



**JAMES L. MADARA, MD**  
EXECUTIVE VICE PRESIDENT, CEO

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November 18, 2016

Margaret E. O'Kane  
President  
National Committee for Quality Assurance  
1100 13th St., NW Suite 1000  
Washington, DC 20005

Re: New Georgetown research on narrow network design

Dear Ms. O'Kane:

On behalf of the physician and student members of the American Medical Association (AMA), I write to draw your attention to a recent issue brief by the Georgetown University Health Policy Institute on narrow networks, commissioned by the AMA, and an AMA analysis. (Both are attached.)

In its issue brief, Georgetown offers important findings regarding the regulation of networks, specifically narrow networks. As you might expect, the research shows that state regulators generally do not define or regulate “narrow networks” or “tiered networks” any differently than standard networks. Additionally, when the Georgetown researchers asked state regulators and other stakeholders whether provider network rules should incorporate the concept of quality, especially when assembling narrow networks, they found that there was little to no focus on quality in network design, even for the narrowest of networks.

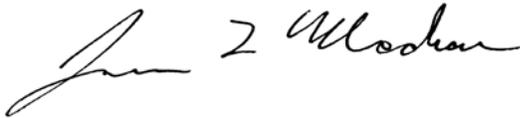
These findings concern us, as the AMA believes a focus on the regulations governing these narrow networks should ensure that patients and consumers have access to quality care. Unfortunately, we believe a lack of focus on accessible quality care when these networks are designed and regulated could lead to poor health outcomes, cost-shifting onto patients and patients simply not receiving value for the products they have purchased.

There is no doubt that accreditation and, specifically NCQA, will continue to play a large role in determining appropriate network requirements. As you continue to evaluate your standards on network adequacy, profiling programs and quality requirements, we urge you to consider the holes in narrow network regulation highlighted by the Georgetown issue brief and the need for attention to these holes as stressed in our accompanying analysis.

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We are happy to discuss these issues further with you at your convenience. If you any questions, please contact Emily Carroll, Senior Legislative Attorney, Advocacy Resource Center at [emily.carroll@ama-assn.org](mailto:emily.carroll@ama-assn.org) or (312) 464-4967. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Madara". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke.

James L. Madara, MD

Attachments