid Catchment Areas.

Table A-1—Nevada Medicaid Catchment Areas<sup>A-1</sup>

Cottob words A was						
	Catchment Area					
State	Cities/Zip Codes					
Arizona	<b>Bullhead City:</b> 86426, 86427, 86429, 86430, 86439, 86442, 86446 <b>Kingman:</b> 86401, 86402, 86411, 86412, 86413, 86437, 86445 <b>Littlefield:</b> 86432					
California	Bishop: 93512, 93514, 93515 Bridgeport: 93517 Davis: 95616, 95617, 95618 Loyalton: 96118 Markleeville: 96120 Needles: 92363 Sacramento: 94203, 94204, 94205, 94206, 94207, 94208, 94209, 94211, 94229, 94230, 94234, 94235, 94236, 94237, 94239, 94240, 94244, 94245, 94246, 94247, 94248, 94249, 94250, 94252, 94254, 94256, 94257, 94258, 94259, 94261, 94262, 94263, 94267, 94268, 94269, 94271, 94273, 94274, 94277, 94278, 94279, 94280, 94282, 94283, 94284, 94285, 94286, 94287, 94288, 94289, 94290, 94291, 94293, 94294, 94295, 94296, 94297, 94298, 94299, 95811, 95812, 95813, 95814, 95815, 95816, 95817, 95818, 95819, 95820, 95821, 95822, 95823, 95824, 94825, 95826, 95827, 95828, 95829, 95830, 95831, 95832, 95833, 95834, 95835, 95836, 95837, 95838, 95840, 95841, 95842, 95843, 95851, 95852, 95853, 95860, 95864, 95865, 95866, 95867, 95887, 95894, 95899 South Lake Tahoe: 96150, 96151, 96152, 96154, 96155, 96156, 96157, 96158 Susanville: 96127, 96130 Truckee: 96160, 96161, 96162					
Idaho	<b>Boise:</b> 83701, 83702, 83703, 83704, 83705, 83706, 83707, 83708, 83709, 83711, 83712, 83713, 83714, 83715, 83716, 83717, 83719, 83720, 83721, 83722, 83724, 83725, 83726, 83727, 83728, 83729, 83730, 83731, 83732, 83733, 83735, 83756, 83757, 83799 <b>Mountain Home:</b> 83647 <b>Twin Falls:</b> 83301, 83302, 83303					
Utah	Cedar City: 84720, 84721 Enterprise: 84725 Orem: 84057, 84058, 84059, 84097 Provo: 84601, 84602, 84603, 84604, 84605, 84606 Salt Lake City: 84101, 84102, 84103, 84104, 84105, 84106, 84107, 84108, 84109, 84110, 84111, 84112, 84113, 84114, 84115, 84116, 84117, 84118, 84119, 84120, 84121, 84122, 84123, 84124, 84125, 84126, 84127, 84128, 84130, 84131, 84132, 84133, 84134, 84136, 84138, 84139, 84141, 84143, 84144, 84145, 84147, 84148, 84150, 84151, 84152, 84153, 84157, 84158, 84165, 84170, 84171, 84180, 84184, 84189, 84190, 84199 St. George: 84770, 84771, 84790, 84791 Tooele: 84074 Wendover: 84083 West Jordan: 84084					

SFY 2019-20 Network Adequacy Validation Report

Page A-1
State of Nevada

NV2019-20\_NAV\_Report\_F3\_1020

A-1 Nevada Department of Health and Human Services. Provider Enrollment Information Booklet. Updated 22 Nov 2019. Available at: <a href="https://www.medicaid.nv.gov/Downloads/provider/NV">www.medicaid.nv.gov/Downloads/provider/NV</a> Provider Enrollment Information Booklet.pdf. Accessed on: May 5, 2020.



# **Appendix B. Geographic Distribution Analysis**

#### **Average Travel Distances and Travel Times**

For each MCO and DBA, Appendix B presents the average travel time and travel distance to the nearest three providers for rural and urban areas. For all tables below, 'NA' indicates that the MCO/DBA did not report providers in the provider category.

Table B-1—Average Travel Distances and Travel Times for Anthem—Primary Care Providers—Rural Areas

	First-Nearest		Second-Nearest		Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)
Primary Care Providers						
Primary Care, Adults	40.3	44.1	41.5	45.6	42.8	47
General Practitioner	49.3	59.7	229.1	276.2	233.4	291.9
FQHC/RHC	239.2	337.6	NA	NA	NA	NA
Family Practice	44.1	50	45.7	53.6	46	54.1
Internal Medicine	44.8	50.8	46.3	54.5	46.8	55.3
NP	41.2	45.1	42.4	46.5	45.3	50
PA	42.4	46.7	43.7	48.1	45	49.8
OB/GYN	45.7	51.1	46.3	52.7	46.4	53
Pediatrician	40.1	47.5	40.8	48.6	41.7	50.1

Table B-2—Average Travel Distances and Travel Times for Anthem—Specialty Providers—Rural Areas

	First-N	First-Nearest		Second-Nearest		Third-Nearest		
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)		
Specialty Providers								
Allergists & Immunologists	50.1	61	51.7	65.1	53.5	72.8		
Allergists & Immunologists, Pediatric	NA	NA	NA	NA	NA	NA		
Cardiologists	47.2	55.8	48.1	57.2	49.4	58.9		
Cardiologists, Pediatric	230	275.9	230.2	276.2	230.2	276.2		
Dermatologists	48.5	57.9	49.5	59.3	50.8	62		
Dermatologists, Pediatric	NA	NA	NA	NA	NA	NA		
Endocrinologists	49.6	62.9	51.3	64.6	232.1	291.4		



	First-N	earest	Second-Nearest		Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)
Endocrinologists, Pediatric	43.8	52.5	46.2	55.4	48.2	57.8
Gastroenterologists	47.4	54.2	49.1	58.9	49.8	60.4
Gastroenterologists, Pediatric	46.2	55.9	224.7	276.2	228.6	276.2
General Surgery	48.1	56.7	48.4	57.1	49.2	58.6
Pediatric Surgery	45.7	57.3	224	275.3	224.6	283.3
Geriatrics	49.8	66.6	49.8	66.6	50.5	67.8
Infectious Disease	50.9	61.8	51.1	61.9	52.4	63.4
Infectious Disease, Pediatric	47.7	64.1	383.8	502.3	NA	NA
Maternal/Fetal Medicine	47.2	57.5	47.9	58.3	48	58.3
Nephrologists	49.7	59.1	50.2	59.3	51.4	61.2
Nephrologists, Pediatric	46.6	62.4	227.9	321.7	228.3	322.2
Neurologists	47.3	53.1	48.6	57.8	49.1	58
Neurologists, Pediatric	44.1	53.4	45.2	55	46.8	59.2
Oncologist/Hematologist	48.8	58.4	49.3	58.7	49.4	58.8
Oncologist/Hematologist, Pediatric	44.7	53.4	46.5	56.3	47.3	56.7
Oncologist/Radiologist	NA	NA	NA	NA	NA	NA
Orthopedic Surgeons	48.1	55.4	48.7	58.5	49	59
Orthopedic Surgeons, Pediatric	227.3	320.9	NA	NA	NA	NA
Otolaryngologists (ENTs)	49.1	59.6	49.9	60.5	50	60.7
Otolaryngologists (ENTs), Pediatric	NA	NA	NA	NA	NA	NA
Physical Medicine Specialists	51.3	65	53.3	74.9	237.4	294.2
Physical Medicine Specialists, Pediatric	NA	NA	NA	NA	NA	NA
Pulmonologists	48	53.8	49.2	59.6	50.1	63.4
Pulmonologists, Pediatric	47.1	56.7	47.9	64.1	202.2	242.6
Rheumatologist	50.4	62.9	51.7	68.8	52.9	69.7
Rheumatologist, Pediatric	228.2	276.2	230.2	276.2	231	323.3
Urologists	49.4	59	50.1	59.9	50.8	63.1
Urologists, Pediatric	227.2	272.8	228.5	274.7	230.8	282.2
Vision Care Provider	43.5	47.6	44.3	49	44.8	49.8
Vision Care Provider, Pediatric	49	69.1	379.3	535.5	NA	NA



Table B-3—Average Travel Distances and Travel Times for Anthem—Ancillary Providers—Rural Areas

	First-Nearest		Second-Nearest		Third-Nearest			
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)		
Ancillary Providers								
Audiologists	49.3	58.9	49.8	59.9	50.6	60.5		
Occupational Therapists	47.2	56.5	47.6	57.1	48	57.5		
Podiatrists	48.7	58.4	49.8	61.5	50.2	65.7		
Physical Therapists	44.7	50.4	45.8	53.6	45.8	53.8		
Speech Therapists	47	56.2	48.3	57.9	48.8	58.5		

 $Table\,B-4-Average\,Travel\,Distances\,and\,Travel\,Times\,for\,Anthem-Behavioral\,Health\,Providers-Rural\,Areas$ 

Provider Category	First-N	First-Nearest		Second-Nearest		Third-Nearest	
	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	
Behavioral Health Providers							
Outpatient Mental Health Facilities	49.4	55.9	50	60.5	51	62.2	
Behavior Analyst/Technician	46.6	54.8	46.6	54.9	46.6	54.9	
Counselor	46	51.3	47.3	54.2	47.8	55.5	
Substance Abuse Counselor	46	51.9	46.8	52.8	47	53	
Marriage and Family Therapist	45.4	50.7	46.2	51.7	46.3	51.9	
Psychologist	46.8	52.7	48.2	58.7	48.8	59.5	
Pediatric Psychologist	225.4	279.5	226.1	318.7	226.5	319.5	
Social Worker	45.6	50.6	46.9	53.9	47.1	54.3	
Psychiatrist	46.9	53.8	48.3	58	48.6	58.9	
Pediatric Psychiatrist	42.7	52.1	44.8	57.9	45.5	61.8	
Substance Abuse Facilities/Clinics	238	335.9	238.2	336.2	NA	NA	



Table B-5—Average Travel Distances and Travel Times for Anthem—Facility Level Providers—Rural Areas

	First-N	Nearest	Second-Nearest		Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)
Facility Level Providers						
Hospitals, Adults	46.5	51.8	46.5	51.8	49.3	55.4
Inpatient Hospital	46.7	52.1	46.7	52.1	50	56.1
Psychiatry Inpatient Hospital	50.6	60.6	51.7	64.8	54.7	67.4
Pediatric Hospital	226.3	271.6	434.7	521.6	438.5	526.2
Ambulatory Surgical Centers/Outpatient Hospitals	48.2	58	49.2	59.2	50.1	63.1
Radiology (Facilities/Clinics)	56	69	236	332.9	384.3	487.4
Hospice	NA	NA	NA	NA	NA	NA
ICF/IID	NA	NA	NA	NA	NA	NA
Home Health Facility	49.5	59.8	51.5	62.6	53.5	67.7
Skilled Nursing Facility	43.9	48.4	49.3	55.6	51.5	59.9
Dialysis/ESRD Facility	46.1	52.2	49.7	59	51	60.8
Pharmacy	50.8	64	55.2	76.2	237.3	335

Table B-6—Average Travel Distances and Travel Times for Anthem—Primary Care Providers—Urban Areas

	First-N	First-Nearest		Second-Nearest		Third-Nearest		
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)		
Primary Care Providers								
Primary Care, Adults	3.6	5.5	3.8	5.9	3.9	6.1		
General Practitioner	6.1	10.7	33.8	55.8	35.4	60.3		
FQHC/RHC	37.1	74.3	NA	NA	NA	NA		
Family Practice	4.2	6.9	4.6	7.7	4.8	8.2		
Internal Medicine	4.2	6.7	4.6	7.7	4.8	8.2		
NP	3.8	5.8	4	6.3	4.3	6.8		
PA	4	6.3	4.3	6.9	4.6	7.4		
OB/GYN	5.3	8.5	5.8	9.3	6.1	9.9		
Pediatrician	4.6	7.8	5	8.6	5.4	9.3		



Table B-7—Average Travel Distances and Travel Times for Anthem—Specialty Providers—Urban Areas

	First-l	Vearest	Second	-Nearest	Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)
Specialty Providers						
Allergists & Immunologists	6.9	12.4	9.2	17.1	11.7	22.7
Allergists & Immunologists, Pediatric	NA	NA	NA	NA	NA	NA
Cardiologists	5.6	9.6	5.9	10	6.1	10.5
Cardiologists, Pediatric	28.6	45.7	28.8	46	28.8	46
Dermatologists	6.1	10.8	6.7	12	7.8	14
Dermatologists, Pediatric	NA	NA	NA	NA	NA	NA
Endocrinologists	6.7	12.3	8	14.5	35.7	61.2
Endocrinologists, Pediatric	12.2	19.5	14.7	23.5	18	28.8
Gastroenterologists	5.8	9.9	6.3	11.2	6.8	12.5
Gastroenterologists, Pediatric	7.9	13.5	27.2	45.3	27.6	45.3
General Surgery	5.5	9.4	6.4	11	7.1	12.3
Pediatric Surgery	8.2	14.1	27.4	45.1	28.2	49
Geriatrics	7.4	14.3	7.4	14.3	8	15.5
Infectious Disease	7.3	12.3	7.5	12.5	7.8	13.2
Infectious Disease, Pediatric	9.4	18.3	358	581	NA	NA
Maternal/Fetal Medicine	7.3	12.3	7.7	12.8	7.8	13.1
Nephrologists	5.9	10	6.2	10.6	6.9	12
Nephrologists, Pediatric	11.1	21.7	30.6	61.2	32.7	65.3
Neurologists	6.3	10.2	6.6	11	6.7	11.1
Neurologists, Pediatric	7.3	13.3	8.1	14.8	9.7	17.8
Oncologist/Hematologist	6.7	12.1	6.9	12.3	7.2	12.9
Oncologist/Hematologist, Pediatric	8.1	13.3	9.3	15.2	9.7	15.4
Oncologist/Radiologist	NA	NA	NA	NA	NA	NA
Orthopedic Surgeons	6.1	10.3	6.4	11.1	6.5	11.7
Orthopedic Surgeons, Pediatric	30.6	61.3	NA	NA	NA	NA
Otolaryngologists (ENTs)	6	10.1	6.8	11.4	7	11.8
Otolaryngologists (ENTs), Pediatric	NA	NA	NA	NA	NA	NA
Physical Medicine Specialists	7.9	14.4	8.9	17.8	37.2	63.1
Physical Medicine Specialists, Pediatric	NA	NA	NA	NA	NA	NA
Pulmonologists	6.2	10.1	6.6	11.6	7	12.9
Pulmonologists, Pediatric	8.6	14.6	10.4	19	339	542.3
Rheumatologist	8.1	15.2	8.9	17.2	9.2	17.6
Rheumatologist, Pediatric	27.6	45.1	28.8	46.1	30	58.4
Urologists	6.8	12.1	7.7	13.8	9.2	17.1
Urologists, Pediatric	28	46.2	32.6	52.3	34.4	56.5
Vision Care Provider	4.6	7.3	5.3	8.6	5.6	9.2
Vision Care Provider, Pediatric	14.5	29	355.9	711.7	NA	NA



Table B-8—Average Travel Distances and Travel Times for Anthem—Ancillary Providers—Urban Areas

Provider Category	First-Nearest		Second-Nearest		Third-Nearest				
	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)			
Ancillary Providers									
Audiologists	6.6	11.1	7.5	13.3	8.5	15.2			
Occupational Therapists	5.6	9.8	6.2	11.1	6.5	11.7			
Podiatrists	5.8	10.3	6.6	11.9	7	13.3			
Physical Therapists	4.5	7.3	4.7	8	4.9	8.3			
Speech Therapists	5.3	9.2	6	10.6	6.3	11.2			

Table B-9—Average Travel Distances and Travel Times for Anthem—Behavioral Health Providers—Urban Areas

	First-Nearest		Second-Nearest		Third-Nearest			
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)		
Behavioral Health Providers								
Outpatient Mental Health Facilities	5.9	9.9	6.8	12.3	7.7	14		
Behavior Analyst/Technician	4.6	7.9	4.7	8	4.8	8.3		
Counselor	4.3	6.7	4.4	7.1	4.6	7.5		
Substance Abuse Counselor	4.9	8.1	5.4	8.9	5.5	9.1		
Marriage and Family Therapist	4.1	6.5	4.4	7	4.5	7.3		
Psychologist	4.9	8.1	5.4	9.6	5.7	10.2		
Pediatric Psychologist	27.5	47.3	28.2	56.3	29.1	58.1		
Social Worker	4.2	6.6	4.4	7.1	4.5	7.3		
Psychiatrist	4.3	7	4.8	8.3	5.1	8.9		
Pediatric Psychiatrist	6.4	11.5	7.6	14.3	8.6	16.6		
Substance Abuse Facilities/Clinics	36.6	73.1	36.8	73.7	NA	NA		



Table B-10—Average Travel Distances and Travel Times for Anthem—Facility Level Providers—Urban Areas

	First-P	Nearest	Second-Nearest		Third-Nearest			
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)		
Facility Level Providers								
Hospitals, Adults	6.1	9.6	6.2	9.8	7	11.4		
Inpatient Hospital	6.5	10.4	6.5	10.4	7.3	12.3		
Psychiatry Inpatient Hospital	7.6	12.6	7.9	13.6	10.4	18.7		
Pediatric Hospital	28.5	45.6	381.5	610.4	381.8	610.9		
Ambulatory Surgical Centers/Outpatient Hospitals	5.6	9.9	6.5	11.6	7	12.7		
Radiology (Facilities/Clinics)	9.8	18.1	41.2	82.4	350.9	512.3		
Hospice	NA	NA	NA	NA	NA	NA		
ICF/IID	NA	NA	NA	NA	NA	NA		
Home Health Facility	6.9	12.2	8.1	14.2	9	16.5		
Skilled Nursing Facility	5.8	9.6	6.7	11.5	8	14.3		
Dialysis/ESRD Facility	5.7	9.5	6.7	11.9	7.9	14		
Pharmacy	7.9	14.9	10.2	20.1	38.6	77.2		

Table B-11—Average Travel Distances and Travel Times for HPN—Primary Care Providers—Rural Areas

	First-f	First-Nearest		Second-Nearest		Nearest		
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)		
Primary Care Providers								
Primary Care, Adults	27.2	29.7	27.6	30.2	27.7	30.4		
General Practitioner	31.9	35.6	35.4	40	37.4	42.9		
FQHC/RHC	NA	NA	NA	NA	NA	NA		
Family Practice	NA	NA	NA	NA	NA	NA		
Internal Medicine	27.2	29.8	27.4	30.1	27.5	30.2		
NP	NA	NA	NA	NA	NA	NA		
PA	NA	NA	NA	NA	NA	NA		
OB/GYN	31.8	35.5	32.8	36.7	33.4	37.6		
Pediatrician	27.1	30.1	27.5	30.4	27.8	30.9		



Table B-12—Average Travel Distances and Travel Times for HPN—Specialty Providers—Rural Areas

	First-N	learest	Second	-Nearest	Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)
Specialty Providers						
Allergists & Immunologists	35.8	43.5	37.3	45.3	38.5	46.9
Allergists & Immunologists, Pediatric	NA	NA	NA	NA	NA	NA
Cardiologists	30	33.1	30.3	33.7	31.6	35.1
Cardiologists, Pediatric	34.8	42.2	35.4	42.6	37	44.4
Dermatologists	32.8	36.8	33.4	37.6	33.9	38.3
Dermatologists, Pediatric	NA	NA	NA	NA	NA	NA
Endocrinologists	36	44	37.1	45.8	37.4	46.1
Endocrinologists, Pediatric	34.5	41.4	35.6	42.7	38.6	46.3
Gastroenterologists	33.9	39.5	35	41.7	35.7	42.8
Gastroenterologists, Pediatric	211.5	260.3	211.6	260.3	212.4	261.2
General Surgery	31	34.8	32.6	36.7	34.5	38.9
Pediatric Surgery	212.3	260.8	212.3	260.8	212.3	260.8
Geriatrics	38.2	52	40.9	55.8	221.9	266.8
Infectious Disease	35.5	40.3	35.9	40.8	36.6	41.8
Infectious Disease, Pediatric	35.4	43.5	38.4	46.9	39	51.8
Maternal/Fetal Medicine	34.8	38.8	35.2	39.3	35.2	39.3
Nephrologists	33.2	37.7	33.8	38.4	34.1	38.6
Nephrologists, Pediatric	213.6	259.9	214.3	302.3	217.2	303.4
Neurologists	32.9	37	34.2	39	35.1	40.1
Neurologists, Pediatric	34.5	42	35.9	45.3	215.1	261.8
Oncologist/Hematologist	35.9	41.3	37.5	42.7	37.9	44.7
Oncologist/Hematologist, Pediatric	37.8	44.7	38.3	45.6	38.5	46
Oncologist/Radiologist	NA	NA	NA	NA	NA	NA
Orthopedic Surgeons	31.7	35.3	33.2	37.7	33.7	38.4
Orthopedic Surgeons, Pediatric	210.2	296.7	211.3	298.3	211.3	298.3
Otolaryngologists (ENTs)	30.7	34.3	32.3	36.4	33.3	38.2
Otolaryngologists (ENTs), Pediatric	NA	NA	NA	NA	NA	NA
Physical Medicine Specialists	32.1	36.5	32.9	38.1	33.3	38.9
Physical Medicine Specialists, Pediatric	NA	NA	NA	NA	NA	NA
Pulmonologists	33.7	38.1	34.7	41.9	35.5	42.9
Pulmonologists, Pediatric	36.8	45	38.8	47	40.2	51.3
Rheumatologist	37.5	45.2	38.8	49.5	39.3	50.1
Rheumatologist, Pediatric	214.2	258.1	216.2	259.3	219.9	308.9
Urologists	37.1	42.2	38.3	46.1	38.4	47.6
Urologists, Pediatric	34.3	40.3	35.3	41.6	211.4	259.7
Vision Care Provider	29.6	32.8	30.5	34	31.2	34.8
Vision Care Provider, Pediatric	33.2	37.5	207.5	240.9	208.5	250.3



Table B-13—Average Travel Distances and Travel Times for HPN—Ancillary Providers—Rural Areas

Provider Category	First-Nearest		Second-Nearest		Third-Nearest				
	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)			
Ancillary Providers									
Audiologists	35.2	42	36	43.1	36.1	43.3			
Occupational Therapists	31.2	34.5	33.7	38.7	34.1	39.3			
Podiatrists	32.1	36.2	32.9	37.1	34.6	41.4			
Physical Therapists	29.5	32.5	31.2	34.3	31.4	34.7			
Speech Therapists	33.5	39.9	34.1	40.6	34.4	41			

 $Table\,B-14-Average\,Travel\,Distances\,and\,Travel\,Times\,for\,HPN-Behavioral\,Health\,Providers-Rural\,Areas$ 

	First-P	First-Nearest		Second-Nearest		Third-Nearest			
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)			
Behavioral Health Providers									
Outpatient Mental Health Facilities	NA	NA	NA	NA	NA	NA			
Behavior Analyst/Technician	33.9	40.3	34.2	40.7	34.3	40.8			
Counselor	34.1	38.9	36.3	41.8	37.5	44.4			
Substance Abuse Counselor	34.1	39	35.7	43.5	36.4	44.5			
Marriage and Family Therapist	32.9	37.4	34	38.8	34.9	40			
Psychologist	33.2	37.4	34.8	39.5	36.8	45			
Pediatric Psychologist	NA	NA	NA	NA	NA	NA			
Social Worker	31.4	35.6	32.4	36.9	34.8	39.8			
Psychiatrist	31.6	35.7	32.9	37.1	34.2	38.5			
Pediatric Psychiatrist	NA	NA	NA	NA	NA	NA			
Substance Abuse Facilities/Clinics	38.2	46.8	41.6	56.8	145.6	170.2			



Table B-15—Average Travel Distances and Travel Times for HPN—Facility Level Providers—Rural Areas

	First-N	learest	Second-Nearest		Third-Nearest				
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)			
Facility Level Providers									
Hospitals, Adults	32.9	36.8	34.4	38.9	35.8	40.8			
Inpatient Hospital	33.2	37.1	34.7	39.2	36.1	40.8			
Psychiatry Inpatient Hospital	38.9	47.8	40.7	53.5	43.3	59.5			
Pediatric Hospital	NA	NA	NA	NA	NA	NA			
Ambulatory Surgical Centers/Outpatient Hospitals	33.4	40	34.3	41.2	35.5	43			
Radiology (Facilities/Clinics)	29.2	32	30.3	33.4	30.5	33.7			
Hospice	34.2	40.1	35.1	42.3	37.5	45.9			
ICF/IID	NA	NA	NA	NA	NA	NA			
Home Health Facility	33.4	37.8	35.1	40.9	36.5	42.8			
Skilled Nursing Facility	33.2	37	35.8	42.7	37	44.5			
Dialysis/ESRD Facility	35.1	41.8	39.4	47.4	42.2	50.9			
Pharmacy	27.7	30.3	28.5	31.2	29.4	32.3			

Table B-16—Average Travel Distances and Travel Times for HPN—Primary Care Providers—Urban Areas

	First-Nearest		Second-Nearest		Third-Nearest			
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)		
Primary Care Providers								
Primary Care, Adults	2.8	4.3	2.9	4.6	3	4.8		
General Practitioner	4.1	6.9	4.9	8.2	5.7	9.4		
FQHC/RHC	NA	NA	NA	NA	NA	NA		
Family Practice	NA	NA	NA	NA	NA	NA		
Internal Medicine	2.8	4.4	2.9	4.6	3	4.8		
NP	NA	NA	NA	NA	NA	NA		
PA	NA	NA	NA	NA	NA	NA		
OB/GYN	4	6.4	4.3	6.9	4.5	7.4		
Pediatrician	3.1	5	3.4	5.4	3.6	5.8		



Table B-17—Average Travel Distances and Travel Times for HPN—Specialty Providers—Urban Areas

<u> </u>	First-l	Vearest	Second	-Nearest	Third-	Nearest
Provider Category	Distance	Time	Distance	Time	Distance	Time
	(Miles)	(Minutes)	(Miles)	(Minutes)	(Miles)	(Minutes)
Specialty Providers						
Allergists & Immunologists	5.1	8.9	5.8	10.3	6.6	11.9
Allergists & Immunologists, Pediatric	NA	NA	NA	NA	NA	NA
Cardiologists	4.2	7	4.5	7.5	4.6	7.8
Cardiologists, Pediatric	8.5	13.9	8.6	14	8.8	14.2
Dermatologists	5.6	9.5	5.6	9.6	5.7	9.6
Dermatologists, Pediatric	NA	NA	NA	NA	NA	NA
Endocrinologists	5.7	10.4	6.5	12.1	7.1	13.2
Endocrinologists, Pediatric	12.5	20	13.7	21.8	16.1	25.8
Gastroenterologists	4.9	8.5	5.3	9.4	5.6	10.1
Gastroenterologists, Pediatric	28.7	47.7	29	48.1	29.7	49.4
General Surgery	4.1	6.8	4.9	8.2	5.3	8.9
Pediatric Surgery	30.2	49.6	30.2	49.6	30.2	49.6
Geriatrics	13	25.7	16.6	32.8	332.1	531.3
Infectious Disease	6.1	9.7	6.5	10.3	6.9	11
Infectious Disease, Pediatric	6.8	12.5	8	14.4	8.8	16.6
Maternal/Fetal Medicine	5.3	8.6	5.5	9	5.5	9.1
Nephrologists	4.8	8.1	5.3	9	5.5	9.4
Nephrologists, Pediatric	29.5	49	31.5	62.7	35.1	67.3
Neurologists	4.5	7.5	4.8	8.2	5.2	9
Neurologists, Pediatric	6.3	11.4	7.5	13.9	31.7	53.1
Oncologist/Hematologist	5.3	8.8	5.9	9.8	6	10.1
Oncologist/Hematologist, Pediatric	14.6	23.2	14.6	23.2	14.6	23.3
Oncologist/Radiologist	NA	NA	NA	NA	NA	NA
Orthopedic Surgeons	4.7	8	5.1	8.7	5.3	9.1
Orthopedic Surgeons, Pediatric	31	62	32.1	64.2	32.1	64.2
Otolaryngologists (ENTs)	4.7	7.9	5	8.6	5.2	9.1
Otolaryngologists (ENTs), Pediatric	NA	NA	NA	NA	NA	NA
Physical Medicine Specialists	4	6.8	4.3	7.5	4.4	7.6
Physical Medicine Specialists, Pediatric	NA	NA	NA	NA	NA	NA
Pulmonologists	4.9	8.1	5.5	9.9	5.9	10.6
Pulmonologists, Pediatric	7.2	12.4	8.9	15.8	10.6	19.1
Rheumatologist	6.5	11.9	8.4	15.9	8.5	16.2
Rheumatologist, Pediatric	30.9	51.7	37	59.2	37.8	70.9
Urologists	6.7	12	7	12.8	7	12.9
Urologists, Pediatric	7.1	11.7	7.8	12.7	30.1	50.4
Vision Care Provider	3.9	6.5	4.1	6.8	4.1	6.9
Vision Care Provider, Pediatric	6	9.5	28.3	43.4	29	46.7



Table B-18—Average Travel Distances and Travel Times for HPN—Ancillary Providers—Urban Areas

	First-N	Nearest	Second	-Nearest	Third-Nearest		
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	
Ancillary Providers							
Audiologists	5.6	9.8	6.1	10.9	6.7	12.1	
Occupational Therapists	3.7	6.1	3.9	6.4	4	6.7	
Podiatrists	5.1	8.8	5.7	9.7	6.6	11.6	
Physical Therapists	3.3	5.2	3.4	5.5	3.5	5.7	
Speech Therapists	3.9	6.8	4.1	7	4.4	7.7	

 $Table\,B-19-Average\,Travel\,Distances\,and\,Travel\,Times\,for\,HPN-Behavioral\,Health\,Providers-Urban\,Areas$ 

	First-f	Nearest	Second-Nearest		Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)
Behavioral Health Providers						
Outpatient Mental Health Facilities	NA	NA	NA	NA	NA	NA
Behavior Analyst/Technician	4.7	8.1	4.8	8.3	4.9	8.5
Counselor	4.3	7.3	4.8	8.3	5.2	9.1
Substance Abuse Counselor	4	6.6	4.5	7.9	4.9	8.6
Marriage and Family Therapist	3.7	6.2	4	6.7	4.3	7.3
Psychologist	4.1	6.8	5	8.5	5.6	10.2
Pediatric Psychologist	NA	NA	NA	NA	NA	NA
Social Worker	3.4	5.6	4	6.6	4.3	7.3
Psychiatrist	3.6	5.9	4.1	6.8	4.5	7.5
Pediatric Psychiatrist	NA	NA	NA	NA	NA	NA
Substance Abuse Facilities/Clinics	6.4	11.8	8.2	16.1	23.6	38.4



Table B-20—Average Travel Distances and Travel Times for HPN—Facility Level Providers—Urban Areas

	First-N	Nearest	Second	Second-Nearest		Nearest
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)
Facility Level Providers						
Hospitals, Adults	4.6	7.6	5.4	9.2	6.2	10.7
Inpatient Hospital	4.8	7.9	6	10.3	6.9	11.9
Psychiatry Inpatient Hospital	6.2	11.2	7.6	13.9	9.2	17.8
Pediatric Hospital	NA	NA	NA	NA	NA	NA
Ambulatory Surgical Centers/Outpatient Hospitals	4.1	7.2	5.1	9	5.8	10.3
Radiology (Facilities/Clinics)	3.4	5.4	3.7	6	3.8	6.2
Hospice	7.3	13.2	7.3	13.5	9.4	17.6
ICF/IID	NA	NA	NA	NA	NA	NA
Home Health Facility	5	8.7	6.2	11.1	6.6	11.9
Skilled Nursing Facility	4.9	8.5	5.7	10.1	6.4	11.4
Dialysis/ESRD Facility	5.7	10.1	7.8	14.2	9.4	17
Pharmacy	2.7	4.2	3	4.8	3.3	5.2

Table B-21—Average Travel Distances and Travel Times for SilverSummit—Primary Care Providers—Rural Areas

Provider Category	First-f	st-Nearest Sec		Second-Nearest		Nearest
	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)
Primary Care Providers						
Primary Care, Adults	38.8	42.3	39.7	43.4	40.9	44.9
General Practitioner	48.1	57.5	48.4	57.8	49.9	59.8
FQHC/RHC	NA	NA	NA	NA	NA	NA
Family Practice	40.9	44.8	41.9	45.9	43.1	47.5
Internal Medicine	41.5	45.5	43.3	48.2	44.7	49.9
NP	39.9	43.7	40.9	44.8	42.1	46.4
PA	41.6	45.7	43.2	48	43.4	48.4
OB/GYN	41.9	46.6	44.4	49.8	44.7	50.9
Pediatrician	54.7	65.2	55.1	65.7	55.8	67.5



Table B-22—Average Travel Distances and Travel Times for SilverSummit—Specialty Providers—Rural Areas

Table B-22—Average Travel Distances an		Vearest	Second-Nearest		Third-Nearest	
Provider Category	Distance	Time	Distance	Time	Distance	Time
	(Miles)	(Minutes)	(Miles)	(Minutes)	(Miles)	(Minutes)
Specialty Providers						
Allergists & Immunologists	55.1	77.8	223.6	315.7	386.1	545
Allergists & Immunologists, Pediatric	230.2	325	230.8	325.8	NA	NA
Cardiologists	47	52	47.9	56.4	48.7	57.7
Cardiologists, Pediatric	62.1	74.5	62.1	74.5	231.2	277.4
Dermatologists	47	53.1	50.3	60.4	50.8	61.2
Dermatologists, Pediatric	NA	NA	NA	NA	NA	NA
Endocrinologists	49.1	59	50.6	61.2	55.6	68.4
Endocrinologists, Pediatric	59.2	71	66.8	80.1	388.8	466.6
Gastroenterologists	48.1	57.1	48.8	58.2	49.3	58.8
Gastroenterologists, Pediatric	61.3	82	225.5	318.3	225.6	318.4
General Surgery	45.5	50.6	47.2	52.7	48.3	54.3
Pediatric Surgery	225.2	276.4	225.2	276.4	225.2	276.4
Geriatrics	NA	NA	NA	NA	NA	NA
Infectious Disease	50.1	60.5	51.2	62.2	52.4	63.7
Infectious Disease, Pediatric	62.5	83.8	230.4	325.3	394.3	513.1
Maternal/Fetal Medicine	45.5	51.3	45.7	51.6	46.3	55.5
Nephrologists	47.6	54.4	49.5	58.8	50.3	59.9
Nephrologists, Pediatric	227.3	276.8	232.6	323.5	NA	NA
Neurologists	48	56.9	49.9	59.3	50.5	60.8
Neurologists, Pediatric	60.1	72.5	229.9	290.8	231.6	324.5
Oncologist/Hematologist	48.5	55.6	48.8	56.1	50.3	60.9
Oncologist/Hematologist, Pediatric	62.1	74.5	62.1	74.5	231.3	277.5
Oncologist/Radiologist	NA	NA	NA	NA	NA	NA
Orthopedic Surgeons	46.3	51.6	47.2	52.7	47.7	53.3
Orthopedic Surgeons, Pediatric	227.5	321.1	NA	NA	NA	NA
Otolaryngologists (ENTs)	49.7	59.2	51.9	62.1	209.6	257.1
Otolaryngologists (ENTs), Pediatric	228.2	322.1	NA	NA	NA	NA
Physical Medicine Specialists	48.7	57.6	49.3	58.3	50	60.2
Physical Medicine Specialists, Pediatric	56.1	67	58.9	70.2	59	70.3
Pulmonologists	49.8	59.2	51.3	61.1	53.4	63.3
Pulmonologists, Pediatric	61.4	74.3	229.4	286.2	231.2	324.6
Rheumatologist	51.3	68.6	53.4	71.3	213	300.6
Rheumatologist, Pediatric	231.3	277.5	NA	NA	NA	NA
Urologists	49.6	59.5	49.7	59.7	50	60.1
Urologists, Pediatric	59.6	70.8	62	77.6	65.5	81.8
Vision Care Provider	48	55	49.4	60.1	50.2	62.4
Vision Care Provider, Pediatric	NA	NA	NA	NA	NA	NA



Table B-23—Average Travel Distances and Travel Times for SilverSummit—Ancillary Providers—Rural Areas

	First-N	learest	earest Second		Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)
Ancillary Providers						
Audiologists	49.5	59.6	50.2	60.7	52.4	62.7
Occupational Therapists	45.9	51.3	47.4	52.9	49	58.3
Podiatrists	210.7	257.8	211.9	259.8	213.3	298.3
Physical Therapists	41.5	45.7	44.6	49.2	45	49.6
Speech Therapists	47.3	56.1	48.5	57.4	48.9	58.4

Table B-24—Average Travel Distances and Travel Times for SilverSummit—Behavioral Health Providers—Rural Areas

	First-N	First-Nearest		Second-Nearest		Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	
Behavioral Health Providers							
Outpatient Mental Health Facilities	47.4	53.5	51.1	59.4	51.7	62.2	
Behavior Analyst/Technician	47	53.4	49.5	58.1	49.9	60.8	
Counselor	43.7	48.1	45.9	51.1	46.4	53	
Substance Abuse Counselor	48.2	58.1	48.5	58.7	49.5	59.8	
Marriage and Family Therapist	45.8	51	47.3	54.7	47.7	57.2	
Psychologist	47	52.6	48.3	57.8	49.3	59.3	
Pediatric Psychologist	222.5	314.1	227.6	321.2	230.2	324.9	
Social Worker	44	49.7	44.6	50.5	44.7	50.7	
Psychiatrist	45.6	50.9	47.7	54	49	58.8	
Pediatric Psychiatrist	54.8	61.7	57.9	66.2	59.9	70.3	
Substance Abuse Facilities/Clinics	NA	NA	NA	NA	NA	NA	



Table B-25—Average Travel Distances and Travel Times for SilverSummit—Facility Level Providers—Rural Areas

	First-N	First-Nearest		Second-Nearest		Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	
Facility Level Providers							
Hospitals, Adults	45.3	50.4	49.4	55.8	50.8	59.5	
Inpatient Hospital	46	50.9	52.6	59.3	196.4	217.1	
Psychiatry Inpatient Hospital	49.9	59.6	51.6	64.5	52.5	65.7	
Pediatric Hospital	NA	NA	NA	NA	NA	NA	
Ambulatory Surgical Centers/Outpatient Hospitals	48.3	57.9	50.9	63.9	53.8	66.4	
Radiology (Facilities/Clinics)	46.8	52.2	48.3	57.5	48.9	57.9	
Hospice	57.6	64.3	199.1	221	214.3	284.3	
ICF/IID	NA	NA	NA	NA	NA	NA	
Home Health Facility	48.3	57.7	51	62.5	51.6	66.4	
Skilled Nursing Facility	45	50	51.8	59.1	74.3	86.2	
Dialysis/ESRD Facility	45.8	52.2	49.6	58.3	52.4	62.3	
Pharmacy	53.2	66.5	216.9	306.1	218.1	307.8	

Table B-26—Average Travel Distances and Travel Times for SilverSummit—Primary Care Providers—Urban Areas

	First-N	First-Nearest		Second-Nearest		Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	
Primary Care Providers							
Primary Care, Adults	3.1	4.7	3.2	5	3.3	5.2	
General Practitioner	4.7	8	4.9	8.3	5.6	9.7	
FQHC/RHC	NA	NA	NA	NA	NA	NA	
Family Practice	3.5	5.5	3.8	6.1	4	6.5	
Internal Medicine	3.6	5.7	3.9	6.3	4	6.6	
NP	3.2	5	3.4	5.4	3.6	5.7	
PA	3.6	5.6	3.8	6.2	4	6.5	
OB/GYN	4.7	7.6	5	8.3	5.4	9	
Pediatrician	5.1	8.7	5.6	9.6	5.9	10.1	



Table B-27—Average Travel Distances and Travel Times for SilverSummit—Specialty Providers—Urban Areas

Table B-27—Average Travel Distances an		Vearest		-Nearest		Nearest
Provider Category	Distance	Time	Distance	Time	Distance	Time
	(Miles)	(Minutes)	(Miles)	(Minutes)	(Miles)	(Minutes)
Specialty Providers						
Allergists & Immunologists	9.4	18.7	332.1	664.2	356.8	713.7
Allergists & Immunologists, Pediatric	32.5	65	33.4	66.8	NA	NA
Cardiologists	5.1	8.3	5.7	9.5	5.8	9.7
Cardiologists, Pediatric	10.4	16.6	10.4	16.6	33.1	53
Dermatologists	5.5	9.3	6.8	12.1	8	14.5
Dermatologists, Pediatric	NA	NA	NA	NA	NA	NA
Endocrinologists	5.9	10.4	7.9	14.1	9.1	16.2
Endocrinologists, Pediatric	13.3	21.3	21.6	34.5	357.8	572.4
Gastroenterologists	5.2	9.1	5.7	10.2	6.2	11.1
Gastroenterologists, Pediatric	9.5	18.3	31.9	63.8	31.9	63.8
General Surgery	5.1	8.4	5.9	9.5	6.1	10.1
Pediatric Surgery	31.5	51.9	31.5	51.9	31.5	51.9
Geriatrics	NA	NA	NA	NA	NA	NA
Infectious Disease	5.4	9.4	6	10.6	6.8	12
Infectious Disease, Pediatric	10.3	20	32.9	65.8	358.5	583.2
Maternal/Fetal Medicine	6.2	9.8	6.5	10.3	7.2	12.3
Nephrologists	5.3	8.8	5.6	9.7	5.9	10.3
Nephrologists, Pediatric	33.5	55.4	37.1	71.3	NA	NA
Neurologists	5.5	9.3	5.9	9.9	6.2	10.4
Neurologists, Pediatric	8.7	15.6	33.1	57.7	33.4	66.3
Oncologist/Hematologist	5.7	9.4	6.2	10.6	6.5	11.7
Oncologist/Hematologist, Pediatric	10.4	16.7	10.4	16.7	33.2	53
Oncologist/Radiologist	NA	NA	NA	NA	NA	NA
Orthopedic Surgeons	4.8	8	5.6	9.3	6	9.9
Orthopedic Surgeons, Pediatric	37.4	74.8	NA	NA	NA	NA
Otolaryngologists (ENTs)	5.4	9.4	6.5	10.9	30.7	50.9
Otolaryngologists (ENTs), Pediatric	35.4	70.7	NA	NA	NA	NA
Physical Medicine Specialists	4.9	8.2	5.7	9.8	6.4	10.9
Physical Medicine Specialists, Pediatric	6.9	11.6	7.9	13.1	8.1	13.4
Pulmonologists	6.3	10.8	8	14.3	8.5	15.4
Pulmonologists, Pediatric	8.8	14.9	32.9	56.1	35	68.8
Rheumatologist	7.8	15.2	8.7	16.8	35.5	70.9
Rheumatologist, Pediatric	33.2	53	NA	NA	NA	NA
Urologists	6.7	12.1	8.3	15	8.5	15.5
Urologists, Pediatric	9.2	16.4	14	25	19.9	34.8
Vision Care Provider	4.7	7.9	5.3	9.3	5.6	10.1
Vision Care Provider, Pediatric	NA	NA	NA	NA	NA	NA



Table B-28—Average Travel Distances and Travel Times for SilverSummit—Ancillary Providers—Urban Areas

	First-Nearest		Second-Nearest		Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)
Ancillary Providers						
Audiologists	6.6	11	8.5	15.6	9.4	17.1
Occupational Therapists	4.5	7.6	4.7	7.9	4.9	8.7
Podiatrists	30.5	50.8	31.3	52.1	32	63.2
Physical Therapists	3.9	6.3	4.1	6.6	4.3	7.1
Speech Therapists	5.1	9.1	5.9	10.6	6.1	10.9

Table B-29—Average Travel Distances and Travel Times for SilverSummit—Behavioral Health Providers— Urban Areas

	First-N	First-Nearest		Second-Nearest		Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	
Behavioral Health Providers							
Outpatient Mental Health Facilities	5	8.4	5.9	10.1	6.5	11.5	
Behavior Analyst/Technician	3.8	6.2	4.3	7.2	4.6	8.1	
Counselor	3.4	5.4	3.7	5.9	3.8	6.2	
Substance Abuse Counselor	4.8	8.3	5.3	9.4	5.9	10.5	
Marriage and Family Therapist	3.7	6	3.9	6.5	4.2	7.2	
Psychologist	4.3	7	5	8.7	5.4	9.6	
Pediatric Psychologist	29.9	59.8	33.3	66.6	35.9	71.9	
Social Worker	3.5	5.5	3.6	5.9	3.8	6.1	
Psychiatrist	3.9	6.4	4.5	7.4	4.9	8.6	
Pediatric Psychiatrist	6.1	10.3	7.3	12.5	8.8	15.6	
Substance Abuse Facilities/Clinics	NA	NA	NA	NA	NA	NA	



Table B-30—Average Travel Distances and Travel Times for SilverSummit—Facility Level Providers—Urban Areas

	First-N	First-Nearest		Second-Nearest		Third-Nearest	
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	
Facility Level Providers							
Hospitals, Adults	5.1	8.3	6.2	10.1	6.7	11.4	
Inpatient Hospital	5.4	9	7.2	12	30.1	45.2	
Psychiatry Inpatient Hospital	6.3	10.4	7.9	14.1	9.4	17.1	
Pediatric Hospital	NA	NA	NA	NA	NA	NA	
Ambulatory Surgical Centers/Outpatient Hospitals	5.1	8.8	6.2	11.3	6.9	12.4	
Radiology (Facilities/Clinics)	5.2	8.5	5.9	10	6.2	10.4	
Hospice	8.6	14.7	31.8	49	35.7	64	
ICF/IID	NA	NA	NA	NA	NA	NA	
Home Health Facility	4.4	7.6	5.5	10	5.9	11	
Skilled Nursing Facility	5.5	9.4	6.8	11.6	11.6	19.5	
Dialysis/ESRD Facility	5	8.4	6	10.5	7.3	13	
Pharmacy	8.1	15.2	34.7	69.4	38.7	77.5	

 ${\bf Table}\,B{\bf -31} - {\bf Average}\,{\bf Travel}\,{\bf Distances}\,{\bf and}\,{\bf Travel}\,{\bf Times}\,{\bf for}\,{\bf LIBERTY} - {\bf Primary}\,{\bf Care}\,\,{\bf Providers} - {\bf Rural}\,{\bf Areas}\,$ 

	First-N	earest	Second-Nearest		Third-N	learest
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)
General Dental Providers						
General Dentists	28	30.9	28.2	31.2	28.7	31.7
Pediatric Dentists	29.3	32.4	30.3	33.3	30.9	34.5
Specialty Dental Providers						
Endodontists	39	46.8	41.5	53.2	53	68
Periodontists	210.3	296.8	NA	NA	NA	NA
Prosthodontists	208.9	294.9	210.3	296.8	210.3	296.8
Oral Surgeons	36	43.4	38.3	47.2	38.5	49.1
Orthodontists	NA	NA	NA	NA	NA	NA
Mid-Level Dental Providers	3					
Dental Hygienists	NA	NA	NA	NA	NA	NA
Dental Therapists	NA	NA	NA	NA	NA	NA



Table B-32—Average Travel Distances and Travel Times for LIBERTY—Primary Care Providers—Urban Areas

	First-N	First-Nearest Second-Nearest		First-Nearest Second-Nearest Th		First-Nearest Second-Nearest Third-No		Nearest
Provider Category	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)	Distance (Miles)	Time (Minutes)		
General Dental Providers								
General Dentists	2.7	4.4	2.9	4.7	3	5		
Pediatric Dentists	3.5	5.6	3.8	6.2	4	6.6		
Specialty Dental Providers								
Endodontists	7.6	14.2	7.8	14.9	10.7	19.9		
Periodontists	33	66	NA	NA	NA	NA		
Prosthodontists	31.9	63.7	33	66	33	66		
Oral Surgeons	4.6	8.2	5.1	9.2	5.5	10.2		
Orthodontists	NA	NA	NA	NA	NA	NA		
Mid-Level Dental Providers	3							
Dental Hygienists	NA	NA	NA	NA	NA	NA		
Dental Therapists	NA	NA	NA	NA	NA	NA		



# **Appendix C. MCO Responses**

The DHCFP offered each of the MCOs the opportunity to provide a written response to the 2019–2020 Network Adequacy Validation report. Based on discussions with the MCOs, it appeared that not all data were submitted to HSAG as per the original data requirements document. MCO responses to the NAV activity are presented in the sections below.

## **Anthem Response**

Anthem provided the following written response to the 2019–2020 Network Adequacy Validation report:

Anthem completed the HSAG requested FY 2019–2020 Network Adequacy Validation (NAV) Provider Data Submission Requirements based on the submission guidelines. The data pull consisted of a full record of our network providers and demographic information (name, TIN, Specialty, address, provider type, taxonomy code, etc.) for a crosswalk. The pull did not include member data to determine network adequacy in relationship to our members. Our contractual network adequacy reports reflect compliance. HSAG's NAV report did include additional specialties that are not part of the ongoing network adequacy reporting to DHCFP. If the state has identified any needed revisions to the required reporting Anthem will make the needed modifications once instructed. Please note that as a whole, Anthem is currently working on a large initiative to expand our provider network. We are working on several means of identifying providers that are currently not enrolled with Anthem Medicaid and prioritizing based on member needs.



### **HPN Response**



MOVEMBELS CARP CONTROL SCHOOL SCHOOL

September 23, 2020

Theresa Carsten
Nevada Department of Health and Human Services
Division of Health Care Finance and Policy, Managed Care & Quality Assurance
1100 E William Street, Suite 100
Carson City, Nevada 89701

Dear Ms. Carsten,

Health Plan of Nevada, Inc. (HPN) has completed its review of the recorded FY 2019-20 Network Adequacy Validation (NAV) report provided on June 30, 2020. Upon review of the data submitted to the Health Services Advisory Group, Inc. (HSAG) on December 17, 2019, our team identified numerous discrepancies.

HPN has provided an updated spreadsheet to demonstrate these discrepancies, which contains three columns:

- Unique Providers: Count of unique providers.
- Non-Unique Providers: Count of providers servicing members at multiple locations.
- HSAG Report: Total provided by HSAG on 06/30/2020.

### Discrepancies include:

#### • Incorrect totals (highlighted in orange on spreadsheet)

Primary Care Providers	PCP Extenders	Cardiologist	Dermatologists
General Surgery	Infectious Disease	Maternal/Fetal Medicine	Neurologists
Neurologists, Pediatric	Oncologist/Hematologist	Oncologist/Hematologist,	Otolaryngologists (ENTs)
		Pediatric	
Physical Medicine Specialists	Behavior Analyst/Technician	Counselor	Substance Abuse Counselor
Marriage and Family Therapist	Pediatric Psychologist	Social Worker	Psychiatrist
Pediatric Psychiatrist	Substance Abuse	Occupational Therapists	Podiatrists
72	Facilities/Clinics		
Physical Therapists	Speech Therapists	Psychiatry Inpatient	Radiology (Facilities/Clinics)
		Hospital	207/5000
Hospice	Home Health Facility	Skilled Nursing Facility	

#### • Facility level providers included in provider section (highlighted in blue on spreadsheet)

Outpatient Mental Health Facilities	Substance Abuse Facilities/Clinics

#### Non-Licensed providers identified as Counselors: (highlighted in orange on spreadsheet)

In order to help provide the highest quality of mental health and substance abuse care to our members, HPN behavioral providers are required to complete our credentialing process. The definition of Counselor provided by HSAG included non-licensed and non-credentialed providers. HPN would not have included non-licensed and non-credentialed providers. Our count would be significantly higher should such providers be considered Counselors.





### A UnitedHealthcare Company

• Outpatient Mental Health Facilities: (highlighted in yellow on spreadsheet)

HPN behavioral providers are credentialed under their professional licensure/specialty and not under their practicing facility.

No additional data was included outside of the December 17, 2019 submission. Supporting documentation and evidence of the above is available at any time upon request.

We appreciate your time and consideration of our corrected data. These reports are a moment in time of an everchanging landscape and HPN routinely conducts network adequacy assessments to identify contract opportunities.

Please do not hesitate to contact me at (702) 838-2090 if you have questions or require further information.

Sincerely,

Joshua Coello

Jahn Culla

Associate Director, Network Development and Contracts Health Plan of Nevada, Inc.





Health Plan of Nevada	Unique Providers	Non-Unique Providers	HSAG REPORT
Primary Care Providers			
Primary Care Providers (1:1,500)	1,618	2,899	2,767
FQHCs/RHCs	7	7	N/A
Family Practice	414	831	N/A
Internal Medicine	684	1,113	1,978
General Practitioner	20	32	55
OB/GYN	194	282	280
Pediatrician	299	634	412
PCP Extenders (1:1,800)	889	1,592	N/A
NP	643	1,113	N/A
PA	246	479	N/A
Specialty Providers		·	
Physician Specialist Providers (1:1,500)	1,822	4,021	1,884
Allergists & Immunologists	16	33	16
Allergists & Immunologists, Pediatric	0	0	N/A
Cardiologists	206	574	243
Cardiologists, Pediatric	16	46	16
Dermatologists	66	183	63
Dermatologists, Pediatric	0	0	N/A
Endocrinologists	31	40	31
Endocrinologists, Pediatric	8	10	8
Gastroenterologists	93	154	93
Gastroenterologists, Pediatric	8	14	8
General Surgery	151	218	163
Pediatric Surgery	7	13	7
Geriatrics	10	11	10
Infectious Disease	41	51	48
Infectious Disease, Pediatric	4	11	4
Maternal/Fetal Medicine	98	316	111
Nephrologists	105	228	105
Nephrologists, Pediatric	4	5	4
Neurologists	137	206	138
Neurologists, Pediatric	14	10	10
Oncologist/Hematologist	84	119	85



Oncologist/Hematologist, Pediatric	13	18	14
Oncologist/Radiologist	0	0	N/A
Orthopedic Surgeons	179	270	179
Orthopedic Surgeons, Pediatric	6	11	6
Otolaryngologists (ENTs)	67	220	75
Otolaryngologists (ENTs), Pediatric	0	0	N/A
Physical Medicine Specialists	129	220	133
Physical Medicine Specialists, Pediatric	0	0	N/A
Pulmonologists	97	137	97
Pulmonologists, Pediatric	6	11	6
Rheumatologist	17	21	17
Rheumatologist, Pediatric	3	11	3
Urologists	34	64	34
Urologists, Pediatric	7	15	7
Vision Care Provider	157	752	157
Vision Care Provider, Pediatric	8	29	8
Behavioral Health Providers			
Outpatient Mental Health Facilities	1	1	N/A
Behavior Analyst/Technician	395	425	428
Counselor	70	81	80
Substance Abuse Counselor	131	155	157
Marriage and Family Therapist	220	264	263
Psychologist	75	67	75
Pediatric Psychologist	25	25	N/A
Social Worker	236	266	266
Psychiatrist	213	300	300
Pediatric Psychiatrist	26	76	N/A
Substance Abuse Facilities/Clinics	7	9	9
Ancillary Providers			
Audiologists	36	59	36
Occupational Therapists	122	585	137
Podiatrists	28	41	36
Physical Therapists	288	2,117	297
Speech Therapists	138	299	154
Facility Level Providers			
Inpatient Hospital	35	35	35
Pediatric Hospital	NA	NA	N/A
Psychiatry Inpatient Hospital	7	7	10
Ambulatory Surgical Centers/Outpatient Hospitals	58	58	58
Radiology (Facilities/Clinics)	24	24	313



Hospice	14	14	16
Intermediate Care Facility for Individuals with Developmental Disability (ICF/IID)	NA	NA	N/A
Home Health Facility	31	44	44
Skilled Nursing Facility	27	28	28
Dialysis/ESRD Facility	14	14	14
Pharmacy	454	454	454



# **SilverSummit Response**



September 24, 2020

Dear Ms. Evins,

In response to your email regarding the concerns that were presented to the DHCFP regarding the data in the 2019-2020 Network Adequacy Validation report, SilverSummit Healthplan would like to take the opportunity to submit an appendix to the final report. Our findings are included below.

SilverSummit's response to the initial data request was based on the Crosswalk provided by HSAG and included the following assumptions:

- Practitioners would only be reported once
- · Practitioners would only be reported under their primary specialty

These assumptions led to practitioners who have more than one specialty or, for which the HSAG Crosswalk displayed the same taxonomy in more than one Provider Type category, only being listed once and only under their primary specialty.

With the above assumptions in mind and based on the HSAG NAV respective findings, SilverSummit would like to respond to the following apparent discrepancies:

- 1. Table 2-2 Summary of Ratio Analysis Results for Primary Care Providers
  - FQHC/RHC's SilverSummit's initial submission shows zero FQHCs/RHCs. The
    practitioners associated with an FQHC clinic are loaded based on their primary
    taxonomy. These practitioners were reported under their applicable specialty such as
    Family Practice, Internal Medicine, etc. The following table reflects the total FQHC
    group, location and practitioner counts:

PROVIDER CATEGORY	Practitioner Count
Counselor	5
Endocrinology, Pediatric	1
Family Practitioner	51
General Practitioner	2
Infectious Disease	1
Internist	8
Marriage/Family Therapist	7
Neurology	2

1-844-366-2880 TDD/TTY 1-844-804-6086

SilverSummitHealthPlan.com



Nurse Practitioner	64
OB/GYN Provider	1
Pediatric Psychiatry	3
Pediatrician	13
Physician Assistant	28
Psychiatry	5
Psychologist	1
Social Worker	29
Substance Abuse Counselor	4
Vision Care	1
Grand Total	186

Total FQHC Groups: 28Total Locations: 38

- 2. Table 2-3 Summary of Ratio Analysis Results for Specialty Care Providers
  - SilverSummit would like to provide updated counts for the following specialties:

PROVIDER CATEGORY	Practitioner Count
Allergy and Immunology	6
Endocrinology	20
General Surgery, Pediatric	9
Geriatric Medicine	24
Nephrology, Pediatric	4
Orthopedic Surgery, Pediatric	4
Pulmonology	50
Rheumatology, Pediatric	2
Vision Care, Pediatric	2
Oncologist Radiologist	25

- 3. Table 2-4 Summary of Ratio Analysis Results for Behavioral Health Providers
  - SilverSummit initially did not report Substance Abuse facilities/clinics on the initial submission. Based upon an updated review SilverSummit's network includes thirty one substance abuse facilities.
- 4. Table 2-6 Summary of Ratio Analysis for Facility Level Providers

1-844-366-2880 TDD/TTY 1-844-804-6086

SilverSummitHealthPlan.com



- SilverSummit initially did not report any in network Pediatric Hospitals on the initial submission. Based upon an updated review SilverSummit's network includes one Pediatric Hospital in Clark County.
- SilverSummit initially reported 19 SNF's on their initial submission. Based upon an updated review SilverSummit's network includes 26 SNF's.

Sincerely,

Sarah Fox

Vice President Network Development & Contracting

1-844-366-2880 TDD/TTY 1-844-804-6086

SilverSummitHealthPlan.com