



**COLORADO**

**Department of Health Care  
Policy & Financing**

# Network Adequacy Quarterly Report Template

Managed Care Entity: *Colorado Community Health Alliance*

Line of Business: *RAE*

Contract Number: *19-107520A15*

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Report due by *1/31/2024*, covering the MCE's network from *10/01/2023 – 12/31/2023*, FY24 Q2

*—Final Copy: September 2023 Release—*

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## 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\_F1\_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) <i>(Hospitals, Pharmacies, Imaging Services, Laboratories)</i>	X	X	
Prenatal Care and Women’s Health Services	X	X	X
Primary Care Providers (PCPs)	X	X	X
Physical Health Specialists	X	X	
Behavioral Health Specialists <i>(RAEs’ network categories include Substance Use Disorder [SUD] treatment coverage that went into effect on 1/1/2021)</i>	X		X
Ancillary Physical Health Services <i>(Audiology, Optometry, Podiatry, Occupational/Physical/Speech Therapy)</i>	X	X	

## 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

Supporting contract reference: 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.**

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

Requirement	Previous Quarter		Current Quarter	
	Number	Percent	Number	Percent
<i>Sample</i>	0	0.0%	0	0.0%
<b>CHP+ MCO, Medicaid MCO, RAE</b>				
Total members	198,858	N/A	174,849	N/A
Total primary care practitioners (i.e., PROV CAT codes beginning with “PV” or “PG”)	454	N/A	455	N/A
Primary care practitioners accepting new members	357	77%	375	84%
Primary care practitioners offering after-hours appointments	155	34%	155	34%
New primary care practitioners contracted during the quarter	4	1%	12	3%
Primary care practitioners that closed or left the MCE’s network during the quarter	3	1%	29	6%

**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**

During the reporting period, the primary barriers affecting the network were as follows:

- General lack of providers

The Region 7 Provider Network offers members a choice of two or more providers; however, there are ongoing challenges due to the general lack of health care providers in Park and Teller counties. Currently, CCHA is aware of only one primary care medical provider (PCMP) in Park County and one PCMP in Teller County not yet contracted. After extensive outreach to the Park County practice, the provider moved forward in signing a contract join the Region 7 PCMP network. While the contract was being reviewed, it was identified the provider needed to apply for a new Medicaid ID for this Park County location. This additional step has been communicated to the provider and no further updates on progress have been provided at this time. CCHA will continue to work to recruit this provider and is committed to mitigating any barriers that may be perceived to completing the contracting process. In the meantime, CCHA continues to collaborate with Rocky Mountain Rural Health (RMRH) to aid in member access and connection to services in Park County. The Teller County practice continues to express not being interesting in contracting.
- Obstetrician/Gynecologist (OB/GYN) Providers and Family Planning Services

CCHA identifies practices and providers that offer family planning services at the time of contracting and annually thereafter. Among the CCHA network, family planning services are offered by both primary care and OB/GYN providers. Though the number of OB/GYN providers contracted as PCMPs has decreased over time due to operations that are more aligned with specialty care than primary care medical home services, OB/GYN specialists continue to work with CCHA to ensure members continue to have access to women’s health and family planning services. CCHA’s care coordination and member support teams work directly with members to help coordinate access to care, including family planning needs identified by the member. CCHA accomplishes this in collaboration with members by assessing member needs and preferences, discussing family planning services as appropriate, and referring members to women’s health specialty providers for necessary covered services if not provided by the member’s designated primary care provider. Additionally, CCHA promotes women’s health services on the CCHA website, which provides comprehensive benefit information, including guidance indicating services can be accessed without a referral, and how to contact CCHA for additional guidance or help.

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**

- COVID-19 response

In response to public health orders due to the COVID-19 outbreak that began in March 2020, CCHA and the provider network have continued to assess and update processes to maximize member access. Though most practices have returned to normal business hours and operations that promote access to routine services such as immunizations and well visits, alternate operations remain in place among the broad network as member enrollment decreases with ongoing Continuous Coverage Unwind activities. Below is a summary of operations that continue to cause some disruption to network maintenance:

- Site closures/consolidated care at certain locations.
- Workforce shortages, difficulty filling open positions, and staff retention continue to be the most prominent issues disrupting provider operations and network maintenance. Though some providers have adjusted wages in hopes of hiring to full capacity, others have and/or are planning to consolidate care to operate out of fewer locations.

- Provider Revalidation

With the public health emergency (PHE) unwind, provider revalidation is a high priority for CCHA and maintaining a sufficient network. Many providers are not current with revalidation, as some requirements were waived during the PHE. As such, CCHA continues to provide revalidation information in monthly CCHA Provider Newsletters to help providers prepare and understand what to expect, including: how to verify their revalidation due date, when to anticipate revalidation notification and begin the revalidation process, and where to find additional resources. Upon provider request, CCHA is also providing as much direct support to providers as possible to ensure timely completion of revalidation.

Increased use of telehealth:

The Center for Medicare and Medicaid Services (CMS) updates to telehealth requirements have effectively expanded use of telehealth to help reduce barriers to access. During the reporting period, the physical health network maintained access to services through telehealth. Since telehealth rules changed, claims data has consistently shown the highest utilization is for general office visits among established patients, with a majority of claims from federally qualified health centers (FQHCs) as the provider type, and roughly 25% from clinic practitioners. Though the volume of telehealth services has decreased over time, correlated with practices returning to normal business hours and increases in in-person access, CCHA will continue tracking telehealth utilization trends. Given Colorado’s adoption of updated telehealth rules, CCHA is hopeful providers’ use of telehealth will remain a useful resource for engaging members who have historically faced challenges with access.

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

Requirement	Previous Quarter		Current Quarter	
	Number	Percent	Number	Percent
<i>Sample</i>	0	0.0%	0	0.0%
<b>CHP+ MCO, Medicaid MCO, RAE</b>				
Total members	198,858	N/A	174,849	N/A
Total behavioral health practitioners (i.e., PROVCAT codes beginning with “BV” or “BG”)	8,103	N/A	8,464	N/A
Behavioral health practitioners accepting new members	7,127	93%	7,334	94%
Behavioral health practitioners offering after-hours appointments	5,080	66%	5,061	65%
New behavioral health practitioners contracted during the quarter	350	4.5%	299	3.8%
Behavioral health practitioners that closed or left the MCE’s network during the quarter	120	1.6%	175	2.2%

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

Requirement	Previous Quarter	Current Quarter
	Number	Number
<i>Sample</i>	0	0
<b>RAE</b>		
Total SUD treatment facilities offering American Society of Addiction Medicine (ASAM) Level 3.1 services	22	23
Total SUD treatment facilities offering ASAM Level 3.3 services	2	3
Total SUD treatment facilities offering ASAM Level 3.5 services	31	33
Total SUD treatment facilities offering ASAM Level 3.7 services	18	20
Total SUD treatment facilities offering ASAM Level 3.2 WM (Withdrawal Management)	18	19
Total SUD treatment facilities offering ASAM Level 3.7 WM services	11	12



**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**

During the reporting period, the primary barriers affecting the network were as follows:

- Out-of-state providers  
CCHA uses out-of-state providers when a member requires treatment at a residential treatment facility. These providers are included in Table A-1-Practitioners with SCAs.
- Provider education  
As CCHA has worked to improve the contracting timeline, needs for provider education on claims and billing processes increased. Following an influx of newly contracted clinicians, CCHA focused on increasing provider education and informational resources. Some examples include:
  - A dedicated COVID-19 landing page on the CCHA website that includes comprehensive telehealth expansion billing, claim, and Health Insurance Portability and Accountability Act (HIPAA) guidance.
  - Provider-facing contact list with contact information and a variety of topics, including contact information for provider experience and contract manager staff by region, which are also posted on the CCHA website.
  - The Contact Us page, available from the CCHA website, which routes providers directly to their assigned Provider Experience Associate and helps CCHA track a 2-business day turnaround for response time.
  - Implementation of an online Provider Enrollment Application process. Training documents are available on the CCHA website and have been shared at CCHA Open Mic sessions.
  - Behavioral Health Provider Claim Questions/Issue Resolution Process Flow – document to outline the resources available and process flow of when to best engage the resources to expedite questions, and issue resolution, also available on the CCHA website.
  - Monthly Open Mic meetings held for the behavioral health network, which provide a forum for educational opportunities and exchanging information.
  - Behavioral Health Listening Sessions allow independent provider network providers to share feedback with CCHA leadership and identify opportunities for continued collaboration and education.
  - Increased provider communications with a supplemental publication that is specific to Behavioral Health (BH) providers and is distributed monthly.

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**

- CCHA also implemented BH-specific email alerts announcing behavioral health topics, including increased advertisement of monthly Open Mic sessions. These efforts have helped drive attendance and attention to educational information available to providers.
- Substance Use Disorder (SUD)-specific training:
  - BH Onboarding for SUD Benefit Expansion
  - American Society of Addiction Medicine (ASAM) Criteria in Health Care Management Training
  - Utilization Management SUD Training
- Provider Orientations
  - Enhanced content based on common questions received by providers
- Provider Training Sessions
  - Monthly webinars designed to pick different topic to train on each month
- SUD provider network  
CCHA has an open SUD network. Since the start of the SUD benefit expansion, CCHA has increased SUD access as follows for the last quarter:
  - Colorado Addiction Recovery for ASAMs 3.5 and 3.7 – located in Aurora (RAE Other)
  - Red Rock Recovery Centers for ASAMs 3.1, 3.2WM, 3.3, 3.5, 3.7 and 3.7 WM – located in Jefferson County (RAE 6)

CCHA will deploy the use of single case agreements (SCAs) in addition to contracted providers to ensure there is appropriate member access as assessment and adjustment of the network unfolds. CCHA remains committed to working closely with our network of providers who render SUD services to provide education on processes, notification requirements, and to minimize paperwork associated with single case agreements where possible. Gaps in the continuum of SUD services exist in various regions of the state. These gaps have been longstanding and were reflected in the Office of Behavioral Health’s Needs Analysis: Current Status, Strategic Positioning, and Future Planning report of April 2015. We will continue to work with community providers to expand the array of available SUD services across the care continuum to ensure member access to medically appropriate levels of service.

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**

Use of telehealth:

CMS updates to telehealth requirements have effectively expanded use of telehealth to help reduce barriers to access. A vast majority of the behavioral health network has expanded access through telehealth services. However, a comparison of paid behavioral health claims from 2022 to 2023 indicates the following changes in the volume of paid claims for the current reporting period in 2023: 33% increase in October, 43% decrease in November, and a 16% decrease in December. Though claims data for the reporting period is not yet final, the general trend in volume of paid claims continues to indicate utilization has increased for July and September and decreased in August. CCHA plans to continue tracking telehealth utilization through claims data to assess ongoing trends and inform network planning.

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

Requirement	Previous Quarter		Current Quarter	
	Number	Percent	Number	Percent
<i>Sample</i>	0	0.0%	0	0.0%
<b>CHP+ MCO, Medicaid MCO</b>				
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**

*MCE to provide narrative response here regarding these contract requirements.*

## Network Changes and Deficiencies

### Network Changes

Supporting contract reference: 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**

CCHA monitors and tracks changes in the network that could affect sufficiency of service delivery, availability, or provider capacity on an ongoing basis. CCHA notifies HCPF when network changes are significant and result in a deficiency within the network. CCHA also provides HCPF with notification of any issues related to quality of care, competence, and professional conduct and reports those issues and resolutions on a quarterly basis in the Quality of Care Concerns report. Below is a summary of network additions and terminations that occurred during the reporting period:

#### Region 7 PCMP Network Additions

- El Paso County
  - Newma, LLC
  - Wee Care Pediatrics Too

#### Region 7 PCMP Network Terminations

The practice termination during this reporting period did not have a material impact to the network or result in a network deficiency. Members were notified and continue to have access to providers at nearby PCMPs within the Region 7 network.

- El Paso County site closures
  - Colorado Community Clinic
  - Matthews-Vu – Weber, Suite 320
    - Note: Members continue have access to Matthews-Vu providers, including two sites on Weber Street that remain active (suites 120 and 220).

#### BH Network Additions

A total of 299 practitioners joined the network during the reporting period as follows:

- 231 new practitioners were added to existing provider groups statewide

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

- Region 6: 39 new practitioners
- Region 7: 33 new practitioners
- Other counties outside of Regions 6 and 7: 159 new practitioners
- 68 solo practices joined the network statewide
  - Region 6: 11 new practices
  - Region 7: 17 new practices
  - Other counties outside of Regions 6 and 7: 40 new practitioners

#### BH Network Terminations

The BH network terminations during the reporting period were due to large group roster clean-up and typical churn and did not have a material impact to services, availability or provider capacity. CCHA reports all provider terminations to HCPF on a monthly basis.

A total of 175 practitioners left the statewide network as follows:

- Region 6: 104 practitioners termed
  - 83 moved out of area
  - 1 grouped cancelled contract
  - 3 network management cancelled contract
  - 17 quit contracted group/no longer with Tax ID
- Region 7: 20 practitioners termed
  - 11 quit contracted group / left provider organization
  - 6 moved out of area
  - 2 network management cancelled contract
  - 1 NPI deactivated
- Other counties outside of Regions 6 and 7: 51 practitioners termed
  - 44 quit contracted group/no longer with Tax ID
  - 1 moved out of area
  - 3 network management cancelled contract
  - 1 NPI deactivated
  - 1 other
  - 1 provider no longer at location

**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 re-credentialing from the MCE?

**CHP+ MCO**

*MCE to provide narrative response here regarding these contract requirements.*

## Inadequate Network Policies

Supporting contract reference: 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**

<p><b>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?</b></p> <p><b>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?</b></p>
<b>CHP+ MCO</b>
<i>MCE to provide narrative response here regarding these contract requirements.</i>

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

<p><b>Did the MCE discontinue providing covered services to members within an entire county within the MCE’s service area?</b></p> <p><b>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?</b></p>
<b>CHP+ MCO</b>
<i>MCE to provide narrative response here regarding these contract requirements.</i>

**Table 8—CHP+ MCO Provider Network Changes: Discussion**

<p><b>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?</b></p> <p><b>If the MCE answered “yes”, did the MCE notify the Department, in writing, of the change?</b></p>
<b>CHP+ MCO</b>
<i>MCE to provide narrative response here regarding these contract requirements.</i>



## Appointment Timeliness Standards

### Appointment Timeliness Standards

Supporting contract reference: 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**

CCHA has written policies and procedures that describe the member access standards, member rights and responsibilities, and the methodology used for assessing timeliness of access to physical health services, as outlined below.

#### Policies and Procedures

- All PCMP contracts require the following standards for member access:
  - Inpatient follow-up appointment within 7 days after discharge.
  - Non-urgent, symptomatic care visit within 7 days after the request.
  - Urgent care appointment within 24 hours after the initial identification of need.
  - Well-care visit within 1 month after the request, unless an appointment is required sooner to ensure the provision of screenings.
- CCHA Member Rights and Responsibilities Policy
  - CCHA adopts Federal and State of Colorado laws and regulations that pertain to the rights of members and ensure that its staff and network providers take those rights into account when furnishing services to members. Members are entitled to the right to have health care services provided in accordance with the requirement for timely access and medically necessary care. CCHA does not adversely regard a member who exercises their rights, as stated below. CCHA communicates member rights and responsibilities to members per contract guidelines via the *For Members* section of CCHA’s website.
  - Providers are notified via the Provider Manual, which is available and distributed according to the contract requirements, and via provider newsletters. CCHA staff receive educational information on member rights and responsibilities during new hire orientation. CCHA shall comply with any other applicable Federal and State laws including 42 CFR § 438.100 and 42 CFR § 438.400 (b).

#### Methodology for Assessing Timeliness

The CCHA practice transformation coaches and network managers work with PCMPs to collect third next available appointment (3NA) data, which is used to assess the network and ensure it meets timeliness requirements for urgent care, non-symptomatic care, and well-care physical examinations.

**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**

Third next available appointment is a national measure used to assess access to care. It examines the third available appointment instead of the next available appointment to account for cancelations and other events that result in unexpected appointment availability, thereby providing a more accurate representation of true appointment availability. Using the third next available appointment eliminates chance occurrences from the measure of availability. To collect this data, CCHA uses the following process:

1. CCHA staff meets with both the PCMP’s office manager and a scheduler.
2. The scheduler opens the appointment book and looks for the next open appointment, starting with the schedule for the following day. There must be an open slot in the schedule. If there are no open appointments, the subsequent day’s schedule is reviewed for an open appointment. This process is continued until the 3NA is identified. The 3NA value is the number of working days from tomorrow to reach the third available appointment. For example, if 3NA is tomorrow, the value is 0.
3. If the schedule reserves times based on appointment type (e.g., physical exams or certain procedures), 3NA is assessed for each unique appointment type. For example, there are typically separate 3NA measures for short visits (e.g., emergency follow up or acute care) and long visits (e.g., physical exams). Assessing the 3NA for unique appointment types provides information about timeliness and informs where improvements are necessary. Note: times reserved for same-day appointments are counted as emergency follow up or acute care visits when assessing 3NA access.
4. Assessment of each PCMP’s 3NA is conducted on the same day of the week and at the same time of day if possible. CCHA analyzes and graphs the data, which provides a visual representation of the practice/provider access and areas of improvement.
5. The 3NA findings are used to help practices understand their demand and consider whether their provider resources are sufficient. If 3NA findings indicate timeliness standards are not being met, practice transformation coaches work with the practice to evaluate and optimize empanelment using Right-Size Panel and Demand analysis tools.

Current Status of Network Timeliness:

CCHA conducts appointment availability assessment and improvement efforts with coached practices on a quarterly basis. As part of the Office Systems Review, this appointment availability data is also collected from non-coached practices (those with fewer than 300 members) on an annual basis and included annually in the Quarter 3 report.

Per the following table, the 3NA data CCHA collected from coached practices during the reporting period indicates timeliness standards were met.

**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**

Region 7: SFY 2023-2024 – Quarter 2

Visit Type	Standard	Q2 Numerator	Q2 Denominator	Q2 Rate
<b>Inpatient hospitalization follow-up</b>	Within 7 days after discharge	44	48	91.7%
<b>Non-urgent, symptomatic</b>	Within 7 days of member request	47	48	97.9%
<b>Urgent/Acute</b>	Within 24 hours of member request	30	48	62.5%
<b>Well-care physical examinations</b>	Within 30 days of member request	46	48	95.8%

**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**

CCHA has written policies and procedures that describe the member access standards, member rights and responsibilities, and the methodology used for assessing timeliness of access to behavioral health services, as outlined below.

Policies and Procedures

- CCHA Member Rights and Responsibilities Policy
  - CCHA adopts Federal and State of Colorado laws and regulations that pertain to the rights of members and ensure that its staff and network providers take those rights into account when furnishing services to members. Members are entitled to the right to have health care services provided in accordance with the requirement for timely access and medically necessary care. CCHA does not adversely regard a member who exercises their rights, as stated below. CCHA communicates member rights and responsibilities to members per contract guidelines via the *For Members* section of CCHA’s website
  - Providers are notified via the Provider Manual, which is available and distributed according to the contract requirements, and via the provider newsletters. CCHA staff receive educational information on member rights and responsibilities during new hire orientation. CCHA shall comply with any other applicable Federal and State laws including 42 CFR § 438.100 and 42 CFR § 438.400 (b).

**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**

- Behavioral health provider access requirements:
  - Emergency behavioral health care by phone within fifteen (15) minutes after initial contact, including TTY accessibility; in person within one (1) hour of contact in urban and suburban areas, in person within two (2) hours after contact in rural and frontier areas.
  - Non-urgent, symptomatic behavioral health services – within seven (7) days after a member’s request.
  - Administrative intake appointments or group intake processes shall not be considered as a treatment appointment for non-urgent, symptomatic care.
  - Members shall not be placed on waiting lists for initial routine service requests.

CCHA monitors the behavioral health services through the annual Appointment Access Survey, which covers the following categories: Urgent Care, Initial Visit - Routine Care, Follow-up - Routine Care, and Non-Life-Threatening Emergency Care. The 2023 Appointment Access Survey was conducted July 3 – July 31, 2023. A total of 145 surveys were completed, an 11% completion rate with 1,362 phone numbers dialed. Below is a summary of the findings for the last three years.

Year Over Year Compliance Results			
Visit Type	Standard	Prescribers 2021 / 2022/ 2023	Non-Prescribers 2021 / 2022 / 2023
<b>Overall Compliance</b>	-	71% / 74% / 61%	80% / 83% / 69%
<b>Urgent Care</b>	Within 48 hours of member request	70% / 67% / 61%	71% / 86% / 71%
<b>Initial Visit Routine Care</b>	Within 7 days of member request	36% / 39% / 40%	60% / 66% / 59%
<b>Follow-up Routine Care</b>	Within 30 days of member request	95% / 95% / 89%	98% / 100% / 98%
<b>Non-Life-Threatening Emergent Care</b>	Immediately	83% / 90% / 63%	89% / 79% / 48%

- Noted year-over-year trends:
  - Overall compliance among behavioral health prescribers decreased from 2022 to 2023 and has dropped overall.
  - Initial Visit Routine Care for prescribers showed a slight increase in compliance by 1%, moving from 39% to 40%.

**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**

- Appointment timeliness standards met for the following:
  - Follow-up - Routine Care standards met by non-prescribing practitioners at 98%.
- Appointment timeliness standards not met for the following:
  - Urgent Care standards not met by non-prescribing and prescribing practitioners.
  - Initial Visit - Routine Care standards not met by non-prescribing and prescribing practitioners.
  - Non-Life-Threatening Emergency Care standards not met by prescribing and non-prescribing practitioners.
- 2022 non-compliant practitioners were re-surveyed, resulting in overall compliance of 67%.

Any provider who does not meet the contracted access to care standards is placed under corrective action to remediate the access issue. As such, CCHA will be sending letters in the third quarter to the practice groups indicating which appointment type was non-compliant with the access requirements. Enclosed with the letter, the practice group receives an Appointment Availability Survey Response form to indicate the corrective actions taken to meet the standards, CCHA will review the responses from the correction action plans to understand the drop in compliance for 2023. For those providers that did not return the correction action plan CCHA will be doing follow up calls to those practices. CCHA will be doing targeted provider education on the importance that members receive timely behavioral health appointments. CCHA will also ensure the survey was proctored appropriately and do a deeper review of the data to determine if the sample is capturing a full and accurate representation of the CCHA behavioral health network.

### Health Care Network Time and Distance Standards

Supporting contract reference: 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 required to report compliance with minimum time and distance requirements for all members regardless of county residence.

- 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 contracted urban 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 contracted urban Colorado counties where the MCE does not meet the time/distance requirements.

**CHP+ MCO, Medicaid MCO, RAE**

Time and Distance Results

Below is a summary of time and distance standards in which time and/or distance was not met per the results in the MS Excel workbook.

El Paso County

- Psychiatric Hospitals, or Psychiatric Units in Acute Care Hospitals
  - 97% member access
- SUD Treatment Facilities
  - 99% member access
- SUD Treatment Facilities-ASAM 3.1
  - 99% member access
- SUD Treatment Facilities-ASAM 3.2 WM
  - 99% member access
- SUD Treatment Facilities-ASAM 3.3
  - 0% member access
- SUD Treatment Facilities-ASAM 3.5
  - 99% member access
- SUD Treatment Facilities-ASAM 3.7
  - 98% member access
- SUD Treatment Facilities-ASAM 3.7 WM
  - 99% member access

Teller County

- Psychiatric Hospitals or Psychiatric Units in Acute Care Hospitals
  - 8% member access
- SUD Treatment Facilities
  - 99% member access
- SUD Treatment Facilities-ASAM 3.1
  - 91% member access
- SUD Treatment Facilities-ASAM 3.2 WM
  - 73% member access
- SUD Treatment Facilities-ASAM 3.3
  - 0% member access
- SUD Treatment Facilities-ASAM 3.5
  - 91% member access

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

List the specific contracted urban 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 contracted urban Colorado counties where the MCE does not meet the time/distance requirements.

**CHP+ MCO, Medicaid MCO, RAE**

- SUD Treatment Facilities-ASAM 3.7
  - 89% member access
- SUD Treatment Facilities-ASAM 3.7 WM
  - 91% member access

Addressing Access to Care

CCHA utilizes community partnership and care coordination to reduce barriers to accessing care. Access-related issues are triaged to provider solutions and network management staff for assessment and any further action that may be necessary. CCHA’s care coordination and member support teams also work directly with members to develop care plans that help address barriers, including but not limited to any challenges related to proximity of providers. When travel time and/or distance is a barrier, CCHA works with the member and local providers to help coordinate transportation or other types of intermediate interventions such as telehealth.

Additionally, CCHA’s community partnerships team is focused on developing strong relationships with county departments, non-profit organizations, and local service providers. In areas where time and distance requirements are not met, CCHA collaborates with these community entities on identifying additional resources and opportunities for reducing access barriers and/or recruiting providers.

Below is a summary of such efforts aimed to increase access in areas where time and distance standards are not being met:

- In addition to CCHA’s efforts to connect members with educational resources and access to vaccines, CCHA also continues to identify and partner with network providers to expand member outreach and increase vaccination rates.
- Aspen Mine Center (AMC) continues to provide care coordination services in Teller County. AMC conducts outreach to members and is now meeting with members in-person during office visits and in the community when needed. AMC continues to work closely with the local county Department of Human Services (DHS) on targeted outreach and member engagement. With the help of CCHA and the county DHS, AMC is aiding in efforts to ensure members are updating their information to maintain coverage and access to their benefits. Finally, AMC continues to explore options for delivering services through increased collaboration with other community organizations. Most recently, AMC began providing co-located services at Gorman Medical beginning in October.



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

List the specific contracted urban 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 contracted urban Colorado counties where the MCE does not meet the time/distance requirements.

**CHP+ MCO, Medicaid MCO, RAE**

- CCHA continues to support initiatives through annual Community Incentive Program funding. For calendar year 2024, CCHA is funding 7 community-based organizations’ initiatives in Region 7. The CCHA Community Incentive Program provides funding support for initiatives that aim to increase social determinants of health, member and family support services, and activities focused on diversity, equity, and inclusion.
- CCHA notes that there are zero 3.3 ASAM level providers found within Diversus Health’s seven-county managed services organization (MSO) region. Additionally, CCHA will implement a Single Case Agreement where necessary to support member access to care.

**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 contracted rural 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 contracted rural Colorado counties where the MCE does not meet the time/distance requirements.

**CHP+ MCO, Medicaid MCO, RAE**

Time and Distance Results

Below is a summary of time and distance standards in which time and/or distance was not met per the results in the MS Excel workbook.

Park County

- Adult Primary Care
  - 94% member access
- Psychiatric Hospitals or Psychiatric Units in Acute Care Hospitals
  - 0% member access
- SUD Treatment Facilities
  - 26% member access
- SUD Treatment Facilities-ASAM 3.1
  - 0% member access

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

List the specific contracted rural 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 contracted rural Colorado counties where the MCE does not meet the time/distance requirements.

**CHP+ MCO, Medicaid MCO, RAE**

- SUD Treatment Facilities-ASAM 3.2
  - 83% member access
- SUD Treatment Facilities-ASAM 3.3
  - 0% member access
- SUD Treatment Facilities-ASAM 3.5
  - 0% member access
- SUD Treatment Facilities-ASAM 3.7
  - 0% member access
- SUD Treatment Facilities-ASAM 3.7 WM
  - 0% member access

Addressing Access to Care

Similar to CCHA’s urban counties, members residing in Park County have access to providers in neighboring Region 7 counties within the time and distance standards. However, CCHA remains alert to the ongoing lack of provider options within the county and partners with local county departments, non-profit organizations, and providers in nearby counties to ensure the members are able to access covered services without unreasonable delay. In addition to the efforts indicated for urban counties in Region 7, below are examples of efforts to increase access through partnerships in Park County:

- Rocky Mountain Rural Health (RMRH) continues to provide care coordination services in Park County. RMRH staff are working with their co-locations within the community where they connect with members to provide educational materials, help with health care navigation and vaccination triage, and connect members with providers and resources. RMRH also continues working with the community and adjusting processes as needed to help with member access to care, including care coordination needs assessments and health care navigation for patients of the primary care clinic where RMRH staff are co-located. Additional RMRH efforts include Medicaid application, renewal assistance and transition support to Connect for Health Colorado.
- CCHA continues to support initiatives through annual Community Incentive Program funding. For calendar year 2024, CCHA is funding 7 community-based organizations’ initiatives in Region 7, two of which operate from within Park County. The CCHA Community Incentive Program provides funding support for initiatives that aim to increase social determinants of health, member and family support services, and activities focused on diversity, equity, and inclusion.
- CCHA notes that there are zero 3.3 ASAM level providers found within Diversus Health’s seven-county managed services organization (MSO) region. Additionally, CCHA will implement a Single Case Agreement where necessary to support member access to care.

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

<p>Present detailed time/distance results for members residing in Colorado’s frontier counties using the accompanying MS Excel workbook template.</p> <p>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.</p> <p>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.</p>
<p><b>CHP+ MCO, Medicaid MCO, RAE</b></p>
<p><i>MCE to provide narrative response here regarding these contract requirements.</i></p>

## A. 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.

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

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
<i>Franklin Q. Smith</i>	0000000	<i>Denver</i>	<i>PV050</i>	<i>Adult Only Primary Care</i>	■
<i>Chrysalis Behavioral Health</i>	0000000	<i>Baca</i>	<i>BF085</i>	<i>SUD Treatment Facility, ASAM Levels 3.1 and 3.3</i>	■
<b>CHP+ MCO, Medicaid MCO, RAE</b>					
Cumberland Hospital	30721717	New Kent, VA	BF140	Inpatient Psychiatric	■
Valley Hope Association	9000187267	Parker, CO (Douglas)	BF085	SUD Treatment Clinic ASAM Level 3.5	■
KVC Hospitals, Inc dba Camber Children's Mental Health	9000210133	Kansas City, KS	BF142	Psychiatric Residential Treatment Facility (RTF)	■
Lakeland Hospital Acquisition	9000213634	Springfield, MO	BF140	Inpatient Psychiatric	■
Lakemary Center, Inc.	9000178301	Paola, KS	BF142	Psychiatric Residential Treatment Facility (RTF)	■
Shiloh Home, Inc.	9000199600	Littleton, CO (Jefferson)	BF142	Qualified Residential Treatment Facility (QRTF)	■

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
Perimeter Behavioral of Forrest City	9000202310	Forrest City, AK	BF142	Psychiatric Residential Treatment Facility (RTF)	■
Piney Ridge Treatment Center	9000191671	Fayetteville, AR	BF142	Psychiatric Residential Treatment Facility (RTF)	■
UHS of Laurel Heights, L.P. dba Laurel Heights Hospital	9000166045	Atlanta, GA	BF142	Psychiatric Residential Treatment Facility (RTF)	■
ViaMar Health Inst of the PB LLC dba ViaMar Health Institutes of the Palm Beaches LLC	9000188347	West Palm Beach, FL	BF142	Eating Disorder Partial Hospitalization Program (RTF)	■

**Table A-2—Practitioners with SCAs: Discussion**

<p><b>Describe the MCE’s approach to expanding access to care for members with the use of SCAs.</b></p> <p><b>Describe the methods used to upgrade practitioners with SCAs to fully contracted network practitioners.</b></p>
<p><b>CHP+ MCO, Medicaid MCO, RAE</b></p> <p>CCHA has an open behavioral health network that allows all practitioners who are Medicaid approved, meet CCHA credentialing criteria, and accept a contract to serve CCHA members. CCHA Provider Solutions utilizes all available tools for provider recruitment, including but not limited to out of network authorization and single case agreement requests. Out of network providers that are identified as having a material number of single case agreements or requests for out of network authorization are prioritized for recruitment into the network.</p>

## B. 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*

## C. 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.