



November 11, 2013

Nicole Edwards
Account Manager
Centers for Medicare & Medicaid Services
90 7th Street, Suite 5-300 (5W)
San Francisco, CA 94103-6708

Dear Ms. Edwards:

Thank you for speaking with me last week about United Healthcare's (UHC) decision to terminate physicians from its Medicare Advantage plans and the negative impact these actions are having in Ohio.

As promised during our phone conversation, the Ohio State Medical Association (OSMA) has been collecting specific examples from our members who believe the terminations have led to questionable network adequacy standards in their community.

To date we have collected 18 such examples that we believe raise substantial questions about UHC's network adequacy and should require detailed investigation and review by your office. The location, specialty, issue in question and summary are provided for each example in the attached document.

Due to patient confusion caused by the terminations and upcoming deadlines for open enrollment, we are asking for the investigation to be conducted and concluded as soon as possible and a summary of the findings for each example to be provided to us so we can appropriately inform our physician leaders. As examples of adequacy questions are still being submitted to us, we will send any additional examples to you as they arrive.

Additionally, we have heard from several members of Ohio's Congressional Delegation who may have additional specific examples, as many of them have indicated that they are fielding inquiries from both Ohio physicians and patients. As we inform them of the information we have provided to you, please let me know how you would like me to relay to them how to submit their questions.

On behalf of Ohio's patients and physicians, I want to thank you in advance for your guidance and willingness to review these important healthcare access questions.

Sincerely,

Todd Baker
Director, Professional Relations

Ohio State Medical Association's Request to the Centers For Medicare & Medicaid Into United Healthcare's Network Adequacy in Ohio

Inquiry 1

Region: Central and Southern Ohio

Specialty: Ophthalmology (specifically Retina)

Network Adequacy Issue: Lack of sufficient subspecialty coverage in region

Summary of Issue: The largest retina practice in Columbus (with 6 retina specialists) has been terminated from UHC. The practice has locations throughout central and southern Ohio in places like Chillicothe, Lancaster, Zanesville, Mt. Vernon and Mansfield where there is little or no other access to Retina specialists.

Inquiry 2

Region: Cincinnati

Specialty: Gastroenterology

Network Adequacy Issue: Hospital Coverage and Lack of Specific Procedure/Training Availability

Summary of Issue: One practice in the Cincinnati has traditionally provided the majority of inpatient care at five hospitals in the Cincinnati area, ranging from 100 to 50-75% care. With the UHC terminations, it is unclear who will be providing the care for those patients who are seen in those hospitals. Additionally, the practice has two of the only board certified hepatologists in town, and all physicians in the practice who perform advanced endoscopic ultrasounds have extensive fellowship training not available at other practices.

Inquiry 3

Region: Cincinnati

Specialty: Immunology/Rheumatology

Network Adequacy Issue: Incorrect/Inaccurate coverage information listed by UHC

Summary of Issue: Locations are listed which are not actual care centers but research and educational sites for the local University. Additionally, some of the office locations that patients have been directed to for care by UHC are no longer practice locations for that given physician. Therefore, patients are being instructed to see physicians who aren't available to provide care.

Inquiry 4

Region: Cincinnati

Specialty: Nephrology

Network Adequacy Issue: Hospital Coverage

Summary of Issue: While Christ Hospital remains a part of the UHC network, the nephrologists who serve their patients in the hospital setting are being dropped.

Inquiry 5

Region: Cincinnati

Specialty: Orthopedics (Hand)

Network Adequacy Issue: No Hand Specialist in entire region

Summary of Issue: There is only one hand specialty practice in the Tristate area that has nine physicians serving nine different locations in the Tristate (Ohio, Indiana, and Kentucky). All have been dropped from UHC, and therefore there are no physicians in the area who specialize in hand ailments who those with UHC can see.

Inquiry 6

Region: Dayton

Specialty: Obstetrics/Gynecology

Network Adequacy Issue: Lack of specialty care

Summary of Issue: A large number of gynecologists in the area have received UHC termination letter notices. Question of whether remaining physicians can absorb volume of patients.

Inquiry 7

Region: Dayton, Springfield

Specialty: Orthopedic Surgery

Network Adequacy Issue: Lack of specialty care

Summary of Issue: In the Springfield area, local resources indicate that over 75% of the orthopedic surgeons have been cut from the network. Some of those remaining may only take younger not Medicare age patients. The remaining network may not be sufficient to serve the UHC Medicare Advantage patient base.

Inquiry 8

Region: Dayton

Specialty: Otolaryngology

Network Adequacy Issue: Specific procedures not available in region

Summary of Issue: One practice in the area specializing in otolaryngology provides services that have specific services and care options not available anywhere else in the region.

Inquiry 9

Region: Dayton

Specialty: Pulmonary/Critical Care/Sleep

Network Adequacy Issue: Hospital Coverage

Summary of Issue: A practice with twelve physicians specializing in pulmonary, critical care, and sleep was terminated from UHC. They are the only pulmonary, critical care, and sleep providers at Miami Valley Hospital, and provides 24/7 in-house ICU coverage as well as pulmonary service. Additionally, four physicians in the practice have exclusive sleep privileges at the sleep labs owned by Miami Valley. Patients with respiratory issues or who require critical care will not have participating provider access at MVH.

Inquiry 10

Region: Mahoning

Specialty: Pulmonary/Critical Care/Sleep

Network Adequacy Issue: Hospital Coverage

Summary of Issue: A practice in Mahoning which specializes in pulmonary, critical care, and sleep medicine provides services at the Northeast Medical Center, and is the only practice with those specialties to do so in the area. Additionally, the practice provides care to the MICU, a closed unit, which means that they are the only providers who provide care for the patients on the unit. Two of the physicians in the group were dropped from UHC, and therefore any services provided to the MICU by those physicians would have to be charged as out of network, because the contract that the practice has with MICU is with the group, not individual physicians.

Inquiry 11

Region: Oxford

Specialty: Allergy/Immunology

Network Adequacy Issue: Lack of specialty care

Summary of Issue: The allergists in the area see a large population of elderly patients There are a limited number of physicians in the area who specialize in immunology and allergy care, and patients will have to travel to Cincinnati to see an allergist or immunologist.

Issue 12

Region: Oxford

Specialty: Internal Medicine

Network Adequacy Issue: Hospital Coverage, Incorrect Listing of Available Doctors

Summary of Issue: Patients in the area will be forced to travel at least an hour away to see physicians accepting UHC in downtown Cincinnati or in West Chester. Additionally, four out of five physicians who also see patients at the Ft. Hamilton hospital have also been released from UHC, and therefore their patients have even further limited access to care. There have also been reports of patients being advised to see their physician at an incorrect/outdated practice location or a physician who is not even in the area anymore.

Issue 13

Region: Warren County

Specialty: Dermatology

Network Adequacy Issue: Lack of Specialty Care

Summary of Issue: At least five physicians specializing in dermatology have been terminated from UHC in the Warren County/Cincinnati area. Many of the remaining dermatology groups in the area are not accepting new patients or are only practicing part-time.

Issue 14

Region: Portage County

Specialty: Ophthalmology

Network Adequacy Issue: Hospital coverage and subspecialty procedures

Summary of Issue: The only sub-specialty practice providing cornea, surgical glaucoma and uveitis in the county has been terminated. It is also the only practice providing these services to patients from the surrounding counties of Trumbull, Wayne, Medina, and Summit. The practice regularly receives referrals from these counties. The practice is also the only ophthalmologist who provides emergency care at Robinson Memorial, and in order or receive emergency ophthalmological care UHC patients would have to drive to another county or be transferred to another hospital for multi-trauma management. The practice also has privileges at Akron City Hospital, NEOMED, Summa Western Reserve, and the only other hospital in the two county areas (Akron General) must refer their emergency subspecialty care to Akron City hospital. The next closest city where care could be provided is Cleveland.

Issue 15

Region: Tuscarawas, Guernsey, Stark Counties

Specialty: Ophthalmology (Retina)

Network Adequacy Issue: Lack of availability of subspecialty services

Summary of Issue: There is only one retinal specialist in Tuscarawas County with a dedicated office for vitreal retinal services. The same practice is also the only Retinal Specialist in Guernsey County and the only person that provides the full scope of vitreal retinal treatment in Guernsey. This solo practice has been terminated. This same practice is in Stark County. They are one of only two practices that contain physicians who are fellowship trained in Retinal in a county of approximately 375,000 people.

Issue 16

Region: Warren

Specialty: Orthopedics

Network Adequacy Issue: Lack of subspecialty services

Summary of Issue: The main orthopedic group in town has been terminated. There is large elderly population in the area who cannot travel to Cleveland or other nearby cities for care, as many have restricted mobility and require transportation assistance to obtain physical therapy and other orthopedic services.

Issue 17

Region: Warren

Specialty: Urology

Network Adequacy Issue: Lack of hospital coverage

Summary of Issue: With terminations, Trumbull Memorial Hospital is no longer covered and no network urologists are practicing at St. Joseph's, which would imply that patients requiring those services would need to travel to Pittsburgh or Akron to see a physician if surgery was required.

Issue 18

Region: Warren

Specialty: Trauma Care

Network Adequacy Issue: Lack of adequate specialty coverage

Summary of Issue: A number of trauma surgeons have received terminations. Trauma patients often need immediate, life-saving care from physicians and with many trauma physicians being dropped from the network, there will be a scarcity of physicians who are experienced in caring for those high risk, emergency patients.