
Network Adequacy: Time and Distance Standards

Presented by:

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Agenda

- Background
- Current Time and Distance Standards
- Proposed Time and Distance Standards
- Future Goals
- Feedback and Discussion

Background

January 2023 Time and Distance Changes

- Our goal was to update these standards effective January 2023 but after receiving feedback we decided to wait to make the changes for July 2023.

Time and Distance Analysis

- Had previously been completed by our External Quality Review Organization but is now being done internally.
- We are utilizing a geospatial software called ArcGIS to assist in the time and distance analysis, as well as to provide information we can use in developing updates to the time and distance standards.

Current Time and Distance Standards

OAR 410-141-3515(7)(c)

(c) All MCEs acceptable travel time and distance monitoring must assess the geographic distribution of providers relative to members and calculate driving time and distance from the member's physical address to the provider's location through the use of geocoding software or other mapping applications. Time and distance standards may not exceed the following, unless otherwise approved by the Authority:

- (A) In urban areas, 30 miles, or 30 minutes;
- (B) In rural areas, 60 miles, or 60 minutes.

Current Time and Distance Standards

OAR 410-141-3515(7)(a)

(a) All MCEs shall ensure all members can access providers within acceptable travel time or distance requirements. Specifically:

- (A) Mental health providers
- (B) Oral health providers
- (C) Specialty providers
- (D) Substance use disorder
- (E) Primary care providers
- (F) Patient Centered Primary Care Homes;
- (G) Federally Qualified Health Centers;

- (H) Hospital;
- (I) Hospital, acute psychiatric care;
- (J) Rural Health Centers;
- (K) Pharmacies;
- (L) Post-hospital skilled nursing facilities;
- (M) Urgent Care Centers;
- (N) Additional provider types when it promotes the objectives of the Authority.

Proposed Time and Distance Standards

Proposed January 2023 Updates:

- A more aggressive Time and Distance standard
- Change in adherence to reflect member and network realities.

Area	Provider Type	Distance	Time	Adherence
Urban	Primary Care	15 miles	15 minutes	95%
	Specialists	30 miles	30 minutes	95%
Rural	Primary Care	30 miles	30 minutes	95%
	Specialists	60 miles	60 minutes	95%

Proposed Time and Distance Standards

July 2023 Time and Distance Standards Changes:

Alignment with requirements for Provider-specific network adequacy standards in [42 CFR § 438.68\(b\)](#) requiring inclusion of specific provider types within the network adequacy standards. Specifically:

- OB/GYN
- Specialist (as designated by the State), adult, and pediatric.
 - CCO Quarterly Provider Capacity Reports
 - CMS Medicare Advantage Time and Distance Standards for Oregon

Proposed Time and Distance Standards

July 2023 Time and Distance Standards Changes:

Alignment with CMS County Designations:

- Standards are currently based on “Urban” or “Rural” designations.
- CMS has five designations: Large Metro, Metro, Micro, Rural, and CEAC (Counties with Extreme Access Considerations)

Time and Distance Standards for **Primary Care Providers**, by designation:

Area	Distance	Time
Large Metro	5 miles	10 minutes
Metro	10 miles	15 minutes
Micro	20 miles	30 minutes
Rural	30 miles	40 minutes
CEAC	60 miles	70 minutes

Proposed Time and Distance Standards

Next Steps:

- Development of the Provider Specialty Matrix:
 - Identifies and categorizes providers into specialties.
 - Merges Taxonomy with the CMS Specialty cross-walk.
 - Allows for improved identification of specialty types available within CCO networks.
- Internal Stakeholder Feedback :
 - Internal clinicians: collaboration to identify providers and categorization.
 - Workforce Committee: feedback to identify concerns in adopting the CMS time and distance standards and county designations.

What's Coming Next

- Gather input from members to better understand member experience and inform improved standards.
- Utilize technology to identify and develop improved standards that will more accurately represent Oregon's population.
- ArcGIS
 - Mapping system that will allow us to visually see where providers are located, in relation to members.
 - May help in identifying appropriate time and distance standards based on where members and providers are located.

Feedback and Discussion



Please submit any additional comments, questions, or feedback via email to HSD.QualityAssurance@odhsoha.oregon.gov