COLORADO Department of Health Care Policy & Financing



Network Adequacy Quarterly Report Template

Managed Care Entity: *Colorado Access* Line of Business: *RAE 3* Contract Number: *19-107514A13* Contact Name: *Lisa Hug* Report Submitted by: *Brad Schrom* Report Submitted on: *1/30/2024* Report due by *01/31/2024*, covering the MCE's network from *10/01/2023* – *12/31/2023*, FY23-24 Q2

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1. Instructions for Using the Network Adequacy Quarterly Report Template

This document contains the September 2023 release of a standardized template for use by all Colorado Medicaid or CHP+ Managed Care Entities (MCEs) for quarterly Network Adequacy (NA) reporting to the Colorado Department of Health Care Policy and Financing (HCPF). Each MCE should generate one quarterly NA report for each applicable line of business (i.e., CHP+ MCO, Medicaid MCO, or RAE); the report shall contain template elements applicable to the line of business. Network categories required for quarterly reporting are defined in the CO Network Adequacy Crosswalk Definitions (September 2023 version).

The practitioners, practice sites, and entities included in the quarterly NA report will include ordering, referring, and servicing contractors that provide care through a Colorado Medicaid or CHP+ MCE. To ensure consistent data collection across MCEs, each MCE must use this HCPF-approved report template (MS Word and MS Excel templates) to present the MCE's quarterly NA report and data for the corresponding practitioners, practice sites, and entities. Report due dates will align with those outlined in the MCE's contract, unless otherwise stated.

Fiscal Year Quarter Reported	Quarterly Reporting Deadline for HCPF	Reporting Date for Member and Network Files
FY 2023-24 Q1	October 2023	September 30, 2023
FY 2023-24 Q2	January 2024	December 31, 2023
FY 2023-24 Q3	April 2024	March 31, 2024
FY 2023-24 Q4	July 2024	June 30, 2024

Definitions

- "MS Word template" refers to the *CO Network Adequacy_Quarterly Report Word Template_F2_0923* document.
- "MS Word MCE Data Requirements" refers to the *CO Network Adequacy_MCE_DataRequirements_F1_0923* document that contains instructions for each MCE's quarterly submission of member and network data.
- "MS Excel Geoaccess Compliance template" refers to the CO<20##-##>_NAV_FY <####> Q<#> QuarterlyReport_GeoaccessCompliance_<MCE Type>_<MCE Name> spreadsheet.
 - MCEs will use this file to supply county-level results from their geoaccess compliance calculations, including practitioner to member ratios and time/distance calculations.
- Use the Colorado county designations from the Colorado Rural Health Center to define a county as urban, rural, or frontier; the most recent county-level map is available at the following website:
 - https://coruralhealth.org/resources/maps-resource
 - Note: Urban counties with rural areas (e.g., Larimer County) should be reported with the rural counties and use rural time/distance standards.



- A "practice site" or "practice" refers to a physical healthcare facility at which the healthcare service is performed.
- A "practitioner" refers to an individual that personally performs the healthcare service, excluding single case agreement (SCA) practitioners.
- An "entity" refers to a facility-level healthcare service location (e.g., hospital, pharmacy, imaging service facility, and/or laboratory).

Report Instructions

Each MCE should use this template to generate one quarterly NA report for each applicable line of business (i.e., CHP+ MCO, Medicaid MCO, and RAE); the report shall contain template elements applicable to the line of business. The MCE should update the highlighted, italicized data fields on the cover page of this template to reflect their contact information, contract information, and report dates associated with the current report submission.

This report template contains a comprehensive list of NA requirements for the CHP+ MCO, Medicaid MCO, and RAE lines of business. Each table in this MS Word document contains a header row which confirms the applicable line(s) of business for each response. The table below shows expected network categories by MCE type. The accompanying MS Excel spreadsheets contain tabs in which network data can be imported (e.g., member counts, ratio results, time/distance calculation results).

Network Category	CHP+ MCO	Medicaid MCO	RAE
Facilities (Entities) (Hospitals, Pharmacies, Imaging Services, Laboratories)	Х	Х	
Prenatal Care and Women's Health Services	Х	Х	Х
Primary Care Providers (PCPs)	Х	Х	Х
Physical Health Specialists	Х	Х	
Behavioral Health Specialists (<i>RAEs' network categories include Substance Use Disorder [SUD]</i> treatment coverage that went into effect on 1/1/2021)	Х		Х
Ancillary Physical Health Services (Audiology, Optometry, Podiatry, Occupational/Physical/Speech Therapy)	Х	Х	

Questions

• Contact the MCE's Department contract manager or specialist for data submission instructions and assistance with questions or access to HCPF's FTP site.



Establishing and Maintaining the MCE Network

<u>Supporting contract reference:</u> The MCE shall maintain a network that is sufficient in numbers and types of practitioners/practice sites to assure that all covered services to members will be accessible without unreasonable delay. The MCE shall demonstrate that it has the capacity to serve the expected enrollment in that service area.

- To count members, include each unique member enrolled with the MCE and line of business as of the last day of the measurement period (e.g., September 30, 2023, for the quarterly report due to the Department on October 31, 2023).
- To count practitioners/practice sites:
 - Include each unique practitioner/practice sites contracted with the MCE and line of business as of the last day of the measurement period (e.g., September 30, 2023, for the quarterly report due to the Department on October 31, 2023).
 - Define unique individual practitioners using Medicaid ID; a practitioner serving multiple locations should only be counted once for the count of practitioners and ratio calculations.

Define unique practice sites by de-duplicating records by location, such that a single record is shown for each physical location without regard to the number of individual practitioners at the location.

Poquiromont	Previous Quarter		Current Quarter	
Requirement	Number	Percent	Number	Percent
Sample	0	0.0%	0	0.0%
CHP+ MCO, Medicaid MCO, RAE				
Total members	342,892	N/A	306,802	N/A
Total primary care practitioners (i.e., PROVCAT codes beginning with "PV" or "PG")	2,943	N/A	3,100	N/A
Primary care practitioners accepting new members	2,935	99.73%	3086	99.55%
Primary care practitioners offering after-hours appointments	54	1.83%	53	1.71%
New primary care practitioners contracted during the quarter	101	3.43%	103	3.32%
Primary care practitioners that closed or left the MCE's network during the quarter	39	1.33%	35	1.13%

Table 1A–Establishing and Maintaining the MCE Network: Primary Care Data



Table 1B–Establishing and Maintaining the MCE Network: Primary Care Discussion

Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of primary care practitioners to assure that all covered services will be accessible to members without unreasonable delay.

Describe how the MCE ensures members' access to family planning services offered by any appropriate physical health practitioner, practice group, or entity.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

CHP+ MCO, Medicaid MCO, RAE

Colorado Access (COA) monitors its primary care medical provider (PCMP) clinic sites across Region 3 to ensure adequate clinic to member ratio coverage. COA continues to review and grow its PCMP network to ensure all covered services are accessible to members without unreasonable delay. COA's practice facilitators and the Provider Network Services (PNS) team regularly engage with providers and quickly respond to barriers that could impact access to care. COA and providers tackle problems together to ensure members have timely access to primary care. Between data, care management, quality improvement and resource support, COA ensures providers have what they need to support members in improving their health. COA strives to keep primary care at the hub of member healthcare by complementing and augmenting the work providers are already doing.

Every contracted Region 3 PCMP has an assigned practice facilitator from COA's practice support team. As a part of their engagement with providers, the facilitators monitor attribution, closed panels, and capped attribution as they work to support providers in increasing engagement with their attributed members, which aligns with the primary care value-based payment utilization component. In addition, practice support staff aid providers in maximizing funding potential in the value-based payment program.

Practice facilitators and network managers track member attribution rates at the practice level and gauge provider capacity leading to an increase or decrease in cap limits. "Newly Attributed Members" are tracked in monthly member reports, which offers an easy way for providers to identify individuals for engagement outreach. Decreases in cap limits are most commonly associated with staff turnover and the inability to fill vacancies with qualified individuals.

Practice Facilitators provide reports to PCMPs which highlight their performance on clinical and engagement metrics on a regular basis to help them focus in on areas where they have the potential, and interest, to make improvements. On a monthly basis, COA staff share a scorecard with providers that reflects their performance across all value-based payment measures. With this scorecard, providers are able to compare themselves against similar providers and quickly identify opportunities for improvement.

Providers continue to experience barriers to specialty care referrals, specifically for Health First Colorado members in need of endocrinology, neurology, urology and orthopedic specialty care. PCMPs have voiced that many specialists are scheduling a year out on new appointments, presenting a large challenge for members who need more immediate care.



Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of primary care practitioners to assure that all covered services will be accessible to members without unreasonable delay.

Describe how the MCE ensures members' access to family planning services offered by any appropriate physical health practitioner, practice group, or entity.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

CHP+ MCO, Medicaid MCO, RAE

Regarding family planning services, COA has worked directly with reproductive health providers (OB/GYN) in Region 3 to develop a value-based payment model focused on family planning services. The Reproductive Health Model went live in July 2022.

During Q1 State Fiscal Year 2023-2024 (SFY 23-24), the average rate of family planning services for women ages 15-44, as reflected on a claim, across the Region 3 PCMP network was 11.28%. In the reproductive health provider cohort a higher rate of 13.91% was observed. Due to claims runout, data is reported on a three-month lag, which is why Q1 SFY 23-24 is the most recent quarter of data available.

It is important to note that the network's ability to provide family planning services extends well beyond the number of contracted OB/GYN providers. Family planning services are made available to all members, both women and men, through their primary care providers, as family planning is not limited to women's health services. During Q1 SFY23-24, the average rate of family planning services for all population ages 15-44, as reflected on a claim, across the Region 3 PCMP network was 6.13%. In the reproductive health provider cohort a higher rate of 14.32% was observed. Therefore, COA has a very robust network of providers who perform family planning services.

The Virtual Care Collaboration and Integration (VCCI) Program at COA continues to provide increased access to virtual behavioral health care for its participating Region 3 primary care network providers. With an emphasis on collaborative, team-based care, the VCCI Program allows its Primary Care Medical Providers (PCMPs) to receive clinical consultations for any Region 3 member, regardless of insurance, and enables Medicaid members eligible with COA in Region 3 to be referred for treatment over telehealth by VCCI's virtual team of clinicians and psychiatrists. Eligible Region 3 members can be seen over telehealth within the primary care setting and can also access services within schools for participating school-based health centers, or directly within the member's home, with a strong emphasis placed on the psychological safety of the member. The VCCI Program integrates care coordination and works collaboratively with the member's PCMP team to share applicable information and treatment notes and with COA care managers to connect eligible members with social determinants of health (SDOH) resources and higher/more appropriate levels of care as needed. The VCCI program includes an eConsult component that allows its participating PCMPs to directly query a VCCI psychiatrist via asynchronous HIPAA-secure email for a rapid response to their psychiatric questions.



Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of primary care practitioners to assure that all covered services will be accessible to members without unreasonable delay.

Describe how the MCE ensures members' access to family planning services offered by any appropriate physical health practitioner, practice group, or entity.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

CHP+ MCO, Medicaid MCO, RAE

The VCCI Direct Care (DC) Program also increases access to care for eligible members by allowing COA care managers to make referrals to the VCCI Program for Region 3 members that may be unconnected to behavioral health care including psychiatry. The VCCI Program has incorporated feedback from its participating practices and is expanding its scope to include long-term therapy. To monitor the utilization of VCCI's behavioral health services, Salesforce is used as the Electronic Health Record system, which allows for the creation of fields and easy reporting tools to capture usage and member information. Salesforce's "Community" platform is also utilized as an online portal that allows participating practices to make referrals, see their own practice data, and share information to advance the coordination and integration of care between VCCI's behavioral health team and the participating primary care practices.

COA educates providers on new telehealth rules through webinars and provider resource groups hosted by its practice support team. COA also continues to promote the use of telehealth services in its provider newsletters which helps educate providers on new telehealth policies or coding updates. Lastly, COA's provider directory lists providers that offer telehealth services. Additionally, the COA telehealth team continues to actively engage in conversations with the community to understand community DE&I needs and is working with the COA internal DE&I team to identify community partners that will help to increase access to behavioral health care services among marginalized communities and practices.

TERMINATIONS:

RAE 3 PCMP Arbor Family Medicine and Romanat Clinic terminated their PCMP contracts.

Doguiromont	Previous Quarter		Current Quarter	
Requirement	Number	Percent	Number	Percent
Sample	0	0.0%	0	0.0%
CHP+ MCO, Medicaid MCO, RAE				
Total members	342,892	N/A	306,802	N/A
Total behavioral health practitioners (i.e., PROVCAT codes beginning with "BV" or "BG")	8,405	N/A	8,568	N/A
Behavioral health practitioners accepting new members	8,295	98.70%	8,338	97.32%

Table 2A–Establishing and Maintaining the MCE Network: Behavioral Health Data



Requirement	Previous Quarter		Current Quarter	
Kequirement	Number	Percent	Number	Percent
Behavioral health practitioners offering after-hours appointments	110	1.31%	113	1.32%
New behavioral health practitioners contracted during the quarter	302	3.63%	383	4.47%
Behavioral health practitioners that closed or left the MCE's network during the quarter	217	2.62%	141	1.65

Table 2B–Establishing and Maintaining the MCE Network: Substance Use Disorder (SUD) Treatment Facilities

Dominant	Previous Quarter	Current Quarter
Requirement	Number	Number
Sample	0	0
RAE		
Total SUD treatment facilities offering American Society of Addiction Medicine (ASAM) Level 3.1 services	14	25
Total SUD treatment facilities offering ASAM Level 3.3 services	1	0
Total SUD treatment facilities offering ASAM Level 3.5 services	21	40
Total SUD treatment facilities offering ASAM Level 3.7 services	9	6
Total SUD treatment facilities offering ASAM Level 3.2 WM (Withdrawal Management)	11	6
Total SUD treatment facilities offering ASAM Level 3.7 WM services	7	7



Table 2C–Establishing and Maintaining the MCE Network: Behavioral Health Discussion

Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of behavioral health practitioners to assure that all covered services will be accessible to members without unreasonable delay. If your network includes out-of-state practitioners serving members enrolled with the MCE, please describe.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

For RAEs, describe any barriers to incorporating the ASAM levels of care for the SUD treatment practitioners, practice sites, and entities. Describe the methods used to monitor the available SUD treatment bed at each ASAM level.

CHP+ MCO, Medicaid MCO, RAE

COA recognizes the current capacity and workforce shortages experienced by behavioral health practices. COA continues to support providers' business operations and staffing needs in a variety of ways. COA provides resources to reduce burnout professionally and operationally, and regularly promotes resources tied to physical and behavioral health support in COA's provider newsletters, the *Provider Update* and *Navigator*. COA has also positioned its practice supports and PNS provider-facing teams to train, educate and leverage core COA programs to support providers. These programs include contracting support, access to care standards, telehealth support, data, and value-based care programs and incentives.

Regarding telehealth, COA continues to provide services to improve access to behavioral health. The Virtual Care Collaboration and Integration (VCCI) Program at COA continues to provide increased access to virtual behavioral health care for its participating Region 3 primary care network providers. With an emphasis on collaborative, team-based care, the VCCI Program allows its Primary Care Medical Providers (PCMPs) to receive clinical consultations for any Region 3 member, regardless of insurance, and enables Medicaid members eligible with COA in Region 3 to be referred for treatment over telehealth by VCCI's virtual team of clinicians and psychiatrists. Eligible Region 3 members can be seen over telehealth within the primary care setting and can also access services within schools for participating school-based health centers, or directly within the member's home, with a strong emphasis placed on the psychological safety of the member. The VCCI Program integrates care coordination and works collaboratively with the member's PCMP team to share applicable information and treatment notes and with COA care managers to connect eligible members with SDOH resources and higher/more appropriate levels of care as needed. The VCCI program includes an eConsult component that allows its participating PCMPs to directly query a VCCI psychiatrist via asynchronous HIPAA-secure email for a rapid response to their psychiatric questions. The VCCI Direct Care (DC) Program also increases access to care for eligible members by allowing COA care managers to make referrals to the VCCI Program for Region 3 members that may be unconnected to behavioral health care including psychiatry. The VCCI Program incorporated feedback from its participating practices and is expanding its scope to include long-term therapy. Salesforce is used as the Electronic Health Record system, which allows for the creation of fields and easy reporting tools to capture usage and member information. Salesforce's "Community" platform is also utilized as an online portal that allows participating practices to make referrals, see their own practice data, and share information to advance the coordination and integration of care between VCCI's behavioral health team and the participating primary care practices.



Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of behavioral health practitioners to assure that all covered services will be accessible to members without unreasonable delay. If your network includes out-of-state practitioners serving members enrolled with the MCE, please describe.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

For RAEs, describe any barriers to incorporating the ASAM levels of care for the SUD treatment practitioners, practice sites, and entities. Describe the methods used to monitor the available SUD treatment bed at each ASAM level.

CHP+ MCO, Medicaid MCO, RAE

COA educates providers on new telehealth rules through webinars and provider resource groups hosted by its practice support team. COA also continues to promote the use of telehealth services in its provider newsletters which helps educate providers on new telehealth policies or coding updates. Lastly, COA's provider directory lists providers that offer telehealth services. Additionally, the COA telehealth team continues to actively engage in conversations with the community to understand community DE&I needs and is working with the COA internal DE&I team to identify community partners that will help to increase access to behavioral health care services among marginalized communities and practices.

In Q2 SFY 23-24, there were 7,766 Behavioral Health providers in the Independent Provider Network (IPN).

ASAM levels

The ASAM levels reflected in Table 2B are those COA is contracted with. Additionally, while COA may be contracted with a provider for a particular level, it is sometimes the case that when trying to refer a member to the provider that the level of care is no longer being offered at the site. Because of this, COA implemented a quarterly survey process to learn from providers which ASAM level(s) they are providing. COA had a 100% response rate from this quarterly survey and will continue to collect this data quarterly. The ASAM data in Table 2B will demonstrate the variability from quarter to quarter. The increase in ASAM 3.1 and 3.5 providers noted in Table 2B was a result of increased accuracy of this data due to the information collected through COA's quarterly survey. COA's behavioral health team completes quality reviews with ASAM level 3.1 or higher providers. COA continues to recruit ASAM level SUD providers.

Mitigating barriers

In order to meet the needs of members needing eating disorder services and SUD and mental health residential treatment services, COA is seeking innovative models of care for the treatment of eating disorders and is also seeking providers outside of the state of Colorado due to the lack of in-state facilities, especially for adolescent youth. Copper Hills Youth Center in Salt Lake County, Utah, a SUD and mental health treatment facility, and Coastal Harbor Treatment Center in Chatham County, Georgia, a SUD treatment facility for both children and adults, are both fully contracted providers with COA. COA is in final discussions with Equip Health, a comprehensive eating disorder telehealth program for adolescents, based in San Diego County, CA.

Mitigating Barriers - Attestation Process for unlicensed/pre-licensed clinicians to render services

COA participates with the other RAEs to permit unlicensed/pre-licensed clinicians to render services to Health First Colorado members. The standards identified in the process are intended to safeguard the public while also maintaining the integrity of the health care profession. The greatest priority of the RAEs is maintaining a high



Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of behavioral health practitioners to assure that all covered services will be accessible to members without unreasonable delay. If your network includes out-of-state practitioners serving members enrolled with the MCE, please describe.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

For RAEs, describe any barriers to incorporating the ASAM levels of care for the SUD treatment practitioners, practice sites, and entities. Describe the methods used to monitor the available SUD treatment bed at each ASAM level.

CHP+ MCO, Medicaid MCO, RAE

clinical standard of care for members. The newly aligned standards will help ensure that unlicensed providers within mental health organizations and integrated care settings are receiving appropriate supervision and oversight, with the goal of quality member care that also supports expanding the workforce pipeline. In conjunction with regular audit activities, a provider group will complete an initial attestation (with annual follow-up) that underscores adherence to established standards.

Other Support

COA provides ongoing coaching support to its behavioral health network. COA continues to utilize two behavioral health practice facilitators to offer support for providers. Practice facilitators can meet individually with providers to create or improve administrative practices and procedures, develop new workflows to improve authorization procedures and/or transitions of care, develop and organize training plans and requirements, and develop clinical oversight processes. At this time, COA continues to permit all SUD providers who are validated by the State, and not yet contracted with COA, to render SUD treatment and receive out-of-network rates.

As of December 2022, COA requires ASAM level 3.1 and higher providers to complete clinical reviews in order to contract. Prospective providers must meet a minimum of 18 Quality measures as a condition of participation. Providers that fall short of any of these measures are invited to attend a remediation meeting with behavioral health facilitators to enhance and, if necessary, create new policies, procedures and workflows that adhere to COA standards. When remediation is complete, providers may re-apply. COA recently completed the remediation process for an additional ASAM level 3.7 provider, and they are now in the contracting process. COA practice facilitators will continue to provide support to ASAM level 1 and 2.1 providers as needed or by request. Each ASAM level of care has unique requirements.

In the reporting period, COA in partnership with the other RAEs, provided funding to EDCare to open a new adult residential unit for Coloradans. This funding will also support the expansion of intensive outpatient and partial hospitalization programs.

COA has also funded and built strong partnerships with three additional intensive in-home providers. This funding was dedicated to increase capacity, reduce waitlists and extend the COA geographic coverage area. This includes a provider who is offering intensive in-home services via telehealth to members living in rural areas. Providers began reporting in June 2023. Reports have indicated a 48% increase in intensive in-home capacity and a 25% reduction in wait time for services. This has resulted in more timely and appropriate referrals to services for members.



Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of behavioral health practitioners to assure that all covered services will be accessible to members without unreasonable delay. If your network includes out-of-state practitioners serving members enrolled with the MCE, please describe.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

For RAEs, describe any barriers to incorporating the ASAM levels of care for the SUD treatment practitioners, practice sites, and entities. Describe the methods used to monitor the available SUD treatment bed at each ASAM level.

CHP+ MCO, Medicaid MCO, RAE

COA successfully amended the current Professional Provider Agreement to include the encounter rate program reimbursement for two primary care practices, Partners in Pediatrics (2 sites) and Cornerstone Family Practice. There are now a total of fifteen encounter rate program sites. COA also continued partnership with Assuring Better Child Health and Development (ABCD) HealthySteps on the expansion of the HealthySteps model, an evidence based, team-based pediatric primary care program that promoting nurturing parenting for babies and toddlers, across primary care clinics.

Additionally, COA has developed the Behavioral Health Language Services Initiative program to allocate funding to providers to address shortages in network capacity for services in non-English languages. Organizations that meet the provider eligibility requirements and service qualifications are eligible for an enhanced rate on qualified services. This program went live to the entire network during Q2, and 35 providers have completed the required training, attestation and are submitting claims utilizing a modifier for increased reimbursement.

The Colorado Legislature passed House Bill 22-1302 in May 2022 to support, improve, and expand integrated behavioral health services in Colorado. With the assistance of the Practice Innovation Program (PIP) at the University of Colorado, COA practice facilitators will collaborate with care teams as they design and implement new processes and interventions to expand access to care and treatment for mental health substance use disorders in integrated physical care settings. COA practice facilitators will assist assigned practice Transformation Officers for 12 practices (20 sites total). Practice facilitators will assist assigned practices in developing and achieving goals, implementing and tracking improvements based on the Building Blocks of Behavioral Health Integration and the practice's BHI-1302 grant application to the Department of Healthcare Policy and Financing (the Department). Award period: July 1, 2023 – December 30, 2026.

TERMINATIONS: No significant terminations. All terminations were roster clean-ups or life events.

Table 3A–Establishing and Maintaining the MCE Network: Specialty Care Data



Poquiroment	Previous Quarter		Current Quarter	
Requirement	Number	Percent	Number	Percent
Sample	0	0.0%	0	0.0%
CHP+ MCO, Medicaid MCO				
Total members		N/A		N/A
Total specialty care practitioners (i.e., PROVCAT codes beginning with "SV" or "SG")		N/A		N/A
Specialty care practitioners accepting new members				
Specialty care practitioners offering after-hours appointments				
New specialty care practitioners contracted during the quarter				
Specialty care practitioners that closed or left the MCE's network during the quarter				

Table 3B–Establishing and Maintaining the MCE Network: Specialty Care Discussion

Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of specialty care practitioners to assure that all covered services will be accessible to members without unreasonable delay.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

CHP+ MCO, Medicaid MCO

N/A to the Region 3 report.



3. Network Changes and Deficiencies

Network Changes

<u>Supporting contract reference:</u> The MCE shall report in writing to the Department, all changes or deficiencies in MCE Networks related to access to care.

Table 4–Network Changes: Discussion

If the MCE experienced an unexpected or anticipated material change to the network or a network deficiency that could affect service delivery, availability, or capacity within the provider network, describe the change and state whether the MCE notified the Department, in writing, within five (5) business days of the change.

Note: If the MCE experienced an unexpected or anticipated material change to the network or a network deficiency that could affect service delivery, availability, or capacity within the provider network during the quarter prior to the measurement period, the MCE's response should include a description of the actions taken by the MCE during the current measurement period to address the deficiency.

CHP+ MCO, Medicaid MCO, RAE

Internal quality, compliance and provider engagement departments monitor the network and track providers related to quality of care, competence, and professional conduct. COA has not experienced a change in the network this quarter.

Table 5–CHP+ MCO Network Volume Changes and Notification: Discussion

If the MCE experienced at least a five percent (5%) increase or decrease in its network in a thirty (30) calendar day period, describe the change and answer the following questions:

Did the MCE notify the Department, in writing, within ten (10) business days of the change?

Was the change due to a practitioner/practice site/entity's request to withdraw; was the change due to the MCE's activities to obtain or retain NCQA accreditation?

Was the change due to a practitioner/practice site/entity's failure to receive credentialing or recredentialing from the MCE?

CHP+ MCO

N/A to the Region 3 report.



Inadequate Network Policies

<u>Supporting contract reference:</u> If the MCE fails to maintain an adequate network that provides Members with access to PCPs within a county in the MCE's Service Area, the Department may designate that county as a mixed county for the purpose of offering the option of an HMO or the State's self-funded network to eligible Members by providing the MCE a thirty (30) calendar day written notice.

Table 6–CHP+ MCO Inadequate Access to PCPs: Discussion

Did the MCE fail to maintain an adequate network that provides members with access to PCPs within a county in the MCE's service area?

If the MCE answered "yes", did the Department designate that county as a mixed county for the purpose of offering the option of an HMO or the State's self-funded network to eligible members?

CHP+ MCO

N/A to the Region 3 report.

Table 7–CHP+ MCO Discontinue Services to an Entire County: Discussion

Did the MCE discontinue providing covered services to members within an entire county within the MCE's service area?

If the MCE answered "yes", did the MCE provide no less than sixty (60) calendar days prior written notice to the Department of the MCE's intent to discontinue such services?

CHP+ MCO

N/A to the Region 3 report.

Table 8–CHP+ MCO Provider Network Changes: Discussion

Did the MCE experience an unexpected or anticipated material change to the network or a network deficiency that could affect service delivery, availability or capacity within the provider network? If the MCE answered "yes", did the MCE notify the Department, in writing, of the change?

CHP+ MCO

N/A to the Region 3 report.



4. Appointment Timeliness Standards

Appointment Timeliness Standards

<u>Supporting contract reference:</u> The MCE shall ensure its network is sufficient so that services are provided to members on a timely basis.

Table 9–Physical Health Appointment Timeliness Standards

Describe the method(s) used by the MCE to monitor its contract's timeliness requirements for members' access to physical health services. Describe findings specific to the current reporting period.

CHP+ MCO, Medicaid MCO, RAE

As documented in previous Network Adequacy reports, COA has relied on the Access to Care program to monitor its contracted providers' compliance with access to care standards. Providers have been vocal about increased issues of staff shortages, high staff turnover, shortened office hours due to illnesses and provider burnout.

Considering the pressures on providers, COA has expanded its ability to evaluate and monitor access to care standards. This evolved model is built upon data and outcomes obtained from the Access to Care program and, specifically, data trends in practices that were not passing the standards for which they were being tested. It was recognized that rotating staff in the front office significantly contributed to challenges in adhering to the access to care standards. As a result, this model consists of a collaborative training program with providers that is targeted towards all aspects of access to care requirements, including a specific dedication to training front office staff on Health First Colorado rules. COA believes that regular and consistent office training is the key to understanding and adhering to program requirements and will help practices be more successful with completing COA network monitoring programs, such as Access to Care.

In Q2, COA continued its enhanced training program for access to care standards targeting specific areas of practice to ensure all staff understand and adhere to the standards. Examples include training on appointment scheduling requirements developed for front office staff, or voice mail scripts to ensure appropriate referral messaging. This training is conducted in person preferably (virtual if necessary) and includes leave-behind materials. Providers are randomly selected to participate in this COA-led training. All training will be available on COA's Learning Management System (LMS) and will be accessible to all providers at any time.

Each practice staff member who sets patient appointments will be asked to complete the training. Each staff member has three attempts to pass the training test. Once a practice has received the training, they will be referred to COA's quality department for the assessment portion of the program. COA conducts mock telephone calls or online inquiries to providers that mirror common member behavior to test consistency of provider behavior and availability of services. All test calls are based on validated scripts built internally by COA and describe specific scenarios tied to access to care standards outlined in the contract. COA has both adolescent and adult call scripts. For practices that are unable to be assessed via telephone calls or online inquiries, the quality team will collaborate with the practice to complete a Third Next Available Appointment (3NA) request, a Quality Management industry standard for monitoring access to care.



Describe the method(s) used by the MCE to monitor its contract's timeliness requirements for members' access to physical health services. Describe findings specific to the current reporting period.

CHP+ MCO, Medicaid MCO, RAE

Each provider receives a summary report of their performance and relevant findings. If practices fail the assessment portion of the program, indicating that they are unable to meet access to care timeliness standards and contractual agreements, the quality department may identify an opportunity for quality improvement. The purpose of this opportunity is to offer support, education and resources to practices for process improvement. This allows practices to develop and implement a practice-specific quality improvement plan that will improve access to care for members. COA assists practices with the creation of a quality improvement plan that is completed and approved within approximately 30 days after receiving results and implemented within 60 days after approval. The intent is to better understand what barriers practices are experiencing and to assist practices in creating an individualized improvement plan with the knowledge of these existing barriers.

As mentioned above, practices are randomly selected to participate in COA-led access to care training. The COA quality team randomly selects practices for inclusion in the training. The quality department uses a stratified process to select 50 behavioral health (BH) or physical health (PH) providers and forwards them to the PNS team so the providers can train prior to being secretly shopped. The quality team is responsible for selecting the providers and the PNS team is responsible for training. Due to program cadence, no PH practices were enrolled in the Access to Care program in Q2.

3NA Pilot Project:

COA conducts an annual assessment survey of all contracted PCMPs to evaluate their compliance with contractual requirements. The 2023 survey took place in September (Q2). In addition to standard assessments, a set of exploratory questions, that do not affect PMPM payments but aim to enhance the organization's knowledge about the provider network and supporting upcoming initiatives, was included. This year, the practice support and quality departments collaborated to introduce questions specifically evaluating Third Next Available Appointments (3NA). While COA typically uses 3NA monitoring when additional information is needed following routine secret shopper inquiries, this marks the first time such an assessment has been undertaken with a substantial subset of providers. This initiative served as a pilot project to determine the feasibility of monitoring this from providers more regularly. The wording used in the survey aligns with standard language from the Department of Healthcare Policy and Financing's (the Department's) Alternative Payment Model (APM), consistent with what enrolled practices have encountered before.

The assessment asked providers to answer the following questions:

Question 1) Does your organization have standards for appointment availability, including providing same day appointments? Availability standards may be established and measured for a variety of appointment types (such as urgent care, new patient physicals, follow-up appointments) or the practice may set a single standard across all visit types.

Question 2) Provide documentation (as a single file attachment) for BOTH of the following: Third next available appointment report with at least five days of data; AND Documented process explaining availability standards, including same-day appointment policy. Documented process should define appointment types and amount of time for each appointment type.



Describe the method(s) used by the MCE to monitor its contract's timeliness requirements for members' access to physical health services. Describe findings specific to the current reporting period.

CHP+ MCO, Medicaid MCO, RAE

Implementation:

The survey was administered to 113 PCMP entities and 48 ECP entities in Region 3. While 95.29% of total PCMPs responded to the survey, 100% of the ECP survey population responded. Assistance was offered if providers needed help interpreting the questions or required additional information to successfully complete the survey.

Results

Question 1 received responses from 104 survey participants. Out of these, 103 participants affirmed that their practices adhere to standards for appointment availability, with a commitment to offering same-day appointments. Only one practice indicated that they do not follow such standards. Additionally, 50 instances of documentation were submitted to fulfill inquiries related to 3NA reporting and process documentation within Question 2.

Conclusions and Opportunities

Important discoveries emerged regarding network reporting during this activity. The analysis of providers within the network revealed dramatic variation in their capability to track and report 3NA, as evidenced by the diverse examples presented in Q2's reporting.

Due to the reporting exhibiting such variation, this introduced potential issues of data validity into the analysis. Each provider entity possesses unique reporting sophistication and administrative resources, making the standardization of reporting more costly than the value derived from requiring such standardization. This aspect also contributes to practices' methodology used for assessing 3NA, aligning with the philosophy or practice of what appointment availability standards means within each practice. This variability in having appointment standards was evident in submissions, ranging from providers with robust policies or procedures on appointment scheduling to those offering brief responses.

The question posed by COA aligns with the survey's wording and adheres to standard language from the Department's Alternative Payment Model (APM), facilitating ease of reporting for providers familiar with the question. However, utilizing a more specific question that seeks additional details on the frequency of sameday appointments and requests written standards guiding access to care could yield valuable insights into each provider's approach.

An ideal further investigation would translate the member's experience of access to actual appointments as reported by providers. This exercise revealed improvement opportunities, prompting ongoing consideration. For instance, providing education to providers through the provider update could enhance awareness of the importance of 3NA monitoring.



Table 10–Behavioral Health Appointment Timeliness Standards

Describe the method(s) used by the MCE to monitor its contract's timeliness requirements for members' access to behavioral health services. Describe findings specific to the current reporting period.

CHP+ MCO, RAE

As documented in previous Network Adequacy reports, COA has relied on the Access to Care program to monitor its contracted providers' compliance with access to care standards. Over the past year, COA has had the opportunity to evaluate the impact of the Access to Care program to further align this monitoring tool with additional network management efforts. Providers have been vocal about continued issues of staff shortages, high staff turnover, shortened office hours due to illnesses and provider burnout.

Considering the pressures on providers, COA is expanding its ability to evaluate and monitor access to care standards. This evolved model is built upon data and outcomes obtained from the Access to Care program and, specifically, data trends in practices that were not passing the standards for which they were being tested. It was recognized that rotating staff in the front office significantly contributed to challenges in adhering to the access to care standards. As a result, this new model will consist of a collaborative training program with providers that is targeted towards all aspects of access to care requirements, including a specific dedication to training front office staff on Health First Colorado rules. COA believes that regular and consistent office training is the key to understanding and adhering to program requirements and will help practices be more successful with completing COA network monitoring programs, such as Access to Care.

COA has continued its enhanced training program for Access to Care standards targeting specific areas of practice to ensure all staff understand and adhere to the standards. Examples include training on appointment scheduling requirements developed for front office staff, or voice mail scripts to ensure appropriate referral messaging. Providers are randomly selected to participate in this COA-led training. Any practice that experiences turnover in staff key to access to care compliance (front office, office manager etc.) will have training scheduled for all new staff within two weeks of notification. All training will be available on COA's Learning Management System (LMS) and will be accessible to all providers at any time.

Each practice staff member who sets patient appointments will be required to complete the training. Once a practice has received the training, they will be referred to COA's quality department for the assessment portion of the program. COA conducts mock telephone calls or online inquiries to providers that mirror common member behavior to test consistency of provider behavior and availability of services. All test calls are based on validated scripts built internally by COA and describe specific scenarios tied to access to care standards outlined in the contract. COA has both adolescent and adult call scripts. For practices that are unable to be assessed via telephone calls or online inquiries, the quality team will collaborate with the practice to complete a Third Next Available Appointment (3NA) request, a Quality Management industry standard for the monitoring of access to care.

Each provider receives a summary report of their performance and relevant findings. If practices fail the assessment portion of the program, indicating that they are unable to meet access to care timeliness standards and contractual agreements, the quality department may identify an opportunity for quality improvement. The purpose of this opportunity is to offer support, education and resources to practices for process improvement. This allows practices to develop and implement a practice-specific quality improvement plan that will improve access to care for members. COA assists practices with the creation of a quality improvement plan that is completed and approved within approximately 30 days after receiving results and implemented within 60 days



Describe the method(s) used by the MCE to monitor its contract's timeliness requirements for members' access to behavioral health services. Describe findings specific to the current reporting period.

CHP+ MCO, RAE

after approval. The intent is to better understand what barriers practices are experiencing and to assist practices in creating an individualized improvement plan with the knowledge of these existing barriers.

As mentioned above, practices are randomly selected to participate in COA-led access to care training. The COA quality team will randomly select practices for inclusion in the training. The Quality department uses a stratified process to select 50 behavioral health providers and forwards them to the PNS team so the providers can train prior to being secret shopped. The quality team is responsible for selecting the providers and the PNS team is responsible for training. During Q2, 17 practices received and passed Access to Care training from the PNS team. Ten providers were monitored during Q2. Results are as follows: 8 practices passed, 1 practice was sent a request for additional information, and 1 practice will be required to complete a quality improvement plan.

In addition to the Access to Care program, COA's Contracting team provides additional funding to community mental health centers (CMHCs). This supports CMHCs in hiring additional staff to help with operations and clinical work, which results in greater access to services.

COA Access to Care Program Metrics SFY23-24 Q2						
Quarter	Practices Trained:	Training Results	Practices Secret Shopped / Assessed:	Secret Shopper / Assessment Results		
Q1 (Oct-Dec)	Behavioral <u>Health/SUD:</u> 17 SUD practices received ATC training.	Behavioral Health/SUD: 17 practices received and attempted training. Passed: 100% (17)	Behavioral Health/SUD: 10 practices were assessed in Q2.	Behavioral Health/SUD: Passed: 8 practices COA has provided education & practice is required to respond to additional information request: 1 practice. COA has provided education & practice is required to compete QI plan before completion of program: 1 practice.		
	Physical Health: Due to program cadence, no PH providers were trained in Q2.	<u>Physical Health:</u> N/A	Physical Health: Due to program cadence, no PH providers were assessed in Q2.	<u>Physical Health (TNAA):</u> N/A		





5. Time and Distance Standards

Health Care Network Time and Distance Standards

<u>Supporting contract reference</u>: The MCE shall ensure that its network has a sufficient number of practitioners, practice sites, and entities who generate billable services within their zip code or within the maximum distance for their county classification. The MCE must use GeoAccess or a comparable service to measure the travel time and driving distance between where members live and the physical location of the practitioners/practice sites/entities in the MCE's Region.

Enter time and distance compliance results (e.g., "Met" or "Not Met") in the MS Excel template. Use Tables 11, 12, and 13 for additional relevant information regarding the MCE's compliance with time and distance requirements in its contracted counties, including region-specific contracted counties for RAEs' behavioral health networks. Geographic regions refer to the areas in which members reside, as members may travel outside their county of residence for care. For physical health time and distance requirements, MCEs are only required to report compliance with minimum time and distance requirements for members residing inside the MCE's contracted counties. For statewide behavioral health time and distance requirements, MCEs are requirements, MCEs are requirements for members residing inside the MCE's contracted counties. For statewide behavioral health time and distance requirements, MCEs are required to report compliance with minimum time and distance statewide behavioral health time and distance requirements, MCEs are required to report compliance.

- CHP+ MCO defines "child members" as 0 through the month in which the member turns 19 years of age.
- CHP+ MCO defines "adult members" as those over 19 years of age (beginning the month after the member turned 19 years of age).
- Medicaid MCO and RAE define "child members" as under 21 years of age.
- Medicaid MCOs and RAEs define "adult members" as those 21 years of age or over.

There are two levels of primary care practitioners: primary practitioners that can bill as individuals (e.g., MDs, DOs, NPs, and CNS') and mid-level practitioners that cannot bill as individuals (e.g., PAs); each type of practitioner has its own row in the MS Excel template tabs for time/distance reporting.

A practitioner/practice site/entity should only be counted one time in the MCE's data submission for each associated network category (PROVCAT code). If a practitioner provides primary care for adult and pediatric members at a specific location, count the practitioner once under the Adult Primary Care Practitioner PROVCAT code, once under the Pediatric Primary Care Practitioner PROVCAT code, and once under the Family Practitioner PROVCAT code. For example, a primary care nurse practitioner (NP) that serves adult and pediatric members can be categorized with the PV063, PV064, and PV065 PROVCAT codes. That practitioner will then be counted for the minimum network standards for pediatric primary care practitioner (NP) (PV064 and PV065); adult primary care practitioner (NP) (PV063 and PV064); and family practitioner (NP) (PV064).



Table 11–Urban Health Care Network Time and Distance Standards: Discussion

Present detailed time/distance results for members residing in Colorado's urban counties using the accompanying MS Excel workbook template.

List the specific <u>contracted urban</u> counties in which the MCE does not meet the time/distance requirements. Each RAE should limit this discussion to counties within its RAE region for both physical and behavioral health time/distance requirements.

Describe the MCE's approach to ensuring access to care for members residing in its <u>contracted urban</u> Colorado counties where the MCE does not meet the time/distance requirements.

CHP+ MCO, Medicaid MCO, RAE

COA continually monitors its network adequacy, and the Contracting and PNS teams work closely with the Care Management department to address any areas of concern. When there is a need in the network, COA actively recruits providers in those areas. COA also continues to receive requests from new providers wanting to join the network; if eligible, COA makes every effort to add them to its panel of providers.

Currently, through a data driven process, the provider recruitment program is determining the status of all providers and recruitment priorities. There is particular focus on recruiting RAE primary care providers, behavioral health bi-lingual providers, residential mental and/or SUD treatment facilities for adolescents, eating disorder programs and SUD treatment facilities with ASAM levels 3.1 and higher. This quarter, in terms of ASAM levels, the time and distance standards for 3.3, 3.7, 3.2WM are all showing as 0% access, but for levels 3.2WM and 3.7 this is incorrect. We do have those levels available to members. We believe it is a taxonomy and related provider category code issue. We will be researching the issue and hope to have it corrected in Q3 23-24 report.

The percentages shown below represent the percentage of members that have access to services.

Adams:

Network Category	% With Access
Pediatric SUD Treatment Practitioner	99.2
General SUD Treatment Practitioner	99.8
Psychiatric Hospitals, or Psychiatric Units in Acute Care Hospitals	97.9
SUD Treatment Facilities-ASAM 3.1	99.6
SUD Treatment Facilities-ASAM 3.3	0
SUD Treatment Facilities-ASAM 3.5	99.9
SUD Treatment Facilities-ASAM 3.7	0
SUD Treatment Facilities-ASAM 3.2 WM	0
SUD Treatment Facilities-ASAM 3.7 WM	98.5



Present detailed time/distance results for members residing in Colorado's urban counties using the accompanying MS Excel workbook template.

List the specific <u>contracted urban</u> counties in which the MCE does not meet the time/distance requirements. Each RAE should limit this discussion to counties within its RAE region for both physical and behavioral health time/distance requirements.

Describe the MCE's approach to ensuring access to care for members residing in its <u>contracted urban</u> Colorado counties where the MCE does not meet the time/distance requirements.

CHP+ MCO, Medicaid MCO, RAE

Arapahoe:				
Network Category	% With Access			
General SUD Treatment Practitioner	99.8			
SUD Treatment Facilities-ASAM 3.3	0			
SUD Treatment Facilities-ASAM 3.7	0			
SUD Treatment Facilities-ASAM 3.2 WM	0			

Douglas:

Network Category	% With Access
SUD Treatment Facilities-ASAM 3.3	0
SUD Treatment Facilities-ASAM 3.7	0
SUD Treatment Facilities-ASAM 3.2 WM	0

Elbert:

Network Category	% With Access
SUD Treatment Facilities-ASAM 3.3	0
SUD Treatment Facilities-ASAM 3.7	0
SUD Treatment Facilities-ASAM 3.2 WM	0



Table 12–Rural Health Care Network Time and Distance Standards: Discussion

Present detailed time/distance results for members residing in Colorado's rural counties using the accompanying MS Excel workbook template.

List the specific <u>contracted rural</u> counties in which the MCE does not meet the time/distance requirements. Each RAE should limit this discussion to counties within its RAE region for both physical and behavioral health time/distance requirements.

Describe the MCE's approach to ensuring access to care for members residing in its <u>contracted rural</u> Colorado counties where the MCE does not meet the time/distance requirements.

CHP+ MCO, Medicaid MCO, RAE

Region 3 does not have rural areas.

Table 13–Frontier Health Care Network Time and Distance Standards: Discussion

Present detailed time/distance results for members residing in Colorado's frontier counties using the accompanying MS Excel workbook template.

List the specific <u>contracted frontier</u> counties in which the MCE does not meet the time/distance requirements. Each RAE should limit this discussion to counties within its RAE region for both physical and behavioral health time/distance requirements.

Describe the MCE's approach to ensuring access to care for members residing in its <u>contracted frontier</u> Colorado counties where the MCE does not meet the time/distance requirements.

CHP+ MCO, Medicaid MCO, RAE

Region 3 does not have frontier areas.



Appendix A. Single Case Agreements (SCAs)

Individual practitioners with single case agreements (SCAs) are not counted as part of the MCE's health care network and should be excluded from tabulations in the body of this MS Word report and the associated MS Excel report(s). However, the Department acknowledges the role of SCAs in mitigating potential network deficiencies and requests that the MCE use Tables A-1 and A-2 below to list individual practitioners or SUD treatment facilities with SCAs and describe the MCE's use of SCAs.

SCA Practitioners or SUD Treatment Facilities	Medicaid ID	County Name	HCPF Network Category Code(s)	HCPF Network Category Description (include ASAM levels for SUD treatment facilities)	Number of Members Served by SCA
Franklin Q. Smith	0000000	Denver	<i>PV050</i>	Adult Only Primary Care	
Chrysalis Behavioral Health	0000000	Baca	BF085	SUD Treatment Facility, ASAM Levels 3.1 and 3.3	
CHP+ MCO, Medicaid MCO, RAE					
HMIH Cedar Crest, LLC	9000175278	Belton, TX	BF142	Psychiatric Residential Treatment Facility	
Rolling Hills Hospital, LLC	9000183237	Ada, OK	BF142	Psychiatric Residential Treatment Facility	
Kids Behavioral Health of Utah, Inc.	9000223126	West Jordan, UT	BF142	Psychiatric Residential Treatment Facility	
HHC Poplar Springs, LLC	9000200343	Petersburg, VA	BF142	Psychiatric Residential Treatment Facility	
Lakeland Hospital Acquisition, LLC	9000191672	Springfield, MO	BF142	Psychiatric Residential Treatment Facility	

Table A-1–Practitioners and SUD Treatment Facilities with SCAs: Data



Table A-2–Practitioners with SCAs: Discussion

Describe the MCE's approach to expanding access to care for members with the use of SCAs. Describe the methods used to upgrade practitioners with SCAs to fully contracted network practitioners.

CHP+ MCO, Medicaid MCO, RAE

When necessary, COA enters into a single case agreement (SCA) with a non-participating provider based on requests from its utilization management and/or care management departments. Once an SCA is complete, COA contacts the provider to ask if they are interested in joining the network or amending their contract to add the service. If interested, COA follows its usual policy and procedures with respect to the contracting process.



Appendix B. Optional MCE Content

This optional appendix may contain additional information, graphs, or maps that the MCE would like to include in its quarterly report.

Instructions for Appendices

To add an image:

- Go to "Insert" and click on "Pictures".
- Select jpg file and click "Insert".

To add an additional Appendix:

- Go to "Layout" and click on "Breaks".
- Select "Next Page" and a new page will be created.
- Go to "Home" and select "HSAG Heading 6".
- Type "Appendix C." and a descriptive title for the appendix.
- Select the Table of Contents and hit F9 to refresh.

Optional MCE Content

Free text



Appendix C. Optional MCE Content

This optional appendix may contain additional information, graphs, or maps that the MCE would like to include in its quarterly report.