

MILLIMAN RESEARCH REPORT

Addiction and mental health vs. physical health: Analyzing disparities in network use and provider reimbursement rates

A quantitative approach to investigating nonquantitative treatment limitations: 42 million lives, three years, state-by-state analysis

Commissioned by Mental Health Treatment and Research Institute LLC, a not-for-profit subsidiary of The Bowman Family Foundation.

December 2017

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As state and federal regulators increase their focus on enforcement of mental health and addiction parity laws, nonquantitative treatment limitations have emerged as a key trouble area for some health plans.

The Final Rules (FR) of the Mental Health Parity and Addiction Equity Act of 2008 (MHPAEA) contain the provision that any processes, strategies, evidentiary standards, and other factors used in managing mental health and substance use benefits (“behavioral” benefits) must be comparable to, and applied no more stringently than, those used in managing the “medical/surgical” benefits.¹ This includes medical management standards, prescription drug formulary design, network adequacy, provider fee levels, and step therapies, among other processes. These nonquantitative treatment limits (NQTLs) are just as important in the implementation of the Final Rules as the quantitative financial requirements and treatment limits that get most of the attention of health plans and employers. Recent studies have identified difficulty in access to behavioral healthcare providers.^{2,3}

A determination of compliance or noncompliance with the MHPAEA rules for NQTLs generally requires a careful qualitative review of a plan’s or health plan issuer’s care management protocols by competent clinical and legal professionals. However, in some areas, it is possible to use quantitative methods to identify issues that warrant further investigation.⁴ Based on an analysis of two large research databases of administrative claims data, we have identified significantly higher rates of out-of-network use for behavioral care compared to medical/surgical care, and have also found that medical/surgical providers are paid at higher rates than behavioral providers, often for providing the same services.

In this report, we have focused on two quantitative analyses: (1) out-of-network utilization rates for inpatient and outpatient facility services, as well as professional office visits, and (2) reimbursement rates for office visits for in-network healthcare providers. Using two large national research databases containing medical claims records from major insurers for preferred provider organizations (PPOs) covering nearly 42 million individuals as of 2015 across the United States, we have identified disparities in both out-of-network utilization and reimbursement rates for medical/surgical providers in comparison to behavioral providers.

Overview

Overall, we found that patients used an out-of-network provider for a substantially higher proportion of behavioral care than they did for medical/surgical care. Between 2013 and 2015, the proportion of inpatient facility services for behavioral healthcare that were provided out-of-network was 2.8 to 4.2 times higher than for medical/surgical services, and the proportion of outpatient facility services for behavioral healthcare that were provided out-of-network was 3.0 to 5.8 times higher than for medical/surgical services. Additionally, the proportion of behavioral office visits that were provided out-of-network was 4.8 to 5.1 times higher than for medical/surgical primary care office visits, and 3.6 to 3.7 times higher than for medical/surgical specialist office visits (primary care and specialist providers in this report are medical/surgical providers). Figure 1 shows the higher proportion of out-of-network use for behavioral versus medical/surgical care, by care setting and year. For example, the orange bar for inpatient facility indicates that, in 2015, the proportion of inpatient facility care that was provided out-of-network was over four times higher for behavioral care than for medical/surgical care.

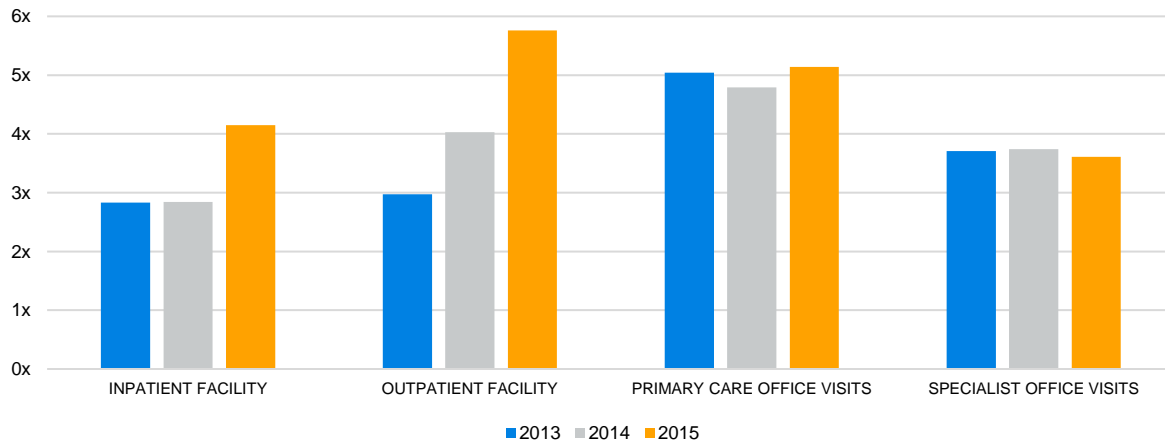
¹ The full text of the Final Rules may be found in the Federal Register, Vol. 78, No. 219, November 13, 2013, at <https://www.gpo.gov/fdsys/pkg/FR-2013-11-13/pdf/2013-27086.pdf>.

² Mental Health Association of Maryland (January 2015). Access to Psychiatrists in 2014 Qualified Health Plans.

³ NAMI (April 2015). A Long Road Ahead, Achieving True Parity in Mental Health and Substance Use Care.

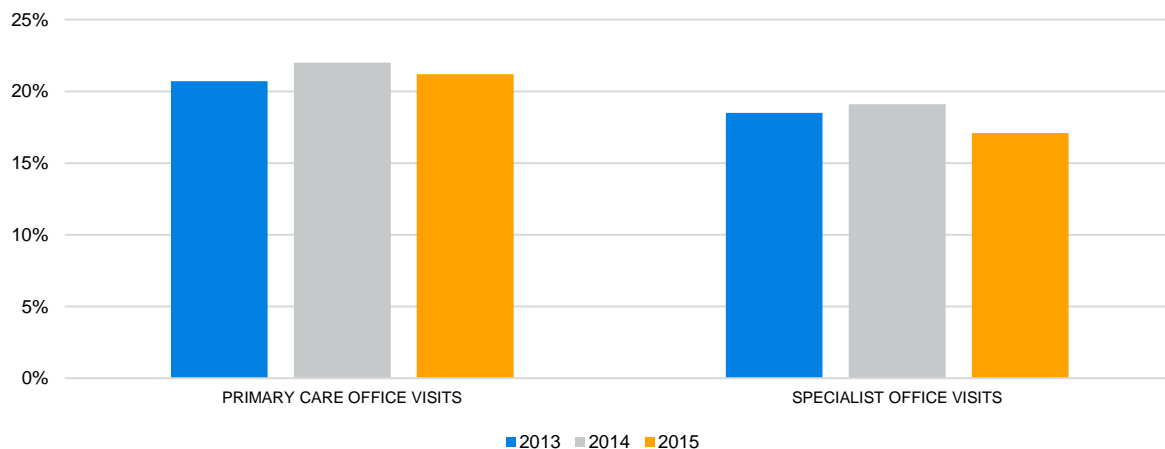
⁴ Examples from the Final Rules contain quantitative elements of NQTL compliance.

FIGURE 1: HIGHER PROPORTION OF OUT-OF-NETWORK CARE FOR BEHAVIORAL VS. MEDICAL/SURGICAL



Additionally, we found that medical/surgical providers received higher reimbursement rates (relative to Medicare-allowed amounts) than behavioral providers for comparable services. Between 2013 and 2015, primary care providers were paid 20.7% to 22.0% higher rates for office visits than behavioral providers, and medical/surgical specialty care providers were paid 17.1% to 19.1% higher rates for office visits than behavioral providers. Lower reimbursement rates provided to behavioral providers are a major contributor to lower network participation rates by these providers, and to potential access challenges for behavioral healthcare.^{2,3}

FIGURE 2: HIGHER PROVIDER PAYMENTS FOR MEDICAL/SURGICAL OFFICE VISITS COMPARED TO BEHAVIORAL OFFICE VISITS



NETWORK UTILIZATION RATES

A variety of factors can influence a provider’s decision of whether or not to participate in a particular health plan’s network, but agreement on appropriate fee levels with the payer is typically a key consideration. When both parties are unable to come to favorable terms, providers are less likely to opt in to a health plan’s network, and as a result patients may have fewer options for in-network care. In-network care typically has lower member copays or coinsurance requirements compared to out-of-network benefits. As a result, if there are in-network access challenges, patients who choose to visit out-of-network providers typically pay more out-of-pocket for the services.

Some patients may want to avoid the higher costs and delay seeking needed services from behavioral healthcare providers, which can lead to less effective care.⁵

We analyzed in-network and out-of-network utilization rates for inpatient facility care,⁶ outpatient facility care,⁷ and professional office visits, separately for medical/surgical services and behavioral healthcare services, across the United States from 2013 to 2015, focusing on patients covered by PPO plans that offer coverage for both in-network and out-of-network providers.

In 2015, the most recent year we studied, we found that out-of-network providers (including both facilities and professionals) provided 4.0% of medical/surgical care in an inpatient setting, while providing 16.7% of behavioral care in the same setting. For outpatient facility care, the difference was even larger. We found that out-of-network providers (including facilities and professionals) provided 5.5% of medical/surgical care in an outpatient facility setting, while providing 31.6% of behavioral care in the same setting. Additionally, out-of-network providers provided 3.7% of primary care office visits and 5.2% of specialist office visits for medical/surgical care, while providing 18.7% of behavioral office visits.

Nationally in 2015 the proportion of behavioral care that was provided out-of-network was 3.6 to 5.8 times higher than medical/surgical care, varying by care setting.

Figure 3 shows the national average proportion of care provided by care setting and calendar year, separately for medical/surgical care and for behavioral care. For office visits, medical/surgical care is subdivided between primary care visits and specialist visits. The “higher proportion of behavioral out-of-network use” column shows the relative proportion of behavioral utilization that took place out-of-network, compared to medical/surgical utilization.

FIGURE 3: NETWORK UTILIZATION RATES FOR PPO PLANS BY CARE SETTING AND YEAR

CARE SETTING AND YEAR	OUT-OF-NETWORK UTILIZATION		BEHAVIORAL	HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK USE	
	MEDICAL/SURGICAL			COMPARED TO PRIMARY CARE	COMPARED TO SPECIALISTS
INPATIENT FACILITY					
2013	3.4%		9.6%	2.8X	
2014	4.0%		11.3%	2.8X	
2015	4.0%		16.7%	4.2X	
OUTPATIENT FACILITY					
2013	5.3%		15.6%	3.0X	
2014	5.6%		22.5%	4.0X	
2015	5.5%		31.6%	5.8X	
OFFICE VISITS	PRIMARY CARE	SPECIALISTS	BEHAVIORAL	COMPARED TO PRIMARY CARE	COMPARED TO SPECIALISTS
2013	3.8%	5.1%	19.0%	5.0X	3.7X
2014	4.0%	5.1%	16.2%	4.8X	3.7X
2015	3.7%	5.2%	18.7%	5.1X	3.6X

⁵ Wang, P.S., Berglund, P.A., Olsson, M., & Kessler, R.C. (2004). Delays in Initial Treatment Contact after First Onset of a Mental Disorder. *Health Services Research*, 39(2), 393–416. Retrieved August 4, 2017 from https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1361014/pdf/hesr_00234.pdf.

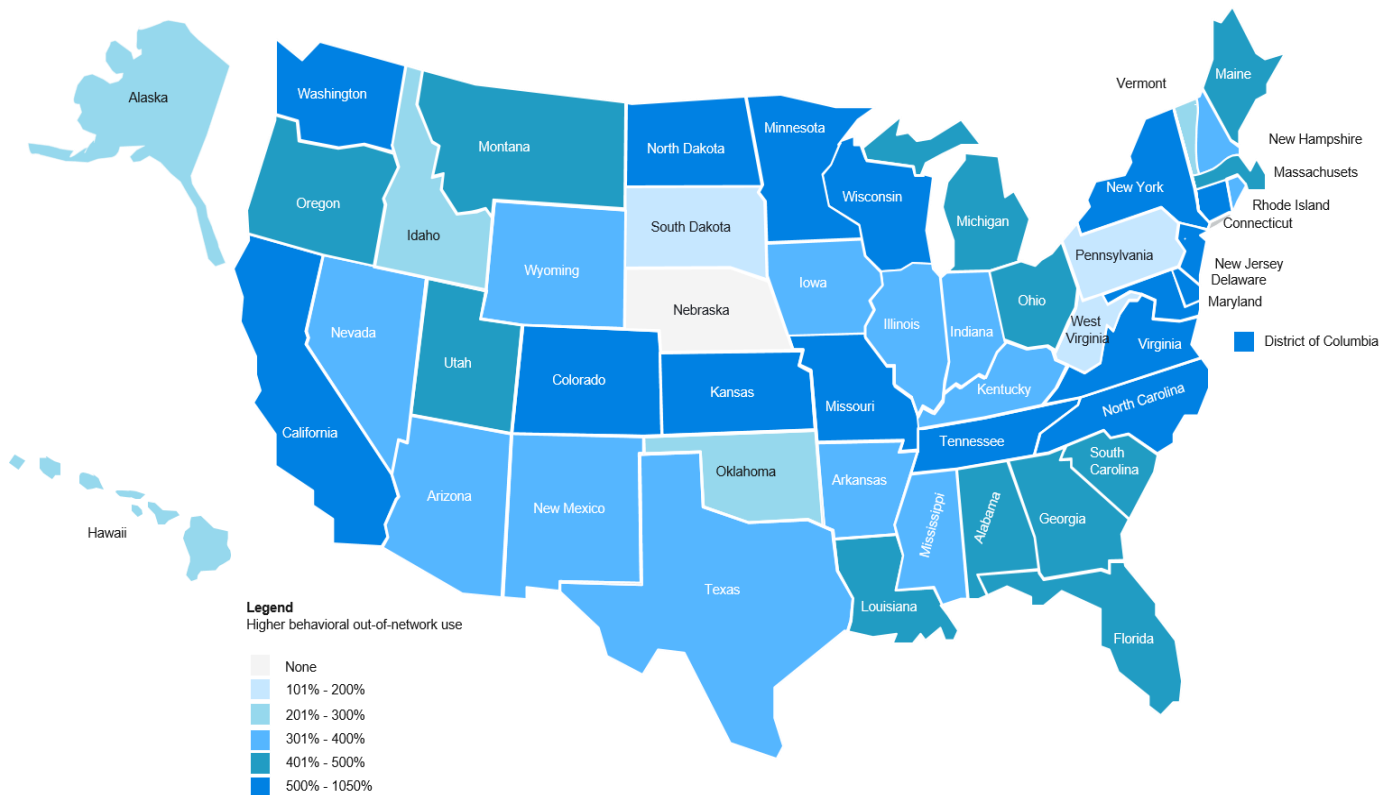
⁶ The inpatient facility category compares all medical or surgical care provided in an inpatient or skilled nursing facility setting to all behavioral care in an inpatient or residential facility setting.

⁷ The outpatient facility category compares physical, occupational, speech, and cardiovascular therapy for medical or surgical care provided in an outpatient setting to intensive outpatient and partial hospitalization services for behavioral health conditions in an outpatient setting.

While the level of out-of-network utilization for office visits was relatively stable from 2013 through 2015, we observed a rapid increase in out-of-network use for behavioral care in both inpatient and outpatient facility settings. Out-of-network utilization for behavioral care nearly doubled in the inpatient setting, increasing from 9.6% to 16.7%, and more than doubled in the outpatient facility setting, increasing from 15.6% to 31.6% between 2013 and 2015. The MHPAEA Interim Final Rules became effective for plans renewing on or after July 1, 2010, and the Final Rules became effective for plans renewing on or after July 1, 2014. However, we do not see any clear reductions in out-of-network use for behavioral care since this effective date, and have actually seen increases for inpatient and outpatient facility settings.

Across the United States, the difference between medical/surgical and behavioral use of out-of-network providers varies greatly among states. In 2015, only one state experienced lower out-of-network use for behavioral office visits compared to primary care office visits (Nebraska), and, in other states, the proportion of behavioral office visits that were provided out-of-network varied from 1.4 (South Dakota) to 10.5 (Connecticut) times higher than for primary care office visits. The map in Figure 4 gives a visual representation of the differences in out-of-network utilization between primary care office visits and behavioral care office visits nationwide. States shaded light blue had smaller differences, while states shaded dark teal had the largest differences. See appendices A through I for sample utilization counts and results by state.

FIGURE 4: HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK CARE: BEHAVIORAL OFFICE VISITS VS. PRIMARY CARE OFFICE VISITS IN 2015



The observed differences between out-of-network utilization rates for behavioral and medical/surgical services point to possible inequitable design and standards for network providers for behavioral services. While other explanations, such as supply-side issues or patient reluctance to switch providers to stay in-network, are certainly possible and likely contribute as well, further investigation is warranted to understand these out-of-network use differences between medical/surgical care and behavioral care.

PROVIDER PAYMENT LEVELS

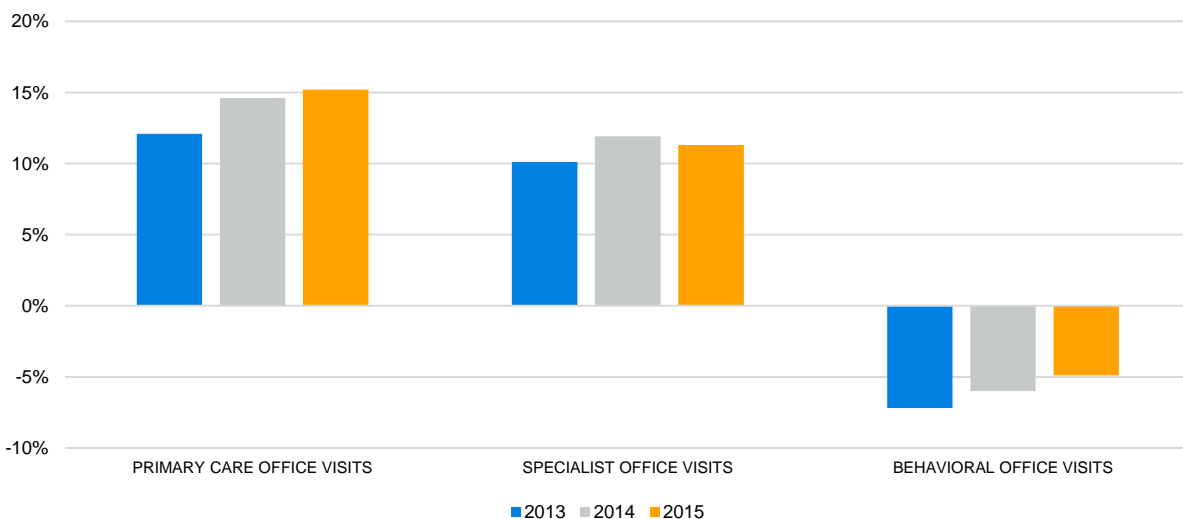
Health plans develop fee schedules to pay providers for professional services. These payment rates for in-network services are developed and included in the contracts that are signed by providers when they agree to become network providers for the health plan. The Interim Final Rules (IFR) and Final Rules (FR) state that these reimbursement rates should be developed and applied in a comparable and no more stringent manner for behavioral providers in comparison to medical/surgical providers.

We examined payment rates for professional office-based services, separately for primary care providers, medical/surgical specialist providers, and behavioral providers across the United States from 2013 to 2015. As with the out-of-network utilization analysis, we focused on patients enrolled in PPO plans that provide both in-network and out-of-network coverage.

In order to account for differences in the mix of services provided by different providers, we examined payment rates relative to the Medicare Physician Fee Schedule amounts in each year for the same services. The use of Medicare-allowed amounts is an industry-recognized approach to adjusting for differences in resource intensity of various professional services. Medicare fees are just one potential benchmark that can be used for gauging provider fees. However, it is an especially important one because many health plans actually define or negotiate their professional fee schedules in terms of their relativity to the Medicare fee schedules.

In 2015, we found that primary care and medical/surgical specialist providers were paid on average 15.2% and 11.3% higher than Medicare-allowed amounts, respectively, while behavioral providers were paid on average 4.9% less than Medicare-allowed amounts. Primary care services were paid 21.2% higher as compared to behavioral services, and specialist services were paid 17.1% higher as compared to behavioral services.

FIGURE 5: PROVIDER PAYMENT LEVEL DIFFERENCES COMPARED TO MEDICARE-ALLOWED AMOUNTS



The two most commonly billed services for office visits are “evaluation & management” (E&M) visits for patients with low and moderate complexity, which are billed for using Current Procedural Terminology (CPT) codes 99213 and 99214. As of 2013, primary care, medical/surgical specialist, and behavioral physicians (psychiatrists) can all bill for these services. Because the Medicare-allowed amounts for these services do not vary by type of physician, the payment levels provided for these services offer the most direct apples-to-apples comparison between primary care, medical/surgical specialists, and behavioral physician payment levels. The payment differences observed across all office visits were persistent for these specific services as well. Primary care and medical/surgical specialist physicians were paid 20.6% and 14.1% higher, respectively, for low complexity E&M visits than psychiatrists, and were paid 20.0% and 17.8% higher for moderate complexity E&M visits.

FIGURE 6: HIGHER PAYMENTS FOR PRIMARY CARE AND MEDICAL/SURGICAL SPECIALIST E&M VISITS RELATIVE TO PSYCHIATRISTS

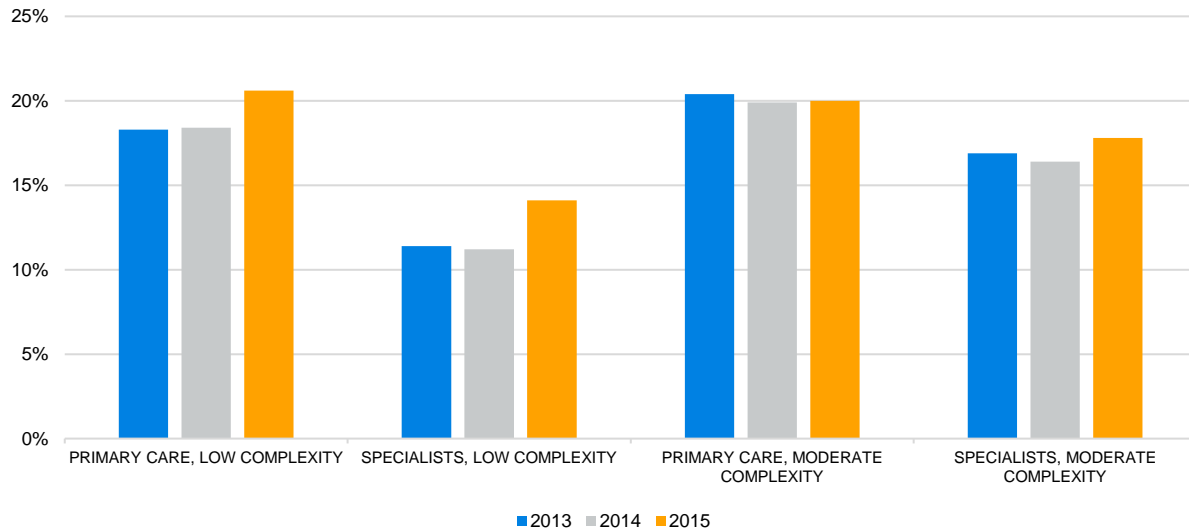


Figure 7 shows the national average allowed charge levels as a percentage of Medicare-allowed charges for office visits from 2013 to 2015 for PPO plans, separately for primary care, medical/surgical specialist, and behavioral office visits. We present charge levels in aggregate across all office visits, and for both low and moderate complexity E&M visits (CPT codes 99213 and 99214.) The “higher payments compared to behavioral” columns show the percentage increase in reimbursement for primary care and specialist services compared to behavioral services.

FIGURE 7: IN-NETWORK PROVIDER PAYMENT LEVELS RELATIVE TO MEDICARE FOR OFFICE VISITS IN PPO PLANS

CARE SETTING AND CALENDAR YEAR	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PAYMENTS COMPARED TO BEHAVIORAL	
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL	PRIMARY CARE	SPECIALISTS
ALL OFFICE VISITS					
2013	112.1%	110.1%	92.8%	20.7%	18.5%
2014	114.6%	111.9%	94.0%	22.0%	19.1%
2015	115.2%	111.3%	95.1%	21.2%	17.1%
LOW COMPLEXITY E&M (CPT 99213*)					
2013	112.6%	106.0%	95.1%	18.3%	11.4%
2014	115.1%	108.1%	97.2%	18.4%	11.2%
2015	115.4%	109.2%	95.7%	20.6%	14.1%
MODERATE COMPLEXITY E&M (CPT 99214*)					
2013	110.9%	107.8%	92.2%	20.4%	16.9%
2014	113.3%	110.0%	94.5%	19.9%	16.4%
2015	114.2%	112.2%	95.2%	20.0%	17.8%

* Note: Medicare sets an allowed fee amount for CPT codes 99213 and 99214 that is identical for all M.D.s, including psychiatrists.

Next steps

While the disparity in network use levels that we uncovered with this research may point to underlying issues of noncompliance with MHPAEA, this analysis is not able to conclusively attribute these observations to any specific cause(s). A variety of market forces may contribute to these results, and additional assessment, including careful qualitative and quantitative reviews of health plan issuer's NQTL practices, would be needed to confirm the presence or absence of any noncompliant practices surrounding NQTLs occurring at any particular health plan issuer. To the extent that market forces may contribute to these results, plans must still comply with MHPAEA and the NQTL regulations. This highlights the need for auditing by plans to ensure compliance with all NQTLs that may be limiting access to the behavioral health benefit.

A health plan should evaluate its provider fee schedules to determine whether there are differences in payment levels between physical healthcare providers and behavioral healthcare providers. Plans and issuers may consider a wide array of factors in determining provider reimbursement rates for both medical/surgical services and mental health and substance use disorder services. This is the case so long as, pursuant to the NQTL rule, "as written and in operation, any processes, strategies, evidentiary standards, or other factors used in applying the nonquantitative treatment limitation to mental health or substance use disorder benefits in the classification are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, or other factors used in applying the limitation with respect to medical/surgical benefits in the classification."

Our findings of payment disparities in this data suggest that there is value in plans conducting a detailed assessment of provider payment rate methodologies to ensure compliance with MHPAEA and its NQTL regulations. Problems will not necessarily be found in every situation, but disparities appear to be common enough that close attention is warranted. If the plan finds that it is not parity-compliant in this area, the plan should increase its payment levels to the behavioral healthcare providers to get them compliant with parity. That increase in payment rates could also lead to an increase in the desire of behavioral healthcare providers to join that health plan's provider network, which could then, in turn, lead to higher use of in-network services for behavioral healthcare. This then addresses the other potential NQTL compliance issue of disparate out-of-network utilization rates between physical and behavioral healthcare. Lastly, more utilization of effective behavioral healthcare could improve the health of the plan's members with mental health and substance use disorders, thus helping the plan to achieve elements of the quadruple aim, including improving the health of insured members, improving the consumer experience, and potentially reducing healthcare costs and improving the providers' experience.

While MHPAEA initially came into effect in 2010, the rollout of the associated rules and any enforcement actions from regulators has been gradual. However, we have seen increasing attention given to this issue by health plans as well as state and federal regulators in recent years, with many states now requiring formal parity compliance attestations as part of annual plan filings with state divisions of insurance. Much of the focus of health plans and regulators has been on quantitative treatment limitations, such as copays, coinsurance, application of deductibles, etc., but NQTLs are equally important to consider. The majority of high-profile litigation and enforcement actions related to parity in recent years has been due to violations related to NQTLs. The rules allow for penalties of up to \$100 per member per day for plans that are found to be noncompliant.

Network admission standards and provider payment levels are only two of the NQTLs that plans should be mindful of as they consider how to increase access to in-network behavioral health benefits to put them on par with medical/surgical benefits, thereby equalizing consumer out-of-pocket costs. Careful consideration should also be given to medical management standards, prescription drug formulary design, step therapy protocols, requirements to complete a course of treatment in order for benefits to be provided, and restrictions based on geography, facility type, provider specialty, or similar criteria.

Health plan issuers with questions or concerns about their compliance with MHPAEA should confer with competent clinical, actuarial, and legal professionals to ensure that appropriate policies for quantitative or nonquantitative treatment limitations are in place.

Caveats

This report was commissioned by Mental Health Treatment and Research Institute LLC, a not-for-profit subsidiary of The Bowman Family Foundation. All opinions and conclusions are those of the authors. Milliman does not intend to create a legal duty to any recipients of this report.

DATA RELIANCE

We relied primarily on two large, national, research databases for this analysis:

- 2013 through 2015 Truven MarketScan Commercial Claims and Encounters Databases
- 2013 through 2015 Milliman Consolidated Health Cost Guidelines™ Databases

The Truven Health MarketScan Research Databases reflect the healthcare experience of employees and dependents covered by the health benefit programs of large employers, health plans, and government organizations. These claims data are collected from approximately 350 payers. The MarketScan Commercial Claims and Encounters Database includes data from active employees, early retirees, COBRA continues, and dependents insured by employer-sponsored plans.

The Milliman Consolidated Health Cost Guidelines Databases contain healthcare experience primarily for large group commercial members, using data contributed from a number of payers with which Milliman has data purchase or trade agreements. Milliman collects this data from various health plans for use in product development, research, and client projects.

We have not audited the data sets used for this analysis, but have extensive experience using them, and have found them to be reasonable. Any errors or omissions in the data sets could affect the results in this report. Some of the data contributors may use third-party vendors to provide behavioral healthcare services, which could lead to the exclusion of some behavioral healthcare claims from these data sets. We are not able to identify coverage levels or use of third-party vendors for behavioral healthcare in the data sets used for this analysis.

The national results discussed in this white paper reflect the geographic and demographic mixes of data available in the research databases used for this analysis. We have not normalized the data to reflect a standard geographic or demographic distribution for the United States. All state-specific and national results represent a blend of both research databases used for this analysis.

PROVIDER AND SERVICE CATEGORIZATION

We relied on provider specialty codes in order to categorize the data by primary care, medical/surgical specialist, or behavioral healthcare provider. The data fields used for this purpose contained a mix of both custom and industry standard coding schemes, varying by data contributor. The various coding schemes were standardized to Centers for Medicare and Medicaid Services (CMS) specialty codes in order to consistently identify provider specialty types across all data contributors.

The most prevalent provider types in the primary care category included family practice, internal medicine, and pediatric medicine providers. The most prevalent provider types in the specialty category included dermatology, orthopedic surgery, and obstetrics/gynecology fields. Finally, the most prevalent provider types in the behavioral category included psychiatrists, supportive therapists, and psychologists.

Additionally, we relied on revenue and procedural codes to classify facility services and office visits. Low and moderate complexity E&M visits (CPT codes 99213 and 99214) comprised the largest portion of total units for professional office visits. The inpatient facility category includes all medical and surgical care in an inpatient or skilled nursing facility setting and all behavioral care in an inpatient or residential facility setting. The outpatient facility category includes physical, occupational, speech, and cardiovascular therapy for medical/surgical conditions in an outpatient setting and intensive outpatient and partial hospitalization services for behavioral health conditions.

QUALIFICATIONS

Guidelines issued by the American Academy of Actuaries require actuaries to include their professional qualifications in all actuarial communications. Stephen P. Melek and Daniel Perlman are members of the American Academy of Actuaries, and meet the qualification standards for performing the analyses in this report.

Commissioned by Mental Health Treatment and Research Institute LLC, a not-for-profit subsidiary of The Bowman Family Foundation.

Appendices

The following appendices provide detailed results for each state, including sample sizes, for 2013 through 2015. Please review sample sizes before relying on the results for any particular state.

- Inpatient Facility Network Utilization Rates for PPO Plans
 - 2013 - Appendix A
 - 2014 - Appendix B
 - 2015 - Appendix C
- Outpatient Facility Network Utilization Rates for PPO Plans
 - 2013 - Appendix D
 - 2014 - Appendix E
 - 2015 - Appendix F
- Office Visit Network Utilization Rates for PPO Plans
 - 2013 - Appendix G
 - 2014 - Appendix H
 - 2015 - Appendix I
- In-network Provider Payment Levels Relative to Medicare for Office Visits in PPO Plans
 - 2013 - Appendix J
 - 2014 - Appendix K
 - 2015 - Appendix L

APPENDIX A

INPATIENT FACILITY NETWORK UTILIZATION RATES FOR 2013 PPO PLANS

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT- OF-NETWORK USE	SAMPLE SIZE (NUMBER OF CLAIMS)	
	MEDICAL/SURGICAL	BEHAVIORAL		MEDICAL/SURGICAL	BEHAVIORAL
INPATIENT FACILITY					
ALL STATES	3.4%	9.6%	2.83X	2,671,147	178,086
ALABAMA	2.5%	12.2%	4.83X	28,463	1,868
ALASKA	11.4%	22.2%	1.95X	3,033	225
ARIZONA	2.9%	13.1%	4.53X	35,107	2,280
ARKANSAS	5.0%	19.0%	3.78X	17,924	1,355
CALIFORNIA	2.9%	14.1%	4.91X	145,628	11,311
COLORADO	2.7%	10.4%	3.87X	28,328	1,779
CONNECTICUT	1.6%	13.5%	8.63X	32,950	2,571
DELAWARE	0.9%	8.2%	9.21X	14,743	1,770
FLORIDA	2.9%	14.8%	5.11X	94,188	6,622
GEORGIA	2.3%	9.5%	4.20X	68,631	4,201
HAWAII	9.6%	12.0%	1.26X	387	25
IDAHO	1.6%	6.3%	3.89X	24,836	1,702
ILLINOIS	3.5%	10.2%	2.91X	72,138	4,898
INDIANA	1.9%	4.8%	2.55X	84,664	6,196
IOWA	1.8%	3.6%	2.03X	48,078	2,833
KANSAS	3.5%	8.2%	2.31X	20,678	981
KENTUCKY	2.3%	6.2%	2.68X	40,482	2,738
LOUISIANA	2.6%	7.8%	3.03X	46,128	3,429
MAINE	1.8%	8.8%	4.97X	10,249	581
MARYLAND	2.2%	11.9%	5.50X	26,237	1,797
MASSACHUSETTS	5.7%	12.3%	2.15X	24,934	2,180
MICHIGAN	11.2%	17.2%	1.53X	69,269	5,969
MINNESOTA	1.2%	2.4%	2.12X	44,191	4,104
MISSISSIPPI	5.0%	9.7%	1.92X	13,965	856
MISSOURI	3.9%	8.7%	2.22X	77,376	3,952
MONTANA	2.1%	2.9%	1.39X	9,989	699
NEBRASKA	27.3%	10.4%	0.38X	58,008	1,951
NEVADA	2.9%	12.3%	4.26X	15,734	1,170
NEW HAMPSHIRE	1.9%	11.8%	6.14X	5,638	476
NEW JERSEY	2.8%	20.7%	7.36X	41,499	3,317
NEW MEXICO	6.0%	22.5%	3.77X	8,004	507
NEW YORK	1.9%	11.4%	5.84X	201,908	13,539
NORTH CAROLINA	2.8%	10.0%	3.59X	48,832	2,916
NORTH DAKOTA	3.5%	5.2%	1.50X	3,707	211
OHIO	3.0%	6.9%	2.32X	226,643	12,561
OKLAHOMA	4.5%	12.9%	2.83X	17,339	949

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT- OF-NETWORK USE	SAMPLE SIZE (NUMBER OF CLAIMS)	
	MEDICAL/SURGICAL	BEHAVIORAL		MEDICAL/SURGICAL	BEHAVIORAL
OREGON	2.8%	13.2%	4.70X	50,696	2,682
PENNSYLVANIA	0.9%	5.1%	5.68X	294,028	19,066
RHODE ISLAND	1.2%	12.1%	10.17X	4,357	544
SOUTH CAROLINA	3.5%	8.3%	2.38X	64,056	4,096
SOUTH DAKOTA	3.0%	2.6%	0.87X	11,621	849
TENNESSEE	1.9%	3.5%	1.86X	111,628	8,993
TEXAS	4.0%	10.1%	2.55X	153,669	8,251
UTAH	4.2%	17.1%	4.04X	43,870	3,131
VERMONT	5.4%	18.6%	3.45X	1,616	113
VIRGINIA	3.0%	7.8%	2.55X	53,568	4,146
WASHINGTON	3.1%	9.5%	3.07X	87,786	6,751
WEST VIRGINIA	2.6%	7.1%	2.76X	27,520	1,471
WISCONSIN	3.5%	10.1%	2.89X	53,556	3,240
WYOMING	9.1%	36.4%	4.00X	2,584	198
WASHINGTON D.C.	5.0%	8.3%	1.68X	684	36

APPENDIX B

INPATIENT FACILITY NETWORK UTILIZATION RATES FOR 2014 PPO PLANS

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT-OF- NETWORK USE	SAMPLE SIZE (NUMBER OF CLAIMS)	
	MEDICAL/SURGICAL	BEHAVIORAL		MEDICAL/SURGICAL	BEHAVIORAL
INPATIENT FACILITY					
ALL STATES	4.0%	11.3%	2.84X	2,689,397	184,394
ALABAMA	2.4%	15.4%	6.42X	27,565	1,732
ALASKA	11.2%	27.2%	2.42X	4,533	453
ARIZONA	3.7%	16.8%	4.61X	32,432	2,196
ARKANSAS	5.7%	21.1%	3.67X	16,420	1,189
CALIFORNIA	2.9%	15.0%	5.12X	144,704	11,055
COLORADO	2.8%	15.3%	5.42X	29,005	2,078
CONNECTICUT	6.7%	16.5%	2.45X	31,906	2,459
DELAWARE	0.7%	8.1%	11.72X	18,106	2,052
FLORIDA	3.8%	19.0%	4.95X	100,248	7,509
GEORGIA	4.3%	8.2%	1.90X	55,279	3,472
HAWAII	10.4%	15.0%	1.44X	452	20
IDAHO	3.0%	8.9%	2.91X	26,258	1,998
ILLINOIS	4.6%	7.3%	1.56X	70,561	4,405
INDIANA	1.9%	5.7%	2.92X	80,488	6,115
IOWA	2.1%	4.4%	2.11X	52,137	2,811
KANSAS	3.6%	8.9%	2.50X	21,756	942
KENTUCKY	1.8%	8.3%	4.60X	55,895	3,805
LOUISIANA	2.2%	9.3%	4.27X	48,913	4,140
MAINE	2.7%	7.8%	2.90X	10,021	576
MARYLAND	2.3%	14.4%	6.34X	23,836	1,835
MASSACHUSETTS	6.2%	11.5%	1.84X	23,599	2,019
MICHIGAN	9.3%	12.4%	1.34X	68,614	5,707
MINNESOTA	1.2%	2.8%	2.26X	39,857	3,510
MISSISSIPPI	4.5%	13.9%	3.10X	13,562	990
MISSOURI	4.3%	9.1%	2.14X	85,354	4,265
MONTANA	5.5%	14.9%	2.70X	3,289	168
NEBRASKA	32.0%	18.2%	0.57X	55,040	1,934
NEVADA	3.8%	10.9%	2.84X	14,827	1,101
NEW HAMPSHIRE	3.6%	18.1%	4.97X	6,102	531
NEW JERSEY	2.8%	22.7%	8.22X	41,698	3,403
NEW MEXICO	7.4%	19.9%	2.69X	7,784	381
NEW YORK	1.9%	11.1%	5.78X	193,893	13,000
NORTH CAROLINA	2.9%	9.5%	3.24X	75,569	4,620
NORTH DAKOTA	4.1%	6.7%	1.62X	3,336	239
OHIO	3.8%	8.4%	2.18X	216,942	12,570
OKLAHOMA	3.1%	13.3%	4.27X	24,877	1,484

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT-OF- NETWORK USE	SAMPLE SIZE (NUMBER OF CLAIMS)	
	MEDICAL/SURGICAL	BEHAVIORAL		MEDICAL/SURGICAL	BEHAVIORAL
OREGON	3.0%	15.7%	5.22X	46,824	2,379
PENNSYLVANIA	1.1%	7.3%	6.35X	292,715	21,142
RHODE ISLAND	2.6%	8.4%	3.19X	4,390	475
SOUTH CAROLINA	4.0%	10.2%	2.52X	65,187	4,606
SOUTH DAKOTA	2.4%	3.2%	1.34X	13,088	943
TENNESSEE	5.7%	12.5%	2.19X	117,746	10,031
TEXAS	4.2%	14.1%	3.34X	157,841	8,924
UTAH	4.5%	18.1%	4.02X	44,957	3,495
VERMONT	9.9%	19.4%	1.97X	1,482	103
VIRGINIA	4.6%	10.0%	2.19X	53,107	4,131
WASHINGTON	3.6%	13.0%	3.62X	82,091	6,323
WEST VIRGINIA	3.2%	9.2%	2.90X	29,538	1,483
WISCONSIN	4.0%	10.9%	2.72X	52,264	3,366
WYOMING	9.8%	18.4%	1.88X	2,595	190
WASHINGTON D.C.	2.1%	10.3%	4.88X	714	39

APPENDIX C

INPATIENT FACILITY NETWORK UTILIZATION RATES FOR 2015 PPO PLANS

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT-OF- NETWORK USE	SAMPLE SIZE (NUMBER OF CLAIMS)	
	MEDICAL/SURGICAL	BEHAVIORAL		MEDICAL/SURGICAL	BEHAVIORAL
INPATIENT FACILITY					
ALL STATES	4.0%	16.7%	4.15X	2,170,753	161,919
ALABAMA	1.9%	18.0%	9.38X	24,028	1,606
ALASKA	9.0%	24.8%	2.76X	3,847	379
ARIZONA	3.1%	20.6%	6.67X	27,183	2,147
ARKANSAS	5.1%	14.8%	2.93X	13,646	957
CALIFORNIA	3.8%	28.2%	7.41X	66,167	6,434
COLORADO	3.0%	22.8%	7.48X	20,754	1,594
CONNECTICUT	1.6%	27.1%	16.60X	16,252	1,326
DELAWARE	0.6%	10.5%	17.57X	17,244	2,058
FLORIDA	3.6%	37.2%	10.41X	88,290	10,140
GEORGIA	2.9%	11.9%	4.04X	58,265	4,100
HAWAII	7.4%	25.0%	3.39X	258	12
IDAHO	3.2%	10.8%	3.35X	25,442	2,093
ILLINOIS	5.3%	9.3%	1.77X	55,329	3,683
INDIANA	3.6%	13.5%	3.73X	40,086	2,995
IOWA	2.4%	4.4%	1.85X	50,521	2,971
KANSAS	3.4%	13.5%	3.95X	18,590	713
KENTUCKY	3.5%	9.6%	2.72X	34,017	2,314
LOUISIANA	2.0%	8.5%	4.29X	47,224	4,578
MAINE	1.4%	18.8%	13.62X	6,651	398
MARYLAND	2.5%	17.4%	7.01X	19,091	1,485
MASSACHUSETTS	2.9%	16.8%	5.78X	17,742	1,609
MICHIGAN	3.9%	10.3%	2.61X	52,540	4,544
MINNESOTA	1.9%	11.5%	6.19X	32,831	3,176
MISSISSIPPI	4.8%	18.7%	3.90X	10,550	791
MISSOURI	4.0%	14.0%	3.53X	71,667	3,619
MONTANA	5.5%	19.5%	3.56X	2,564	185
NEBRASKA	34.8%	22.8%	0.66X	51,659	2,077
NEVADA	4.0%	24.2%	6.05X	9,972	768
NEW HAMPSHIRE	2.8%	28.3%	10.06X	3,626	431
NEW JERSEY	2.6%	28.6%	11.17X	32,550	2,714
NEW MEXICO	6.8%	20.5%	3.00X	6,639	273
NEW YORK	2.2%	18.3%	8.43X	150,882	11,386
NORTH CAROLINA	3.2%	15.1%	4.74X	42,315	2,896
NORTH DAKOTA	4.7%	11.2%	2.38X	3,093	196
OHIO	4.7%	10.7%	2.30X	163,937	9,322
OKLAHOMA	3.4%	14.2%	4.17X	21,678	1,378

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT-OF- NETWORK USE	SAMPLE SIZE (NUMBER OF CLAIMS)	
	MEDICAL/SURGICAL	BEHAVIORAL		MEDICAL/SURGICAL	BEHAVIORAL
OREGON	2.8%	18.1%	6.54X	43,767	2,302
PENNSYLVANIA	1.1%	11.1%	10.03X	254,222	19,867
RHODE ISLAND	2.3%	18.3%	7.85X	2,918	317
SOUTH CAROLINA	3.2%	9.7%	3.08X	61,067	4,323
SOUTH DAKOTA	2.3%	4.8%	2.06X	11,926	852
TENNESSEE	4.7%	18.1%	3.83X	115,992	10,877
TEXAS	3.9%	16.9%	4.35X	141,147	8,674
UTAH	4.0%	23.7%	5.85X	41,802	3,996
VERMONT	7.5%	16.3%	2.16X	1,210	80
VIRGINIA	3.7%	17.0%	4.57X	41,248	3,061
WASHINGTON	4.5%	19.4%	4.32X	78,152	6,234
WEST VIRGINIA	3.6%	12.7%	3.51X	24,593	1,281
WISCONSIN	4.8%	11.3%	2.37X	43,120	2,524
WYOMING	10.5%	26.2%	2.51X	1,959	164
WASHINGTON D.C.	2.2%	15.8%	7.18X	500	19

APPENDIX D

OUTPATIENT FACILITY NETWORK UTILIZATION RATES FOR 2013 PPO PLANS

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT- OF-NETWORK USE	SAMPLE SIZE (NUMBER OF CLAIMS)	
	MEDICAL/SURGICAL	BEHAVIORAL		MEDICAL/SURGICAL	BEHAVIORAL
OUTPATIENT FACILITY					
ALL STATES	5.3%	15.6%	2.97X	9,011,191	1,632,245
ALABAMA	4.5%	8.0%	1.80X	49,553	9,073
ALASKA	14.9%	46.1%	3.09X	7,601	2,583
ARIZONA	7.8%	35.8%	4.60X	65,790	21,617
ARKANSAS	7.3%	38.7%	5.28X	48,658	3,402
CALIFORNIA	4.7%	28.5%	6.10X	247,008	82,559
COLORADO	5.8%	22.4%	3.89X	93,506	15,245
CONNECTICUT	2.9%	23.8%	8.16X	105,480	29,166
DELAWARE	2.1%	17.1%	8.28X	56,795	21,870
FLORIDA	7.3%	43.8%	5.96X	293,386	40,099
GEORGIA	5.4%	21.7%	4.04X	165,013	24,561
HAWAII	12.8%	49.7%	3.88X	1,278	191
IDAHO	3.4%	52.1%	15.27X	69,324	6,074
ILLINOIS	6.7%	12.6%	1.88X	239,762	45,291
INDIANA	4.1%	12.3%	3.00X	289,409	34,011
IOWA	2.3%	4.6%	1.97X	229,414	38,276
KANSAS	6.0%	12.8%	2.12X	73,075	5,941
KENTUCKY	5.7%	17.6%	3.07X	102,362	13,623
LOUISIANA	5.7%	14.9%	2.61X	99,428	22,472
MAINE	4.0%	26.2%	6.61X	51,222	8,630
MARYLAND	8.2%	16.1%	1.96X	48,198	29,709
MASSACHUSETTS	4.8%	17.6%	3.65X	117,206	25,851
MICHIGAN	3.1%	14.2%	4.50X	370,274	24,947
MINNESOTA	2.2%	2.4%	1.10X	213,212	55,520
MISSISSIPPI	8.8%	18.8%	2.14X	41,765	6,938
MISSOURI	6.2%	16.8%	2.73X	337,892	24,498
MONTANA	2.9%	8.9%	3.05X	39,502	2,787
NEBRASKA	28.0%	12.6%	0.45X	143,714	11,912
NEVADA	8.6%	19.7%	2.30X	16,931	6,066
NEW HAMPSHIRE	3.6%	22.3%	6.14X	37,609	3,626
NEW JERSEY	3.2%	29.5%	9.17X	132,714	52,225
NEW MEXICO	6.8%	29.3%	4.30X	22,564	4,910
NEW YORK	7.3%	8.3%	1.13X	451,336	249,932
NORTH CAROLINA	7.6%	19.1%	2.53X	127,000	20,405
NORTH DAKOTA	6.9%	4.9%	0.71X	14,484	1,648
OHIO	5.2%	14.8%	2.87X	1,042,100	88,472
OKLAHOMA	6.5%	25.5%	3.95X	52,207	5,256

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT- OF-NETWORK USE	SAMPLE SIZE (NUMBER OF CLAIMS)	
	MEDICAL/SURGICAL	BEHAVIORAL		MEDICAL/SURGICAL	BEHAVIORAL
OREGON	6.1%	29.2%	4.76X	191,421	24,478
PENNSYLVANIA	2.8%	7.8%	2.81X	1,171,599	268,081
RHODE ISLAND	4.4%	14.3%	3.22X	14,412	4,674
SOUTH CAROLINA	8.2%	18.1%	2.20X	146,194	14,961
SOUTH DAKOTA	4.3%	4.9%	1.14X	47,021	5,946
TENNESSEE	1.7%	6.6%	3.89X	528,836	58,848
TEXAS	10.0%	15.1%	1.52X	405,550	67,780
UTAH	3.8%	42.2%	11.09X	85,924	13,803
VERMONT	10.3%	34.8%	3.39X	10,142	781
VIRGINIA	6.4%	34.1%	5.32X	164,840	21,969
WASHINGTON	2.9%	20.4%	6.98X	370,589	70,570
WEST VIRGINIA	5.2%	26.1%	5.03X	102,331	8,370
WISCONSIN	5.3%	12.8%	2.42X	266,984	31,547
WYOMING	16.2%	35.7%	2.21X	7,241	694
WASHINGTON D.C.	0.5%	19.6%	37.39X	1,335	357

APPENDIX E

APPENDIX E: OUTPATIENT FACILITY NETWORK UTILIZATION RATES FOR 2014 PPO PLANS

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT-OF- NETWORK USE	SAMPLE SIZE (NUMBER OF CLAIMS)	
	MEDICAL/SURGICAL	BEHAVIORAL		MEDICAL/SURGICAL	BEHAVIORAL
OUTPATIENT FACILITY					
ALL STATES	5.6%	22.5%	4.03X	9,644,388	1,877,701
ALABAMA	5.0%	15.8%	3.14X	50,143	9,858
ALASKA	13.3%	39.5%	2.98X	20,939	4,512
ARIZONA	7.9%	41.8%	5.29X	62,228	26,901
ARKANSAS	8.6%	35.7%	4.16X	49,158	3,691
CALIFORNIA	4.4%	38.4%	8.71X	260,262	111,221
COLORADO	5.7%	28.2%	4.96X	104,642	19,465
CONNECTICUT	5.7%	33.4%	5.80X	108,723	36,113
DELAWARE	1.4%	21.1%	14.77X	68,967	27,525
FLORIDA	7.7%	53.1%	6.87X	323,813	59,862
GEORGIA	6.6%	28.3%	4.28X	165,594	24,275
HAWAII	17.3%	64.7%	3.74X	1,427	85
IDAHO	3.7%	52.4%	14.13X	71,815	7,236
ILLINOIS	7.4%	13.1%	1.76X	243,189	45,810
INDIANA	4.5%	15.9%	3.57X	288,339	35,333
IOWA	2.6%	6.5%	2.55X	256,082	43,968
KANSAS	5.2%	22.6%	4.32X	81,369	5,263
KENTUCKY	4.8%	25.7%	5.37X	157,609	26,459
LOUISIANA	4.4%	25.6%	5.84X	100,454	23,357
MAINE	4.1%	26.1%	6.41X	54,976	7,690
MARYLAND	8.8%	25.8%	2.94X	48,362	33,483
MASSACHUSETTS	5.9%	19.6%	3.36X	116,211	26,284
MICHIGAN	2.4%	13.9%	5.81X	434,629	28,190
MINNESOTA	2.5%	3.4%	1.37X	198,777	55,531
MISSISSIPPI	7.6%	40.8%	5.38X	46,089	8,251
MISSOURI	5.5%	18.6%	3.41X	410,187	30,892
MONTANA	9.9%	30.4%	3.05X	12,352	869
NEBRASKA	31.2%	21.2%	0.68X	137,054	13,878
NEVADA	8.0%	35.3%	4.44X	17,367	6,754
NEW HAMPSHIRE	4.9%	31.7%	6.44X	40,984	5,555
NEW JERSEY	3.4%	34.4%	10.25X	137,731	58,438
NEW MEXICO	7.6%	37.3%	4.91X	23,667	4,329
NEW YORK	8.1%	13.6%	1.68X	482,146	275,974
NORTH CAROLINA	5.4%	24.6%	4.55X	213,339	31,778
NORTH DAKOTA	7.9%	16.9%	2.14X	13,116	2,163
OHIO	5.5%	19.2%	3.47X	1,085,576	97,885
OKLAHOMA	4.6%	26.9%	5.83X	85,701	10,487

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK USE	SAMPLE SIZE (NUMBER OF CLAIMS)	
	MEDICAL/SURGICAL	BEHAVIORAL		MEDICAL/SURGICAL	BEHAVIORAL
OREGON	6.4%	31.9%	5.02X	175,614	25,428
PENNSYLVANIA	2.7%	11.4%	4.23X	1,247,931	283,706
RHODE ISLAND	3.3%	19.0%	5.69X	17,828	5,744
SOUTH CAROLINA	8.1%	22.9%	2.81X	153,128	18,714
SOUTH DAKOTA	4.2%	4.1%	0.98X	54,993	9,211
TENNESSEE	4.3%	30.7%	7.12X	520,963	74,818
TEXAS	9.6%	20.9%	2.18X	461,601	81,890
UTAH	3.8%	58.1%	15.14X	101,361	23,233
VERMONT	13.3%	28.7%	2.16X	10,167	707
VIRGINIA	8.2%	33.5%	4.09X	176,775	22,899
WASHINGTON	3.5%	30.7%	8.80X	351,795	77,272
WEST VIRGINIA	6.0%	41.0%	6.80X	113,784	10,338
WISCONSIN	5.3%	16.3%	3.06X	277,299	33,401
WYOMING	18.5%	57.8%	3.13X	6,872	474
WASHINGTON D.C.	1.8%	39.1%	21.43X	1,260	501

APPENDIX F

OUTPATIENT FACILITY NETWORK UTILIZATION RATES FOR 2015 PPO PLANS

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT- OF NETWORK USE	SAMPLE SIZE (NUMBER OF CLAIMS)	
	MEDICAL/SURGICAL	BEHAVIORAL		MEDICAL/SURGICAL	BEHAVIORAL
OUTPATIENT FACILITY					
ALL STATES	5.5%	31.6%	5.76X	8,850,537	1,890,969
ALABAMA	4.3%	22.4%	5.26X	45,006	9,883
ALASKA	9.9%	53.2%	5.39X	19,906	4,698
ARIZONA	6.9%	45.7%	6.67X	63,709	29,132
ARKANSAS	8.0%	35.2%	4.38X	45,130	4,593
CALIFORNIA	6.3%	47.9%	7.58X	198,024	102,989
COLORADO	4.7%	31.4%	6.65X	91,549	21,187
CONNECTICUT	3.1%	34.4%	10.98X	81,200	26,835
DELAWARE	2.1%	25.1%	12.06X	63,164	23,804
FLORIDA	6.3%	79.8%	12.62X	273,343	146,130
GEORGIA	5.6%	34.2%	6.11X	182,650	30,521
HAWAII	20.4%	16.3%	0.80X	1,278	141
IDAHO	4.7%	49.3%	10.39X	74,921	8,740
ILLINOIS	6.9%	17.3%	2.49X	223,276	45,275
INDIANA	6.8%	28.6%	4.23X	199,881	27,377
IOWA	2.8%	5.9%	2.09X	261,984	47,021
KANSAS	3.9%	26.1%	6.67X	75,406	4,986
KENTUCKY	7.7%	31.6%	4.13X	100,215	18,531
LOUISIANA	3.5%	16.9%	4.84X	101,601	28,569
MAINE	2.9%	37.0%	12.80X	44,769	5,682
MARYLAND	9.0%	31.6%	3.52X	46,367	28,854
MASSACHUSETTS	3.7%	24.1%	6.48X	93,441	24,874
MICHIGAN	2.7%	17.8%	6.53X	356,535	25,711
MINNESOTA	2.9%	10.2%	3.50X	199,000	52,775
MISSISSIPPI	7.0%	42.8%	6.10X	39,413	7,148
MISSOURI	3.4%	23.2%	6.94X	396,208	33,273
MONTANA	9.3%	54.1%	5.81X	11,108	676
NEBRASKA	32.7%	25.9%	0.79X	135,326	11,968
NEVADA	8.0%	52.9%	6.57X	13,532	6,562
NEW HAMPSHIRE	4.5%	53.3%	11.83X	28,533	5,287
NEW JERSEY	3.6%	35.1%	9.68X	129,748	53,305
NEW MEXICO	5.3%	45.9%	8.65X	23,274	2,343
NEW YORK	9.2%	22.7%	2.46X	456,973	223,156
NORTH CAROLINA	6.7%	36.3%	5.41X	124,318	24,113
NORTH DAKOTA	8.5%	15.0%	1.77X	13,987	1,748
OHIO	6.2%	24.6%	3.97X	980,519	87,424
OKLAHOMA	3.9%	32.5%	8.41X	87,159	10,498

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT- OF NETWORK USE	SAMPLE SIZE (NUMBER OF CLAIMS)	
	MEDICAL/SURGICAL	BEHAVIORAL		MEDICAL/SURGICAL	BEHAVIORAL
OREGON	5.6%	36.0%	6.46X	178,652	28,676
PENNSYLVANIA	2.8%	16.9%	6.10X	1,163,463	269,058
RHODE ISLAND	5.4%	29.0%	5.36X	8,071	3,560
SOUTH CAROLINA	7.4%	24.3%	3.28X	152,410	18,919
SOUTH DAKOTA	4.0%	7.7%	1.93X	53,264	8,407
TENNESSEE	3.2%	40.3%	12.78X	520,033	97,973
TEXAS	8.0%	24.5%	3.05X	480,553	87,669
UTAH	3.4%	67.0%	19.95X	110,974	34,166
VERMONT	15.6%	41.8%	2.68X	7,946	815
VIRGINIA	7.4%	35.0%	4.71X	158,263	24,899
WASHINGTON	3.6%	31.7%	8.85X	354,642	90,633
WEST VIRGINIA	5.4%	36.9%	6.77X	107,804	11,035
WISCONSIN	5.4%	19.3%	3.57X	264,728	28,234
WYOMING	16.7%	71.7%	4.30X	6,107	866
WASHINGTON D.C.	3.5%	29.2%	8.36X	1,174	250

APPENDIX G

OFFICE VISIT NETWORK UTILIZATION RATES FOR 2013 PPO PLANS

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION			HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK USE COMPARED TO		SAMPLE SIZES (NUMBER OF CLAIMS)		
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL	PRIMARY CARE	SPECIALISTS	PRIMARY CARE	SPECIALISTS	BEHAVIORAL
OFFICE VISITS								
ALL STATES	3.8%	5.1%	19.0%	5.04X	3.71X	76,050,544	60,865,692	20,197,801
ALABAMA	2.5%	2.7%	11.5%	4.67X	4.17X	1,034,944	727,874	112,037
ALASKA	28.8%	44.9%	57.4%	2.00X	1.28X	85,218	52,348	25,150
ARIZONA	3.6%	5.9%	13.1%	3.62X	2.20X	967,509	776,968	189,940
ARKANSAS	3.7%	4.9%	12.7%	3.47X	2.62X	523,290	281,843	60,235
CALIFORNIA	4.9%	8.0%	31.7%	6.52X	3.97X	5,163,749	4,739,537	2,105,051
COLORADO	2.7%	3.9%	19.4%	7.33X	4.98X	780,281	602,266	220,794
CONNECTICUT	13.0%	3.4%	30.4%	2.33X	8.83X	1,403,329	932,485	379,466
DELAWARE	1.3%	1.4%	8.5%	6.39X	6.10X	422,602	430,481	162,096
FLORIDA	3.9%	4.7%	16.7%	4.26X	3.55X	2,439,646	2,444,001	493,106
GEORGIA	3.2%	3.7%	17.7%	5.49X	4.73X	2,254,494	2,088,398	442,477
HAWAII	10.6%	13.5%	27.1%	2.55X	2.00X	15,650	12,429	3,320
IDAHO	1.8%	3.1%	7.8%	4.39X	2.50X	647,614	458,391	156,596
ILLINOIS	5.0%	5.6%	17.7%	3.55X	3.14X	1,692,314	1,660,503	559,069
INDIANA	2.6%	3.1%	10.5%	4.06X	3.41X	2,533,005	1,761,279	531,023
IOWA	0.6%	2.0%	2.8%	4.39X	1.40X	1,595,528	847,928	268,602
KANSAS	2.8%	4.4%	15.4%	5.60X	3.53X	571,968	314,708	88,358
KENTUCKY	2.4%	2.7%	9.0%	3.74X	3.33X	1,518,294	844,831	169,555
LOUISIANA	2.0%	1.6%	10.7%	5.37X	6.62X	1,338,897	1,259,142	230,144
MAINE	5.8%	4.0%	14.1%	2.42X	3.52X	360,529	190,283	96,294
MARYLAND	4.3%	4.3%	34.1%	7.95X	7.91X	742,616	686,205	235,568
MASSACHUSETTS	6.5%	5.8%	18.2%	2.79X	3.17X	801,926	558,116	368,956
MICHIGAN	3.8%	4.1%	13.1%	3.42X	3.19X	2,065,600	1,172,342	617,422
MINNESOTA	1.0%	1.5%	3.7%	3.76X	2.39X	1,050,429	681,416	415,497
MISSISSIPPI	3.6%	4.5%	11.9%	3.34X	2.64X	450,712	259,626	33,938
MISSOURI	3.2%	4.4%	12.9%	4.05X	2.94X	1,864,246	1,395,557	317,934
MONTANA	2.7%	4.4%	4.9%	1.80X	1.11X	263,927	154,016	114,676
NEBRASKA	16.5%	24.8%	10.3%	0.62X	0.42X	1,291,120	883,754	169,301
NEVADA	4.8%	5.4%	21.2%	4.42X	3.94X	419,231	363,527	57,166
NEW HAMPSHIRE	7.1%	3.8%	10.8%	1.51X	2.87X	204,346	144,120	72,536
NEW JERSEY	5.8%	8.8%	45.5%	7.79X	5.14X	1,283,460	1,298,892	535,960
NEW MEXICO	5.4%	5.2%	7.2%	1.33X	1.39X	228,249	168,418	86,801
NEW YORK	4.4%	7.3%	30.7%	6.95X	4.19X	6,181,653	5,803,194	2,986,349
NORTH CAROLINA	3.2%	3.9%	16.5%	5.12X	4.28X	1,622,734	1,236,549	340,828
NORTH DAKOTA	2.5%	4.7%	10.9%	4.30X	2.34X	84,497	46,328	13,319

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION			HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK USE COMPARED TO		SAMPLE SIZES (NUMBER OF CLAIMS)		
	PRIMARY	SPECIALISTS	BEHAVIORAL	PRIMARY	SPECIALISTS	PRIMARY	SPECIALISTS	BEHAVIORAL
	CARE			CARE		CARE		
OHIO	2.2%	2.5%	10.1%	4.66X	4.05X	5,554,472	4,736,904	1,404,500
OKLAHOMA	5.3%	5.2%	15.4%	2.92X	2.95X	468,300	316,792	62,300
OREGON	3.5%	5.1%	19.4%	5.51X	3.78X	1,292,271	985,051	464,632
PENNSYLVANIA	3.7%	5.9%	10.1%	2.76X	1.72X	6,469,007	6,046,476	1,895,275
RHODE ISLAND	3.4%	3.4%	7.7%	2.28X	2.26X	142,755	97,341	74,813
SOUTH CAROLINA	2.8%	4.1%	13.6%	4.80X	3.32X	1,998,846	1,927,480	276,915
SOUTH DAKOTA	2.5%	3.2%	2.6%	1.03X	0.82X	328,893	179,181	62,748
TENNESSEE	1.3%	1.4%	5.1%	4.07X	3.63X	4,232,628	2,760,245	563,593
TEXAS	4.7%	5.4%	16.9%	3.56X	3.16X	3,911,551	3,160,529	646,132
UTAH	2.7%	3.3%	14.6%	5.40X	4.42X	873,394	635,830	208,664
VERMONT	13.9%	9.1%	24.7%	1.77X	2.71X	58,283	30,586	16,884
VIRGINIA	3.4%	4.1%	24.8%	7.32X	6.00X	1,862,640	1,349,103	439,868
WASHINGTON	2.0%	6.8%	17.2%	8.77X	2.51X	2,896,195	1,927,259	932,108
WEST VIRGINIA	2.6%	3.1%	5.9%	2.23X	1.88X	798,404	539,070	125,652
WISCONSIN	2.5%	3.7%	13.4%	5.34X	3.62X	1,177,580	835,941	334,284
WYOMING	14.1%	16.8%	41.4%	2.94X	2.47X	60,290	38,617	13,865
WASHINGTON D.C.	14.0%	8.1%	62.9%	4.51X	7.77X	21,428	21,532	16,004

APPENDIX H

OFFICE VISIT NETWORK UTILIZATION RATES FOR 2014 PPO PLANS

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION			HIGHER PROPORTION OF BEHAVIORAL OUT-OF- NETWORK USE COMPARED TO		SAMPLE SIZES (NUMBER OF CLAIMS)		
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL	PRIMARY CARE	SPECIALISTS	PRIMARY CARE	SPECIALISTS	BEHAVIORAL
OFFICE VISITS								
ALL STATES	4.0%	5.1%	19.2%	4.79X	3.74X	78,809,092	63,866,757	21,296,001
ALABAMA	2.6%	2.6%	12.2%	4.64X	4.72X	1,037,511	713,743	113,752
ALASKA	32.1%	54.0%	67.9%	2.12X	1.26X	160,646	114,027	53,385
ARIZONA	4.2%	6.4%	13.8%	3.32X	2.14X	953,467	771,962	183,992
ARKANSAS	4.0%	5.4%	13.9%	3.46X	2.60X	504,293	281,914	60,911
CALIFORNIA	4.9%	7.3%	30.9%	6.33X	4.21X	4,993,844	4,971,644	2,392,323
COLORADO	3.0%	3.9%	18.7%	6.28X	4.82X	827,068	666,991	248,810
CONNECTICUT	15.5%	3.4%	27.9%	1.80X	8.31X	1,322,364	911,957	445,196
DELAWARE	1.2%	1.2%	7.6%	6.24X	6.50X	507,645	523,066	192,174
FLORIDA	4.6%	5.2%	17.5%	3.81X	3.36X	2,573,116	2,562,548	530,049
GEORGIA	4.0%	3.7%	14.6%	3.66X	3.94X	2,580,069	2,400,473	526,278
HAWAII	10.7%	14.0%	25.3%	2.36X	1.80X	16,505	12,371	4,134
IDAHO	2.4%	3.7%	7.1%	2.89X	1.91X	702,799	517,054	192,363
ILLINOIS	4.8%	5.7%	18.0%	3.73X	3.17X	1,709,927	1,635,218	572,956
INDIANA	2.3%	2.4%	9.4%	4.15X	3.88X	2,484,801	1,723,330	564,262
IOWA	0.7%	2.1%	3.0%	4.41X	1.43X	1,749,560	893,815	297,995
KANSAS	2.9%	4.4%	16.9%	5.91X	3.85X	610,699	333,660	83,226
KENTUCKY	1.9%	2.8%	8.7%	4.48X	3.10X	2,233,567	1,165,077	278,536
LOUISIANA	2.1%	1.6%	9.8%	4.70X	6.04X	1,413,394	1,307,967	281,224
MAINE	6.3%	3.1%	14.2%	2.25X	4.59X	348,235	185,932	97,049
MARYLAND	4.0%	3.8%	33.6%	8.36X	8.75X	711,847	673,303	239,588
MASSACHUSETTS	8.1%	6.3%	17.8%	2.20X	2.82X	784,537	567,529	366,985
MICHIGAN	3.2%	3.3%	11.6%	3.59X	3.49X	1,909,398	1,230,290	618,996
MINNESOTA	1.0%	1.5%	3.8%	3.77X	2.45X	976,692	620,883	388,816
MISSISSIPPI	3.3%	4.2%	12.3%	3.70X	2.91X	472,223	274,775	39,436
MISSOURI	3.6%	4.9%	13.7%	3.76X	2.82X	2,095,126	1,543,505	309,820
MONTANA	5.9%	9.9%	18.9%	3.19X	1.90X	96,247	58,304	24,028
NEBRASKA	17.9%	25.7%	11.4%	0.64X	0.45X	1,254,558	885,107	171,806
NEVADA	7.3%	6.4%	19.1%	2.61X	2.97X	401,435	355,943	56,213
NEW HAMPSHIRE	7.0%	3.2%	11.4%	1.62X	3.50X	216,214	159,601	80,168
NEW JERSEY	5.9%	8.3%	45.4%	7.75X	5.47X	1,265,258	1,321,830	544,252
NEW MEXICO	5.6%	5.3%	8.7%	1.53X	1.64X	235,892	170,558	79,219
NEW YORK	4.7%	7.1%	33.4%	7.09X	4.67X	5,999,235	5,637,193	2,729,396
NORTH CAROLINA	2.2%	2.9%	14.1%	6.37X	4.82X	2,770,598	1,997,224	646,217
NORTH DAKOTA	2.3%	4.1%	8.7%	3.81X	2.13X	82,923	43,858	14,319
OHIO	2.0%	2.1%	9.8%	4.88X	4.62X	5,493,338	5,053,120	1,400,652

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION			HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK USE COMPARED TO		SAMPLE SIZES (NUMBER OF CLAIMS)		
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL	PRIMARY CARE	SPECIALISTS	PRIMARY CARE	SPECIALISTS	BEHAVIORAL
	OKLAHOMA	4.4%	4.5%	11.2%	2.52X	2.47X	739,461	486,811
OREGON	4.0%	5.5%	20.2%	5.03X	3.64X	1,219,784	946,815	460,600
PENNSYLVANIA	3.7%	5.8%	10.4%	2.83X	1.78X	6,461,330	6,019,148	2,000,986
RHODE ISLAND	3.5%	3.7%	7.3%	2.08X	2.01X	142,932	95,914	75,946
SOUTH CAROLINA	3.2%	4.1%	13.8%	4.31X	3.38X	2,037,869	1,982,676	287,686
SOUTH DAKOTA	2.0%	2.8%	2.7%	1.36X	0.95X	379,229	195,396	71,862
TENNESSEE	2.4%	2.8%	11.2%	4.65X	3.96X	4,410,471	2,852,629	566,778
TEXAS	5.2%	5.5%	16.5%	3.17X	2.99X	4,210,040	3,442,706	694,760
UTAH	2.8%	3.2%	13.8%	4.93X	4.33X	905,977	679,582	242,371
VERMONT	14.8%	9.1%	25.3%	1.71X	2.77X	52,959	29,654	17,443
VIRGINIA	4.1%	4.9%	25.5%	6.19X	5.24X	1,940,383	1,379,574	468,378
WASHINGTON	2.4%	7.7%	18.1%	7.53X	2.35X	2,658,119	1,958,862	937,448
WEST VIRGINIA	3.0%	3.5%	5.5%	1.86X	1.56X	833,076	568,690	132,777
WISCONSIN	2.8%	3.8%	12.9%	4.65X	3.41X	1,231,430	876,709	364,467
WYOMING	9.9%	12.6%	31.3%	3.17X	2.47X	67,877	41,280	15,684
WASHINGTON D.C.	13.9%	7.8%	64.2%	4.64X	8.24X	23,124	24,539	18,843

APPENDIX I

OFFICE VISIT NETWORK UTILIZATION RATES FOR 2015 PPO PLANS

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION			HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK USE COMPARED TO		SAMPLE SIZES (NUMBER OF CLAIMS)		
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL	PRIMARY CARE	SPECIALISTS	PRIMARY CARE	SPECIALISTS	BEHAVIORAL
OFFICE VISITS								
ALL STATES	3.7%	5.2%	18.7%	5.14X	3.61X	60,290,021	51,642,748	16,965,666
ALABAMA	2.3%	2.2%	11.7%	4.97X	5.38X	895,183	635,201	99,109
ALASKA	28.2%	46.8%	67.6%	2.39X	1.44X	137,404	93,267	46,304
ARIZONA	3.8%	5.8%	13.3%	3.46X	2.31X	805,999	672,496	182,175
ARKANSAS	3.7%	5.2%	13.6%	3.70X	2.61X	428,806	238,096	59,331
CALIFORNIA	5.7%	9.0%	32.1%	5.68X	3.57X	1,933,783	2,248,700	1,044,734
COLORADO	2.7%	4.1%	18.5%	6.94X	4.46X	550,116	478,681	182,858
CONNECTICUT	3.3%	4.3%	34.2%	10.52X	8.00X	478,771	490,158	251,394
DELAWARE	1.0%	1.0%	6.4%	6.60X	6.70X	499,673	527,520	198,587
FLORIDA	4.0%	5.3%	17.8%	4.43X	3.39X	2,122,560	2,311,977	523,027
GEORGIA	3.7%	3.7%	14.9%	4.04X	4.01X	1,922,565	1,868,245	425,681
HAWAII	12.0%	16.0%	34.3%	2.87X	2.14X	9,619	7,750	2,593
IDAHO	2.4%	3.5%	6.7%	2.82X	1.91X	690,438	518,781	224,927
ILLINOIS	4.9%	5.1%	17.8%	3.63X	3.49X	1,255,325	1,397,303	485,708
INDIANA	3.5%	4.1%	10.9%	3.06X	2.63X	1,021,569	794,399	252,262
IOWA	0.7%	2.2%	2.6%	3.51X	1.17X	1,703,130	870,594	314,144
KANSAS	2.9%	4.0%	18.9%	6.50X	4.79X	486,628	296,598	67,018
KENTUCKY	2.2%	2.4%	8.1%	3.65X	3.41X	1,308,752	762,900	164,875
LOUISIANA	2.0%	1.5%	8.5%	4.16X	5.79X	1,407,883	1,282,012	318,647
MAINE	3.9%	3.1%	15.9%	4.07X	5.19X	190,506	122,445	64,116
MARYLAND	3.3%	3.5%	31.2%	9.46X	8.78X	594,611	576,829	210,455
MASSACHUSETTS	3.4%	3.8%	16.9%	4.95X	4.44X	485,065	404,949	319,201
MICHIGAN	3.4%	3.4%	14.2%	4.17X	4.21X	1,352,759	925,114	414,614
MINNESOTA	1.3%	2.4%	10.8%	8.01X	4.56X	800,024	544,367	355,018
MISSISSIPPI	3.1%	3.8%	12.4%	3.99X	3.27X	370,447	226,314	33,529
MISSOURI	2.9%	4.2%	14.6%	5.06X	3.47X	1,740,352	1,304,588	231,450
MONTANA	6.0%	9.8%	24.4%	4.05X	2.48X	74,195	47,516	20,711
NEBRASKA	19.1%	26.6%	12.5%	0.65X	0.47X	1,195,278	867,950	167,879
NEVADA	6.1%	5.2%	19.7%	3.21X	3.81X	266,252	245,897	39,855
NEW HAMPSHIRE	3.6%	3.9%	12.5%	3.48X	3.22X	111,806	104,820	56,930
NEW JERSEY	4.7%	8.1%	45.2%	9.62X	5.56X	954,292	1,064,190	452,874
NEW MEXICO	5.1%	4.5%	15.9%	3.14X	3.56X	200,472	147,156	28,296
NEW YORK	4.2%	7.6%	34.0%	8.09X	4.46X	4,613,967	4,545,750	2,180,391
NORTH CAROLINA	3.0%	3.7%	17.4%	5.73X	4.73X	1,418,165	1,099,271	317,963
NORTH DAKOTA	2.5%	3.9%	18.6%	7.55X	4.71X	76,335	41,833	14,511
OHIO	1.9%	2.1%	9.3%	4.93X	4.51X	3,791,423	4,029,543	1,102,648

CARE SETTING AND STATE	OUT-OF-NETWORK UTILIZATION			HIGHER PROPORTION OF BEHAVIORAL OUT-OF- NETWORK USE COMPARED TO		SAMPLE SIZES (NUMBER OF CLAIMS)		
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL	PRIMARY CARE	SPECIALISTS	PRIMARY CARE	SPECIALISTS	BEHAVIORAL
	OKLAHOMA	4.0%	4.1%	11.7%	2.89X	2.88X	668,233	428,447
OREGON	3.3%	4.6%	16.5%	4.98X	3.63X	1,142,377	905,085	477,724
PENNSYLVANIA	3.8%	5.8%	10.6%	2.81X	1.83X	5,806,677	5,514,485	1,798,672
RHODE ISLAND	2.4%	3.4%	9.7%	3.98X	2.86X	82,236	67,099	45,817
SOUTH CAROLINA	3.1%	3.7%	13.8%	4.50X	3.79X	1,912,888	1,921,062	293,845
SOUTH DAKOTA	1.7%	2.3%	2.5%	1.41X	1.08X	359,837	184,944	74,113
TENNESSEE	1.9%	2.6%	11.3%	5.78X	4.36X	4,230,773	2,735,932	562,254
TEXAS	5.0%	5.0%	16.5%	3.29X	3.31X	3,733,200	3,166,263	653,449
UTAH	3.0%	2.9%	12.9%	4.35X	4.44X	846,562	642,865	262,895
VERMONT	8.8%	15.1%	22.8%	2.60X	1.52X	37,785	25,082	14,304
VIRGINIA	3.4%	4.4%	26.0%	7.61X	5.94X	1,392,622	1,105,714	391,074
WASHINGTON	2.5%	9.3%	17.2%	6.79X	1.86X	2,493,706	1,911,558	972,274
WEST VIRGINIA	2.8%	3.2%	5.3%	1.88X	1.65X	689,401	486,243	121,640
WISCONSIN	2.8%	3.8%	14.4%	5.08X	3.77X	939,217	707,206	307,410
WYOMING	13.6%	15.1%	47.3%	3.49X	3.14X	46,091	31,322	12,394
WASHINGTON D.C.	9.2%	6.7%	66.5%	7.23X	9.91X	14,263	16,231	13,283

APPENDIX J

IN-NETWORK PROVIDER PAYMENT LEVELS RELATIVE TO MEDICARE FOR OFFICE VISITS IN 2013 PPO PLANS

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
OFFICE VISITS					
ALL STATES - ALL OFFICE VISITS	112.1%	110.1%	92.8%	20.7%	18.5%
LOW COMPLEXITY E&M VISITS	112.6%	106.0%	95.1%	18.3%	11.4%
MODERATE COMPLEXITY E&M VISITS	110.9%	107.8%	92.2%	20.4%	16.9%
ALABAMA - ALL OFFICE VISITS	92.1%	90.1%	90.3%	2.0%	-0.2%
LOW COMPLEXITY E&M VISITS	93.9%	92.8%	71.6%	31.2%	29.6%
MODERATE COMPLEXITY E&M VISITS	95.4%	95.3%	61.1%	56.1%	55.9%
ALASKA - ALL OFFICE VISITS	171.4%	169.2%	112.2%	52.8%	50.7%
LOW COMPLEXITY E&M VISITS	169.3%	162.9%	166.7%	1.6%	-2.3%
MODERATE COMPLEXITY E&M VISITS	166.2%	160.5%	142.2%	16.9%	12.9%
ARIZONA - ALL OFFICE VISITS	91.4%	98.1%	78.5%	16.4%	24.9%
LOW COMPLEXITY E&M VISITS	90.6%	93.8%	82.0%	10.5%	14.4%
MODERATE COMPLEXITY E&M VISITS	90.4%	96.9%	77.4%	16.9%	25.2%
ARKANSAS - ALL OFFICE VISITS	114.7%	114.8%	98.4%	16.6%	16.7%
LOW COMPLEXITY E&M VISITS	113.8%	113.0%	95.3%	19.4%	18.6%
MODERATE COMPLEXITY E&M VISITS	114.6%	113.1%	97.4%	17.7%	16.1%
CALIFORNIA - ALL OFFICE VISITS	110.0%	109.7%	99.5%	10.5%	10.2%
LOW COMPLEXITY E&M VISITS	113.7%	107.7%	114.5%	-0.8%	-5.9%
MODERATE COMPLEXITY E&M VISITS	105.8%	104.5%	100.7%	5.1%	3.7%
COLORADO - ALL OFFICE VISITS	117.8%	119.7%	87.3%	34.9%	37.1%
LOW COMPLEXITY E&M VISITS	117.4%	114.2%	91.6%	28.2%	24.7%
MODERATE COMPLEXITY E&M VISITS	117.6%	118.4%	91.1%	29.0%	29.9%
CONNECTICUT - ALL OFFICE VISITS	103.6%	111.8%	81.4%	27.4%	37.4%
LOW COMPLEXITY E&M VISITS	105.6%	105.8%	89.9%	17.5%	17.7%
MODERATE COMPLEXITY E&M VISITS	107.9%	110.1%	74.6%	44.5%	47.5%
DELAWARE - ALL OFFICE VISITS	94.8%	94.9%	87.3%	8.6%	8.7%
LOW COMPLEXITY E&M VISITS	94.3%	89.6%	83.6%	12.7%	7.2%
MODERATE COMPLEXITY E&M VISITS	93.7%	92.6%	84.3%	11.1%	9.8%
FLORIDA - ALL OFFICE VISITS	95.9%	103.7%	76.3%	25.6%	35.9%
LOW COMPLEXITY E&M VISITS	95.6%	99.5%	72.2%	32.4%	37.7%
MODERATE COMPLEXITY E&M VISITS	95.2%	103.7%	73.7%	29.3%	40.8%
GEORGIA - ALL OFFICE VISITS	107.7%	112.7%	77.7%	38.6%	45.0%
LOW COMPLEXITY E&M VISITS	106.8%	106.6%	77.1%	38.5%	38.3%
MODERATE COMPLEXITY E&M VISITS	108.2%	111.6%	77.2%	40.2%	44.6%
HAWAII - ALL OFFICE VISITS	101.3%	107.0%	119.8%	-15.4%	-10.7%
LOW COMPLEXITY E&M VISITS	99.6%	105.5%	104.8%	-5.0%	0.7%
MODERATE COMPLEXITY E&M VISITS	100.1%	102.6%	109.4%	-8.5%	-6.2%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
IDAHO - ALL OFFICE VISITS	154.0%	147.8%	104.0%	48.1%	42.1%
LOW COMPLEXITY E&M VISITS	155.9%	147.1%	152.8%	2.0%	-3.7%
MODERATE COMPLEXITY E&M VISITS	153.3%	147.5%	147.2%	4.1%	0.2%
ILLINOIS - ALL OFFICE VISITS	115.5%	118.8%	99.5%	16.1%	19.4%
LOW COMPLEXITY E&M VISITS	114.6%	113.0%	97.1%	18.0%	16.4%
MODERATE COMPLEXITY E&M VISITS	114.7%	116.4%	96.9%	18.3%	20.1%
INDIANA - ALL OFFICE VISITS	105.2%	107.0%	91.5%	14.9%	16.9%
LOW COMPLEXITY E&M VISITS	104.3%	103.7%	96.9%	7.6%	7.1%
MODERATE COMPLEXITY E&M VISITS	105.6%	105.4%	96.1%	9.9%	9.7%
IOWA - ALL OFFICE VISITS	146.8%	141.4%	123.3%	19.1%	14.7%
LOW COMPLEXITY E&M VISITS	146.3%	139.9%	133.3%	9.7%	4.9%
MODERATE COMPLEXITY E&M VISITS	145.7%	144.4%	138.2%	5.4%	4.5%
KANSAS - ALL OFFICE VISITS	108.5%	111.6%	96.7%	12.3%	15.4%
LOW COMPLEXITY E&M VISITS	107.5%	104.3%	90.0%	19.4%	15.9%
MODERATE COMPLEXITY E&M VISITS	106.9%	107.9%	88.3%	21.1%	22.2%
KENTUCKY - ALL OFFICE VISITS	102.0%	99.5%	75.5%	35.1%	31.8%
LOW COMPLEXITY E&M VISITS	101.8%	93.1%	86.1%	18.3%	8.1%
MODERATE COMPLEXITY E&M VISITS	101.9%	99.1%	85.4%	19.4%	16.0%
LOUISIANA - ALL OFFICE VISITS	100.4%	98.9%	103.8%	-3.3%	-4.7%
LOW COMPLEXITY E&M VISITS	99.5%	96.5%	85.0%	17.1%	13.6%
MODERATE COMPLEXITY E&M VISITS	100.4%	97.7%	89.3%	12.5%	9.4%
MAINE - ALL OFFICE VISITS	116.3%	123.8%	85.0%	36.9%	45.8%
LOW COMPLEXITY E&M VISITS	117.8%	116.6%	101.3%	16.3%	15.1%
MODERATE COMPLEXITY E&M VISITS	120.6%	122.4%	100.2%	20.3%	22.1%
MARYLAND - ALL OFFICE VISITS	97.9%	94.9%	79.5%	23.2%	19.5%
LOW COMPLEXITY E&M VISITS	97.0%	92.0%	77.1%	25.8%	19.3%
MODERATE COMPLEXITY E&M VISITS	98.0%	94.7%	83.3%	17.7%	13.7%
MASSACHUSETTS - ALL OFFICE VISITS	141.0%	145.9%	93.4%	51.0%	56.2%
LOW COMPLEXITY E&M VISITS	140.1%	140.7%	103.8%	35.0%	35.5%
MODERATE COMPLEXITY E&M VISITS	142.8%	145.6%	104.9%	36.2%	38.8%
MICHIGAN - ALL OFFICE VISITS	113.8%	109.4%	104.0%	9.4%	5.2%
LOW COMPLEXITY E&M VISITS	113.9%	108.8%	99.0%	15.1%	9.9%
MODERATE COMPLEXITY E&M VISITS	113.4%	108.9%	99.0%	14.5%	10.0%
MINNESOTA - ALL OFFICE VISITS	174.1%	168.5%	124.1%	40.2%	35.7%
LOW COMPLEXITY E&M VISITS	170.8%	164.0%	127.9%	33.6%	28.2%
MODERATE COMPLEXITY E&M VISITS	176.1%	172.5%	119.8%	47.0%	44.0%
MISSISSIPPI - ALL OFFICE VISITS	112.4%	111.0%	106.0%	6.0%	4.7%
LOW COMPLEXITY E&M VISITS	111.2%	108.4%	104.5%	6.5%	3.7%
MODERATE COMPLEXITY E&M VISITS	111.5%	109.8%	97.3%	14.6%	12.9%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
MISSOURI - ALL OFFICE VISITS	103.3%	104.3%	79.2%	30.4%	31.7%
LOW COMPLEXITY E&M VISITS	101.7%	98.9%	79.7%	27.7%	24.1%
MODERATE COMPLEXITY E&M VISITS	102.6%	102.9%	80.3%	27.8%	28.3%
MONTANA - ALL OFFICE VISITS	151.4%	146.4%	98.6%	53.5%	48.5%
LOW COMPLEXITY E&M VISITS	153.5%	146.6%	151.0%	1.6%	-2.9%
MODERATE COMPLEXITY E&M VISITS	150.5%	148.2%	147.9%	1.8%	0.2%
NEBRASKA - ALL OFFICE VISITS	155.9%	146.8%	140.7%	10.8%	4.3%
LOW COMPLEXITY E&M VISITS	156.3%	156.3%	157.3%	-0.6%	-0.7%
MODERATE COMPLEXITY E&M VISITS	156.5%	157.0%	151.9%	3.0%	3.4%
NEVADA - ALL OFFICE VISITS	89.1%	93.2%	83.1%	7.2%	12.2%
LOW COMPLEXITY E&M VISITS	93.8%	87.6%	79.4%	18.0%	10.3%
MODERATE COMPLEXITY E&M VISITS	81.5%	91.1%	77.8%	4.8%	17.1%
NEW HAMPSHIRE - ALL OFFICE VISITS	143.9%	146.7%	87.5%	64.6%	67.8%
LOW COMPLEXITY E&M VISITS	146.5%	143.9%	113.2%	29.4%	27.1%
MODERATE COMPLEXITY E&M VISITS	147.2%	149.2%	109.6%	34.3%	36.1%
NEW JERSEY - ALL OFFICE VISITS	85.7%	92.4%	84.9%	1.0%	8.9%
LOW COMPLEXITY E&M VISITS	89.3%	89.3%	79.9%	11.8%	11.8%
MODERATE COMPLEXITY E&M VISITS	80.8%	87.2%	67.9%	19.1%	28.5%
NEW MEXICO - ALL OFFICE VISITS	117.4%	117.1%	84.0%	39.8%	39.4%
LOW COMPLEXITY E&M VISITS	116.3%	112.2%	96.2%	20.9%	16.6%
MODERATE COMPLEXITY E&M VISITS	118.8%	117.9%	98.3%	20.8%	19.9%
NEW YORK - ALL OFFICE VISITS	92.0%	89.2%	85.1%	8.1%	4.8%
LOW COMPLEXITY E&M VISITS	91.9%	85.8%	80.7%	13.9%	6.4%
MODERATE COMPLEXITY E&M VISITS	89.9%	84.4%	78.1%	15.2%	8.1%
NORTH CAROLINA - ALL OFFICE VISITS	127.6%	123.7%	84.5%	50.9%	46.4%
LOW COMPLEXITY E&M VISITS	127.7%	115.1%	84.5%	51.2%	36.3%
MODERATE COMPLEXITY E&M VISITS	127.7%	123.0%	83.1%	53.7%	48.1%
NORTH DAKOTA - ALL OFFICE VISITS	163.7%	155.5%	119.4%	37.1%	30.2%
LOW COMPLEXITY E&M VISITS	164.8%	159.6%	125.8%	31.0%	26.9%
MODERATE COMPLEXITY E&M VISITS	164.4%	158.9%	115.5%	42.3%	37.6%
OHIO - ALL OFFICE VISITS	102.1%	104.2%	82.7%	23.4%	25.9%
LOW COMPLEXITY E&M VISITS	102.4%	99.1%	91.7%	11.6%	8.0%
MODERATE COMPLEXITY E&M VISITS	98.4%	99.4%	87.6%	12.4%	13.5%
OKLAHOMA - ALL OFFICE VISITS	112.3%	112.6%	85.1%	32.1%	32.4%
LOW COMPLEXITY E&M VISITS	112.3%	111.0%	98.0%	14.6%	13.3%
MODERATE COMPLEXITY E&M VISITS	113.1%	114.2%	93.9%	20.5%	21.6%
OREGON - ALL OFFICE VISITS	163.1%	157.5%	119.5%	36.6%	31.8%
LOW COMPLEXITY E&M VISITS	167.9%	154.2%	154.4%	8.8%	-0.1%
MODERATE COMPLEXITY E&M VISITS	160.0%	155.3%	151.1%	5.9%	2.8%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
PENNSYLVANIA - ALL OFFICE VISITS	107.1%	102.1%	96.6%	10.8%	5.6%
LOW COMPLEXITY E&M VISITS	107.2%	98.8%	95.1%	12.8%	3.9%
MODERATE COMPLEXITY E&M VISITS	106.3%	100.6%	97.5%	9.0%	3.1%
RHODE ISLAND - ALL OFFICE VISITS	105.1%	103.3%	85.0%	23.7%	21.5%
LOW COMPLEXITY E&M VISITS	105.3%	100.0%	85.5%	23.1%	16.9%
MODERATE COMPLEXITY E&M VISITS	107.2%	104.5%	86.6%	23.7%	20.6%
SOUTH CAROLINA - ALL OFFICE VISITS	98.7%	97.1%	71.7%	37.6%	35.4%
LOW COMPLEXITY E&M VISITS	99.0%	93.2%	79.1%	25.1%	17.8%
MODERATE COMPLEXITY E&M VISITS	97.9%	96.1%	75.9%	29.0%	26.6%
SOUTH DAKOTA - ALL OFFICE VISITS	159.7%	141.1%	141.0%	13.2%	0.1%
LOW COMPLEXITY E&M VISITS	160.2%	144.0%	133.7%	19.8%	7.7%
MODERATE COMPLEXITY E&M VISITS	156.7%	149.6%	139.8%	12.1%	7.0%
TENNESSEE - ALL OFFICE VISITS	114.7%	119.8%	74.7%	53.5%	60.4%
LOW COMPLEXITY E&M VISITS	114.1%	115.0%	74.3%	53.6%	54.8%
MODERATE COMPLEXITY E&M VISITS	116.1%	118.8%	59.4%	95.4%	99.9%
TEXAS - ALL OFFICE VISITS	107.5%	109.1%	80.3%	33.8%	35.8%
LOW COMPLEXITY E&M VISITS	108.0%	106.1%	90.3%	19.6%	17.5%
MODERATE COMPLEXITY E&M VISITS	107.0%	108.0%	83.7%	27.8%	29.1%
UTAH - ALL OFFICE VISITS	113.1%	115.7%	98.1%	15.3%	17.9%
LOW COMPLEXITY E&M VISITS	112.2%	111.7%	106.3%	5.6%	5.1%
MODERATE COMPLEXITY E&M VISITS	112.5%	113.6%	108.1%	4.1%	5.2%
VERMONT - ALL OFFICE VISITS	128.1%	148.4%	85.1%	50.5%	74.3%
LOW COMPLEXITY E&M VISITS	124.2%	140.1%	91.1%	36.4%	53.8%
MODERATE COMPLEXITY E&M VISITS	131.5%	150.1%	106.6%	23.3%	40.8%
VIRGINIA - ALL OFFICE VISITS	112.8%	112.4%	79.1%	42.6%	42.2%
LOW COMPLEXITY E&M VISITS	111.2%	108.9%	77.3%	43.7%	40.8%
MODERATE COMPLEXITY E&M VISITS	114.1%	111.3%	69.5%	64.1%	60.1%
WASHINGTON - ALL OFFICE VISITS	136.5%	134.8%	102.3%	33.4%	31.8%
LOW COMPLEXITY E&M VISITS	137.0%	130.6%	118.4%	15.7%	10.3%
MODERATE COMPLEXITY E&M VISITS	137.7%	133.6%	116.2%	18.5%	15.1%
WEST VIRGINIA - ALL OFFICE VISITS	120.9%	119.4%	120.6%	0.2%	-1.0%
LOW COMPLEXITY E&M VISITS	120.7%	115.8%	109.9%	9.8%	5.3%
MODERATE COMPLEXITY E&M VISITS	119.5%	118.3%	113.1%	5.6%	4.6%
WISCONSIN - ALL OFFICE VISITS	165.2%	160.1%	124.1%	33.1%	29.0%
LOW COMPLEXITY E&M VISITS	162.2%	151.1%	120.0%	35.2%	25.9%
MODERATE COMPLEXITY E&M VISITS	164.9%	154.5%	127.9%	28.9%	20.8%
WYOMING - ALL OFFICE VISITS	135.8%	132.9%	105.7%	28.4%	25.7%
LOW COMPLEXITY E&M VISITS	134.5%	129.2%	112.7%	19.3%	14.6%
MODERATE COMPLEXITY E&M VISITS	132.5%	134.6%	103.6%	27.9%	29.9%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
WASHINGTON D.C. - ALL OFFICE VISITS	95.2%	100.2%	81.9%	16.2%	22.4%
LOW COMPLEXITY E&M VISITS	98.6%	96.8%	80.1%	23.0%	20.8%
MODERATE COMPLEXITY E&M VISITS	93.1%	97.8%	78.7%	18.3%	24.2%

APPENDIX K

IN-NETWORK PROVIDER PAYMENT LEVELS RELATIVE TO MEDICARE FOR OFFICE VISITS IN 2014 PPO PLANS

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
OFFICE VISITS					
ALL STATES - ALL OFFICE VISITS	114.6%	111.9%	94.0%	22.0%	19.1%
LOW COMPLEXITY E&M VISITS	115.1%	108.1%	97.2%	18.4%	11.2%
MODERATE COMPLEXITY E&M VISITS	113.3%	110.0%	94.5%	19.9%	16.4%
ALABAMA - ALL OFFICE VISITS	93.5%	90.7%	91.7%	2.0%	-1.1%
LOW COMPLEXITY E&M VISITS	95.7%	93.2%	70.4%	35.9%	32.3%
MODERATE COMPLEXITY E&M VISITS	97.2%	96.4%	63.5%	53.1%	51.9%
ALASKA - ALL OFFICE VISITS	170.4%	168.0%	106.5%	60.0%	57.7%
LOW COMPLEXITY E&M VISITS	171.2%	163.0%	169.4%	1.1%	-3.8%
MODERATE COMPLEXITY E&M VISITS	165.6%	161.8%	147.8%	12.0%	9.5%
ARIZONA - ALL OFFICE VISITS	92.0%	98.0%	81.8%	12.4%	19.7%
LOW COMPLEXITY E&M VISITS	91.3%	94.0%	85.9%	6.2%	9.4%
MODERATE COMPLEXITY E&M VISITS	90.7%	96.8%	78.7%	15.3%	23.1%
ARKANSAS - ALL OFFICE VISITS	114.9%	114.9%	101.2%	13.5%	13.5%
LOW COMPLEXITY E&M VISITS	114.0%	113.4%	96.2%	18.6%	17.9%
MODERATE COMPLEXITY E&M VISITS	114.8%	113.2%	94.9%	21.0%	19.3%
CALIFORNIA - ALL OFFICE VISITS	112.5%	111.1%	96.9%	16.1%	14.7%
LOW COMPLEXITY E&M VISITS	116.7%	108.8%	110.7%	5.5%	-1.7%
MODERATE COMPLEXITY E&M VISITS	108.2%	106.0%	101.1%	7.0%	4.8%
COLORADO - ALL OFFICE VISITS	119.3%	121.5%	85.6%	39.4%	42.0%
LOW COMPLEXITY E&M VISITS	118.4%	115.9%	93.6%	26.5%	23.8%
MODERATE COMPLEXITY E&M VISITS	119.3%	120.2%	93.4%	27.8%	28.7%
CONNECTICUT - ALL OFFICE VISITS	105.7%	113.8%	80.7%	31.0%	40.9%
LOW COMPLEXITY E&M VISITS	107.4%	108.0%	90.4%	18.7%	19.4%
MODERATE COMPLEXITY E&M VISITS	109.4%	112.9%	70.6%	55.1%	59.9%
DELAWARE - ALL OFFICE VISITS	96.6%	96.6%	88.0%	9.8%	9.8%
LOW COMPLEXITY E&M VISITS	96.4%	91.0%	84.4%	14.2%	7.8%
MODERATE COMPLEXITY E&M VISITS	95.7%	94.5%	85.5%	11.9%	10.6%
FLORIDA - ALL OFFICE VISITS	97.3%	104.7%	78.4%	24.1%	33.6%
LOW COMPLEXITY E&M VISITS	97.0%	100.4%	73.4%	32.2%	36.9%
MODERATE COMPLEXITY E&M VISITS	97.0%	105.1%	75.4%	28.7%	39.4%
GEORGIA - ALL OFFICE VISITS	108.6%	113.1%	78.5%	38.2%	44.0%
LOW COMPLEXITY E&M VISITS	108.3%	108.7%	77.8%	39.2%	39.8%
MODERATE COMPLEXITY E&M VISITS	109.0%	112.9%	80.7%	35.0%	39.8%
HAWAII - ALL OFFICE VISITS	100.9%	103.9%	109.7%	-8.0%	-5.3%
LOW COMPLEXITY E&M VISITS	99.5%	101.7%	101.0%	-1.5%	0.6%
MODERATE COMPLEXITY E&M VISITS	99.3%	101.4%	102.7%	-3.3%	-1.3%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
IDAHO - ALL OFFICE VISITS	156.2%	147.9%	104.8%	49.1%	41.1%
LOW COMPLEXITY E&M VISITS	158.1%	148.0%	152.8%	3.5%	-3.1%
MODERATE COMPLEXITY E&M VISITS	154.4%	148.1%	150.9%	2.3%	-1.9%
ILLINOIS - ALL OFFICE VISITS	117.4%	120.5%	101.0%	16.2%	19.2%
LOW COMPLEXITY E&M VISITS	116.9%	115.1%	98.2%	19.0%	17.2%
MODERATE COMPLEXITY E&M VISITS	116.6%	118.7%	98.5%	18.3%	20.4%
INDIANA - ALL OFFICE VISITS	112.6%	107.9%	106.9%	5.3%	0.9%
LOW COMPLEXITY E&M VISITS	104.9%	105.0%	99.0%	6.0%	6.1%
MODERATE COMPLEXITY E&M VISITS	106.0%	106.4%	97.3%	9.0%	9.4%
IOWA - ALL OFFICE VISITS	150.2%	141.9%	124.6%	20.5%	13.9%
LOW COMPLEXITY E&M VISITS	149.3%	142.2%	137.0%	9.0%	3.8%
MODERATE COMPLEXITY E&M VISITS	147.8%	145.6%	138.0%	7.1%	5.5%
KANSAS - ALL OFFICE VISITS	110.7%	113.6%	95.2%	16.3%	19.3%
LOW COMPLEXITY E&M VISITS	109.5%	106.6%	92.1%	19.0%	15.8%
MODERATE COMPLEXITY E&M VISITS	109.8%	112.2%	87.8%	25.2%	27.8%
KENTUCKY - ALL OFFICE VISITS	101.1%	101.2%	82.4%	22.7%	22.8%
LOW COMPLEXITY E&M VISITS	99.1%	95.2%	92.5%	7.2%	2.9%
MODERATE COMPLEXITY E&M VISITS	101.8%	100.0%	94.4%	7.9%	6.0%
LOUISIANA - ALL OFFICE VISITS	100.5%	99.8%	112.4%	-10.6%	-11.2%
LOW COMPLEXITY E&M VISITS	99.8%	97.3%	96.2%	3.7%	1.1%
MODERATE COMPLEXITY E&M VISITS	100.6%	99.1%	92.7%	8.5%	6.9%
MAINE - ALL OFFICE VISITS	120.0%	126.8%	86.2%	39.2%	47.2%
LOW COMPLEXITY E&M VISITS	122.0%	119.9%	104.7%	16.5%	14.5%
MODERATE COMPLEXITY E&M VISITS	124.7%	125.0%	101.4%	22.9%	23.3%
MARYLAND - ALL OFFICE VISITS	101.6%	97.2%	79.8%	27.2%	21.8%
LOW COMPLEXITY E&M VISITS	100.9%	95.3%	77.9%	29.6%	22.4%
MODERATE COMPLEXITY E&M VISITS	101.8%	96.7%	83.0%	22.7%	16.5%
MASSACHUSETTS - ALL OFFICE VISITS	145.2%	150.0%	96.2%	50.9%	55.8%
LOW COMPLEXITY E&M VISITS	143.6%	144.1%	105.5%	36.2%	36.7%
MODERATE COMPLEXITY E&M VISITS	148.0%	150.2%	109.2%	35.5%	37.6%
MICHIGAN - ALL OFFICE VISITS	115.0%	110.1%	104.4%	10.1%	5.4%
LOW COMPLEXITY E&M VISITS	115.3%	109.7%	99.9%	15.3%	9.8%
MODERATE COMPLEXITY E&M VISITS	114.3%	109.6%	100.7%	13.5%	8.8%
MINNESOTA - ALL OFFICE VISITS	181.2%	173.7%	122.7%	47.7%	41.5%
LOW COMPLEXITY E&M VISITS	177.6%	168.9%	131.4%	35.2%	28.5%
MODERATE COMPLEXITY E&M VISITS	184.1%	176.3%	122.9%	49.8%	43.5%
MISSISSIPPI - ALL OFFICE VISITS	112.3%	110.5%	104.8%	7.2%	5.5%
LOW COMPLEXITY E&M VISITS	111.2%	108.0%	102.0%	8.9%	5.9%
MODERATE COMPLEXITY E&M VISITS	111.3%	109.4%	96.2%	15.7%	13.7%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
MISSOURI - ALL OFFICE VISITS	105.6%	106.5%	80.7%	30.8%	31.9%
LOW COMPLEXITY E&M VISITS	104.3%	100.9%	81.3%	28.3%	24.0%
MODERATE COMPLEXITY E&M VISITS	105.0%	105.3%	81.8%	28.3%	28.7%
MONTANA - ALL OFFICE VISITS	148.0%	139.7%	98.0%	51.0%	42.5%
LOW COMPLEXITY E&M VISITS	152.2%	144.2%	146.3%	4.0%	-1.4%
MODERATE COMPLEXITY E&M VISITS	148.3%	143.8%	144.2%	2.8%	-0.3%
NEBRASKA - ALL OFFICE VISITS	159.8%	150.1%	146.0%	9.4%	2.8%
LOW COMPLEXITY E&M VISITS	160.0%	161.9%	160.7%	-0.4%	0.8%
MODERATE COMPLEXITY E&M VISITS	160.9%	161.1%	159.7%	0.8%	0.9%
NEVADA - ALL OFFICE VISITS	90.8%	95.0%	85.2%	6.7%	11.5%
LOW COMPLEXITY E&M VISITS	93.8%	89.4%	82.3%	13.9%	8.7%
MODERATE COMPLEXITY E&M VISITS	84.7%	93.5%	83.8%	1.0%	11.6%
NEW HAMPSHIRE - ALL OFFICE VISITS	146.1%	150.2%	89.3%	63.6%	68.2%
LOW COMPLEXITY E&M VISITS	149.8%	148.8%	116.8%	28.2%	27.3%
MODERATE COMPLEXITY E&M VISITS	150.0%	152.9%	115.6%	29.8%	32.3%
NEW JERSEY - ALL OFFICE VISITS	89.0%	95.3%	84.9%	4.8%	12.2%
LOW COMPLEXITY E&M VISITS	92.1%	92.4%	80.3%	14.7%	15.1%
MODERATE COMPLEXITY E&M VISITS	84.8%	90.8%	68.4%	24.0%	32.6%
NEW MEXICO - ALL OFFICE VISITS	117.0%	117.7%	86.2%	35.7%	36.6%
LOW COMPLEXITY E&M VISITS	115.5%	112.4%	95.8%	20.6%	17.3%
MODERATE COMPLEXITY E&M VISITS	119.3%	119.6%	96.6%	23.5%	23.8%
NEW YORK - ALL OFFICE VISITS	96.4%	93.1%	87.3%	10.4%	6.6%
LOW COMPLEXITY E&M VISITS	96.0%	89.6%	86.2%	11.3%	3.9%
MODERATE COMPLEXITY E&M VISITS	94.9%	89.4%	81.8%	16.1%	9.3%
NORTH CAROLINA - ALL OFFICE VISITS	129.6%	125.8%	87.8%	47.5%	43.3%
LOW COMPLEXITY E&M VISITS	130.2%	117.5%	90.7%	43.6%	29.6%
MODERATE COMPLEXITY E&M VISITS	129.6%	124.9%	88.7%	46.1%	40.8%
NORTH DAKOTA - ALL OFFICE VISITS	169.5%	162.6%	117.9%	43.8%	37.9%
LOW COMPLEXITY E&M VISITS	170.6%	167.4%	131.2%	30.1%	27.7%
MODERATE COMPLEXITY E&M VISITS	170.6%	166.5%	118.7%	43.7%	40.2%
OHIO - ALL OFFICE VISITS	104.9%	105.4%	84.2%	24.5%	25.1%
LOW COMPLEXITY E&M VISITS	105.6%	100.8%	94.0%	12.2%	7.2%
MODERATE COMPLEXITY E&M VISITS	101.5%	101.6%	89.9%	13.0%	13.0%
OKLAHOMA - ALL OFFICE VISITS	116.9%	117.4%	93.5%	25.0%	25.6%
LOW COMPLEXITY E&M VISITS	117.2%	116.7%	106.2%	10.3%	9.9%
MODERATE COMPLEXITY E&M VISITS	117.3%	118.6%	107.6%	9.0%	10.2%
OREGON - ALL OFFICE VISITS	167.4%	161.4%	120.8%	38.6%	33.7%
LOW COMPLEXITY E&M VISITS	172.7%	158.6%	160.6%	7.5%	-1.3%
MODERATE COMPLEXITY E&M VISITS	164.1%	158.4%	155.2%	5.7%	2.1%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
PENNSYLVANIA - ALL OFFICE VISITS	110.1%	104.1%	96.0%	14.7%	8.5%
LOW COMPLEXITY E&M VISITS	110.7%	101.2%	97.6%	13.5%	3.7%
MODERATE COMPLEXITY E&M VISITS	108.8%	102.5%	99.2%	9.7%	3.3%
RHODE ISLAND - ALL OFFICE VISITS	105.8%	106.0%	86.0%	23.1%	23.2%
LOW COMPLEXITY E&M VISITS	106.4%	101.9%	84.7%	25.6%	20.3%
MODERATE COMPLEXITY E&M VISITS	108.0%	107.9%	85.7%	26.1%	25.9%
SOUTH CAROLINA - ALL OFFICE VISITS	101.7%	99.9%	72.3%	40.7%	38.3%
LOW COMPLEXITY E&M VISITS	101.7%	96.2%	82.4%	23.4%	16.7%
MODERATE COMPLEXITY E&M VISITS	101.3%	99.8%	80.0%	26.6%	24.8%
SOUTH DAKOTA - ALL OFFICE VISITS	165.6%	144.4%	131.3%	26.1%	9.9%
LOW COMPLEXITY E&M VISITS	165.6%	148.2%	139.4%	18.8%	6.3%
MODERATE COMPLEXITY E&M VISITS	162.0%	154.1%	142.6%	13.6%	8.1%
TENNESSEE - ALL OFFICE VISITS	114.7%	119.1%	74.9%	53.1%	59.1%
LOW COMPLEXITY E&M VISITS	114.4%	114.7%	75.0%	52.6%	52.9%
MODERATE COMPLEXITY E&M VISITS	115.8%	118.6%	60.0%	93.0%	97.7%
TEXAS - ALL OFFICE VISITS	108.9%	109.0%	81.7%	33.3%	33.3%
LOW COMPLEXITY E&M VISITS	109.8%	106.6%	91.9%	19.4%	16.0%
MODERATE COMPLEXITY E&M VISITS	108.3%	108.0%	85.7%	26.5%	26.1%
UTAH - ALL OFFICE VISITS	115.5%	118.1%	99.4%	16.1%	18.8%
LOW COMPLEXITY E&M VISITS	114.8%	114.8%	108.0%	6.3%	6.3%
MODERATE COMPLEXITY E&M VISITS	115.0%	116.1%	111.3%	3.3%	4.2%
VERMONT - ALL OFFICE VISITS	127.4%	155.4%	82.3%	54.9%	88.8%
LOW COMPLEXITY E&M VISITS	124.1%	148.1%	88.8%	39.8%	66.8%
MODERATE COMPLEXITY E&M VISITS	133.2%	156.3%	105.3%	26.5%	48.4%
VIRGINIA - ALL OFFICE VISITS	114.3%	114.1%	79.8%	43.2%	42.9%
LOW COMPLEXITY E&M VISITS	113.4%	111.6%	80.5%	41.0%	38.6%
MODERATE COMPLEXITY E&M VISITS	115.4%	113.5%	71.7%	60.8%	58.3%
WASHINGTON - ALL OFFICE VISITS	139.9%	135.7%	102.4%	36.6%	32.5%
LOW COMPLEXITY E&M VISITS	140.8%	132.6%	120.3%	17.0%	10.2%
MODERATE COMPLEXITY E&M VISITS	140.2%	135.4%	118.0%	18.8%	14.7%
WEST VIRGINIA - ALL OFFICE VISITS	122.5%	119.7%	127.6%	-4.0%	-6.2%
LOW COMPLEXITY E&M VISITS	122.3%	116.0%	112.4%	8.8%	3.2%
MODERATE COMPLEXITY E&M VISITS	120.9%	119.3%	113.8%	6.2%	4.8%
WISCONSIN - ALL OFFICE VISITS	169.6%	161.6%	124.3%	36.4%	29.9%
LOW COMPLEXITY E&M VISITS	168.1%	152.9%	120.1%	39.9%	27.2%
MODERATE COMPLEXITY E&M VISITS	168.8%	155.9%	130.1%	29.8%	19.9%
WYOMING - ALL OFFICE VISITS	139.7%	135.7%	109.6%	27.4%	23.8%
LOW COMPLEXITY E&M VISITS	140.4%	134.0%	119.0%	18.0%	12.6%
MODERATE COMPLEXITY E&M VISITS	138.1%	139.5%	119.1%	15.9%	17.1%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
WASHINGTON D.C. - ALL OFFICE VISITS	99.4%	105.0%	80.2%	23.9%	30.9%
LOW COMPLEXITY E&M VISITS	102.3%	101.4%	83.9%	21.9%	20.8%
MODERATE COMPLEXITY E&M VISITS	98.3%	102.2%	82.7%	18.9%	23.6%

APPENDIX L

IN-NETWORK PROVIDER PAYMENT LEVELS RELATIVE TO MEDICARE FOR OFFICE VISITS IN 2015 PPO PLANS

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL SPECIALISTS
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
OFFICE VISITS					
ALL STATES - ALL OFFICE VISITS	115.2%	111.3%	95.1%	21.2%	17.1%
LOW COMPLEXITY E&M VISITS	115.4%	109.2%	95.7%	20.6%	14.1%
MODERATE COMPLEXITY E&M VISITS	114.2%	112.2%	95.2%	20.0%	17.8%
ALABAMA - ALL OFFICE VISITS	87.2%	84.8%	88.4%	-1.3%	-4.1%
LOW COMPLEXITY E&M VISITS	88.6%	87.6%	67.7%	30.9%	29.4%
MODERATE COMPLEXITY E&M VISITS	90.9%	91.1%	59.1%	53.7%	54.1%
ALASKA - ALL OFFICE VISITS	184.6%	182.3%	121.2%	52.3%	50.4%
LOW COMPLEXITY E&M VISITS	185.9%	177.6%	186.8%	-0.5%	-4.9%
MODERATE COMPLEXITY E&M VISITS	178.2%	176.1%	177.2%	0.6%	-0.6%
ARIZONA - ALL OFFICE VISITS	92.3%	98.9%	81.7%	12.9%	21.0%
LOW COMPLEXITY E&M VISITS	91.0%	94.2%	84.9%	7.2%	10.9%
MODERATE COMPLEXITY E&M VISITS	91.0%	97.6%	77.6%	17.1%	25.7%
ARKANSAS - ALL OFFICE VISITS	107.2%	108.2%	97.6%	9.9%	10.9%
LOW COMPLEXITY E&M VISITS	105.4%	106.0%	87.0%	21.1%	21.9%
MODERATE COMPLEXITY E&M VISITS	107.7%	107.2%	84.8%	26.9%	26.4%
CALIFORNIA - ALL OFFICE VISITS	127.1%	129.4%	99.3%	27.9%	30.3%
LOW COMPLEXITY E&M VISITS	130.8%	127.1%	111.3%	17.5%	14.2%
MODERATE COMPLEXITY E&M VISITS	124.6%	126.6%	109.8%	13.5%	15.3%
COLORADO - ALL OFFICE VISITS	121.0%	125.7%	85.9%	40.9%	46.3%
LOW COMPLEXITY E&M VISITS	119.0%	119.2%	91.2%	30.6%	30.8%
MODERATE COMPLEXITY E&M VISITS	121.2%	125.1%	91.8%	32.0%	36.3%
CONNECTICUT - ALL OFFICE VISITS	117.6%	123.3%	84.8%	38.7%	45.4%
LOW COMPLEXITY E&M VISITS	114.1%	115.4%	89.7%	27.2%	28.6%
MODERATE COMPLEXITY E&M VISITS	117.4%	122.8%	76.6%	53.2%	60.2%
DELAWARE - ALL OFFICE VISITS	99.7%	100.1%	90.9%	9.8%	10.1%
LOW COMPLEXITY E&M VISITS	99.8%	94.1%	84.4%	18.2%	11.5%
MODERATE COMPLEXITY E&M VISITS	98.6%	98.2%	86.0%	14.6%	14.2%
FLORIDA - ALL OFFICE VISITS	97.4%	106.0%	81.6%	19.4%	29.9%
LOW COMPLEXITY E&M VISITS	96.0%	100.7%	73.9%	29.9%	36.3%
MODERATE COMPLEXITY E&M VISITS	96.8%	106.0%	75.8%	27.7%	39.9%
GEORGIA - ALL OFFICE VISITS	109.4%	106.2%	80.1%	36.6%	32.6%
LOW COMPLEXITY E&M VISITS	108.6%	108.5%	76.0%	42.8%	42.7%
MODERATE COMPLEXITY E&M VISITS	109.9%	113.5%	79.4%	38.4%	43.0%
HAWAII - ALL OFFICE VISITS	101.4%	104.3%	102.9%	-1.5%	1.4%
LOW COMPLEXITY E&M VISITS	100.5%	101.8%	92.9%	8.1%	9.6%
MODERATE COMPLEXITY E&M VISITS	100.3%	102.8%	109.1%	-8.1%	-5.8%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL SPECIALISTS
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
IDAHO - ALL OFFICE VISITS	150.1%	142.5%	103.8%	44.6%	37.2%
LOW COMPLEXITY E&M VISITS	151.4%	142.4%	144.8%	4.6%	-1.6%
MODERATE COMPLEXITY E&M VISITS	149.1%	143.5%	144.7%	3.0%	-0.8%
ILLINOIS - ALL OFFICE VISITS	117.1%	119.3%	103.2%	13.4%	15.6%
LOW COMPLEXITY E&M VISITS	115.7%	112.9%	95.5%	21.1%	18.2%
MODERATE COMPLEXITY E&M VISITS	116.5%	117.4%	95.9%	21.5%	22.3%
INDIANA - ALL OFFICE VISITS	101.3%	104.2%	99.5%	1.9%	4.7%
LOW COMPLEXITY E&M VISITS	97.7%	100.7%	93.7%	4.4%	7.5%
MODERATE COMPLEXITY E&M VISITS	100.2%	103.2%	86.7%	15.6%	19.0%
IOWA - ALL OFFICE VISITS	149.4%	141.8%	126.5%	18.1%	12.1%
LOW COMPLEXITY E&M VISITS	148.4%	141.1%	135.8%	9.2%	3.9%
MODERATE COMPLEXITY E&M VISITS	147.0%	145.4%	137.6%	6.9%	5.7%
KANSAS - ALL OFFICE VISITS	104.3%	82.1%	91.7%	13.8%	-10.4%
LOW COMPLEXITY E&M VISITS	105.9%	102.1%	85.5%	23.9%	19.5%
MODERATE COMPLEXITY E&M VISITS	105.5%	105.1%	82.1%	28.6%	28.1%
KENTUCKY - ALL OFFICE VISITS	93.7%	95.6%	71.8%	30.4%	33.2%
LOW COMPLEXITY E&M VISITS	92.7%	91.7%	81.9%	13.2%	11.9%
MODERATE COMPLEXITY E&M VISITS	94.8%	96.3%	78.6%	20.5%	22.5%
LOUISIANA - ALL OFFICE VISITS	97.4%	97.8%	126.1%	-22.7%	-22.5%
LOW COMPLEXITY E&M VISITS	95.7%	94.6%	93.5%	2.3%	1.2%
MODERATE COMPLEXITY E&M VISITS	97.5%	97.3%	90.6%	7.6%	7.4%
MAINE - ALL OFFICE VISITS	121.5%	121.9%	78.2%	55.4%	55.9%
LOW COMPLEXITY E&M VISITS	119.3%	117.4%	100.7%	18.4%	16.5%
MODERATE COMPLEXITY E&M VISITS	121.4%	121.2%	96.4%	26.0%	25.8%
MARYLAND - ALL OFFICE VISITS	107.7%	102.0%	84.4%	27.6%	20.7%
LOW COMPLEXITY E&M VISITS	106.7%	99.7%	80.8%	32.1%	23.4%
MODERATE COMPLEXITY E&M VISITS	106.9%	101.5%	86.7%	23.3%	17.0%
MASSACHUSETTS - ALL OFFICE VISITS	156.3%	156.5%	101.0%	54.7%	54.9%
LOW COMPLEXITY E&M VISITS	152.1%	151.5%	105.1%	44.7%	44.1%
MODERATE COMPLEXITY E&M VISITS	155.0%	155.3%	111.0%	39.7%	39.9%
MICHIGAN - ALL OFFICE VISITS	110.7%	106.6%	99.7%	11.0%	6.9%
LOW COMPLEXITY E&M VISITS	109.7%	105.3%	93.9%	16.9%	12.2%
MODERATE COMPLEXITY E&M VISITS	109.5%	105.4%	97.1%	12.7%	8.6%
MINNESOTA - ALL OFFICE VISITS	184.2%	184.4%	115.6%	59.3%	59.5%
LOW COMPLEXITY E&M VISITS	179.6%	180.2%	126.4%	42.1%	42.6%
MODERATE COMPLEXITY E&M VISITS	188.8%	189.8%	116.5%	62.1%	62.9%
MISSISSIPPI - ALL OFFICE VISITS	103.3%	105.2%	100.9%	2.4%	4.2%
LOW COMPLEXITY E&M VISITS	102.1%	101.9%	105.4%	-3.1%	-3.3%
MODERATE COMPLEXITY E&M VISITS	102.5%	104.5%	89.9%	14.1%	16.3%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL SPECIALISTS
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
MISSOURI - ALL OFFICE VISITS	103.8%	99.7%	79.3%	31.0%	25.8%
LOW COMPLEXITY E&M VISITS	103.4%	99.7%	77.3%	33.7%	29.0%
MODERATE COMPLEXITY E&M VISITS	104.3%	105.1%	78.5%	32.8%	33.9%
MONTANA - ALL OFFICE VISITS	148.9%	145.1%	103.8%	43.4%	39.8%
LOW COMPLEXITY E&M VISITS	148.7%	145.5%	145.1%	2.5%	0.3%
MODERATE COMPLEXITY E&M VISITS	149.4%	149.7%	143.4%	4.2%	4.3%
NEBRASKA - ALL OFFICE VISITS	159.0%	151.0%	151.3%	5.1%	-0.2%
LOW COMPLEXITY E&M VISITS	158.7%	160.7%	156.2%	1.6%	2.9%
MODERATE COMPLEXITY E&M VISITS	159.5%	161.9%	158.6%	0.6%	2.1%
NEVADA - ALL OFFICE VISITS	92.0%	95.2%	87.0%	5.7%	9.5%
LOW COMPLEXITY E&M VISITS	94.0%	89.8%	87.2%	7.8%	3.1%
MODERATE COMPLEXITY E&M VISITS	85.7%	94.0%	83.7%	2.4%	12.4%
NEW HAMPSHIRE - ALL OFFICE VISITS	151.4%	154.1%	89.6%	69.1%	72.0%
LOW COMPLEXITY E&M VISITS	150.1%	153.2%	113.5%	32.2%	35.0%
MODERATE COMPLEXITY E&M VISITS	152.7%	159.4%	113.8%	34.3%	40.2%
NEW JERSEY - ALL OFFICE VISITS	100.2%	106.5%	91.2%	9.9%	16.8%
LOW COMPLEXITY E&M VISITS	102.2%	102.0%	86.1%	18.8%	18.5%
MODERATE COMPLEXITY E&M VISITS	97.2%	102.6%	76.1%	27.6%	34.7%
NEW MEXICO - ALL OFFICE VISITS	113.4%	115.1%	86.2%	31.6%	33.6%
LOW COMPLEXITY E&M VISITS	110.5%	109.0%	95.8%	15.4%	13.8%
MODERATE COMPLEXITY E&M VISITS	115.5%	117.5%	94.3%	22.4%	24.5%
NEW YORK - ALL OFFICE VISITS	102.1%	100.7%	89.0%	14.7%	13.2%
LOW COMPLEXITY E&M VISITS	101.0%	95.7%	85.5%	18.2%	12.0%
MODERATE COMPLEXITY E&M VISITS	101.2%	97.7%	85.6%	18.2%	14.2%
NORTH CAROLINA - ALL OFFICE VISITS	127.6%	123.9%	83.9%	52.1%	47.7%
LOW COMPLEXITY E&M VISITS	127.4%	116.2%	86.4%	47.4%	34.4%
MODERATE COMPLEXITY E&M VISITS	126.7%	123.8%	86.7%	46.1%	42.8%
NORTH DAKOTA - ALL OFFICE VISITS	173.1%	167.2%	113.3%	52.9%	47.6%
LOW COMPLEXITY E&M VISITS	173.9%	171.3%	124.5%	39.7%	37.6%
MODERATE COMPLEXITY E&M VISITS	174.3%	173.1%	107.7%	61.9%	60.8%
OHIO - ALL OFFICE VISITS	104.5%	105.2%	86.3%	21.1%	22.0%
LOW COMPLEXITY E&M VISITS	104.5%	101.0%	92.9%	12.4%	8.7%
MODERATE COMPLEXITY E&M VISITS	102.8%	102.1%	90.8%	13.3%	12.5%
OKLAHOMA - ALL OFFICE VISITS	109.2%	112.1%	92.1%	18.5%	21.7%
LOW COMPLEXITY E&M VISITS	109.0%	110.6%	100.7%	8.2%	9.8%
MODERATE COMPLEXITY E&M VISITS	109.8%	113.6%	101.5%	8.2%	11.9%
OREGON - ALL OFFICE VISITS	167.3%	161.8%	119.9%	39.5%	34.9%
LOW COMPLEXITY E&M VISITS	172.9%	158.6%	159.9%	8.1%	-0.8%
MODERATE COMPLEXITY E&M VISITS	163.9%	158.1%	158.8%	3.2%	-0.4%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL SPECIALISTS
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
PENNSYLVANIA - ALL OFFICE VISITS	112.2%	105.1%	95.3%	17.7%	10.3%
LOW COMPLEXITY E&M VISITS	113.1%	102.4%	97.9%	15.5%	4.6%
MODERATE COMPLEXITY E&M VISITS	110.8%	103.9%	100.4%	10.4%	3.6%
RHODE ISLAND - ALL OFFICE VISITS	107.2%	107.5%	89.9%	19.3%	19.6%
LOW COMPLEXITY E&M VISITS	105.5%	101.8%	77.7%	35.9%	31.1%
MODERATE COMPLEXITY E&M VISITS	107.8%	108.9%	81.5%	32.2%	33.7%
SOUTH CAROLINA - ALL OFFICE VISITS	99.2%	96.1%	70.7%	40.3%	36.0%
LOW COMPLEXITY E&M VISITS	98.2%	92.6%	79.8%	23.0%	15.9%
MODERATE COMPLEXITY E&M VISITS	98.9%	97.0%	79.2%	24.9%	22.6%
SOUTH DAKOTA - ALL OFFICE VISITS	168.2%	146.5%	135.4%	24.2%	8.2%
LOW COMPLEXITY E&M VISITS	167.4%	150.2%	142.2%	17.7%	5.6%
MODERATE COMPLEXITY E&M VISITS	165.6%	157.4%	146.7%	12.9%	7.2%
TENNESSEE - ALL OFFICE VISITS	111.3%	117.1%	73.7%	51.0%	59.0%
LOW COMPLEXITY E&M VISITS	110.9%	112.5%	73.3%	51.3%	53.4%
MODERATE COMPLEXITY E&M VISITS	112.1%	116.9%	60.2%	86.1%	94.0%
TEXAS - ALL OFFICE VISITS	104.2%	92.0%	84.1%	24.0%	9.4%
LOW COMPLEXITY E&M VISITS	104.6%	101.8%	88.5%	18.2%	15.0%
MODERATE COMPLEXITY E&M VISITS	104.0%	104.1%	81.5%	27.6%	27.7%
UTAH - ALL OFFICE VISITS	115.3%	118.9%	98.1%	17.5%	21.3%
LOW COMPLEXITY E&M VISITS	114.2%	114.5%	106.5%	7.3%	7.5%
MODERATE COMPLEXITY E&M VISITS	115.3%	116.9%	110.3%	4.6%	6.0%
VERMONT - ALL OFFICE VISITS	128.1%	155.4%	81.6%	56.9%	90.4%
LOW COMPLEXITY E&M VISITS	120.7%	150.0%	90.3%	33.7%	66.2%
MODERATE COMPLEXITY E&M VISITS	132.2%	155.0%	107.9%	22.5%	43.6%
VIRGINIA - ALL OFFICE VISITS	111.0%	93.4%	83.6%	32.8%	11.7%
LOW COMPLEXITY E&M VISITS	111.1%	109.2%	83.6%	32.9%	30.6%
MODERATE COMPLEXITY E&M VISITS	113.0%	112.3%	75.8%	49.1%	48.1%
WASHINGTON - ALL OFFICE VISITS	142.7%	138.0%	102.3%	39.5%	34.9%
LOW COMPLEXITY E&M VISITS	143.3%	134.2%	120.2%	19.2%	11.7%
MODERATE COMPLEXITY E&M VISITS	143.2%	137.1%	121.1%	18.3%	13.3%
WEST VIRGINIA - ALL OFFICE VISITS	121.9%	118.6%	133.8%	-8.9%	-11.3%
LOW COMPLEXITY E&M VISITS	121.8%	114.8%	112.0%	8.7%	2.5%
MODERATE COMPLEXITY E&M VISITS	120.5%	118.0%	116.4%	3.5%	1.3%
WISCONSIN - ALL OFFICE VISITS	160.9%	157.8%	121.9%	32.0%	29.4%
LOW COMPLEXITY E&M VISITS	159.3%	148.5%	115.6%	37.8%	28.4%
MODERATE COMPLEXITY E&M VISITS	158.1%	150.7%	126.3%	25.2%	19.3%
WYOMING - ALL OFFICE VISITS	140.4%	139.7%	101.5%	38.3%	37.6%
LOW COMPLEXITY E&M VISITS	138.5%	138.9%	106.9%	29.6%	29.9%
MODERATE COMPLEXITY E&M VISITS	139.1%	143.7%	119.2%	16.8%	20.6%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE			HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL	HIGHER SPECIALIST PAYMENT LEVELS COMPARED TO BEHAVIORAL SPECIALISTS
	PRIMARY CARE	SPECIALISTS	BEHAVIORAL		
WASHINGTON D.C. - ALL OFFICE VISITS	115.5%	117.9%	85.8%	34.6%	37.5%
LOW COMPLEXITY E&M VISITS	121.0%	115.0%	97.2%	24.5%	18.3%
MODERATE COMPLEXITY E&M VISITS	112.6%	115.8%	92.4%	21.9%	25.3%

Addendum

SUPPLEMENTAL TABLE 1 - DISPARITY LEVELS

INPATIENT FACILITY NETWORK UTILIZATION FOR 2015 PPO PLANS

CARE SETTING AND STATE	OUT OF NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK USE
	MEDICAL/SURGICAL	BEHAVIORAL	
ALL STATES	4.0%	16.7%	4.15X
DELAWARE	0.6%	10.5%	17.57X
CONNECTICUT	1.6%	27.1%	16.60X
MAINE	1.4%	18.8%	13.62X
NEW JERSEY	2.6%	28.6%	11.17X
FLORIDA	3.6%	37.2%	10.41X
NEW HAMPSHIRE	2.8%	28.3%	10.06X
PENNSYLVANIA	1.1%	11.1%	10.03X
ALABAMA	1.9%	18.0%	9.38X
NEW YORK	2.2%	18.3%	8.43X
RHODE ISLAND	2.3%	18.3%	7.85X
COLORADO	3.0%	22.8%	7.48X
CALIFORNIA	3.8%	28.2%	7.41X
WASHINGTON DC	2.2%	15.8%	7.18X
MARYLAND	2.5%	17.4%	7.01X
ARIZONA	3.1%	20.6%	6.67X
OREGON	2.8%	18.1%	6.54X
MINNESOTA	1.9%	11.5%	6.19X
NEVADA	4.0%	24.2%	6.05X
UTAH	4.0%	24.2%	6.05X
MASSACHUSETTS	2.9%	16.8%	5.78X
NORTH CAROLINA	3.2%	15.1%	4.74X
VIRGINIA	3.7%	17.0%	4.57X
TEXAS	3.9%	16.9%	4.35X
WASHINGTON	4.5%	19.4%	4.32X
LOUISIANA	2.0%	8.5%	4.29X
OKLAHOMA	3.4%	14.2%	4.17X
GEORGIA	2.9%	11.9%	4.04X
KANSAS	3.4%	13.5%	3.95X
MISSISSIPPI	4.8%	18.7%	3.90X
TENNESSEE	4.7%	18.1%	3.83X
INDIANA	3.6%	13.5%	3.73X
MONTANA	5.5%	19.5%	3.56X
MISSOURI	4.0%	14.0%	3.53X
WEST VIRGINIA	3.6%	12.7%	3.51X
HAWAII	7.4%	25.0%	3.39X
IDAHO	3.2%	10.8%	3.35X

CARE SETTING AND STATE	OUT OF NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK USE
	MEDICAL/SURGICAL	BEHAVIORAL	
SOUTH CAROLINA	3.2%	9.7%	3.08X
NEW MEXICO	6.8%	20.5%	3.00X
ARKANSAS	5.1%	14.8%	2.93X
ALASKA	9.0%	24.8%	2.76X
KENTUCKY	3.5%	9.6%	2.72X
MICHIGAN	3.9%	10.3%	2.61X
WYOMING	10.5%	26.2%	2.51X
NORTH DAKOTA	4.7%	11.2%	2.38X
WISCONSIN	4.8%	11.3%	2.37X
OHIO	4.7%	10.7%	2.30X
VERMONT	7.5%	16.3%	2.16X
SOUTH DAKOTA	2.3%	4.8%	2.06X
IOWA	2.4%	4.4%	1.85X
ILLINOIS	5.3%	9.3%	1.77X
NEBRASKA	34.8%	22.8%	0.66X

SUPPLEMENTAL TABLE 2 - DISPARITY LEVELS

OUTPATIENT FACILITY NETWORK UTILIZATION FOR 2015 PPO PLANS

CARE SETTING AND STATE	OUT OF NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK USE
	MEDICAL/SURGICAL	BEHAVIORAL	
ALL STATES	5.5%	31.6%	5.76X
UTAH	3.4%	67.0%	19.95X
MAINE	2.9%	37.0%	12.80X
TENNESSEE	3.2%	40.3%	12.78X
FLORIDA	6.3%	79.8%	12.62X
DELAWARE	2.1%	25.1%	12.06X
NEW HAMPSHIRE	4.5%	53.3%	11.83X
CONNECTICUT	3.1%	34.4%	10.98X
IDAHO	4.7%	49.3%	10.39X
NEW JERSEY	3.6%	35.1%	9.68X
WASHINGTON	3.6%	31.7%	8.85X
NEW MEXICO	5.3%	45.9%	8.65X
OKLAHOMA	3.9%	32.5%	8.41X
WASHINGTON DC	3.5%	29.2%	8.36X
CALIFORNIA	6.3%	47.9%	7.58X
MISSOURI	3.4%	23.2%	6.94X
WEST VIRGINIA	5.4%	36.9%	6.77X
ARIZONA	6.9%	45.7%	6.67X
KANSAS	3.9%	26.1%	6.67X
COLORADO	4.7%	31.4%	6.65X
NEVADA	8.0%	52.9%	6.57X
MICHIGAN	2.7%	17.8%	6.53X
MASSACHUSETTS	3.7%	24.1%	6.48X
OREGON	5.6%	36.0%	6.46X
GEORGIA	5.6%	36.0%	6.46X
MISSISSIPPI	7.0%	42.8%	6.10X
PENNSYLVANIA	2.8%	16.9%	6.10X
MONTANA	9*.3%	54.1%	5.81X
NORTH CAROLINA	6.7%	36.3%	5.41X
ALASKA	9.9%	53.2%	5.39X
RHODE ISLAND	5.4%	29.0%	5.36X
ALABAMA	4.3%	22.4%	5.26X
LOUISIANA	3.5%	16.9%	4.84X
VIRGINIA	7.4%	35.0%	4.71X
ARKANSAS	8.0%	35.2%	4.38X
WYOMING	16.7%	71.7%	4.30X
INDIANA	6.8%	28.6%	4.23X
KENTUCKY	7.7%	31.6%	4.13X

CARE SETTING AND STATE	OUT OF NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK USE
	MEDICAL/SURGICAL	BEHAVIORAL	
OHIO	6.2%	24.6%	3.97X
WISCONSIN	5.4%	19.3%	3.57X
MARYLAND	9.0%	31.6%	3.52X
MINNESOTA	2.9%	10.2%	3.50X
SOUTH CAROLINA	7.4%	24.3%	3.28X
TEXAS	8.0%	24.5%	3.05X
VERMONT	15.6%	41.8%	2.68X
ILLINOIS	6.9%	17.3%	2.49X
NEW YORK	9.2%	22.7%	2.46X
IOWA	2.8%	5.9%	2.09X
SOUTH DAKOTA	4.0%	7.7%	1.93X
NORTH DAKOTA	8.5%	15.0%	1.77X
HAWAII	20.4%	16.3%	0.80X
NEBRASKA	32.7%	25.9%	0.79X

SUPPLEMENTAL TABLE 3 - DISPARITY LEVELS

OFFICE VISIT NETWORK UTILIZATION RATES FOR 2015 PPO PLANS

CARE SETTING AND STATE	OUT OF NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK USE
	MEDICAL/SURGICAL	BEHAVIORAL	
ALL STATES	3.7%	18.7%	5.14X
CONNECTICUT	3.3%	34.2%	10.52X
NEW JERSEY	4.7%	45.2%	9.62X
MARYLAND	3.3%	31.2%	9.46X
NEW YORK	4.2%	34.0%	8.09X
MINNESOTA	1.3%	10.8%	8.01X
VIRGINIA	3.4%	26.0%	7.61X
NORTH DAKOTA	2.5%	18.6%	7.55X
WASHINGTON DC	9.2%	66.5%	7.23X
COLORADO	2.7%	18.5%	6.94X
WASHINGTON	2.5%	17.2%	6.79X
DELAWARE	1.0%	6.4%	6.60X
KANSAS	2.9%	18.9%	6.50X
TENNESSEE	1.9%	11.3%	5.78X
NORTH CAROLINA	3.0%	17.4%	5.73X
CALIFORNIA	5.7%	32.1%	5.68X
WISCONSIN	2.8%	14.4%	5.08X
MISSOURI	2.9%	14.6%	5.06X
OREGON	3.3%	16.5%	4.98X
ALABAMA	2.3%	11.7%	4.97X
MASSACHUSETTS	3.4%	16.9%	4.95X
OHIO	1.9%	9.3%	4.93X
SOUTH CAROLINA	3.1%	13.8%	4.50X
FLORIDA	4.0%	17.8%	4.43X
UTAH	3.0%	12.9%	4.35X
MICHIGAN	3.4%	14.2%	4.17X
LOUISIANA	2.0%	8.5%	4.16X
MAINE	3.9%	15.9%	4.07X
MONTANA	6.0%	24.4%	4.05X
GEORGIA	3.7%	14.9%	4.04X
MISSISSIPPI	3.1%	12.4%	3.99X
RHODE ISLAND	2.4%	9.7%	3.98X
ARKANSAS	3.7%	13.6%	3.70X
KENTUCKY	2.2%	8.1%	3.65
ILLINOIS	4.9%	17.8%	3.63
IOWA	0.7%	2.6%	3.51X
WYOMING	13.6%	47.3%	3.49X
NEW HAMPSHIRE	3.6%	12.5%	3.48X

CARE SETTING AND STATE	OUT OF NETWORK UTILIZATION		HIGHER PROPORTION OF BEHAVIORAL OUT-OF-NETWORK USE
	MEDICAL/SURGICAL	BEHAVIORAL	
ARIZONA	3.8%	13.3%	3.46X
TEXAS	5.0%	16.5%	3.29X
NEVADA	6.1%	19.7%	3.21X
NEW MEXICO	5.1%	15.9%	3.14X
INDIANA	3.5%	10.9%	3.06X
OKLAHOMA	4.0%	11.7%	2.89X
HAWAII	12.0%	34.3%	2.87X
IDAHO	2.4%	6.7%	2.82X
PENNSYLVANIA	3.8%	10.6%	2.81X
VERMONT	8.8%	22.8%	2.60X
ALASKA	28.2%	67.6%	2.39X
WEST VIRGINIA	2.8%	5.3%	1.88X
SOUTH DAKOTA	1.7%	2.5%	1.41X
NEBRASKA	19.1%	12.%	0.65X

SUPPLEMENTAL TABLE 4 - DISPARITY LEVELS

IN-NETWORK PROVIDER PAYMENT LEVELS RELATIVE TO MEDICARE FOR OFFICE VISITS IN 2015 PPO PLANS

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE		HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL
	PRIMARY CARE	BEHAVIORAL	
ALL STATES	115.2%	95.1%	21.20%
NEW HAMPSHIRE	151.4%	89.6%	69.10%
MINNESOTA	184.2%	115.6%	59.30%
VERMONT	128.1%	81.6%	56.90%
MAINE	121.5%	78.2%	55.40%
MASSACHUSETTS	156.3%	101.0%	54.70%
NORTH DAKOTA	127.6%	83.9%	52.10%
ALASKA	184.6%	121.2%	52.30%
NORTH CAROLINA	127.6%	83.9%	52.10%
TENNESSEE	111.3%	73.7%	51.00%
IDAHO	150.1%	103.8%	44.60%
MONTANA	148.9%	103.8%	43.40%
COLORADO	121.0%	85.9%	40.90%
SOUTH CAROLINA	99.2%	70.7%	40.30%
OREGON	167.3%	119.9%	39.50%
WASHINGTON	142.7%	102.3%	39.50%
CONNECTICUT	117.6%	84.8%	38.70%
WYOMING	140.4%	101.5%	38.30%
GEORGIA	109.4%	80.1%	36.60%
WASHINGTON DC	115.5%	85.8%	34.60%
VIRGINIA	111.0%	83.6%	32.80%
WISCONSIN	160.9%	121.9%	32.00%
NEW MEXICO	113.4%	86.2%	31.60%
MISSOURI	103.8%	79.3%	31.00%
KENTUCKY	93.7%	71.8%	30.40%
CALIFORNIA	127.1%	99.3%	27.90%
MARYLAND	107.7%	84.4%	27.60%
SOUTH DAKOTA	168.2%	135.4%	24.20%
TEXAS	104.2%	84.1%	24.00%
OHIO	104.5%	86.3%	21.10%
FLORIDA	97.4%	81.6%	19.40%
RHODE ISLAND	107.2%	89.9%	19.30%
OKLAHOMA	109.2%	92.1%	18.5%
IOWA	149.4%	126.5%	18.10%
PENNSYLVANIA	112.2%	95.3%	17.70%
UTAH	115.3%	98.1%	17.50%
NEW YORK	102.1%	89.0%	14.70%
KANSAS	104.3%	91.7%	13.80%

CARE SETTING AND STATE	ALLOWED CHARGES RELATIVE TO MEDICARE		
	PRIMARY CARE	BEHAVIORAL	HIGHER PRIMARY CARE PAYMENT LEVELS COMPARED TO BEHAVIORAL
ILLINOIS	117.1%	103.2%	13.40%
ARIZONA	92.3%	81.7%	12.90%
MICHIGAN	110.7%	99.7%	11.00%
ARKANSAS	107.2%	97.6%	9.90%
NEW JERSEY	100.2%	91.2%	9.90%
DELAWARE	99.7%	90.9%	9.80%
NEVADA	92.0%	87.0%	5.70%
NEBRASKA	159.0%	151.3%	5.10%
MISSISSIPPI	103.3%	100.9%	2.40%
INDIANA	101.3%	99.5%	1.90%
ALABAMA	87.2%	88.4%	-1.30%
HAWAII	101.4%	102.9%	-1.50%
WEST VIRGINIA	121.9%	133.8%	-8.90%
LOUISIANA	97.4%	126.4%	-22.70%



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