

November 30, 2016

The Honorable Edward Ehlinger, MD, MSPH
Commissioner
Minnesota Department of Health
625 N. Robert St.
St. Paul, MN 55155-2538

Via email

Ed.ehlinger@state.mn.us

Dear Commissioner Ehlinger:

We write today with concern about the availability of health care services in 2017 in Southwest Minnesota. As you know, under Minnesota law, insurance companies that sell health plans that require or incentivize patients to use narrow provider networks must ensure that the narrow network provide patients with sufficient access to providers within defined geographic service areas. Specifically, the lesser of 30 miles or 30 minutes for primary care, mental health, and general hospital services and 60 miles or 60 minutes for specialty physician services and specialized hospital services.

The narrow networks being offered in Lyon, Lincoln, Rock and Pipestone counties by Blue Cross Blue Shield (BCBS) have raised great concern among patients in this region. The BCBS plan does not include Avera providers as an option in the narrow network in the individual plans being sold in these counties. There are about 1,675 BCBS individual plans in Lyon and Lincoln Counties, and approximately 1,855 individual market customers are impacted in Rock and Pipestone Counties.

As a result, many patients will be required to change providers. Luverne will be the nearest in-network provider for Pipestone; Canby will be the nearest for Marshall. This will lead to hardships for patients including disruption of long standing physician and hospital care relationships, the added challenge of transferring medical records to other providers, and increased travel to other communities for care. We have significant concerns regarding access to obstetrical care within reasonable geographic distance, and access to OB/GYN services. As an example, Avera Marshall is not considered in-network for the Blue Connect plan in Lyon County – Avera Marshall is the only hospital in Lyon County that delivers babies; 537 deliveries in fiscal year 2016.

In addition, there is widespread concern that there may be insufficient capacity among those providers who are considered to be in-network (especially mental health services) to handle the influx of new patients precipitated by the narrow network design. Many providers who are now considered in-network already have a substantial patient caseload and may not be available to accept the new patients who have been displaced from their prior health care provider relationship. This may result in longer travel to distant

communities to find health care providers who have the capacity to accept the new patients.

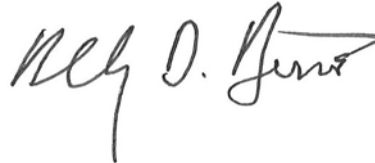
As you know, there is already a shortage of physician and other provider services throughout Greater Minnesota and particularly in Lyon, Lincoln, Rock and Pipestone counties. Under these new narrow network systems, the number of providers available to many patients in the individual market may be further limited.

We have attempted several times to contact BCBS but have not received a response. On behalf of the patients in Lyon, Lincoln, Rock and Pipestone counties. I request that you review the narrow BCBS network imposed on this region and ensure that its implementation in 2017 will not reduce patient access to care. To the extent that it does, the Minnesota Department of Health should require to BCBS to re-establish that the network has sufficient health care capacity.

Sincerely,



Mary Maertens
Regional President & CEO
Avera Marshall
Administrator, Avera Tyler



Bradley Burris
CEO
Pipestone County Medical Center

Cc: Gov. Mark Dayton, Sen. Bill Weber, Sen. Gary Dahms,
Rep. Joe Schoemaker, Rep. Chris Swedzinski