

# Supplementary Response: Inclusion of Essential Community Providers

## Supplementary Response

### Instructions for Submitting a Supplementary Response

Please answer the questions below regarding access to essential community providers (ECPs) in the issuer's proposed service area(s). Please be as complete and specific as possible in each of your responses. To be considered complete, the supplementary response must contain an appropriate explanation for each applicable question. Please note that if the issuer is applying in multiple service areas, the response should address each service area.

Issuers that qualify for the general ECP standard should complete Section 1. Issuers that qualify for the alternate ECP standard should complete Section 2.

### Section 1: Instructions for Issuers Subject to the General ECP Standard

*For issuers that qualify for the general ECP standard: Please indicate whether the issuer meets or does not meet each portion of the general ECP standard, and respond to each applicable question:*

Instructions for Issuers Subject to the General ECP Standard	Meets	Does Not Meet	Instructions
A. Issuer offers a contract to all available Indian health care providers in the service area for the respective QHP certification plan year			Complete Question #1 below if the issuer does not meet this requirement
B. Issuer offers a contract to at least one ECP in each available ECP category in each county in the service area (SADP applicants should check the "Meets" box, since this requirement is not applicable to SADPs)			Complete Question #2 below if the issuer does not meet this requirement
C. Issuer's plan network includes at least 20 percent of available ECPs in the service area			Complete Questions #3–#5 below if the issuer does not meet this requirement

*If the issuer does not offer a contract to all available Indian health care providers in the service area for the respective QHP certification plan year, applying the special terms and conditions required by federal law and regulations as referenced in the recommended model qualified health plan (QHP) addendum for Indian health care providers developed by the Department of Health and Human Services (HHS), please respond to question 1 below.*

1. How will the issuer's provider network(s), as currently structured, provide adequate access to care for American Indians/Alaska Natives?

*If the issuer does not offer a contract to at least one ECP in each available ECP category<sup>1</sup> in each county in the service area for the respective QHP certification plan year, please respond to question 2 below.*

2. How will the issuer's provider networks, as currently structured, provide access to a broad range of ECP types, including access for individuals with HIV/AIDS, individuals with comorbid behavioral health conditions, and individuals seeking women's health and reproductive health services?

*If the issuer's plan network does not include at least 20 percent of available ECPs in the service area, please respond to questions 3–5 below.*

3. Why is the issuer unable to achieve the 20 percent standard for ECPs? The response should address the issuer's efforts to contract with additional ECPs (including provider information and contract offer dates, as applicable) and why those efforts have been unsuccessful. Please be as specific as possible in your response. Please be sure to indicate:
  - a. Number of contracts offered to ECPs for the 2018 plan year.

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<sup>1</sup> ECP categories include federally-qualified health centers (FQHCs); Ryan White providers; family planning providers; Indian health providers; hospitals; and other providers, such as STD clinics, TB clinics, rural health clinics, community mental health centers, black lung clinics, and hemophilia treatment centers.

- b. Names of the ECPs to which the issuer has offered contracts, but an agreement with the providers has not yet been reached. Include any relevant information including date of last contact, contact name, and outcome. (For example, the issuer may want to indicate whether contract negotiations are still in progress or the extent to which the issuer was not able to agree on contract terms with available ECPs and, if so, which terms.)
- 4. How does the issuer plan to increase ECP participation in its provider networks in the future? Identify the number of additional contracts the issuer expects to offer for the 2018 plan year, the names of the ECPs to be contacted, and the time frame of those planned negotiations.
- 5. How does the issuer's provider networks, as currently structured, provide an adequate level of service for low-income and medically underserved individuals? Please be specific in your response.
  - a. Describe how the issuer's current networks provide adequate access to care for individuals with HIV/AIDS and those with comorbid behavioral health conditions.
  - b. Describe how the issuer's current networks provide adequate access to care for American Indians and Alaska Natives.
  - c. Describe how the issuer's current networks provide adequate access to care for low-income and underserved individuals seeking women's health and reproductive health services.

***Section 2: Instructions for Issuers that Qualify for the Alternate ECP Standard***  
***For issuers that qualify for the Alternate ECP standard: Please indicate whether the issuer meets or does not meet each portion of the alternate ECP standard, and respond to each applicable question:***

<b>Instructions for Issuers Subject to the Alternate ECP Standard</b>	<b>Meets</b>	<b>Does Not Meet</b>	<b>Instructions</b>
A. Issuer's plan network includes at least 20 percent of available ECPs in the service area, based on the number of providers located in HPSAs or low-income ZIP codes			Complete Questions #1-3 below if the issuer does not meet this requirement
B. Issuer's plan network provides all of the categories of services provided by entities in each of the ECP categories in each county in the plan's service area; or otherwise offers a contract to at least one ECP outside of the issuer's integrated service delivery system per ECP category per county (SADP applicants should check the "Meets" box, since this requirement is not applicable to SADPs)			Complete Questions #4-5 below if the issuer does not meet this requirement

*If the number of the issuer's providers that are located in Health Professional Shortage Areas (HPSAs) or ZIP codes in which 30 percent or more of the population falls below 200 percent of the federal poverty level is fewer than the equivalent of 20 percent of available ECPs in the service area, please respond to questions 1-3 below.*

1. Why does the issuer's plan not meet the equivalent of the 20 percent threshold? Describe any plans to provide additional access to low-income and medically underserved consumers in the future. The response should address the issuer's efforts to contract with additional ECPs (including provider information and contract offer dates, as applicable) and why those efforts have been unsuccessful. Please be as specific as possible in your response.
2. How does the issuer plan to increase ECP participation in its integrated delivery system in the future? Identify the number of additional providers and provider types the issuer plans to add to its integrated service delivery system for the 2018 plan year and the time frame of those planned negotiations.
3. How does the issuer's integrated delivery system, as currently structured, provide an adequate level of service for low-income and medically underserved individuals? Please be specific in your response?
  - a. How does the issuer's current integrated delivery system provide adequate access to care for individuals with HIV/AIDS and those with comorbid behavioral health conditions?
  - b. How does the issuer's current integrated delivery system provide adequate access to care for low-income and underserved individuals seeking women's health and reproductive health services?

*If the issuer's integrated service delivery system does not provide all of the categories of services provided by entities in each of the ECP categories in each county in the plan's service area; or otherwise offers a contract to at least one ECP outside of the issuer's integrated service delivery system per ECP category per county (SADP applicants should check the "Meets" box, since this requirement is not applicable to SADPs, please respond to questions 4-5 below.*

4. Why does the issuer's integrated delivery system not provide all of the categories of services provided by entities in each of the ECP categories<sup>2</sup> in each county in the plan's service area as outlined in the general ECP standard; or otherwise not offer a contract to at least one ECP outside of the issuer's integrated delivery system per ECP category in each county in the plan's service area that can provide those services to low-income, medically underserved individuals?
  
5. How will the issuer's integrated delivery system, as currently structured, provide adequate access to a broad range of ECP types, including access for individuals with HIV/AIDS, individuals with comorbid behavioral health conditions, and individuals seeking women's health and reproductive health services?

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<sup>2</sup> ECP categories include FQHCs; Ryan White providers; family planning providers; Indian health providers; hospitals; and other providers, such as STD clinics, TB clinics, rural health clinics, community mental health centers, black lung clinics, and hemophilia treatment centers.