



**DEPARTMENT OF COMMUNITY HEALTH**

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**GEORGIA FAMILIES**

**REPORT #13:**

**ANALYSIS OF DENTAL PROVIDER  
NETWORKS**

**JANUARY 21, 2010**

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# REPORT GLOSSARY

The following listing of terminology and references may be used throughout this report:

- **Affiliated Computer Services, Inc. (ACS)** – State fiscal agent claims processor.
- **Aged, Blind, and Disabled (ABD)** – A medical assistance program based on a member's category of eligibility.
- **Avesis** - The dental services subcontractor for Peach State Health Plan from June 1, 2006 through May 31, 2009.
- **Capitation Payment (CAP)** – A Contractual agreement through which a contractor agrees to provide specified health care services to members for a fixed amount per month.
- **Care Management Organization (CMO)** – A private organization that has entered into a risk-based contractual arrangement with the Department to obtain and finance care for enrolled Medicaid and PeachCare for Kids™ members. CMOs receive a per capita or capitation claim payment from the Department for each enrolled member. Three Care Management Organizations currently operate in Georgia. These organizations include AMERIGROUP Community Care (AMGP), Peach State Health Plan (Peach State), and WellCare of Georgia (WellCare).
- **Category of Service (CoS)** – A unique three-digit code assigned to each claim by the Department based on the type of service delivered and/or the location of service.
- **Claim** – An electronic or paper record submitted by a healthcare provider to a payor detailing the health care services provided to a patient for which the provider is requesting payment. A claim may contain multiple health care services.
- **Contract** – The written agreement between the State and a contractor; comprised of the Contract, any addenda, appendices, attachments, or amendments thereto.

- **Dental Faculty** – Per Chapter 150-7-.02 of the Georgia Board of Dentistry Rules, “A Teacher’s or instructor’s license may be issued to a dentist who has graduated from a school or college approved by the Commission on Dental Accreditation of the American Dental Association (ADA) or its successor agency, for the sole purpose of teaching or instructing, in an accredited dental college or training clinic in [Georgia], those procedures and services recognized in [Georgia] to be within the scope of practice of such person’s professional license.”
- **Dental Volunteer** – Per the Georgia Board of Dentistry Rules, Chapter 150-07-.03, “A volunteer license shall be issued for the purpose of serving indigent patients in areas of [Georgia] in which there is inadequate personnel to supply dental services”. Dentists must meet the qualifications determined by the Board. It is noted that one qualification is that the dentist be retired.
- **Department of Community Health (DCH or Department)** –The Department within the state of Georgia that oversees and administers the Medicaid and PeachCare for Kids™ programs.
- **Doral (DentaQuest)** – The dental services subcontractor for AMGP Community Care and WellCare of Georgia. Doral Dental became the dental services subcontractor for Peach State Health Plan for services on or after June 1, 2009. Effective December 1, 2009, Doral changed their name to DentaQuest.
- **Fee-for-Service (FFS)** – A Medicaid and/or PeachCare for Kids™ health care delivery program whereby a provider submits a claim for payment by the Department after the service has been provided.
- **Fiscal Agent Contractor (FAC)** – The entity contracted with the Department to process Medicaid and PeachCare for Kids™ claims and other non-claim specific payments. With the exception of pharmacy claims, Affiliated Computer Services, Inc. is the FAC for the Department.
- **Geographic Access Report** - For purposes of this report, the documentation required by Section 4.18.6.2 of the contract between DCH and the CMOS, to be submitted on a monthly basis. The report must contain Provider Network Adequacy and Capacity Information as specified by the contract provision demonstrating that the CMO offers an appropriate range of preventive, Primary Care and specialty services (including dental) that is adequate for the anticipated number of members for the service area and that the CMO's network of providers is sufficient in number, mix and geographic distribution to meet the needs of the anticipated number of members in the service area.

- **Georgia Families (GF)** – The risk-based managed care health care delivery program for Medicaid and PeachCare for Kids™ where the Department contracts with Care Management Organizations to manage and finance the care of eligible members.
- **Health Professional Shortage Area (HPSA)** – An area designated by the United States Department of Health and Human Services' Health Resources and Services Administration (HRSA) as being underserved in primary medical care, dental or mental health providers. These areas can be geographic, demographic or institutional in nature. An area can be found using the following website: <http://hpsafind.hrsa.gov/>.
- **Licensed Dentist** – A dentist licensed and in good standing in the state of Georgia pursuant to Title 43, Chapter 11 of the Georgia Code.
- **Medicaid Care Management Organizations Act (the Act)** – A bill passed by the Georgia General Assembly, signed into law by Governor Perdue, and effective July 1, 2008 that includes requirements for the administrators of the Medicaid Managed Care plan. The Act includes dental provider network provisions, emergency room claims payment requirements, member eligibility verification requirements, and other requirements.
- **Medicaid Management Information System (MMIS)** – A computerized system used for processing, collecting, analyzing and reporting of information needed to support Medicaid and PeachCare for Kids™ functions. The MMIS consists of all required subsystems as specified in the State Medicaid Manuals.
- **Member** – An individual who is eligible for Medicaid or PeachCare for Kids™ benefits. An individual who is eligible for Medicaid or PeachCare for Kids™ benefits might also be eligible to participate in the Georgia Families program.
- **Participating Provider** – As used in this report, this term refers to providers that have signed a contract with CMOs to offer dental services to Georgia Families members.
- **PeachCare for Kids™ Program (PCK)** – The State Children's Health Insurance Program (SCHIP) funded by Title XXI of the Social Security Act, as amended.
- **Provider Directory** – A listing of health care service providers under contract with CMOs that is prepared by CMOs as a reference of providers that are available to offer services to members.
- **Provider Number (or Provider Billing Number)** – An alphanumeric code utilized by health care payors to identify providers for billing, payment, and reporting purposes.

- **Subcontractor** – An entity that contracts with a CMO to administer the provision of some or all of the health care services for which that CMO is responsible.
- **Subject Matter Expert (SME)** – A member of a group of Department representatives who is available for consultation regarding claims payment issues, Georgia Medicaid and PeachCare for Kids™ coverage and payment policies, or other matters related to claims.

# PROJECT BACKGROUND

The Department of Community Health (DCH or the Department) engaged Myers and Stauffer LC (MSLC) to study and report on specific aspects of the Georgia Families (GF) program, including certain issues presented by providers, selected claims paid or denied by the Care Management Organizations (CMOs), including AMERIGROUP Community Care (AMGP), Peach State Health Plan (PSHP), and WellCare of Georgia (WellCare), and selected GF policies and procedures. Previously issued reports are available online at <http://dch.georgia.gov>. These reports include the payment and denial trends of hospital, physician, and dental claims, the payment accuracy of selected claims, an analysis of certain CMO policies and procedures, and other special studies authorized by the Department.

The Department frequently conducts or authorizes analyses designed to determine the availability of services for Georgia Families members. DCH directed and authorized MSLC to perform an analysis of the dental provider directories as submitted to the Department by the CMOs. The focus of this analysis includes the following areas: geographic distribution of participating dentists, the identification of opportunities to improve access to dental services, a comparison of the fee-for-service and GF dental provider participation, and an analysis of the CMO dental directories.

We understand that the Department may provide a draft of this report to each of the CMOs. At the direction of the Department, CMO comments related to the findings of this report may be incorporated as an exhibit to this report.

As a reference for this report, the amended and restated contract between the Department and the CMOs, effective July 1, 2008, states in section 4.8.13, Geographic Access Requirements, that the contractor shall meet the following geographic access dental standards as it relates to each CMO's members: *One (1) dental provider within 30 minutes or 30 miles for urban areas; One (1) dental provider within 45 minutes or 45 miles for rural areas.*

The Medicaid Care Management Organizations Act, O.C.G.A. 33-21A-8 states the following regarding dental network adequacy in (2)(C):

- (a) Except as provided in subsection (b) of this Code section, no care management organization or agent of such care management organization shall deny any dentist from participating in the Medicaid and PeachCare for Kids dental program administered by such care management organization if:
  - (1) Such dentist has obtained a license to practice in this state and is an enrolled provider who has met all of the requirements of the Department of Community Health for participation in the Medicaid and PeachCare for Kids program; and*
  - (2)(A) The licensed dentist will provide dental services to members pursuant to a state or federally funded educational loan forgiveness program that**

*requires such services; provided, however, each care management organization shall be required to offer dentists wishing to participate through such loan forgiveness programs the same contract terms offered to other dentists in the service region who participate in the care management organization's Medicaid and PeachCare for Kids dental programs;*

*(B) The geographic area in which the dentist intends to practice has been designated as having a dental professional shortage as determined by the Department of Community Health, which may be based on the designation of the Health Resources and Services Administration of the United States Department of Health and Human Services; or*

*(C) Such care management organization fails to establish to the satisfaction of the Department of Community Health that a sufficient number of general dentists and specialists have contracted with the care management organization to provide covered dental services to members in the geographic region.*

*(b) A care management organization may decline to contract with a dentist who meets the requirements of subsection (a) of this Code section if such dentist has had his or her license to practice dentistry sanctioned in any manner or fails to meet the credentialing criteria established by the care management organization. Any dentist denied on this basis shall be entitled to a hearing before an administrative law judge as set forth in subsection (e) of Code Section 49-4-153.*

# DATA AND REFERENCE SOURCES

The data and references sources listed below were analyzed as part of this initiative. In consultation with the Department, we analyzed the data and documentation received from these sources, including the CMOs and their dental subcontractors. Unless specified otherwise, we did not independently validate or verify information received from these entities. Each CMO attested and warranted that the information they provided was “accurate, complete and truthful, and [was] consistent with the ethics statements and policies of DCH.”

## **CMO Dental Provider Directories**

DCH provided the full provider directories (i.e., all provider categories) for each CMO, as well as an extract of only dental providers. The following directories were received: AMGP as of October 15, 2008 and July 2009; PSHP as of June 30, 2008 and July 2009; and WellCare as of October 1, 2008 and July 2009.

## **Fee-for-Service (FFS) Providers**

MSLC developed a list of FFS Medicaid and PeachCare for Kids™ dental providers using MMIS data obtained from the fiscal agent contractor. This list includes only those dental providers who were listed as “Active” in the MMIS and had a Category of Service (CoS) of either “450 - Health Check Dental Program - under 21” or “460 - Adult Dental Program”. From this initial list, we prepared separate lists to correspond with the dates of the CMO directories.

## **Georgia Office of the Secretary of State**

We obtained a list of licensed dental providers that included the provider name, address, license number, issue and expiration date, and license status from the Georgia Office of the Secretary of State (GSOS).

## **Georgia Dental Association Provider Survey**

The Georgia Dental Association (GDA) submitted information from a provider survey that GDA conducted in early 2009. As we understand it, the purpose of the survey was to determine the participation status of GDA’s Medicaid and PeachCare for Kids™ providers with each of the CMOs.

## **CMO Dental Claims Data**

The CMOs submitted dental claims data directly to MSLC as a part of the December 16, 2008, comprehensive data request. The dental claims data from the CMOs included GF dental claims with dates of service between June 1, 2006 and November 30, 2008, the time period requested in the comprehensive data request, with the exception of

PSHP which instead submitted claims with adjudication dates between June 1, 2006 and November 30, 2008.

### **GF Dental Encounter Claims Data and FFS Dental Claims Data**

Many of the completed analyses used FFS claims and GF dental encounter claims data submitted to MSLC by the fiscal agent contractor. As of September 2009, the average encounter submission completion rates for SFY 2009 dental encounters were 91 percent for AMGP, 74 percent for PSHP, and 75 percent for WellCare.

### **Member Enrollment Data**

MSLC calculated member enrollment for each CMO and for FFS using the member eligibility and Georgia Families capitation payment (CAP) files that we received from the fiscal agent contractor. To determine member enrollment for each CMO, we identified members in the CAP file for which a CMO received payment. The CAP files used included the AMGP CAP file as of 10/15/2008, the PSHP CAP file as of 6/30/2008, and WellCare CAP file as of 10/1/2008. Members not assigned to a CMO were assigned to the FFS delivery system.

### **MSLC Dental Provider Survey**

In May 2009, MSLC initiated a market capacity survey to general and pediatric dentists practicing in the State of Georgia and certain border communities. These providers were identified using FFS provider listings and CMO directories provided by the Department, dental provider listings acquired from the Georgia Dental Society and Georgia Dental Association and the Georgia Office of the Secretary of State. We identified providers who participated in the survey that did not have dental claims activity and compared these providers against the CMO dental directories to determine if these providers were included.

### **CMO Geographic Access Reports**

We analyzed quarterly geographic access reports as submitted to DCH by each CMO. Several reports were used in order to perform point in time analyses.

### **Other Resources**

We met with the Department's Subject Matter Experts (SMEs) for dental services, as well as other states with Medicaid Managed Care Programs, via e-mail or telephone to identify industry standards for determining dental network adequacy. We also analyzed the CMOs' and/or their dental administrators' policies and procedures as applicable, the DCH and CMO contract, contracts between the CMOs and their respective subcontractors, and contracts between the subcontractor and their participating providers.

## **Assumptions, Limitations and Analytical Notes**

- We were informed by the Department that, effective December 1, 2009, Doral changed their name to DentaQuest. Accordingly, we have used “DentaQuest” throughout this report.
- AMGP and WellCare use a dental subcontractor, DentaQuest, to administer their members’ dental benefits. Dental provider directories are maintained by DentaQuest.
- At the time the 2008 dental provider directory for PSHP was created, PSHP contracted with a dental subcontractor, Avesis Incorporated (Avesis), to administer their members’ dental benefits. Beginning with dental services on or after June 1, 2009, PSHP contracted with DentaQuest as their dental service subcontractor. Because the change in dental administrators occurred during the course of our analysis, we compared the Avesis directory from 2008 to the DentaQuest directory from 2009.
- The licensed dental provider data from the Georgia Office of the Secretary of State (GSOS) was received on 02/18/09. Depending on the frequency of the updates to the dental provider data available online via the Secretary of State’s website, the license status of a particular provider may have changed by the date of this report.
- Potential duplicate provider location entries were removed from both the 2008 and 2009 CMO dental provider directories when the provider name, provider address and, when available, provider Medicaid ID and/or provider license were identical.
- Depending on adjudication rates, the dental claims data submitted by PSHP may include fewer claims that would have been received if the dental data extract had been based on the date of service of the dental claim.
- Documentation from the Georgia State Office of Rural Health was utilized when making the determination of the rural/urban designation of a county.
- Member files were provided by each CMO and by their subcontractors. We identified apparent discrepancies between the CMO member files and the corresponding subcontractor files. Due to these issues, we did not use this information and instead generated a member list from files received from the fiscal agent contractor.

# ANALYSES AND FINDINGS

The following analyses are included in the sections below:

*Analysis 1:* Summary of Unique Dental Providers and Locations Included in the 2008 and 2009 CMO Dental Provider Directories

*Analysis 2:* Comparison of the CMO Dental Provider Directories to the List of Licensed Dentists from the Georgia Office of the Secretary of State

*Analysis 3:* Comparison of Dental Participation Levels Between FFS and GF

*Analysis 4:* Analysis of the CMOs' Policies and Procedures for Determining Dental Network Adequacy

*Analysis 5:* Comparison of Dental Provider Survey Responses to Information Included in CMO Dental Provider Directories

*Analysis 6:* Analysis of the CMO-Submitted Geographic Access Reports to Contractual Provisions as mandated by DCH

*Analysis 7:* Geographic Distribution of Participating Dentists

**ANALYSIS 1: Summary of Unique Dental Providers and Locations Included in the 2008 and 2009 CMO Dental Provider Directories**

Provider directories are issued to the Department by each CMO on a quarterly basis. Our analysis covers multiple directory periods. In the event that we identified an apparent issue with a 2008 directory, we attempted to determine if the issue was resolved in the 2009 directory. By spanning multiple directory periods, we provide information on changes in dental networks, opportunities to improve the dental directories, or identify opportunities to improve access to dental care.

Total and unique provider counts obtained from the 2008 and 2009 dental directories are listed below in Tables I and II, respectively.

**Table I: Number of Dental Locations and Unique Dental Providers in 2008 Directory, by Region**

		Dental Locations by Region							
CMO	Provider Locations <sup>1</sup>	Atlanta	Central	East	North	Southeast	Southwest	Out of State	Unique Providers <sup>2</sup>
AMGP	639	459	N/A	53	70	57	N/A	0	590
PSHP	978	726	135	N/A	N/A	N/A	117	0	658 <sup>3</sup>
WellCare	2,107	1,259	177	194	234	125	108	10	1,145

Note 1: Duplicate entries, where provider name and location matched another record, were eliminated from this count.

Note 2: Unique providers are providers who are only counted once despite having multiple locations.

Note 3: Although there are 659 unique providers in the PSHP October 2008 directory, one provider entry was listed as a mobile dentist group rather than an individual dental provider. For purposes of this analysis, we have excluded this provider.

**Table II: Number of Dental Locations and Unique Dental Providers in July 2009 Directory, by Region**

CMO	Provider Locations <sup>1</sup>	Dental Locations by Region							Out of State	Unique Providers <sup>2</sup>
		Atlanta	Central	East	North	Southeast	Southwest			
AMGP	2,261	1,356	235	186	246	94	144	0	1,013	
PSHP	813	652	93	N/A	N/A	N/A	68	0	503	
WellCare	1,877	1,145	168	159	215	93	-93	4	1,006	

Note 1: Duplicate entries, where provider name and location matched another record, were eliminated from this count.

Note 2: Unique providers are providers who are only counted once despite having multiple locations.

**AMERIGROUP Community Care (AMGP)**

Table III shows AMGP increased its number of dental provider locations from the October 2008 directory to the July 2009 directory by adding a total of 1,622 provider locations or by 254 percent. AMGP also increased its number of dental providers from 590 unique providers in October 2008 to 1,013 providers in July 2009, resulting in a net increase of 423 dental providers or 72 percent.

It is important to note that AMGP added providers primarily to the Atlanta region, as well as two new regions, the Central and Southwest regions, which are outside of their CMO service area. These service areas were not included in AMGP’s 2008 directory. We requested clarification from AMGP and received the following response: “The reason you will see providers in these regions is Doral contracts with the other CMOs so the providers are included in all products/CMOs.”

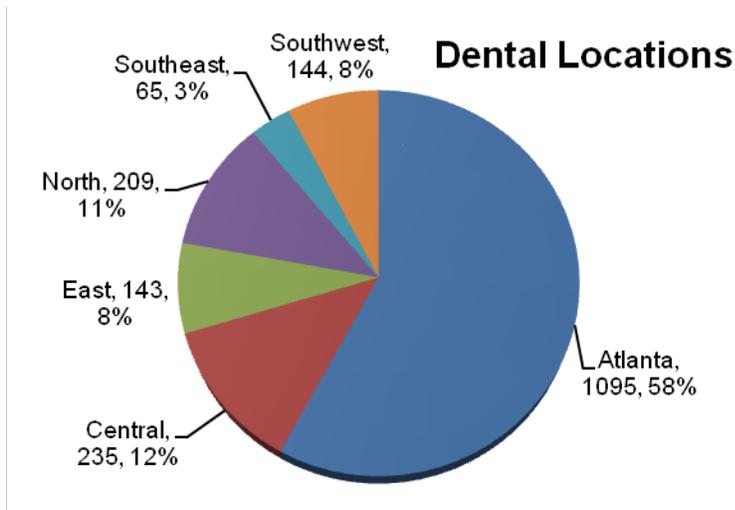
**Table III: Comparison of AMGP’s October 2008 and July 2009 Directories**

	October 2008	July 2009	Change	% Change
Total # of Dental Provider Locations <sup>1</sup>	639	2,261	1,622	254%
Total # of Unique Dental Providers	590	1,013	423	72%

Note 1: Total number of provider locations after duplicates removed.

- Of the 590 unique dental providers included in the October 2008 directory, 340 dentists or 57.6 percent were also included in the July 2009 directory.

- The July 2009 directory contained a total of 1,013 unique providers. Of these 1,013 providers, 673 or 66.4 percent were new providers that had not been included in the 2008 directory. These 673 providers represent 1,891 locations that are located in the following regions:



### **Peach State Health Plan (PSHP)**

As noted previously, PSHP changed their dental administrator from Avesis to DentaQuest effective June 1, 2009; therefore, the June 2008 directory of dental providers were contracted with Avesis, while dental providers included in the July 2009 directory are contracted with DentaQuest.

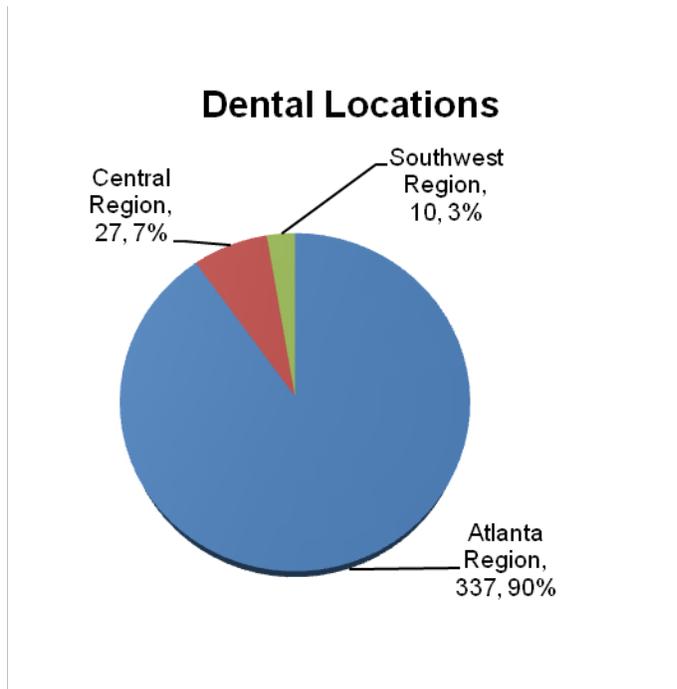
Table IV illustrates that PSHP decreased its number of dental provider locations from the July 2008 directory to the July 2009 directory by 165 provider locations or by 17 percent. PSHP also decreased its number of dental providers from 658 unique providers in July 2008 to 503 providers in July 2009, resulting in a net decrease of 155 dental providers or 24 percent.

**Table IV: Comparison of PSHP's June 2008 and July 2009 Directories**

	June 2008	July 2009	Change	% Change
<b>Total # of Dental Provider Locations<sup>1</sup></b>	<b>978</b>	<b>813</b>	<b>-165</b>	<b>-17%</b>
<b>Total # of Unique Dental Providers</b>	<b>658</b>	<b>503</b>	<b>-155</b>	<b>-24%</b>

*Note 1: Total number of provider locations after duplicates removed.*

- Of the 658 unique dental providers included in the July 2008 directory, 334 or 50.8 percent were also included in the July 2009 directory.
- The PSHP July 2009 dental provider directory contained a total of 503 unique dental providers, including 171 new dental providers or 34 percent that were not included in the 2008 directory. These 171 new dental providers represent 374 locations which are located in the following regions:



**WellCare of Georgia (WellCare)**

Table V illustrates WellCare decreased its number of dental provider locations from the October 2008 directory to the July 2009 directory by 230 provider locations or by 11 percent. WellCare also decreased its number of dental providers from 1,145 unique providers in October 2008 to 1,006 providers in July 2009, resulting in a net decrease of 139 dental providers or 12 percent.

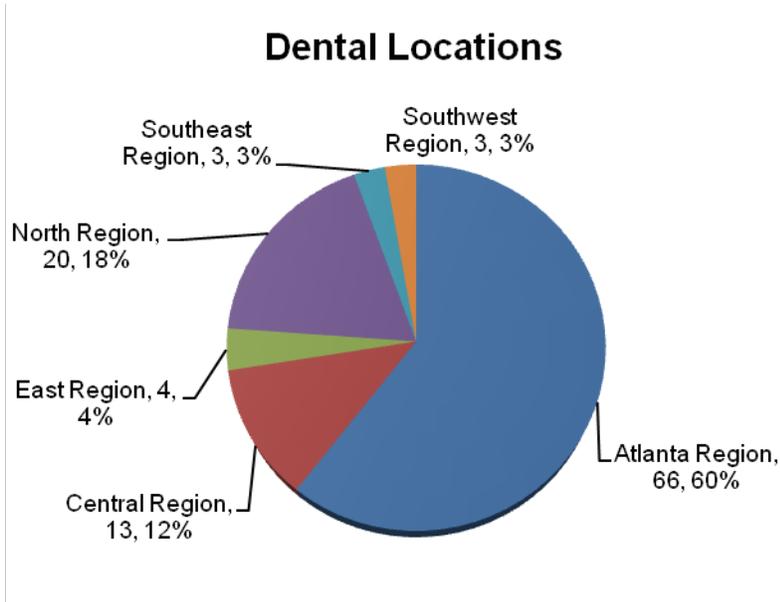
**Table V: Comparison of WellCare’s October 2008 and July 2009 Directories**

	October 2008	July 2009	Change	% Change
<b>Total # of Dental Provider Locations<sup>1</sup></b>	<b>2,107</b>	<b>1,877</b>	<b>-230</b>	<b>-11%</b>
<b>Total # of Unique Dental Providers</b>	<b>1,145</b>	<b>1,006</b>	<b>-139</b>	<b>-12%</b>

Note 1: Total number of provider locations after duplicates removed.

- WellCare’s October 2008 dental provider directory contained 1,145 unique dental providers, of which, 978 dental providers or 85.4 percent were also included in the July 2009 directory.

- The July 2009 dental provider directory contained a total of 1,006 unique dental providers, of which 28 or 2.8 percent were new dental providers and were not included in the 2008 directory. These 28 dental providers represent 109 locations which are located in the following regions:



## Summary of Findings Related to Analysis 1

Findings related to Analysis 1 are as follows:

- Comparison of the October 2008 and July 2009 directories shows AMGP increased its providers by 72 percent and provider locations by 254 percent.
- The AMGP July 2009 directory included two new regions: Central and Southwest, which were not included in the October 2008 directory. The Central and Southwest regions are not currently service regions for AMGP.
- Comparison of the PSHP June 2008 and July 2009 directories shows PSHP decreased its providers by 17 percent and provider locations by 24 percent.
- Comparison of the October 2008 and July 2009 directories shows WellCare decreased its providers by 12 percent and provider locations by 11 percent.
- Upon analysis of the 2009 directories, MSLC identified apparent duplicate entries in each of the CMOs' directories based on comparison of the provider name and location. Potential duplicate provider entries can cause anomalies in reporting of the network adequacy reports, reporting of provider to member ratios per county, and other data elements found in geographic access reports. Exhibit A contains a comprehensive list of all potential duplicate provider entries found on each CMO's July 2009 directory.

## ANALYSIS 2: Comparison of the CMO Dental Provider Directories to the List of Licensed Dentists from the Georgia Office of the Secretary of State

The objective of this analysis was to confirm that each dentist listed in a CMO’s dental provider directory was also listed as a licensed dentist according to the Georgia Office of the Secretary of State (GSOS). To complete this analysis, we developed a list of unique providers from each CMO directory.

The list of licensed dentists obtained from the GSOS contained only providers with a license type of “Dentist”. The dentists on the list had one of the following five license statuses: “Active”, “Probation”, “Renewal Pending”, “Suspended” and “Suspended - Late Renewal Period”. This list contained a total of 5,363 providers of which 5,279 were listed as “Active”, 77 as “Probation”, two providers as “Renewal Pending” and five as “Suspended” or “Suspended-Late Renewal Period”.

We compared each CMO’s unique list of dental providers from their 2008 directories to the list of licensed dentists from the GSOS. In the event that potential inaccuracies were identified, we confirmed the matter remained or had been corrected using the 2009 directory. While we attempted to obtain a historical file from the GSOS that would better align with the period of the CMO directories, this information was not available. Therefore, it should be noted that some of our findings may be impacted by differences in timing. Our findings are listed in Table VI below.

**Table VI: Comparison of Unique Providers Included in the CMO Directories to the List of Licensed Dentists from the Georgia Office of the Secretary of State**

CMO	Unique Providers from CMO Provider Directories <sup>1</sup>	Providers on GSOS Licensed Dentist List	Percent of Providers on GSOS Licensed Dentist List	Providers Not Included on GSOS Licensed Dentist List	Percent of Providers Not on GSOS Licensed Dentist List
AMGP	590	576	97.6%	14	2.4%
PSHP	658	650	98.8%	8	1.2%
WellCare	1,145	1,074	93.8%	71	6.2%

*Note 1: For the purpose of this analysis each provider was only counted once. Some providers practice at multiple locations.*

We identified 93 providers in the CMOs' directories that did not appear on the list of licensed dentists from the GSOS. The distribution of the 93 dental providers can be found below on Table VII(a).

After performing additional research, we were able to confirm that 75 of these providers either are currently licensed or had been licensed at some point in time as dental providers either by Georgia or another state. The complete list of the 93 providers and the details regarding these 75 providers are included in Exhibit B. Many of the 75 dentists had a license status of "Inactive", "Deceased", "Lapsed", "Revoked", "Suspended", "Expired" or were licensed in a category other than "Dentist".

There are 18 total providers represented on Table VII(a) on rows 11 and 13 that do not appear to be licensed dentists. Of these 18 providers, 13 were found to have a license other than dental (i.e., Medical Doctor, Nurse Anesthetist). MSLC was unable to confirm any licensing information for five of the providers: two for both AMGP and PSHP, and one provider on the WellCare directory.

**Table VII(a): Analysis of Providers Included in CMO Directories Not Found on the List of Licensed Dentists from Georgia Office of the Secretary of State**

Row ID	Total Number of Providers Not Included on List of Licensed Dentists from Georgia Office of Secretary of State	AMGP	PSHP	WellCare	
1		14	8	71	
2	Confirmed via GSOS Online License Verification System:	Active	0	1	0
3		Inactive	3	1	3
4		Deceased	3	0	0
5		Lapsed	2	0	5
6		Revoked	1	0	1
7		Superseded	0	0	1
8		Suspended	1	0	0
9		Expired	0	1	2
10		Dental License Other Than, "Dentist"	2	2	39
11		Provider With License Other Than Dental <sup>1</sup>	0	1	12
12	Provider With Dental License From Another State <sup>1</sup>	0	0	7	
13	Unable to Confirm Any License for Provider	2	2	1	

Note 1: Licensing information confirmed using on-line license verification tools from other states' or from Georgia (i.e., Georgia Composite Medical Board).

We identified providers in each CMO directory who held dentistry licenses other than "Dentist" on the list of licensed dentists from GSOS. The other licensing types found were "Dental Faculty" or "Dental Public Health". According to the Department's Provider Enrollment Program Specialists, only dentists who are licensed as "Dentist", "Public Health Dentist" or "Teaching Dentist" are permitted enrollment into the FFS delivery system. We confirmed that this restriction is applicable to the GF program as well.

We attempted to obtain clarification from GSOS regarding the various licenses, license statuses and the services that a dentist can provide to patients when a license is in a status other than "Active". However, due to limited resources available at GSOS, they were not able to provide responses to our questions.

**AMERIGROUP Community Care (AMGP)**

Of the 590 unique dental providers in the AMGP directory, 576 or 97.6 percent were listed on the GSOS licensed dentist list. Of these 576 dentists, 556 or 96.5 percent were included as “Active” status, while 19 or 3.3 percent had a “Probation” status, and one provider had a “Suspended” status.

As mentioned above, one provider, who was found on the Licensed Dentist list from the GSOS, had a license status of “Suspended”. Per review of the GSOS website, this status was put into effect in late March of 2008 and changed to a status of “Probation” in January 2009. Analysis of available claims (June 2006 through November 2008) showed no claims activity after mid-March 2008 for this provider. This provider is included on Table VII(b).

A total of 14 dental providers on the AMGP dental directory were not included on the list of licensed dentists from the GSOS. Of the 14, two providers have active licenses of “Dental Faculty”.

Ten providers had a license status of either: “Inactive”, “Deceased”, “Lapsed”, “Revoked” or “Suspended”. There were two providers included in the AMGP directory that we were not able to locate any “Active” licenses through our research. The table below provides additional information regarding providers identified with a license status other than “Active”. Included is the date when the provider’s license status changed, if available, an indicator of whether the provider is included in the December 2009 directory, and the provider’s claims history as of November 30, 2008.

**Table VII(b): Dental Providers Included in the October 2008 AMGP Directory with a License Status Other Than “Active”**

Provider	License Lapsed	License Inactive	Provider Deceased	License Revoked	License Suspended	On December 2009 DentaQuest Directory	Claims Activity
McCaslin			√ 11/06			No	None after 11/07 <sup>1</sup>
Freihaut			√ 07/07			No	None after 07/07
Mokas			√ 06/07			No	None
Yoda-Blackburn <sup>2</sup>				√		No	None after 05/08
Thach	√					No	None after 07/07
McNeil	√					No	None after 07/07
Ayala-Rubio		√				No	None after 10/07
Morrison		√				No	Yes
Won		√				No	None after 10/06
McGee					√ 03/08	No	None after 03/08
Collins					√ 02/08	No	None after 02/08

Note 1: Three claims were filed with this provider's ID number subsequent to the date of death indicated above. All 3 claims denied and were then resubmitted under a different provider ID.

Note 2: At the time that we performed our analysis, this provider was not included on the licensed dentist list from the GSOS and was identified on the GSOS website with a license status of “Revoked.” On December 8, 2009, we identified this provider on the GSOS website with a license status of “Active.” We are unable to determine either the dates the provider's license was in “Revoked” status or the date the license became “Active.”

As stated earlier, we were not able to obtain information regarding the dates of changes in licensing statuses from the GSOS. It is noted that three providers had a status of “Inactive” on the GSOS Online License Verification System. Per Chapter 295-15 of the Joint Secretary Rules and Regulations, section 295-15-.01 (a) Georgia Board of Dentistry, states “An inactive licensee may not practice dentistry in this State.”

Claims activity for each of the providers listed on Table VII(b) was also analyzed as of November 2008. One provider (Morrison) who is currently listed with a dental status of “Inactive” had claims from September 2006 to November 2008. It is not known to MSLC if the provider had claims beyond November 2008.

### **Peach State Health Plan (PSHP)**

Of the 658 dental providers on the PSHP directory, 650 or 98.8 percent were listed on the GSOS licensed dentist list. Of these 650 dentists, 633 or 97.4 percent were included as “Active” status, while 17 or 2.6 percent had a “Probation” status.

A total of eight dental providers were identified in the June 2008 PSHP dental directory that were not included on the list of licensed dentists from the GSOS. Of the eight dental providers, we were unable to confirm any licensing information for two providers. We noted that one of these providers had the same NPI number, Medicaid ID, address and first name as another oral surgeon; however, their last names were different. Neither of these two providers is included in the December 2009 provider directory accessed via the PSHP website.

We also found two out of the eight providers in the GSOS Online License Verification System with a dental license type other than “Dental”. Both dental providers are listed as “MDs” or medical doctors in the CMO’s directory with a specialty in Oral Surgery (Dental Only). However, we were not able to locate either of these providers in the licensed physician database on the Georgia Composite Board of Medical Examiners website. Both providers were located in the GSOS Online License Verification System as having an “Active” license as “Dental Faculty”, as well as, a dentistry license type of “General Anesthesia Permit”. Both providers are currently listed in the PSHP online directory.

One provider was found in the current PSHP directory listed as a “Doctor of Medical Dentistry”. We were not able to find any licensing information for this provider in the GSOS Online License Verification System. However, the provider is listed as having an active “Medical Doctor” license according to the Georgia Composite Board of Medical Examiners.

There was one dental provider included in the PSHP June 2008 directory who did not appear on the list of licensed dentists from the GSOS. According to the GSOS Online License Verification System, this provider has an “Active” license. It is not known when this provider’s license became “Active” or what the status of this provider’s license was when we received the list of licensed dentists from the GSOS.

The two remaining providers, listed on Table VII(c) below each had a status other than “Active” per the GSOS Online License Verification System. One provider had a dentistry license type of “Public Health” that is listed as “Lapsed”.

The other remaining provider has an “Inactive” status according to the GSOS Online License Verification System. Claims activity for this provider ranged from dates of service of December 2007 to March 2008. Per Chapter 295-15 of the Joint Secretary Rules and Regulations, section 295-15-.01 (a) Georgia Board of Dentistry, “An inactive licensee may not practice dentistry in this State.” It was noted this provider is not included in the current online provider directory on the PSHP website.

**Table VII(c): Dental Providers Included in the June 2008 PSHP Directory with a License Status Other Than “Active”**

Providers	License Inactive	License Lapsed	On December 2009 PSHP Directory	Claims Activity
Morrison	√		No	None after 03/08
Thomas		√	No	None after 11/07

**WellCare of Georgia (WellCare)**

Of the 1,145 providers included in WellCare’s dental directory, 1,074 or 93.8 percent were included in the list of licensed dentists from the GSOS. Of the 1,074 dentists, 1,048 or 97.6 percent had an “Active” status, while 26 or 2.4 percent had a “Probation” status.

Thirty-eight of the 71 providers not included on the list of licensed dentists from the GSOS were identified as “Active” providers with a “Dental Faculty” license in the GSOS Online License Verification System. It is noted that WellCare’s directory contained the Medical College location for all these providers except one; that one provider had an “Active” “Dental Public Health” license with a practice location of a Health District.

Twelve providers in the directory were licensed as either “Medical Doctor” or “Registered Nurse”. All 12 of these providers were listed in the directory with a specialty of Anesthesiology.

We were unable to confirm any licensing information for one provider. We were not able to match this provider to any of the providers on the GSOS licensed dentist list. It is also noted the provider license number listed in the WellCare directory appeared to be incomplete. Seven providers not found on the GSOS License list were found as licensed dentists in a surrounding state.

A total of 12 providers were found to have a dental license in the state of Georgia, but the license status was not “Active”. Per review of the GSOS Online License Verification System, six have a license in a “Lapsed” status, three in an “Inactive” status, and one provider with an “Expired” license. We also noted one provider with a license status of “Revoked” and one provider with a license status of “Superseded”. None of these providers had claims activity after 2007, with the exception of Yoda-Blackburn who had claims from June 2006 to August 2008. Additional information regarding these providers can be found on Table VII(d) below.

**Table VII(d): Dental Providers Included in the October 2008 WellCare Directory with a License Status Other Than “Active”**

Providers	License Lapsed	License Inactive	License Expired	License Revoked	License Superseded	On December 2009 DentaQuest Directory	Claims Activity
Khocht	√					No	None after 11/06
McNeil	√					No	None after 12/07
Mullis	√					No	None after 10/06
Swiec	√					Yes	None after 09/06
Thomas	√					No	None after 10/07
Ayala-Rubio		√				No	None after 10/06
Lim		√				No	None after 08/06
Won		√				No	None
White	√					Yes	None after 12/07
Benson			√			No	None after 08/07
Yoda-Blackburn				√		No	None after 08/08
Myers					√	Yes	None after 06/07

It is noted that on Table VII(d) there are some provider status changes and directories changes from the timeframe in which we performed our analysis to subsequent follow-up review performed at a later date. The changes found are as follows:

- One provider (Benson) was identified on the GSOS website with a license status of “Expired” at the time that we performed our analysis. In December 2009, we identified this provider on the GSOS website with a license status of “Lapsed.” We are unable to determine the dates applicable to either status.
- One Provider (Yoda-Blackburn), at the time that we performed our analysis, was identified on the GSOS website with a license status of “Revoked.” In December 2009, we identified this provider on the GSOS website with a license status of “Active.” We are unable to determine either the dates the provider’s license was in “Revoked” status or the date the license became “Active.”
- One provider (Myers) was identified on the GSOS website with a license status of “Superseded” when we performed our analysis with a license type of “Dental Faculty”. Upon subsequent review performed in January 2010, we identified this provider on the GSOS website with a license status of “Active” and license type of “Dentist”. We are unable to determine either the dates the provider’s license was in “Superseded” status or the date the license became “Active” or when this provider’s dental license type changed from “Dental Faculty” to “Dentist”.
- One provider (White) was included on the WellCare December 2009 online dental directory; however, the provider was not found on the January 2010 WellCare/DentaQuest directory.

### **CMO’s Policies and Procedures Related to the Maintenance of the Provider Directories**

The contract between the Department and the CMOs effective July 1, 2008, states in section 4.3.5.5 “At least once per month, the Contractor shall submit to DCH and its Agent any changes and edits to the Provider Directory. Such changes shall be submitted electronically in a format to be determined by DCH.” In addition, section 4.3.5.2 states, “The Provider Directory shall include names, locations, office hours, telephone numbers of, and non-English languages spoken by, current Contracted Providers. This includes, at a minimum, information on PCPs, specialists, dentists, pharmacists, FQHC’s and RHC’s, mental health and substance abuse Providers, and hospitals. The Provider Directory shall identify Providers that are not accepting new patients.”

We requested from the CMOs, as well as their subcontractors, copies of their policies and procedures related to the maintenance of their provider directories. We noted that both AMGP and WellCare direct the member to the DentaQuest website for a searchable list of dental providers, while the PSHP website contains the listing of their contracted dental providers. AMGP provides a toll-free number for DentaQuest on their website, while WellCare provides a link to the DentaQuest dental provider search engine. Per review of the on-line DentaQuest provider directory, all directory requirements as outlined in contract provision 4.3.5.2 were present for dental providers.

AMGP and WellCare each provided the DentaQuest policy which states that before provider directories are finalized, the appropriate department and/or person reviews the directory for accuracy. If corrections are required, these are made and the directory is finalized. There were no specifics provided as to what types of quality assurance measures are performed and the frequency of those measures.

Per Dawn Rock, PSHP requires all subcontractors to submit their data directly to PSHP so data can be incorporated into both PSHP's printed and on-line directories. Ms. Rock stated via e-mail that none of their subcontractors maintain separate provider directories. Per review of the PSHP on-line provider directory, all directory requirements as detailed in contract provision 4.3.5.2 listed above, were found when a search for dental providers was performed by MSLC.

We requested and received from PSHP, a copy of the Avesis Provider Directory Policy that outlines the data entered into their system upon receipt of a provider application. The policy did not state how this application information is used in the provider directory. It is noted in the Avesis policy that verification of a provider's Medicaid ID on the Georgia Health Partners website is performed to ensure the ID is active and correct. This verification is performed when enrolling new providers and again when the provider is re-credentialed.

### **Provider Contracts**

The DentaQuest Dental Provider Service Agreement, available on DentaQuest's website, states that it is the provider's responsibility to notify DentaQuest "within two (2) business days of the loss or restriction of his/her DEA permit or dentistry license or any other action that limits or restricts Provider's ability to practice dentistry."

The Avesis 2008 Dental Provider Agreement states, "Provider shall notify Avesis within two (2) business days of the confirmation of a medical disability, the restriction or loss of any DEA certificate or license to practice dentistry or any action that limits or restricts a Dentist Provider's ability to practice dentistry including all licensed professional personnel providing services to Member's."

### **Summary of Findings Related to Analysis 2**

To summarize the findings in this section, many of the provider directory issues related to the 2008 versions have been corrected and removed from the 2009 directory. Additional issues found with the CMO directories are as follows:

- Instances were noted where the provider's name was spelled incorrectly or was not updated appropriately (last name hyphenated or changed due to marital status change) when compared to the MMIS and/or GSOS list.
- Instances were identified where certain dental providers were listed with a different Medicaid ID number when compared to the Medicaid ID number in the MMIS.
- Providers were identified with incorrect or incomplete license numbers when compared to the list of licensed dental providers from the GSOS.

- Instances were identified where providers were listed on CMO directory with a license type that did not appear to be accurate (i.e. listed as “Medical Doctor”, but found by MSLC to have a “Dental Faculty” license).

In addition, several providers require further research and/or correction by the CMOs and their dental benefits administrator. These potential issues are listed below on Table VII(e).

**Table VII(e): Outstanding Directory Issues\***

CMO	Provider(s)	Issues for Research and Resolution
AMGP	Listed on Table VII(b)	AMGP providers listed on Table VII(b) should be researched to determine appropriateness of the inclusion of each of these providers on their October 2008 directory. CMO should review all corresponding claims data to determine if any claims for these providers were paid inappropriately due to an ineligible licensing status of provider at time service was rendered.
AMGP	McCaslin	Three claims were filed with this provider's ID number subsequent to the date of death indicated in Table VII(b). All 3 claims denied and were then resubmitted under a different provider ID.
AMGP	Ayala-Rubio Morrison Won	These providers, listed in the October 2008 directory, were found to have a dental license status of "Inactive". Date these providers' dental license status changed to "Inactive" unknown. Per Chapter 295-15 of the Joint Secretary Rules and Regulations, section 295-15-.01 (a) Georgia Board of Dentistry, "An inactive licensee may not practice dentistry in this State."
AMGP	Yoda-Blackburn	This provider, listed in the October 2008 directory, was found to have a license status of "Revoked" when we performed our analysis (currently listed as "Active" on GSOS website). Provider had claims from June 2006 to May 2008. Dates of when license was "Revoked" and then became "Active" again was not available to MSLC.
AMGP	Nguyen	Not able to locate any licensing information for this provider.
AMGP	Ramsey	Not able to locate any licensing information for this provider.
PSHP	Listed on Table VII(c)	PSHP providers listed on Table VII(c) should be researched to determine appropriateness of the inclusion of each of these providers on their June 2008 directory. CMO should review all corresponding claims data to determine if any claims for these providers were paid inappropriately due to an ineligible licensing status of provider at time service was rendered.
PSHP	Borgoy	Not able to locate any licensing information for this provider.
PSHP	Burham	Not able to locate any licensing information for this provider.
PSHP	Morrison	This provider, on the June 2008 directory, has a license status of "Inactive". Date this provider's dental license status changed to "Inactive" unknown. Per Chapter 295-15 of the Joint Secretary Rules and Regulations, section 295-15-.01 (a) Georgia Board of Dentistry, "An inactive licensee may not practice dentistry in this State."
WellCare	Listed on Table VII(d)	WellCare providers listed on Table VII(d) should be researched to determine appropriateness of the inclusion of each of these providers on their October 2008 directory. CMO should review all corresponding claims data to determine if any claims for these providers were paid inappropriately due to an ineligible licensing status of provider at time service was rendered.
WellCare	Ayala-Rubio Lim Won	These providers, listed in the October 2008 directory, were found to have a dental license status of "Inactive". Date these providers dental license status changed to "Inactive" unknown. Per Chapter 295-15 of the Joint Secretary Rules and Regulations, section 295-15-.01 (a) Georgia Board of Dentistry, "An inactive licensee may not practice dentistry in this State."
WellCare	Swiec	This provider, listed in the current WellCare/DentaQuest directory, has a "Lapsed" dental license per the GSOS website.
WellCare	Smith	Not able to locate any licensing information for this provider.
WellCare	Yoda-Blackburn	This provider, listed in the October 2008 directory, was found to have a license status of "Revoked" when we performed our analysis (currently listed as "Active" on GSOS website). Provider had claims from June 2006 to August 2008. Dates of when license was "Revoked" and then became "Active" again was not available to MSLC.

\*Note: The table above includes only those dental providers with issues that remain outstanding as of the date of this report.

### ANALYSIS 3: Comparison of Dental Participation Levels Between Fee-for-Service and Georgia Families (GF), by CMO

MSLC developed three separate FFS dental provider listings to correlate with the point in time for each CMO's 2008 dental directory. We compared the number of active providers in each CMO's directory to the active providers in the FFS listing for the counties in which the respective CMO operates. Provider types, including but not limited to specialists, such as oral surgeons and mobile dentists were included in this comparison.

For purposes of this analysis, we used only GF providers with an "active" license status according to the GSOS because, at the time this analysis was performed, GSOS was not able to provide detailed information regarding whether providers with a license status other than "active" could treat patients. Therefore, dental providers with a license status other than "active" were excluded from the CMO dental provider directories and these same providers were excluded from the FFS dental provider listings for comparison purposes. Providers listed as "active" for CoS 450 and 460 in the MMIS system were used to create the FFS dental provider listings.

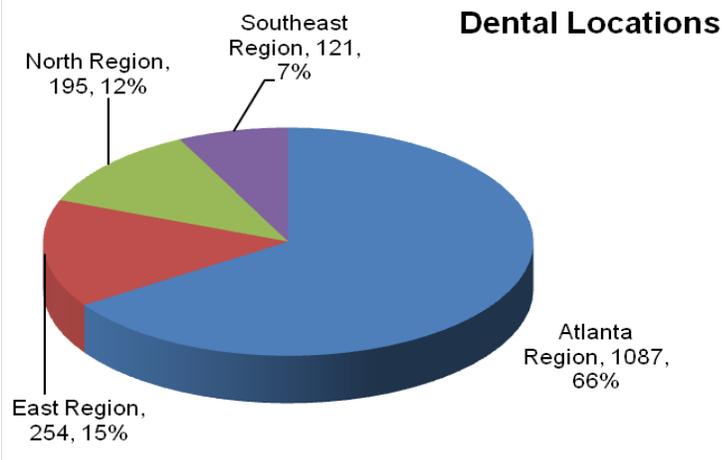
Finally, each CMO dental provider directory included a number of dental providers who are physically located outside of the CMO's contracted service region. For purposes of this analysis, those providers outside the CMO's contracted service area have been excluded. The total number of unique dental providers located outside the CMO contracted service region and included in the 2008 CMO directories are as follows:

- AMGP: 2
- PSHP: 6
- WellCare: 10

#### **AMERIGROUP Community Care (AMGP)**

As of October 15, 2008, AMGP's dental provider directory had 556 unique active dental providers as compared to 1,407 unique active dental providers for FFS. Twenty-eight dental providers, or 5 percent, were included in the AMGP directory but were not included in the FFS dental provider listing.

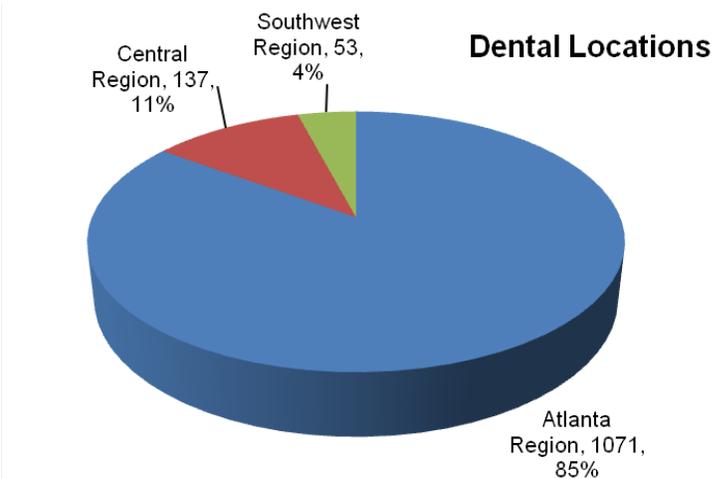
The total number of unique dental providers included in the FFS dental provider listing who were not included in the AMGP dental provider directory was 881, or 62.6 percent, with a total of 1,657 provider locations. These 1,657 provider locations are located in the following regions:



**Peach State Health Plan (PSHP)**

A comparison of the number of active dental providers included in the PSHP June 30, 2008, directory and the FFS dental provider listing for the same period identified 639 dental providers in the PSHP directory and 1,141 dental providers on the FFS list. Twenty-seven, or 4.2 percent providers included in the PSHP directory were not included in the FFS dental provider listing.

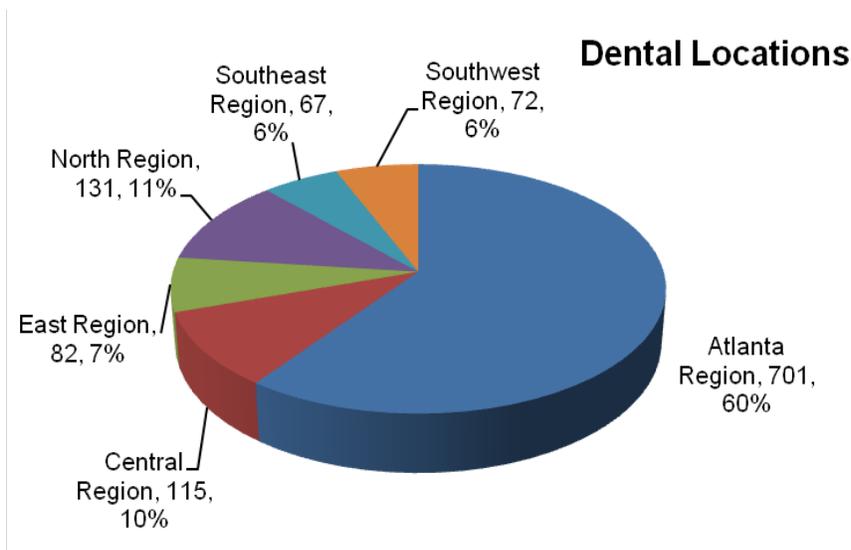
The total number of unique dental providers included on the FFS list who were not also included in the PSHP directory was 535, or 46.8 percent. These 535 dental providers account for 1,261 total dental provider locations. The 1,261 dental provider locations are located in the following regions:



**WellCare of Georgia (WellCare)**

WellCare had a total of 1,104 unique active dental providers included in their October 01, 2008 directory. The FFS listing for the same time period included 1,661 unique active providers. Sixty-eight providers, or 6.2 percent, included in the WellCare directory were not included in the FFS dental provider listing.

There were 635 unique providers included in the FFS listing not included in the WellCare October 2008 dental provider directory, or 38.2 percent. These 635 dental providers correspond to a total of 1,168 provider locations. These 1,168 provider locations are located in the following regions:



## ANALYSIS 4: Analysis of CMO Policies and Procedures for Determining Dental Network Adequacy

### DentaQuest

On August 13<sup>th</sup>, 2009, we conducted a conference call with Brett Bostrack, Director of Client Relations, from DentaQuest Dental, the dental subcontractor currently used by each of the CMOs. Mr. Bostrack provided information regarding the factors DentaQuest utilizes when determining network adequacy. Mr. Bostrack stated most dental administrator contracts, if a network adequacy standard is included, have a standard network dental provider-to-member ratio of 1:1,500. He also stated that the average network ratio for DentaQuest nationwide is 1:800.

According to Mr. Bostrack, when DentaQuest generates reports on dental network adequacy, only those dental providers who have submitted claims for services are included in the report. If a dental provider has not submitted any claims, they are not included in the total dental providers who are considered to be rendering services to health plan members.

Specific to the DentaQuest Georgia dental provider network, Mr. Bostrack stated DentaQuest has a number of urban counties in Georgia with dental provider to member ratios of 1:150 and 1:200, although he was not aware of any contractual requirement related to minimum provider to member ratios. He indicated DentaQuest has a strong network of providers in Georgia with very dense networks in the urban counties. Mr. Bostrack indicated that the network adequacy in rural Georgia counties is subject to dental provider availability and he noted that the issue of maintaining an adequate level of rural providers in Georgia is ongoing. He noted that the DentaQuest dental provider network may extend into contingent counties in order to contract with a dental provider that will offer services to members because of a lack of dental providers in a member's county of residence. Mr. Bostrack also stated that DentaQuest performs checks to ensure that the contractual member access standards of a dental provider within 30 miles in urban areas and within 45 miles in rural areas are being met by DentaQuest.

Mr. Bostrack stated that neither a dental provider's availability at multiple locations or hours of operation of any dental location is considered when determining network adequacy. The acceptance of new patients is, however, a factor used to determine network adequacy. He indicated that 95 percent of DentaQuest dental providers in Georgia have indicated they are agreeable to accepting new GF patients. Mr. Bostrack confirmed that DentaQuest does have difficulty measuring the availability of different types of dental providers and the mix of patient types seen by the DentaQuest network of dental providers.

We requested copies of any written policies regarding the dental network adequacy determination from DentaQuest. On August 14<sup>th</sup>, 2009, we received an email from

Norma Ornelas-Roberts at DentaQuest stating “Doral does not currently have any policy that specifically outlines our process in determining network adequacy.”

### Avesis

Written policies and procedures received from PSHP/Avesis contained documentation describing the steps utilized to demonstrate how network adequacy is achieved and maintained. These steps include multiple attempts to contract with dental providers, maintaining an electronic dental provider directory, use of geographic access reports, and review of dental provider information, such as languages spoken and nationality.

Dawn Rock, Vice President of Compliance for PSHP, on September 28<sup>th</sup>, 2009, provided the following responses to our questions regarding Avesis policies and procedures for determining dental network adequacy.

MSLC Question #1: Are factors such as hours of operation, provider status (part-time, full-time, and as needed), and whether a provider is accepting new patients, taken into consideration when preparing provider directories?

PSHP response to Question #1: “These are monitored during Avesis access calls and provider site visits.”

MSLC Question #2: Are there any benchmarks in place, such as a provider to member ratio? If so, what are the benchmarks? Do the benchmarks differ between urban and rural counties?

PSHP response to Question #2: “Urban - 1 provider within 30 miles. Rural - 1 provider within 45 miles.”

MSLC Question #3: Did Avesis provide to PSHP a report regarding network adequacy? If so, what information was provided and how often was report generated?

PSHP Response to Question #3: “Peach State generates a deficiency report based on a file provided by Avesis each week. The file that Avesis provided included various fields (e.g., provider names, full addresses, specialty, and NPI and MA# [Medicaid ID]) that were input into Peach State's geographic access system to calculate distance to members. Geographic access summarizes the report by comparing the distances to the access standards referenced above.”

MSLC Question #4: Were there any contractual requirements between PSHP and Avesis regarding network adequacy?

PSHP response to Question #4: “See response to question 2.”

### **CMO and Dental Subcontractor Contractual Provisions**

We requested that each CMO provide copies of the contracts, including addendums or amendments, with each of their dental subcontractors.

AMGP supplied us with a copy of their DentaQuest agreement and addendum, both dated October 13<sup>th</sup>, 2006. We were not able to locate within the AMGP/DentaQuest agreement or addendum the geographic access dental standard found in section 4.8.13 of the Amended and Restated contract, between the Department and the CMOs, which states members must have access to one dental provider within 30 minutes or 30 miles for urban areas; and one dental provider within 45 minutes or 45 miles for rural areas. The DentaQuest/AMGP contract, in regards to appointment waiting times, states a participating dental provider must offer hours of operation that are not fewer than the hours available to patients covered by another insurance carrier. This provision is also in the Amended and Restated Contract between the Department and the CMOs in section 4.8.14.1.

The contract between WellCare and DentaQuest Dental dated February 2006 includes the geographic access dental standard listed in the Amended and Restated Contract between the Department and the CMOs in section 4.8.13. Additionally, Amendment 1 of the Independent Practice Association Agreement between DentaQuest and WellCare dated January 29<sup>th</sup>, 2009, references section 4.8.14.2 of the contract between the Department and WellCare which lists the standards for access requirements in regards to appointment waiting times.

The contract between WellCare and DentaQuest also contains similar language to 4.8.14.1 of the Amended and Restated contract between DCH and the CMOs which states "The Contractor shall require that all network Providers offer hours of operation that is no less than the hours of operation offered to commercial and fee-for-service patients. The Contractor shall encourage its PCPs to offer After-Hours office care in the evenings and on weekends."

We did not receive the full contractual agreement between PSHP and Avesis, though all contracts with dental subcontractors were requested. We only received an amendment to the contract and, therefore, we are unable to determine if PSHP had any contractual provisions in place with Avesis in regards to network adequacy.

### **Industry Standards Related to Dental Network Adequacy**

We contacted several State Medicaid agencies and accessed publically available health plan policies and procedures to identify standards within the dental industry that are routinely used to measure dental network adequacy. We were not able to locate any documentation regarding benchmarks that other entities or agencies are using by the date of this report. We contacted other state agencies responsible for administering Medicaid and/or Medicaid Managed Care Programs and inquired regarding procedures or steps taken within their organizations when making a determination of the adequacy of a dental provider network.

One state agency responded that:

- The agency has professional relations staff that contact/recruit with dental offices to participate.
- The managed care health plan network must have at least 20 percent more enrolled providers by county than traditional Medicaid enrollment by county.

We were provided with additional information via one state's website regarding improvements in their dental provider network. This state noted that Medicaid and State Children's Health Insurance Program (SCHIP) members receive dental benefits from one dental benefits administrator based on a fee-for-service methodology. The state noted that having only one dental benefits administrator streamlined the credentialing process and has simplified program requirements (i.e., one set of benefit policies) for dental providers.

## ANALYSIS 5: COMPARISON OF DENTAL PROVIDER SURVEY RESPONSES TO INFORMATION INCLUDED IN THE CMO DENTAL PROVIDER DIRECTORIES

In a report dated November 23, 2009 (See Report #12, available online at <http://dch.georgia.gov>), MSLC conducted a survey of Georgia licensed dentists that included Georgia Families providers. The questions on the survey included, among other things, whether or not the dentist was currently treating and/or accepting new patients. We cross-referenced providers who responded to the survey with the dental encounter data supplied by the CMOs and the FFS data provided by the fiscal agent contractor.

As shown on Table VIII below, a total of 143 dental providers who responded to the survey conducted by MSLC and who had no dental claims activity were included in one or more of the CMOs' directories and/or the fee-for-service dental provider listing. Of these 143 providers, 11 were found on the AMGP directory, 10 on the PSHP directory, 23 on the WellCare directory and 99 on the FFS listing<sup>1</sup>.

As stated above, 11 GF dental providers who were included in the AMGP October 2008 dental provider directory were identified as having no claims activity between June 1, 2006 and November 30, 2008. Of these 11 dentists, 10 stated on the survey that they were either currently treating AMGP patients or were accepting new AMGP patients.

Ten GF dental providers who indicated on the survey that they have contracted with PSHP to provide services were identified as having no claims activity between June 1, 2006 and November 30, 2008. Of these 10 dentists, three indicated that they were either currently treating PSHP patients or were accepting new PSHP patients. Seven providers stated they were not accepting new patients.

Twenty-three GF dental providers who responded that they are WellCare dental providers had no claims activity between June 1, 2006 and November 30, 2008. However, 23 of these dentists indicated on the dental survey that they are currently treating WellCare patients. Twenty-two of the 23 providers indicated that they are also accepting new WellCare patients. One provider stated they were not accepting new patients.

Although MSLC was unable to locate dental claims for the 120 unique providers, it should be noted that we could not account for possible timing issues, or missing or incomplete encounter data. The percentages of encounter data submission for each CMO as of September 2009 can be found in the Data and Reference Sources section of this report.

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<sup>1</sup> Please note that the 143 dental providers correspond to 120 unique dental respondents on the MSLC dental provider survey.

**Table VIII: Number of Dental Survey Respondents without Claims Activity, Included in One or More CMO Dental Provider Directories or FFS Dental Provider Listing**

	AMGP	PSHP	WellCare	FFS	Total Dental Providers	Total Unique Dental Providers
<b>Total Unique Dental Providers Included in CMO or FFS Provider Directories</b>	11	10	23	99	143	120
<b>Dentists Who Indicated on the Survey they are Currently Treating Patients</b>	10	3	23	91	127	110
<b>Dentists Who Indicated on the Survey that are not Accepting New Patients</b>	1	7	1	17	26	24

A detailed listing of the 44 total CMO providers, listed above in Table VIII, can be found in Exhibit C.

Of the nine total CMO providers in Table VIII, who stated they were not accepting new CMO members, one is listed on one or more of the CMOs current dental directories as currently accepting patients. Table VIII(a) lists the provider.

**Table VIII(a): Listing of Dental Survey Respondents with No Claims Activity, Who Stated They Were Not Accepting New Patients, Included in One or More CMOs December 2009 Dental Provider Directories as Accepting New Patients<sup>1</sup>**

CMO	Provider	Potential Issue for Research and Resolution <sup>2</sup>
AMGP	Whatley	This provider office responded to our May 2009 survey that they were not currently accepting new patients for AMGP or PSHP. This provider is listed on the current directory as accepting new patients for both AMGP and PSHP. It is not clear to MSLC if provider is currently accepting new patients or if the directories require updating.
PSHP	Whatley	

*Note 1: The table above includes only dental providers with potential issues that remain outstanding as of the date of this report.*

*Note 2: Research regarding whether or not a provider is included in the current CMO directory is current as of January 13, 2010.*

**ANALYSIS 6: ANALYSIS OF THE CMO-SUBMITTED GEOGRAPHIC ACCESS REPORTS TO CONTRACTUAL PROVISIONS AS MANDATED BY DCH**

The objective of this analysis was to analyze each CMO’s dental provider directory for compliance with contractual requirements as stated in the Amended and Restated contract between the Department and the CMOs. In addition, we attempted to analyze the CMOs’ geographic access in relation to each CMO’s dental provider directory for the same point in time.

There are four relevant sections of the contract between DCH and the CMOs which are listed in the Table IX below.

**Table IX: DCH/CMO Amended and Restated Contract Provisions related to Geographic Access Reporting Requirements**

Provision Number	Provision Language
4.8.13	In addition to maintaining in its network a sufficient number of Providers to provide all services to its Members, the Contractor shall meet the following geographic access standards for all Members: Dental Urban – One (1) within thirty (30) minutes or thirty (30) miles, and Rural – One with forty-five (45) minutes or forty-five (miles).
4.8.13.2	All travel times are maximums for the amount of times it take a Member using usual travel means in a direct route to travel from their home to the Provider. DCH recognizes that transportation with NET vendors may not always follow direct routes due to multiple passengers.
4.18.6.2.1	The Contractor shall submit a Provider Network Adequacy and Capacity Report monthly that demonstrates that the Contractor offers an appropriate range of preventive, Primary Care and specialty services that is adequate for the anticipated number of Members for the service area and that its network of Providers is sufficient in number, mix and geographic distribution to meet the needs of the anticipated number of Members in the service area.
4.18.6.2.2	This Provider Network adequacy and Capacity Report shall list all Providers enrolled in the Contractor’s Provider network, including but not limited to, physicians, hospitals, FQHC/RHCs, home health agencies, pharmacies, Durable Medical Equipment vendors, behavioral health specialists, ambulance vendors, and dentists. Each Provider shall be identified by a unique identifying Provider number as specified in Section 4.8.1.5. This unique identifier shall appear on all Encounter Data transmittals. In addition to the listing, the Provider Network Adequacy and Capacity Report shall identify: i. Provider additions and deletions from the preceding month; ii. All OB/GYN Providers participating in the Contractor’s network, and those with open panels; and iii, List of Primary Care Providers with open panels.

The geographic access reports are currently submitted to DCH on a quarterly basis. We obtained the WellCare and AMGP geographic access reports from each CMO web portal used for submitting DCH reports, while the PSHP geographic access reports were received directly from PSHP. We attempted to analyze the following geographic access reports:

- AMGP reports dated October 17, 2008 and October 12, 2009
- PSHP reports dated October 30, 2008 and October 28, 2009
- WellCare reports dated February 25, 2009 and October 25, 2009; It is noted that the WellCare report dated February 25, 2009 is the report that was supplied by WellCare for their 4<sup>th</sup> quarter 2008 submission.

Our review of the geographic access reports indicates that while the reports are extensive, insufficient detail was available to assess the level of CMO compliance with all the contractual provisions in Sections 4.8.13 and 4.8.6.2. We understand that the Department is considering an amendment to the contract that would include a provision that would require the CMO to only include in its geographic access data reports providers that are accepting new members and providers that have full-time practice hour locations. The current format of these reports, as well as the statements by the CMOs and their dental administrators in Analysis 4, indicate that CMO compliance with this provision may be difficult to monitor.

In addition, we were not able to analyze each CMO's dental provider directory to the CMO's geographic access report to identify any potential variances as the methodology the CMOs used to create the reports, including policies and procedures requested as part of Analysis 4, were not available. MSLC can review the geographic access reports in greater detail at a later date if the information used to generate the reports becomes available and as determined necessary by the Department.

MSLC has included a list of suggestions regarding the geographic access reports in the Recommendations section of this report.

## ANALYSIS 7: GEOGRAPHIC DISTRIBUTION OF PARTICIPATING DENTISTS

Myers and Stauffer analyzed the geographic distribution of participating dentists with respect to the location of members and health professional shortage areas. A map of service regions was developed to demonstrate the dental provider-to-member ratio in each county. In addition to the analysis for each CMO, we also developed a combined GF (includes all CMOs) distribution and for comparison purposes, a fee-for-service distribution.

The provider-to-member ratio distribution analyses were developed based on the number of unique providers from each CMO provider directory per county and members per county at the point in time used for each CMO. Below is a listing of assumptions and limitations to consider when reviewing the maps.

### **Assumptions and Limitations:**

- The provider counts are a unique count based on the time period of the provider directories received for 2008.
- This analysis does not incorporate traveling radiuses. Therefore, care should be taken when drawing conclusions related to the findings.
- Provider counts include those providers with a license status of "Active" and "Probation" as defined by the GSOS since claims submitted by providers with these statuses are eligible for payment by DCH.
- Due to the difficulty in confirming physical location, as well as the area served by mobile providers, those mobile dentists have been excluded from this analysis.
- The provider counts do not take into account if the provider is currently seeing CMO patients, is accepting new CMO patients, or the provider's hours of operation, all of which could impact access to dental care.
- Member counts are based on member capitation files.
- Members with a city, state, and zip code that are not located in Georgia have been excluded from the member counts.
- The combined CMO map was developed by using the providers from each CMO's directory and the total number of CMO members by county. The provider count was developed by using all three CMO's provider directories and then obtaining a count by provider and location. For example, if a provider location was listed on all three CMO's directories, the provider location was counted only once.

Each distribution analysis has a corresponding exhibit which includes the corresponding data tables. The data tables are organized in alphabetical order by county and contain the number of members, number of providers and the resulting provider-to-member ratio per county. Based on the calculated provider-to-member ratios for each county, the analyses include:

- The number of members per one provider;

- If a county did not have any dental providers, the ratio begins with zero (0) followed by the number of members in the county;
- The provider-to-member ratios are based on counties without consideration of the rural/urban mileage requirements.

Each distribution analysis below includes a color legend used to categorize the provider-to-member ratios.

- A county with a potential access issue is identified by the color red, which denotes there are no dental providers present in the county.
- The color orange indicates the provider-to-member ratio is one provider to 1,600 or more members.
- Counties in yellow have a provider-to-member ratio of one provider to a range from 800 to 1,600 members.
- Counties with no color have a provider-to-member ratio of one provider to between 101 members and 800 members.
- Green counties indicate the provider-to-member ratio is less than or equal to 100 members per provider.

### **AMERIGROUP Community Care (AMGP)**

The analysis below illustrates the AMGP service regions. AMGP services 92 counties in Georgia which includes the North, Atlanta, East and Southeast regions.

In 63 of the 92 counties (68.5 percent), there is at least one dental provider. There are no dental providers in 29 counties, representing membership of 19,341 enrollees or approximately 9.4 percent of AMGP's members.

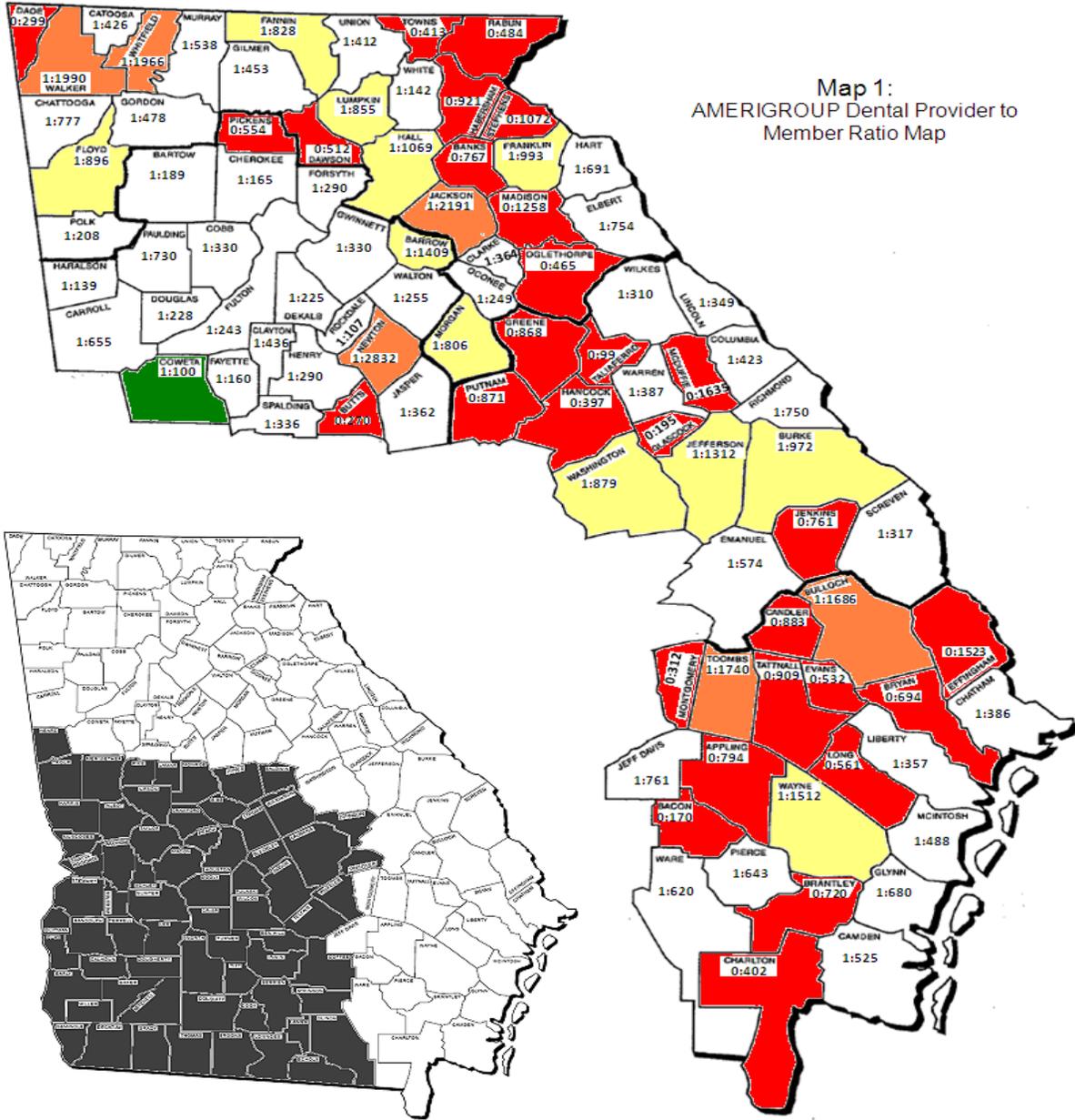
- The counties without a dental provider are considered rural by the State Office of Rural Health except for the following two:
  - Effingham County (Southeast Region)
  - Habersham County (North Region)
- The lowest provider-to-member ratio is in Coweta County (Atlanta region). There are ten providers for the 1,001 AMGP members in the county or one provider for every 100 members (1:100).
- The highest ratio is in Newton County (Atlanta region). There is one provider for the 2,832 members in the county (1:2,832).
- There are 14 counties in non-AMGP service regions, which are not shown on the analysis below, where AMGP has members but no providers, affecting 24 members or .01 percent.

Our analysis indicates that there are nine counties in the North region, two counties in the Atlanta region, seven counties in the East region, and 11 counties in the Southeast region where there are no dental providers.

The overall ratio for AMGP's service area is 512 providers to 206,854 members or one provider for every 404 members.

For additional detail, see Exhibit D.

Map 1:  
AMERIGROUP Dental Provider to  
Member Ratio Map



Color	Description
Green	100 members or less per provider in county
Yellow	Greater than 100 but less than 800 members per provider in county
Orange	Greater than 800 but less than 1600 member per provider in county
Red	Greater than 1600 members per provider in county
White	No provider listed in county

### **Peach State Health Plan (PSHP)**

The analysis below illustrates the PSHP service regions. PSHP services 90 counties in Georgia which includes the Atlanta, Central and Southwest regions.

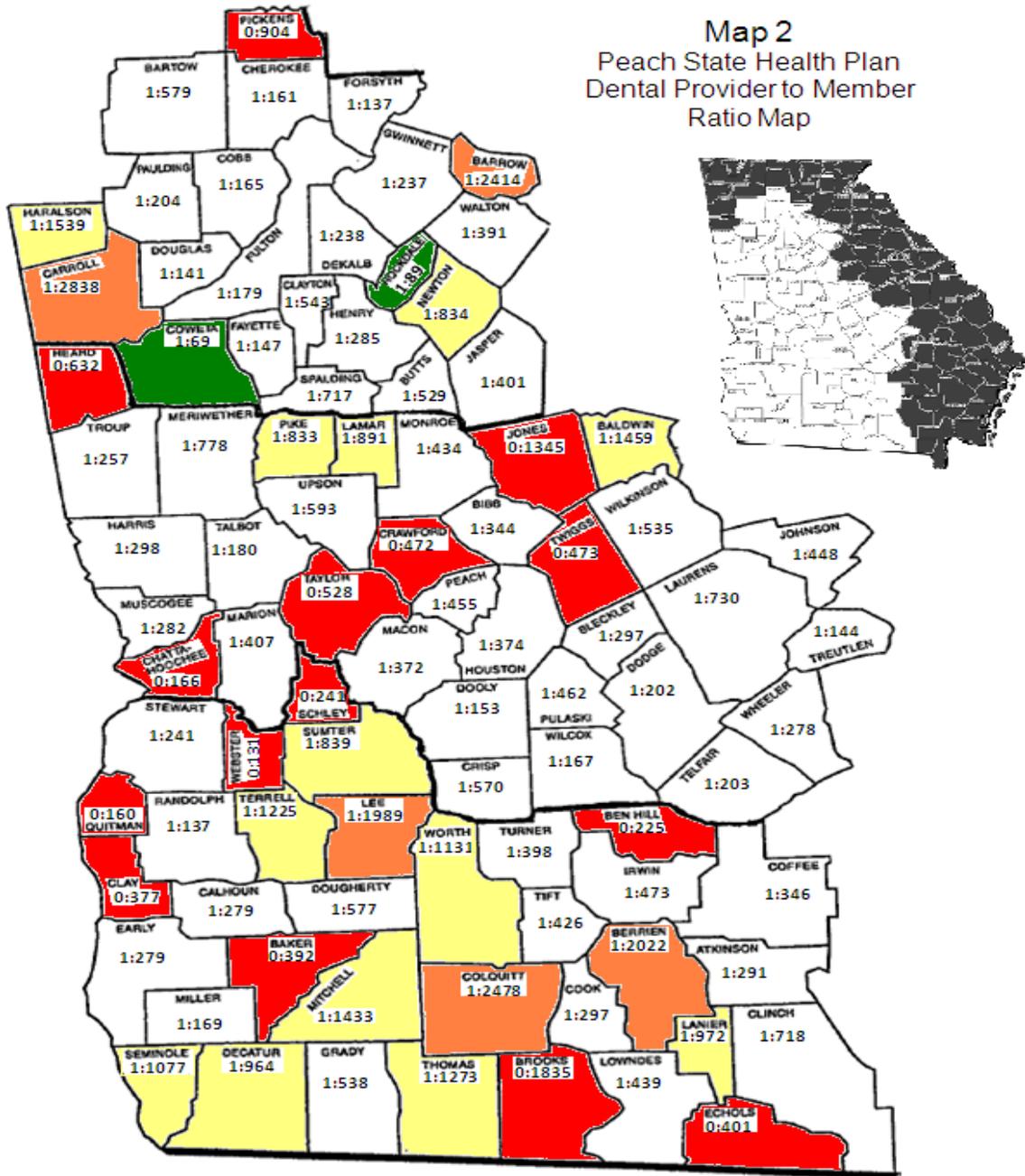
In 75 of the 92 counties (81.5 percent), there is at least one dental provider. There are no dental providers in 15 of the counties representing membership of 10,311 enrollees or approximately 3.6 percent of PSHP's membership.

- The counties without a dental provider are considered rural by the State Office of Rural Health.
- The lowest provider-to-member ratio is in Coweta County (Atlanta region). There are 27 providers for the 1,865 PSHP members in the county or one provider for every 69 members (1:69).
- The highest ratio is in Carroll County (Atlanta region), with two providers for the 5,675 members in the county (1:2,838).
- There are 28 counties in non-PSHP service regions, which are not shown on the analysis below, where PSHP has members but no providers, affecting 87 members, or approximately .03 percent.

The overall ratio for PSHP's service area is 944 providers to 285,339 members or one provider for every 302 members.

For additional detail, see Exhibit E.

**Map 2**  
 Peach State Health Plan  
 Dental Provider to Member  
 Ratio Map



Color	Description
Green	100 members or less per provider in county
Yellow	Greater than 100 but less than 800 members per provider in county
Orange	Greater than 800 but less than 1600 member per provider in county
Red	Greater than 1600 members per provider in county
Red	No provider listed in county

### **WellCare of Georgia (WellCare)**

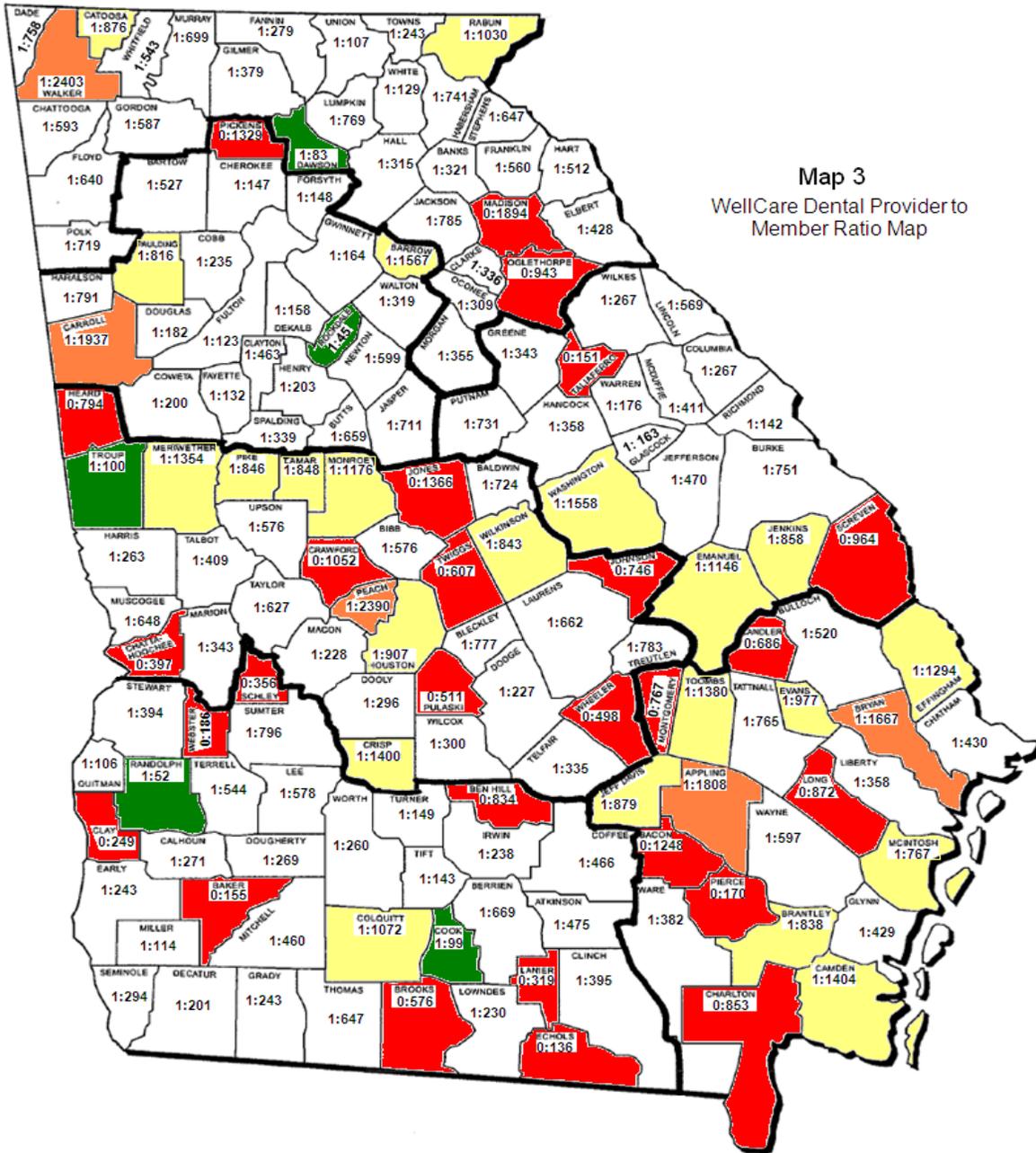
The analysis below illustrates the WellCare service regions. WellCare services all 159 counties in Georgia which includes the North, Atlanta, East, Central, Southwest, and Southeast regions.

In 132 of the 159 counties (83.0 percent), there is at least one provider. There are no dental providers in 27 counties, representing membership of 20,196 enrollees or approximately 4.3 percent of WellCare's members.

- All of the counties without a dental provider are considered rural by the State Office of Rural Health.
- The lowest provider-to-member ratio is in Rockdale County (Atlanta region). There are 89 providers for the 4,047 WellCare members in the county or one provider for every 45 members (1:45).
- The highest ratio is in Walker County (North region). There are two providers for the 4,806 members in the county or one provider to 2,403 members (1:2,403).

The overall ratio for WellCare's service area is 1,661 providers to 475,158 members or one provider for every 286 members.

For additional detail, see Exhibit F.



### **All GF CMOs Combined**

The analysis below illustrates all 159 counties and service regions in the state. There are at least two CMOs in each county, except in the Atlanta region where all three CMOs operate.

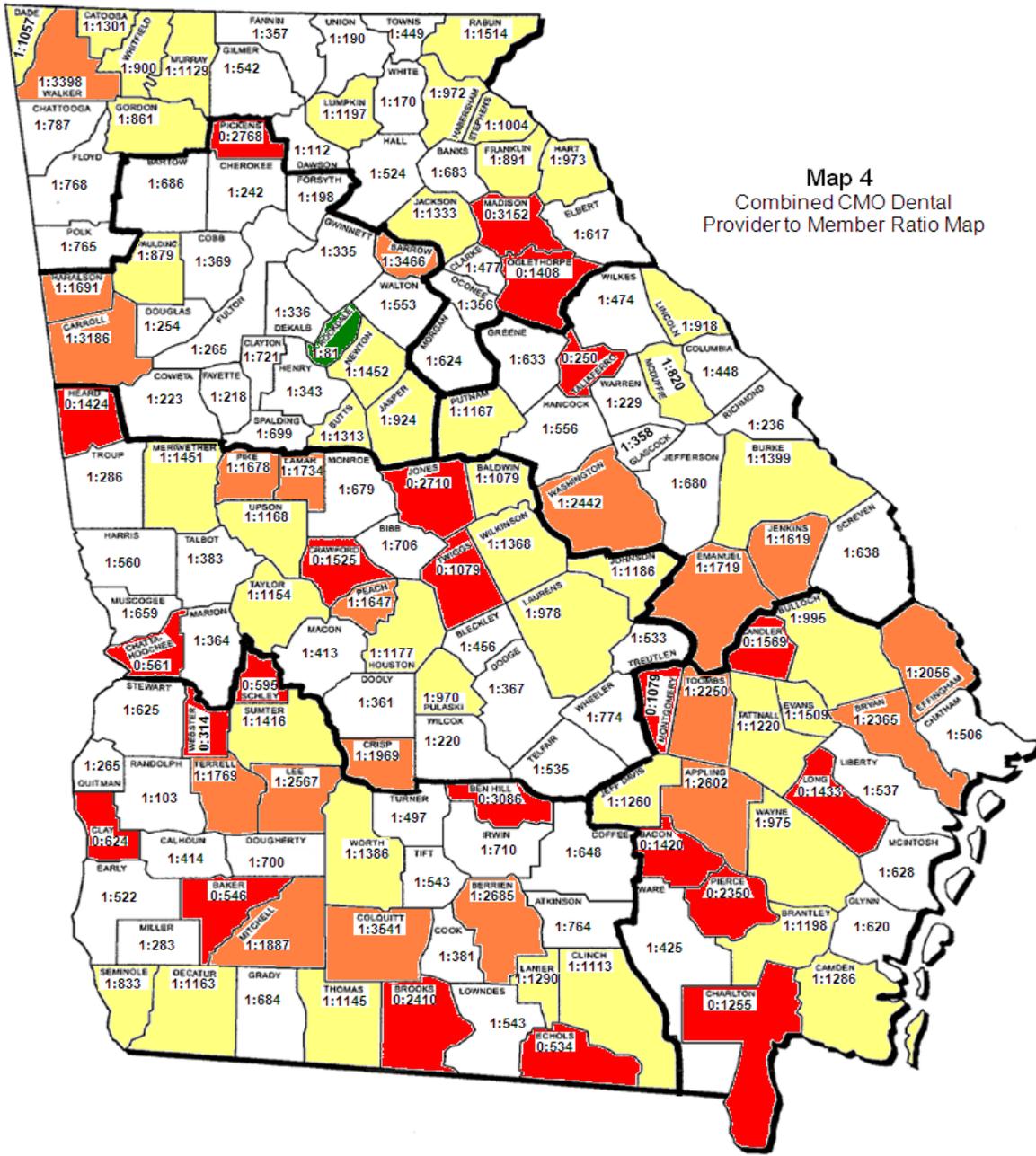
In 137 of the 159 counties (85.5 percent), there is at least one dental provider. There are no dental providers in 22 counties, representing Georgia Families membership of 32,092 or approximately 3.3 percent of the members.

- All of the counties without a dental provider are considered rural by the State Office of Rural Health.
- The lowest ratio is in Rockdale County, in the Atlanta region. There are 117 providers for the 9,529 members in the county or one provider to every 81 members (1:81).
- The highest ratio is in Colquitt County (Southwest region). There are two providers for the 7,082 members in the county (1:3,541).

The overall ratio of providers-to-members in the Georgia Families program is one provider for every 460 members or 1:460.

The combined analysis below identifies several counties where no dental providers are contracted to provide services to GF members and also identifies several counties in which the ratio is higher than 1,600 members per provider, which could cause a potential access to care issue.

For additional detail, see Exhibit G.



### **Fee-for-Service (FFS)**

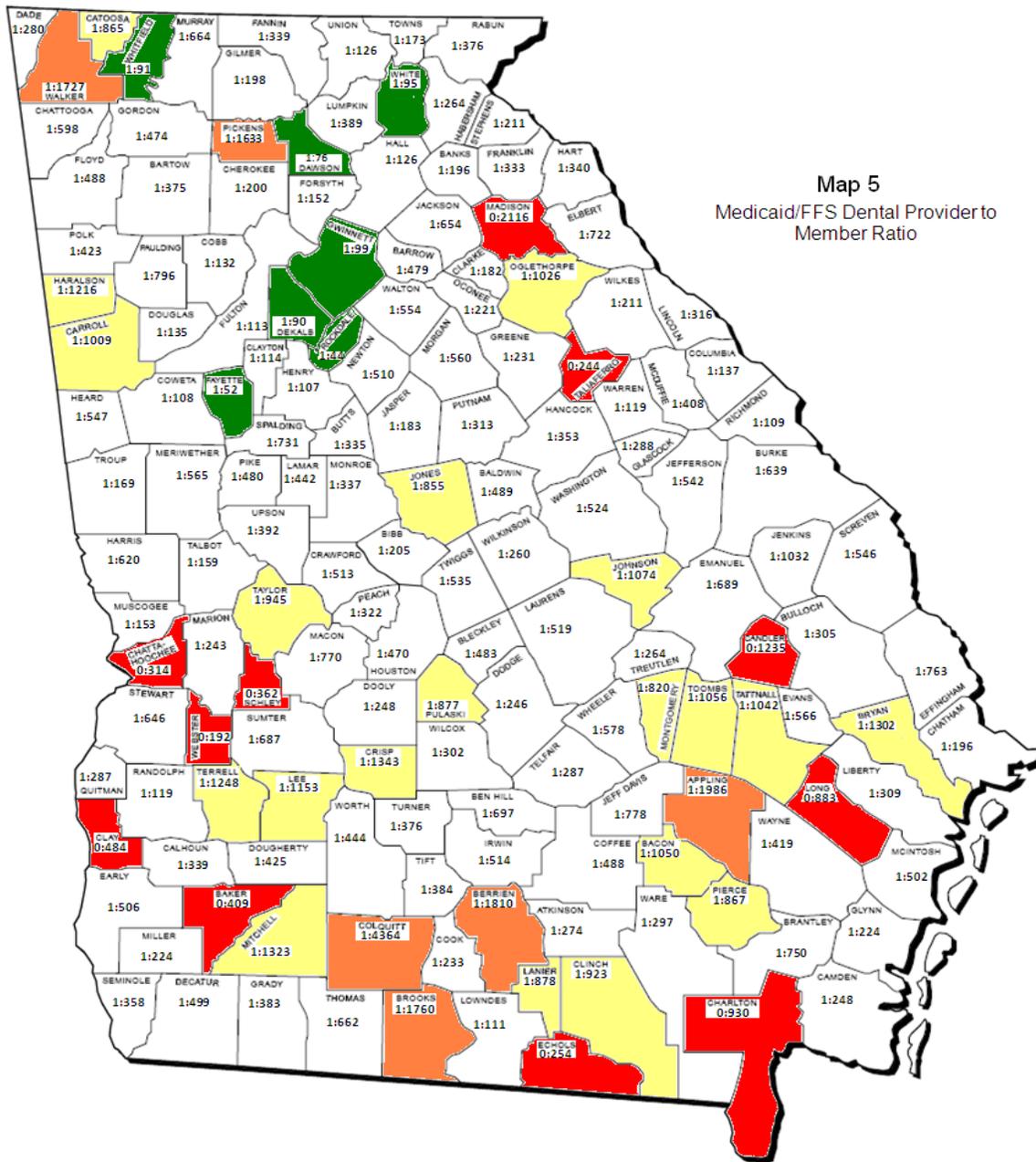
The analysis below illustrates the Georgia Medicaid FFS dental provider-to-member ratios for each county. FFS serves all 159 counties in the state.

In 148 of 159 counties (93.1 percent), there is at least one dental provider. There are no dental providers in 11 counties, representing membership of 7,423 Medicaid FFS enrollees, or approximately 1.3 percent of the FFS population.

- The counties without a dental provider are considered rural by the State Office of Rural Health.
- The lowest ratio is in Rockdale County (Atlanta Region). There are 97 providers for the 4,306 members in the county or one provider for every 44 members (1:44).
- The highest ratio is in Colquitt County (Southwest Georgia). There is one provider for the 4,364 members in the county (1:4,364).

The overall ratio for the FFS program is 3,156 providers to 572,807 members or one provider for every 182 members (1:182).

For additional detail, see Exhibit H.



Map 5  
Medicaid/FFS Dental Provider to  
Member Ratio

Color	Description
Green	100 members or less per provider in county
Yellow	Greater than 100 but less than 800 members per provider in county
Orange	Greater than 800 but less than 1600 member per provider in county
Red	Greater than 1600 members per provider in county
Red	No provider listed in county

As a summary, the overall provider-to-member ratios for each health plan and for FFS are presented in the table below.

**Table X: Overall Provider-to-Member Ratios by Payor**

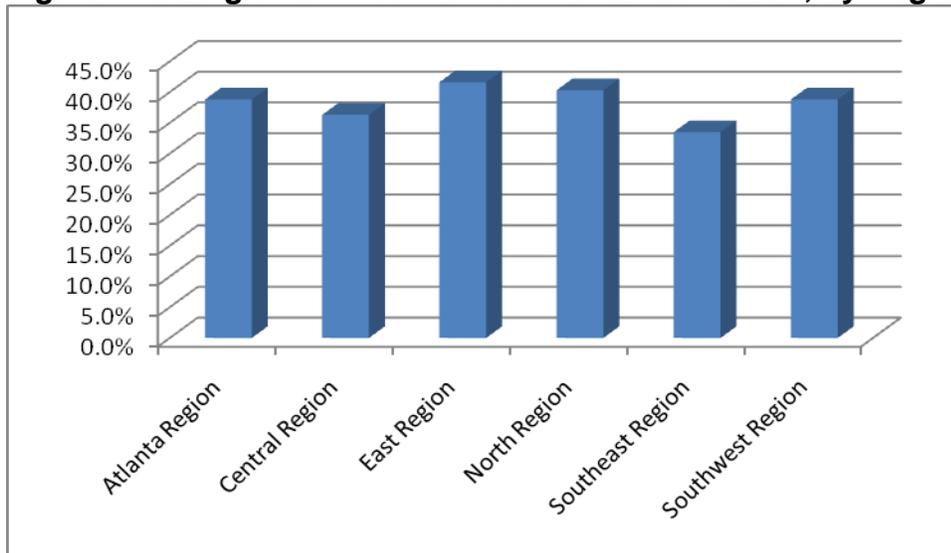
	AMGP	PSHP	WellCare	Combined CMO	FFS
<b>Overall Ratio</b>	1:404	1:302	1:286	1:460	1:182

**Member Utilization – Georgia Families**

As part of the provider-to-member ratio analysis, we analyzed by county the percentage of members utilizing dental services for the Georgia Families and FFS delivery systems. Member utilization was determined by using a unique list of members, CMO encounter data and FFS claim data for the same point in time used in the provider-to-member ratio portion of the analysis. Claims activity for up to one year previous to the point in time was used to determine the number of members with at least one visit to a dental provider.

The total member count for Georgia Families is 964,550 with member utilization of 359,925 (37.3 percent).

**Figure 1: Georgia Families Member Dental Utilization, by Region**



The three highest GF member dental utilization counties are as follows:

- Lincoln County (East region) with the highest percentage of utilization at 50.8 percent.
- Calhoun County (Southwest region) was second at 50.1 percent.
- Dawson County (North region) ranked third at 50.0 percent.
- All three counties are considered rural areas by the State Office of Rural Health.

The three lowest GF member dental utilization counties are as follows:

- Quitman County (Southwest region) has the lowest member utilization at 22.6 percent.
- Charlton County (Southeast region), has the second lowest at 24.1 percent.
- Pulaski County (Central region), is third at 24.7 percent.
- These three counties are all considered rural areas by the State Office of Rural Health.

The non-rural areas include counties that contain or surround the following cities: Atlanta, Savannah, Athens, Albany, Augusta, Macon/Warner Robbins, Columbus, and Chattanooga, TN.

- There are 50 counties in Georgia not considered rural by the State Office of Rural Health. The average member dental utilization in those counties is 37.7 percent, which is slightly less than the average for the entire state.
- Forsyth County (Atlanta region), has the highest utilization of the urban counties at 47.1 percent; followed by Columbia County (East region), at 46.9 percent and Cherokee County (Atlanta region), at 46.1 percent.
- The lowest percentage county is Camden County (Southeast region), at 27.1 percent. Both Muscogee County (Central region) and Bulloch County (Southeast region) have the second lowest utilization of the urban counties at 29.1 percent.

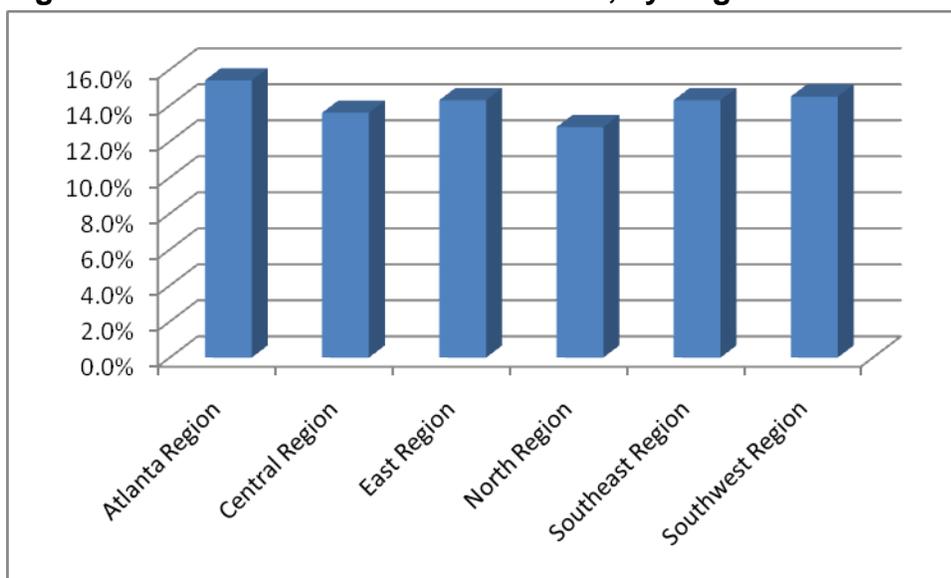
For additional detail, see Exhibit I.



### **Member Utilization – Fee-for-Service**

The total member count for Georgia FFS Medicaid is 572,807 with member utilization of 86,267 (15.1 percent). It should be noted that members in the FFS delivery system are comprised on the Aged, Blind, and Disabled aid categories. Thus, it is not expected that the FFS delivery system would have comparable utilization to the Georgia Families program.

**Figure 2: FFS Member Dental Utilization, by Region**



The three highest member dental utilization counties are as follows:

- Liberty County (Southeast region), has the highest percentage of utilization at 19.6 percent.
- Seminole County (Southwest region), is second at 19.5 percent.
- Lowndes County (Southwest region) ranked third at 19.4 percent.
- Liberty and Seminole counties are considered rural areas by the State Office of Rural Health. Lowndes County is designated an urban county.

The three lowest member dental utilization counties are as follows:

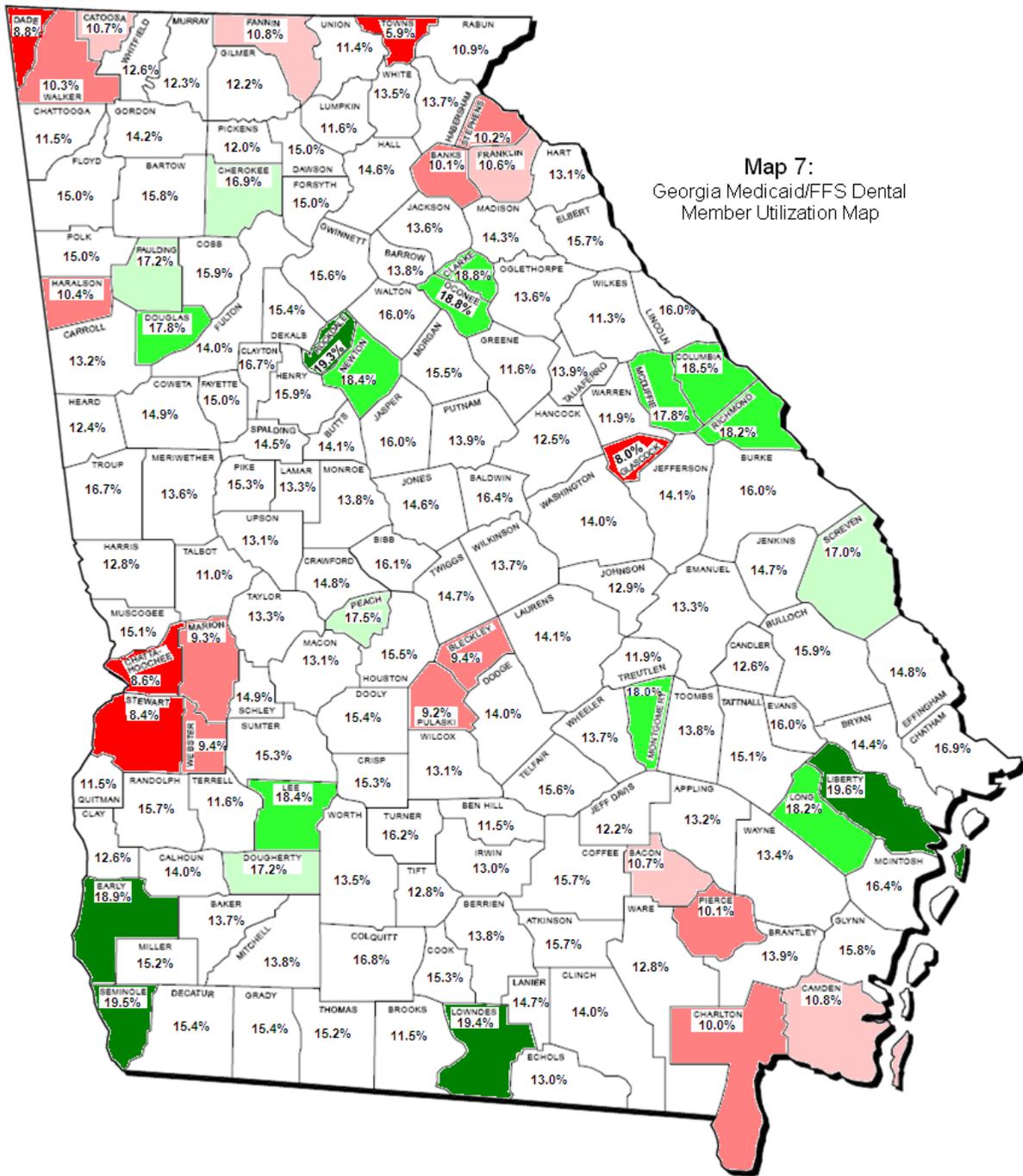
- Towns County (North region), has the lowest member utilization at 5.9 percent.
- Glascock County (East region), has the second lowest percentage at 8 percent.
- Stewart County (Southwest region), is third at 8.4 percent.
- These three counties are all considered rural areas by the State Office of Rural Health.

The non-rural areas include counties comprising the following cities: Atlanta, Savannah, Athens, Albany, Augusta, Macon/Warner Robbins, Columbus, and Chattanooga, TN.

- There are 50 counties in Georgia not considered rural. The average member dental utilization in these counties is 15.3 percent, which is higher than the average for the entire state at 15.1 percent.

- Lowndes County (Southwest region), has the highest member dental utilization at 19.4 percent, followed by Rockdale County (Atlanta region) with 19.3 percent. Clarke County (North region), and Oconee County (North region), both have 18.8 percent member dental utilization.
- The lowest percentage counties are Walker County (North region) at 10.3 percent, Catoosa County (North region) at 10.7 percent and Camden County (Southeast region) at 10.8 percent.

For additional detail, see Exhibit J.



Color	Description
Dark Green	Top 5 Member Utilization Counties
Medium Green	Top 6-15 Member Utilization Counties
Light Green	Top 16-20 Member Utilization Counties
White	All Other
Light Red	Lowest 16-20 Member Utilization Counties
Medium Red	Lowest 6-15 Member Utilization Counties
Dark Red	Lowest 5 Member Utilization Counties

### **Dental Provider-to-Utilizing Member Ratios**

As an additional analysis, we incorporated member utilization into the calculation of dental provider-to-member ratios. Using the member utilization data, we computed an adjusted ratio for both the Georgia Families and FFS delivery systems. It should be noted that our analyses of dental providers to utilizing members does not consider unmet need for dental services and assumes that any member who wanted or needed dental services was able to obtain them. The Department is currently conducting a member satisfaction survey for dental benefits that will attempt to quantify any potential unmet need.

### **All GF CMOs Combined**

The analysis below illustrates all 159 Georgia counties. There are at least two CMOs in each county, except in the Atlanta region where all three CMOs operate.

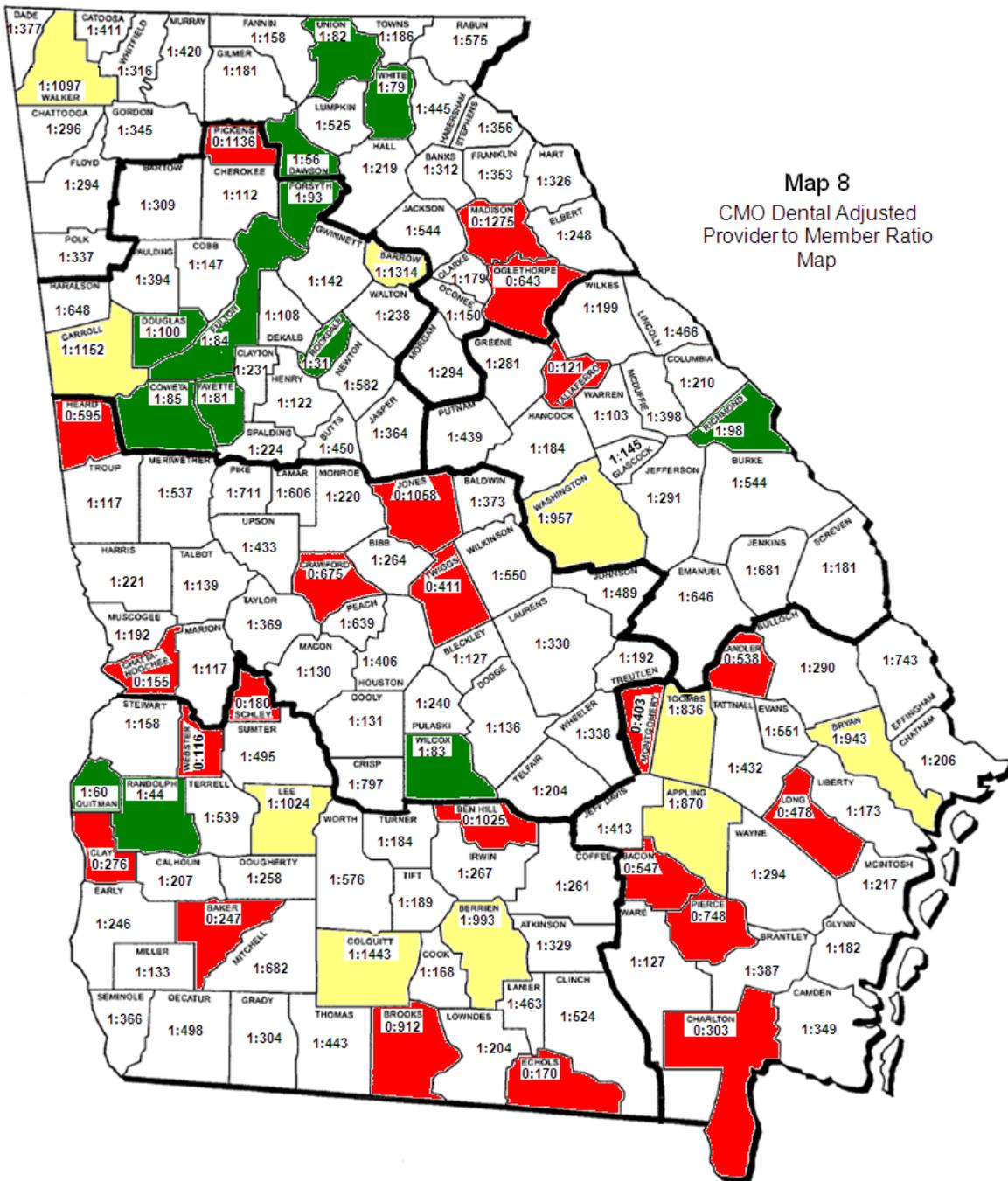
In 137 of the 159 counties (86.2 percent), there is at least one dental provider. There are no dental providers in 22 counties representing membership of 32,092 total CMO enrollees, or approximately 3.3 percent of total CMO members. Counties with no providers represent 12,012 utilizing members, or 3.3 percent of utilizing members.

- All of the counties without a dental provider are considered Rural by the State Office of Rural Health.
- The lowest ratio is in Rockdale County (Atlanta region), with 117 providers for the 9,529 members (1:81) in the county. However, based on utilization, the adjusted ratio is one to every 31 members (1:31).
- The highest ratio is in Colquitt County (Southwest region), which has two dental providers for the 7,082 members (1: 3,541) in the county. Based on utilization, the adjusted ratio is one provider to every 1,443 members (1:1,443).

The overall ratio of providers-to-members is one provider for every 460 members (1:460). However, when considering member utilization of dental services, the adjusted ratio is one provider for every 172 members (1:172).

The combined Georgia Families analysis below identifies several counties where no dental providers are available, which may be an indication of a potential access to care issue.

For additional detail, see Exhibit I.



Map 8  
CMO Dental Adjusted  
Provider to Member Ratio  
Map

Color	Description
Green	100 members or less per provider in county
Yellow	Greater than 100 but less than 800 members per provider in county
Orange	Greater than 800 but less than 1600 member per provider in county
Red	Greater than 1600 members per provider in county
Red	No provider listed in county

### **Fee-for-Service (FFS)**

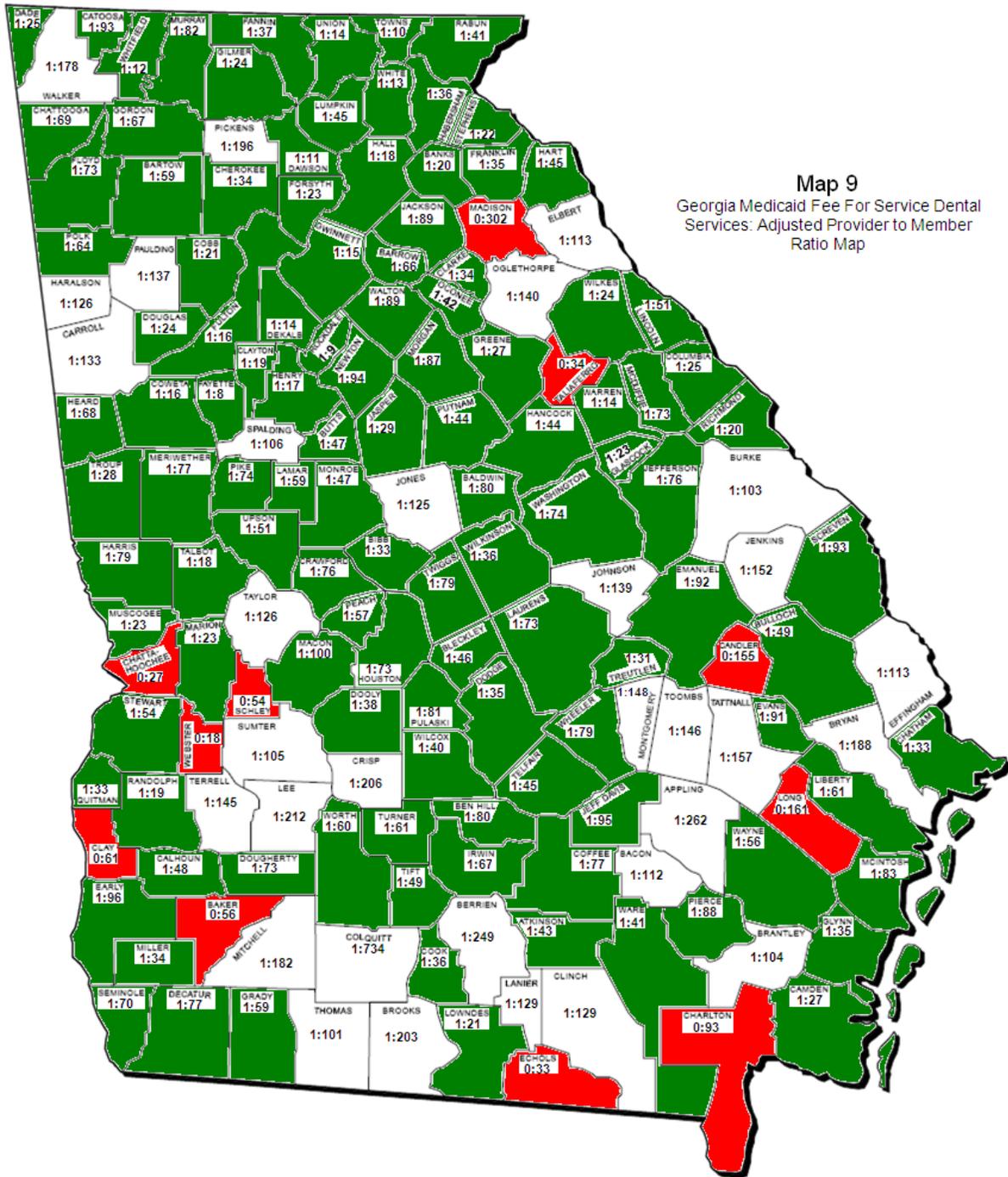
The FFS delivery system serves members in all 159 counties in the state. It is important to note the demographic composition of the population of Medicaid FFS is different than that of the GF program.

In 148 of 159 counties (93.1 percent), there is at least one dental provider. There are no dental providers in 11 counties, representing membership of 7,423 FFS enrollees, or 1.3 percent of total membership. Taking member utilization into account, counties without providers represents 994 utilizing members, or 1.2 percent of utilizing members.

- The counties without a dental provider are considered rural by the State Office of Rural Health.
- The lowest ratio is in Fayette County (Atlanta region), which has 48 providers for the 2,508 members in the county. However, based on utilization, the adjusted ratio is one provider for every 8 members (1:8).
- The highest ratio is in Colquitt County (Southwest Georgia), which has one provider for the 4,364 members (1:4,364) in the county. Based on the utilization of dental services, the adjusted ratio is one provider to every 734 members (1:734).

The overall ratio of providers-to-members is one provider for every 182 members (1:182). However, when considering member utilization of dental services, the adjusted ratio is one provider for every 27 members (1:27).

For additional detail, see Exhibit J.



**Map 9**  
 Georgia Medicaid Fee For Service Dental  
 Services: Adjusted Provider to Member  
 Ratio Map

Color	Description
Green	100 members or less per provider in county
Light Green	Greater than 100 but less than 800 members per provider in county
Yellow	Greater than 800 but less than 1600 member per provider in county
Orange	Greater than 1600 members per provider in county
Red	No provider listed in county

# RECOMMENDATIONS

## Recommendations for CMOs

We have the following recommendations based on our analyses related to the CMO dental provider networks:

- MSLC identified instances of typographical errors and dental providers with multiple locations listed with different names. We also found providers on the directories listed as one type of provider, but upon further research were actually a different provider type. The CMOs should require their dental subcontractor to develop procedures to address such errors and ensure appropriate quality review is being conducted on the dental provider directories, both the versions available to members (paper and electronic) and the cumulative database submitted to DCH.
- Exhibit A contains a listing of all possible duplicate provider entries found on each CMO's July 2009 dental directory. We recommend that each CMO review and determine if these provider entries are duplicates and, if so, update their current directories as applicable.
- CMOs should work with their dental subcontractor(s) to develop policies and procedures to identify dental providers with license status changes. These policies should include the frequency in which license statuses will be checked and subsequent follow-up measures to be taken for providers who are identified as having a dental license status change. Policies and procedures should be developed to address statuses other than active, including but not limited to the following: inactive, deceased, lapsed, revoked, superseded, and suspended license statuses, all of which appear to have been identified within the directories analyzed for this initiative.
- We recommend that AMGP research and report findings to the Department for potential issues identified on Table VII(e) in Analysis 2 :
  - AMGP providers listed on Table VII(b) should be researched to determine appropriateness of the inclusion of each of these providers on their October 2008 directory. CMO should review all corresponding claims data to determine if any claims for these providers were paid inappropriately due to an ineligible licensing status of provider at time service was rendered.
  - There were also two providers identified on the AMGP October Directory in which we were unable to locate any licensing information. AMGP should research these providers to confirm if these providers were licensed at the time services were delivered.
- We recommend that PSHP research and report findings to the Department regarding potential issues identified on Table VII(e) in Analysis 2 :

- The two PSHP providers listed on Table VII(c) should be researched to determine appropriateness of the inclusion of each of these providers on the June 2008 directory. CMO should review all corresponding claims data to determine if any claims for these providers were paid inappropriately due to an ineligible licensing status of provider at time service was rendered.
    - There were two providers on the PSHP June 2008 directory for which MSLC was not able to find any licensing information. PSHP should research these providers to determine their license status.
- We recommend that WellCare research and report findings to the Department regarding potential issues identified on Table VII(e) in Analysis 2 :
  - WellCare providers listed on Table VII(d) should be researched to determine appropriateness of the inclusion of each of these providers on the October 2008 directory. CMO should review all corresponding claims data to determine if any claims for these providers were paid inappropriately due to an ineligible licensing status of provider at time service was rendered.
    - ◊ One provider on Table VII(d), who was found to have a license status of “Lapsed” per the GSOS, was also found on the current WellCare/DentaQuest December directory. WellCare should research this issue further to determine appropriateness of the inclusion of this provider on their current directory.
  - Additionally, MSLC was not able to find any licensing information for one provider found on the WellCare October 2008 directory. CMO should research this provider to determine his/her license status.
- CMOs should develop policies and procedures that require their dental subcontractor to analyze claims data and follow-up with providers without claims activity to determine if they are currently treating or accepting new patients. If a provider has decided not to accept new patients, the subcontractor and /or CMO should update their directory accordingly.
- MSLC found one PSHP provider, who is listed as accepting new patients on the December 2009 PSHP directory, who responded to a survey conducted by MSLC in May 2009 that they were not accepting new patients. PSHP should follow-up with this provider to determine if they are currently accepting new patients or if the directory requires updating. Provider is listed on Table VIII(a) and Exhibit C.
- We recommend that AMGP follow-up with the provider identified on Table VIII(a) (also listed in Exhibit C) to determine if this provider is currently accepting new patients as this provider office responded to a survey conducted by MSLC in May 2009 that provider was not currently accepting new patients. If provider is not currently accepting new patients, AMGP should work with DentaQuest to update their directory accordingly.
- We recommend that AMGP and WellCare update their geographic access reports across all providers’ categories to reflect the correct counties in the East

and Southeast regions. During the analysis of AMGP's and WellCare's geographic access reports, MSLC identified that Screven County is included in the East Region in both CMOs' reports. Screven County should be removed from the East Region and updated to be included in the Southeast Region. In addition, AMGP and WellCare should verify that no other reports submitted to DCH or others contain this discrepancy.

- We recommend that the CMOs provide to the Department documentation regarding their geographic access reports. This documentation should include:
  - The methodology used when creating the reports. This documentation should include, but may not be limited to:
    - ◇ Population of providers used (i.e., If inclusion of providers based on receipt of claims);
    - ◇ Explanation on how providers are counted,
      - If provider has multiple locations, is provider counted as one (1) provider at each unique location;
    - ◇ Type of data used to generate provider population (e.g., encounter or claims data);
    - ◇ Data used to generate member population (e.g., enrollment or claims data);
    - ◇ Rationale of calculation of mile radius.
  - Quality Assurance Measures in place to ensure accuracy of the data and subsequent results.
  - How CMO uses report when evaluating network adequacy.
  - Other than documentation requirements as deemed necessary by the Department.
- AMGP should update their contract with DentaQuest to include all applicable Geographic Access standards as stated in section 4.8.13 of the Amended and Restated contract between the CMOs and the Department of Community Health.
- PSHP should confirm to the Department that their contract with DentaQuest, contains all the contractual provisions, as listed in the Amended and Restated Contract between the CMOs and DCH.
- We recommend that the CMOs follow-up with DentaQuest for a review of the service areas identified in Analysis 7 with potential access issues. The subcontractor should be required to research these areas further and provide the CMOs with an assessment of their findings, including any follow-up actions as applicable.

### **Recommendations for DCH**

The Department may wish to consider the following recommendations:

- A requirement that the CMOs submit dental provider directory data to DCH in a uniform format with key data elements fully populated (i.e., Provider CMO-specific ID, Provider Medicaid ID, National Provider Identification, state issued

license number) to facilitate monitoring and management of the provider directories.

- A requirement that the CMOs develop policies and procedures to periodically analyze, review, correct, and update provider directories on a frequent and routine basis. Quality control procedures should include, but not be limited to, review for duplicate provider entries and review of provider data elements such as Medicaid ID and license number for accuracy. Policies and procedures should also address the appropriate treatment of providers with a status other than active, such as inactive, deceased, lapsed, revoked, superseded, and suspended license statuses.
- A requirement that the CMOs only include dental providers on their directories who are providing care to members within a CMO's respective service region.
- A contractual requirement that each CMO or its delegated subcontractor regularly monitor the information available from the Georgia Secretary of State to detect changes in their participating providers' dental licensure status.
- A requirement that the CMOs or dental benefits administrator develop policies and procedures to analyze claims data and follow-up with providers without claims activity over a given period to determine if the provider is currently treating or accepting new patients. Directories should be updated according to findings.
- A requirement for a periodic reconciliation of eligibility files between the CMO and its subcontractor.
- A requirement that the CMOs review their current directories for duplicate provider entries and to correct or remove these, as applicable. A listing of the potential duplicates based on provider name and location can be found in Exhibit A.
- A requirement that the CMOs research and report findings back to the Department regarding potential issues identified on Table VII(e).
- A requirement that the CMOs research and report findings back to the Department regarding potential issues identified on Table VIII(a).
- A contractual requirement that the CMOs perform the following functions in regards to the mandated geographic access reporting. Requirements should include the following:
  - CMOs provide an account on the methodology used to create the geographic access reports including, but may not be limited to:
    - ◇ Population of providers used (i.e., If inclusion of providers based on receipt of claims);
    - ◇ Explanation on how providers are counted,
      - If provider has multiple locations, is provider counted as one (1) provider at each location;
    - ◇ Type of data used to generate provider population (e.g., encounter or claims data);
    - ◇ Data used to generate member population (e.g., enrollment or claims data);
    - ◇ Rationale of calculation of mile radius.
  - Quality Assurance Measures in place to ensure accuracy of the data and subsequent results.

- How CMO uses report when evaluating network adequacy.
  - Other than documentation requirements as deemed necessary by the Department.
- A contractual requirement to outline the dental provider network adequacy determination and establish additional minimum measures to ensure all Georgia Families members receive prompt and adequate dental care. This could include, but is not limited to:
  - Requiring that the CMOs and their subcontractors accurately account for providers who provide less than full-time services or who practice in multiple locations but with limited hours when determining network adequacy.
  - Requiring that the CMOs accurately report providers who are included in their provider directories but who have not provided services to Georgia Families members for a period of time and may not have notified the CMO of their intent to no longer accept new CMO GF members or provide services to existing CMO GF members. This may also include ensuring that these providers are not included in the CMOs' calculations of network adequacy.
  - Requiring CMOs to develop policies and procedures detailing how dental provider network adequacy is to be determined and monitored. CMOs should mandate their dental subcontractor follow these policies as a part of their contractual obligation.
- A requirement that the CMOs, in consultation with their subcontractors, report to the Department their findings and subsequent action plans for counties identified as having a potential shortage of providers or counties without dental care providers.

# EXHIBITS

**Exhibit A**  
**Possible Duplicated Provider Entries in July 2009 CMO Directories**

CMO	Last Name	First Name	Address	City	Zip code
AMGP	Anderson Jr	James	4721 Chamblee Dunwoody Rd Suite 301	Atlanta	30338
AMGP	Bakeman	Richard	1222 George C Wilson Dr	Augusta	30909
AMGP	Belinfante	Louis	5959 Highway 53 E Ste 250	Dawsonville	30534
AMGP	Berger	Clifford	17 Professional Dr	Brunswick	31520
AMGP	Berger	Clifford	4815 Paulsen St	Savannah	31405
AMGP	Blevins	Keith	7011 Evans Town Center Blvd	Evans	30809
AMGP	D'Arco	Samuel	233 Davis Rd Suite E	Augusta	30907
AMGP	Davila	Manuel	2176 Macland Rd Ste A	Dallas	30157
AMGP	Davila	Manuel	345 Parkway 575 Ste 102	Woodstock	30188
AMGP	Davila	Manuel	55 Witcher St NE Ste 140	Marietta	30060
AMGP	Dillon	Tracy	550 Peachtree St NE Suite 1780	Atlanta	30308
AMGP	Ellis	Terry	1244 Augusta West Pkwy	Augusta	30909
AMGP	Faircloth	David	1222 George C Wilson Dr	Augusta	30909
AMGP	Farish	Sam	1365 Clifton Rd NE Ste 2300	Atlanta	30322
AMGP	Farish	Sam	80 Jesse Hill Jr Dr Se	Atlanta	30303
AMGP	Fox	John	671 Lumpkin Campground Rd Ste 110	Dawsonville	30534
AMGP	Hadley	Isaac	131 Oakley Dr	Columbus	31906
AMGP	Hall	Jennifer	17 Professional Dr	Brunswick	31520
AMGP	Hall	Jennifer	4815 Paulsen St	Savannah	31405
AMGP	Harris	Brad	21 Kimberly Ln Ste A	Blue Ridge	30513
AMGP	Harris	Brad	2176 Macland Rd Ste A	Dallas	30157
AMGP	Harris	Brad	300 E 6th Ave	Rome	30161
AMGP	Harris	Brad	345 Parkway 575 Ste 102	Woodstock	30188
AMGP	Harris	Brad	55 Witcher St NE Ste 140	Marietta	30060
AMGP	Hunt	Robert	2176 Macland Rd Ste A	Dallas	30157
AMGP	Hunt	Robert	345 Parkway 575 Ste 102	Woodstock	30188
AMGP	Hunt	Robert	55 Witcher St Ste 140	Marietta	30060
AMGP	Kinsey	Richard	6043 Prestley Mill Rd Ste A	Douglasville	30134
AMGP	Lewis	Lela	1014 Ralph David Abernathy Blvd SW	Atlanta	30310
AMGP	Loving, Jr	Leroy	2352 Candler Rd	Decatur	30032
AMGP	Neal	Henry	7011 Evans Town Center Blvd	Evans	30809
AMGP	Nguyen	Pat	2367 Shallowford Ter	Atlanta	30341
AMGP	O'Neal	Kyle	7011 Evans Town Center Blvd	Evans	30809
AMGP	Pesto	Alfred	17 Professional Dr	Brunswick	31520
AMGP	Pesto	Alfred	4815 Paulsen St	Savannah	31405
AMGP	Rose	Scott	21 Kimberly Ln Ste A	Blue Ridge	30513
AMGP	Rose	Scott	2176 Macland Rd Ste A	Dallas	30157
AMGP	Rose	Scott	300 E 6th Ave	Rome	30161
AMGP	Rose	Scott	345 Parkway 575 Ste 102	Woodstock	30188
AMGP	Rose	Scott	55 Witcher St Ste 140	Marietta	30060
AMGP	Roser	Steven	1365 Clifton Rd NE Ste 2300	Atlanta	30322
AMGP	Roser	Steven	80 Jesse Hill Jr Dr Se	Atlanta	30303
AMGP	Shurett	Mark	Crawford County	Crawford County	31078
AMGP	Simonton	Fred	1221 Sherwood Park Dr NE Ste C	Gainesville	30501
AMGP	Steed	Martin	1365 Clifton Rd Ne Ste B2300	Atlanta	30322
AMGP	Treadway	Antwan	1790 Mulkey RdSte 3A	Austell	30106
AMGP	Vandewater	Lee	21 Kimberly LnSte A	Blue Ridge	30513
AMGP	Vandewater	Lee	345 Pkwy 575 Ste 102	Woodstock	30188
AMGP	Vandewater	Lee	55 Witcher St Ste 140	Marietta	30060

**Exhibit A**  
**Possible Duplicated Provider Entries in July 2009 CMO Directories**

<b>CMO</b>	<b>Last Name</b>	<b>First Name</b>	<b>Address</b>	<b>City</b>	<b>Zip code</b>
AMGP	Wiebe	John	17 Professional Dr	Brunswick	31520
AMGP	Wiebe	John	4815 Paulsen St	Savannah	31405
PSHP	Shirley	J	5455 Meridian Marks Rd NE Ste 200	Atlanta	30342
WellCare	Hadley	Isaac	131 N Oakley Dr	Columbus	31906

*\* Note: Although potential duplicates were identified in both the 2008 and 2009 directories, only those potential duplicates from the 2009 directories are included in this exhibit for the CMOs to research and resolve.*

**Exhibit B**  
**Resolution of CMO Dental Directory Providers Who Did Not Appear on the GSOS List of Licensed Dental Providers**

Confirmed via GSOS Online License Verification System										Dental License Other than "DN", Dentist	Dental License from Another State	License Other than Dental (i.e., "RN", etc.)	Unable to Confirm Any License for Provider
CMO	Provider	License Active	License Inactive	License Lapsed	License Suspended	License Superseded	License Expired	License Revoked	Provider Deceased				
AMGP	McCaslin								√ 11/06				
AMGP	Freihaut								√ 07/07				
AMGP	Mokas								√ 06/07				
AMGP	Yoda-Blackburn							√					
AMGP	Thach			√									
AMGP	McNeil			√									
AMGP	Ayala-Rubio		√										
AMGP	Morrison		√										
AMGP	Won		√										
AMGP	Collins				√								
AMGP	Nguyen												√
AMGP	Bouloux										√		
AMGP	Steed										√		
AMGP	Ramsey												√
PSHP	Morrison		√										
PSHP	Thomas			√									
PSHP	Borgoy												√
PSHP	Bouloux										√		
PSHP	Burham												√
PSHP	Schluer	√											
PSHP	Nadler											√	
PSHP	Steed										√		
WellCare	Abdelsayed										√		
WellCare	Abreu Serrano										√		
WellCare	Adair										√		

**Exhibit B**  
**Resolution of CMO Dental Directory Providers Who Did Not Appear on the GSOS List of Licensed Dental Providers**

CMO	Provider	Confirmed via GSOS Online License Verification System								Dental License Other than "DN", Dentist	Dental License from Another State	License Other than Dental (i.e., "RN", etc.)	Unable to Confirm Any License for Provider
		License Active	License Inactive	License Lapsed	License Suspended	License Superseded	License Expired	License Revoked	Provider Deceased				
WellCare	Ayala Rubio		√										
WellCare	Balance											√	
WellCare	Barenie									√			
WellCare	Benson						√						
WellCare	Bercowski									√			
WellCare	Bouffard									√			
WellCare	M. Brackett									√			
WellCare	W. Brackett									√			
WellCare	Browning									√			
WellCare	Cadet											√	
WellCare	Caughman									√			
WellCare	Chan									√			
WellCare	Chen									√			
WellCare	Coleman									√			
WellCare	DeLeon									√			
WellCare	Drisko									√			
WellCare	Dubrow											√	
WellCare	Foti											√	
WellCare	Frazier									√			
WellCare	Gramer											√	
WellCare	Hackman									√			
WellCare	Hammond									√			
WellCare	Hanes									√			
WellCare	Herman									√			
WellCare	Horne											√	

**Exhibit B**  
**Resolution of CMO Dental Directory Providers Who Did Not Appear on the GSOS List of Licensed Dental Providers**

CMO	Provider	Confirmed via GSOS Online License Verification System								Dental License Other than "DN", Dentist	Dental License from Another State	License Other than Dental (i.e., "RN", etc.)	Unable to Confirm Any License for Provider
		License Active	License Inactive	License Lapsed	License Suspended	License Superseded	License Expired	License Revoked	Provider Deceased				
WellCare	Kalathingal									√			
WellCare	Khocht			√									
WellCare	Klump											√	
WellCare	Larson										√		
WellCare	Lefebvre									√			
WellCare	Lim		√										
WellCare	Martone									√			
WellCare	Maze									√			
WellCare	McDonald										√		
WellCare	McMillon											√	
WellCare	McNeil			√									
WellCare	Morris									√			
WellCare	Mozaffari									√			
WellCare	Mullis			√									
WellCare	Myers					√							
WellCare	Nelson									√			
WellCare	Obbureke									√			
WellCare	Osborn									√			
WellCare	Polk											√	
WellCare	Roberts									√			
WellCare	Rockman									√			
WellCare	Rumph										√		
WellCare	Schermerhorn											√	
WellCare	Schuster									√			
WellCare	Shrout									√			

**Exhibit B**  
**Resolution of CMO Dental Directory Providers Who Did Not Appear on the GSOS List of Licensed Dental Providers**

CMO	Provider	Confirmed via GSOS Online License Verification System								Dental License Other than "DN", Dentist	Dental License from Another State	License Other than Dental (i.e., "RN", etc.)	Unable to Confirm Any License for Provider
		License Active	License Inactive	License Lapsed	License Suspended	License Superceded	License Expired	License Revoked	Provider Deceased				
WellCare	Smith												√
WellCare	Sockwell											√	
WellCare	Stockstill									√			
WellCare	Swiec			√									
WellCare	Tadsen											√	
WellCare	Tay									√			
WellCare	Taylor									√			
WellCare	Thomas			√									
WellCare	Vice										√		
WellCare	Wallace										√		
WellCare	Wataha									√			
WellCare	Weller									√			
WellCare	White			√									
WellCare	Wikesjo									√			
WellCare	Won		√										
WellCare	Yarn											√	
WellCare	Yates										√		
WellCare	Yoda- Blackburn								√				

## Exhibit C

### Complete Listing of Dental Survey Respondents with No Claims Activity Included in One or More CMO Dental Provider Directories<sup>1</sup>

CMO	Provider	Currently Treating Patients <sup>2</sup>	Accepting New Patients <sup>2</sup>	On December 2009 Directory
AMGP	Ajmo	Yes	Yes	No
AMGP	Baawo	Yes	Yes	No
AMGP	Elliott	Yes	Yes	No
AMGP	Gordon	Yes	Yes	No
AMGP	Holzauer	Yes	Yes	Yes
AMGP	Hurt	Yes	Yes	No
AMGP	Long-Evans	Yes	Yes	Yes
AMGP	Osborn	Yes	Yes	Yes
AMGP	Scott	Yes	Yes	No
AMGP	Steed	Yes	Yes	No
AMGP	Whatley	No	No	Yes
PSHP	Blanton	No	No	No <sup>3</sup>
PSHP	Marable U.	No	No	Yes
PSHP	Martin	No	No	No
PSHP	Moorman	No	No	No
PSHP	Nikain	No	No	No
PSHP	Ousley	No	No	No
PSHP	Smith	Yes	Yes	No
PSHP	Soberano	Yes	Yes	Yes
PSHP	Taylor	Yes	Yes	No <sup>3</sup>
PSHP	Whatley	No	No	Yes
WellCare	Baker	Yes	Yes	Yes
WellCare	Blanton	Yes	Yes	No
WellCare	Brackett W.	Yes	Yes	No
WellCare	Chen	Yes	Yes	Yes
WellCare	Cibirka	Yes	Yes	Yes
WellCare	Cox	Yes	Yes	Yes
WellCare	Culver	Yes	No	No
WellCare	Drisko	Yes	Yes	Yes
WellCare	Haugseth	Yes	Yes	Yes
WellCare	Lefebvre	Yes	Yes	Yes
WellCare	Liposky	Yes	Yes	Yes
WellCare	Mackert	Yes	Yes	Yes
WellCare	Morris	Yes	Yes	Yes
WellCare	Roberts	Yes	Yes	Yes
WellCare	Serrano	Yes	Yes	No
WellCare	Siranli	Yes	Yes	Yes
WellCare	Tay	Yes	Yes	Yes
WellCare	Taylor	Yes	Yes	Yes
WellCare	Van Tuyl	Yes	Yes	Yes
WellCare	Walker	Yes	Yes	No
WellCare	Whatley	Yes	Yes	Yes
WellCare	Yates	Yes	Yes	No

### Exhibit C

## Complete Listing of Dental Survey Respondents with No Claims Activity Included in One or More CMO Dental Provider Directories<sup>1</sup>

CMO	Provider	Currently Treating Patients <sup>2</sup>	Accepting New Patients <sup>2</sup>	On December 2009 Directory
WellCare	Young	Yes	Yes	No

Note <sup>1</sup>: All providers listed were found on either one or more of the CMOs' 2008 dental directories as stated in the report.

Note <sup>2</sup>: Provider response to MSLC May 2009 Dental Survey.

Note <sup>3</sup>: Provider was found on directory, but at a different location, with a different practice or both.

**Exhibit D**  
**AMERIGROUP Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	AMGP Member Count	AMGP Prov. Count	Ratio of 0,1 provider :x Members
001	Appling	Rural Area	Southeast	794	0	0:794
002	Atkinson	Rural Area	Southwest	0	0	0:0
003	Bacon	Rural Area	Southeast	170	0	0:170
004	Baker	Rural Area	Southwest	0	0	0:0
005	Baldwin	Urban	Central	1	0	0:1
006	Banks	Rural Area	North	767	0	0:767
007	Barrow	Urban	Atlanta	1409	1	1:1409
008	Bartow	Urban	Atlanta	1322	7	1:189
009	Ben-Hill	Rural Area	Southwest	0	0	0:0
010	Berrien	Rural Area	Southwest	0	0	0:0
011	Bibb	Urban	Central	2	0	0:2
012	Bleckley	Rural Area	Central	0	0	0:0
013	Brantley	Rural Area	Southeast	720	0	0:720
014	Brooks	Rural Area	Southwest	0	0	0:0
015	Bryan	Rural Area	Southeast	694	0	0:694
016	Bulloch	Urban	Southeast	3372	2	1:1686
017	Burke	Rural Area	East	1943	2	1:972
018	Butts	Rural Area	Atlanta	270	0	0:270
019	Calhoun	Rural Area	Southwest	0	0	0:0
020	Camden	Urban	Southeast	1049	2	1:525
021	Candler	Rural Area	Southeast	883	0	0:883
022	Carroll	Urban	Atlanta	1310	2	1:655
023	Catoosa	Urban	North	1702	4	1:426
024	Charlton	Rural Area	Southeast	402	0	0:402
025	Chatham	Urban	Southeast	6940	18	1:386
026	Chattahoochee	Rural Area	Central	0	0	0:0
027	Chattooga	Rural Area	North	777	1	1:777
028	Cherokee	Urban	Atlanta	2810	17	1:165
029	Clarke	Urban	North	3637	10	1:364
030	Clay	Rural Area	Southwest	0	0	0:0
031	Clayton	Urban	Atlanta	10030	23	1:436
032	Clinch	Rural Area	Southwest	3	0	0:3
033	Cobb	Urban	Atlanta	12211	37	1:330
034	Coffee	Urban	Southwest	1	0	0:1
035	Colquitt	Urban	Southwest	0	0	0:0
036	Columbia	Urban	East	2536	6	1:423
037	Cook	Rural Area	Southwest	0	0	0:0
038	Coweta	Urban	Atlanta	1001	10	1:100
039	Crawford	Rural Area	Central	2	0	0:2
040	Crisp	Rural Area	Central	0	0	0:0
041	Dade	Rural Area	North	299	0	0:299
042	Dawson	Rural Area	North	512	0	0:512
043	Decatur	Rural Area	Southwest	0	0	0:0
044	DeKalb	Urban	Atlanta	15086	67	1:225

**Exhibit D**  
**AMERIGROUP Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	AMGP Member Count	AMGP Prov. Count	Ratio of 0,1 provider :x Members
045	Dodge	Rural Area	Central	0	0	0:0
046	Dooly	Rural Area	Central	0	0	0:0
047	Dougherty	Urban	Southwest	2	0	0:2
048	Douglas	Urban	Atlanta	3414	15	1:228
049	Early	Rural Area	Southwest	0	0	0:0
050	Echols	Rural Area	Southwest	0	0	0:0
051	Effingham	Urban	Southeast	1523	0	0:1523
052	Elbert	Rural Area	North	754	1	1:754
053	Emanuel	Rural Area	East	1147	2	1:574
054	Evans	Rural Area	Southeast	532	0	0:532
055	Fannin	Rural Area	North	828	1	1:828
056	Fayette	Urban	Atlanta	957	6	1:160
057	Floyd	Urban	North	1792	2	1:896
058	Forsyth	Urban	Atlanta	1160	4	1:290
059	Franklin	Rural Area	North	993	1	1:993
060	Fulton	Urban	Atlanta	20925	86	1:243
061	Gilmer	Rural Area	North	1358	3	1:453
062	Glascock	Rural Area	East	195	0	0:195
063	Glynn	Urban	Southeast	2719	4	1:680
064	Gordon	Urban	North	1912	4	1:478
065	Grady	Rural Area	Southwest	0	0	0:0
066	Greene	Rural Area	East	868	0	0:868
067	Gwinnett	Urban	Atlanta	15833	48	1:330
068	Habersham	Urban	North	921	0	0:921
069	Hall	Urban	North	8555	8	1:1069
070	Hancock	Rural Area	East	397	0	0:397
071	Haralson	Rural Area	Atlanta	277	2	1:139
072	Harris	Rural Area	Central	0	0	0:0
073	Hart	Rural Area	North	1381	2	1:691
074	Heard	Rural Area	Central	0	0	0:0
075	Henry	Urban	Atlanta	4065	14	1:290
076	Houston	Urban	Central	0	0	0:0
077	Irwin	Rural Area	Southwest	0	0	0:0
078	Jackson	Urban	North	2191	1	1:2191
079	Jasper	Rural Area	Atlanta	362	1	1:362
080	Jeff-Davis	Rural Area	Southeast	761	1	1:761
081	Jefferson	Rural Area	East	1312	1	1:1312
082	Jenkins	Rural Area	East	761	0	0:761
083	Johnson	Rural Area	Central	0	0	0:0
084	Jones	Rural Area	Central	0	0	0:0
085	Lamar	Rural Area	Central	0	0	0:0
086	Lanier	Rural Area	Southwest	0	0	0:0
087	Laurens	Urban	Central	0	0	0:0
088	Lee	Rural Area	Southwest	0	0	0:0

**Exhibit D**  
**AMERIGROUP Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	AMGP Member Count	AMGP Prov. Count	Ratio of 0,1 provider :x Members
089	Liberty	Rural Area	Southeast	2139	6	1:357
090	Lincoln	Rural Area	East	349	1	1:349
091	Long	Rural Area	Southeast	561	0	0:561
092	Lowndes	Urban	Southwest	0	0	0:0
093	Lumpkin	Rural Area	North	855	1	1:855
094	Macon	Rural Area	Central	0	0	0:0
095	Madison	Rural Area	North	1258	0	0:1258
096	Marion	Rural Area	Central	0	0	0:0
097	McDuffie	Rural Area	East	1635	0	0:1635
098	McIntosh	Rural Area	Southeast	488	1	1:488
099	Meriwether	Rural Area	Central	2	0	0:2
100	Miller	Rural Area	Southwest	0	0	0:0
101	Mitchell	Rural Area	Southwest	0	0	0:0
102	Monroe	Rural Area	Central	0	0	0:0
103	Montgomery	Rural Area	Southeast	312	0	0:312
104	Morgan	Rural Area	North	806	1	1:806
105	Murray	Urban	North	2151	4	1:538
106	Muscogee	Urban	Central	1	0	0:1
107	Newton	Urban	Atlanta	2832	1	1:2832
108	Oconee	Rural Area	North	497	2	1:249
109	Oglethorpe	Rural Area	North	465	0	0:465
110	Paulding	Urban	Atlanta	2191	3	1:730
111	Peach	Rural Area	Central	3	0	0:3
112	Pickens	Rural Area	Atlanta	554	0	0:554
113	Pierce	Rural Area	Southeast	643	1	1:643
114	Pike	Rural Area	Central	1	0	0:1
115	Polk	Urban	North	1040	5	1:208
116	Pulaski	Rural Area	Central	0	0	0:0
117	Putnam	Rural Area	East	871	0	0:871
118	Quitman	Rural Area	Southwest	0	0	0:0
119	Rabun	Rural Area	North	484	0	0:484
120	Randolph	Rural Area	Southwest	0	0	0:0
121	Richmond	Urban	East	11993	16	1:750
122	Rockdale	Urban	Atlanta	2471	23	1:107
123	Schley	Rural Area	Southwest	0	0	0:0
124	Screven	Rural Area	East	951	3	1:317
125	Seminole	Rural Area	Southwest	1	0	0:1
126	Spalding	Urban	Atlanta	671	2	1:336
127	Stephens	Rural Area	North	1072	0	0:1072
128	Stewart	Rural Area	Southwest	0	0	0:0
129	Sumter	Rural Area	Southwest	0	0	0:0
130	Talbot	Rural Area	Central	0	0	0:0
131	Taliaferro	Rural Area	East	99	0	0:99
132	Tattnall	Rural Area	Southeast	909	0	0:909

**Exhibit D**  
**AMERIGROUP Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	AMGP Member Count	AMGP Prov. Count	Ratio of 0,1 provider :x Members
133	Taylor	Rural Area	Central	0	0	0:0
134	Telfair	Rural Area	Central	0	0	0:0
135	Terrell	Rural Area	Southwest	0	0	0:0
136	Thomas	Urban	Southwest	3	0	0:3
137	Tift	Urban	Southwest	0	0	0:0
138	Toombs	Rural Area	Southeast	1740	1	1:1740
139	Towns	Rural Area	North	413	0	0:413
140	Treutlen	Rural Area	Central	0	0	0:0
141	Troup	Urban	Central	1	0	0:1
142	Turner	Rural Area	Southwest	0	0	0:0
143	Twiggs	Rural Area	Central	0	0	0:0
144	Union	Rural Area	North	824	2	1:412
145	Upson	Rural Area	Central	1	0	0:1
146	Walker	Urban	North	1990	1	1:1990
147	Walton	Urban	Atlanta	1786	7	1:255
148	Ware	Urban	Southeast	1239	2	1:620
149	Warren	Rural Area	East	387	1	1:387
150	Washington	Rural Area	East	879	1	1:879
151	Wayne	Rural Area	Southeast	1512	1	1:1512
152	Webster	Rural Area	Southwest	0	0	0:0
153	Wheeler	Rural Area	Central	0	0	0:0
154	White	Rural Area	North	708	5	1:142
155	Whitfield	Urban	North	5897	3	1:1966
156	Wilcox	Rural Area	Central	0	0	0:0
157	Wilkes	Rural Area	East	619	2	1:310
158	Wilkinson	Rural Area	Central	0	0	0:0
159	Worth	Rural Area	Southwest	0	0	0:0
Totals				206854	512	1:404

**Exhibit E**  
**Peach State Health Plan Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	PSHP Member Count	PSHP Prov. Count	Ratio of 0,1 provider :x members
002	Atkinson	Rural Area	Southwest	582	2	1:291
004	Baker	Rural Area	Southwest	392	0	0:392
005	Baldwin	Urban	Central	1459	1	1:1459
007	Barrow	Urban	Atlanta	2414	1	1:2414
008	Bartow	Urban	Atlanta	2315	4	1:579
009	Ben-Hill	Rural Area	Southwest	2254	0	0:2254
010	Berrien	Rural Area	Southwest	2022	1	1:2022
011	Bibb	Urban	Central	8933	26	1:344
012	Bleckley	Rural Area	Central	594	2	1:297
014	Brooks	Rural Area	Southwest	1835	0	0:1835
018	Butts	Rural Area	Atlanta	1058	2	1:529
019	Calhoun	Rural Area	Southwest	557	2	1:279
022	Carroll	Urban	Atlanta	5675	2	1:2838
026	Chattahoochee	Rural Area	Central	166	0	0:166
028	Cherokee	Urban	Atlanta	3712	23	1:161
030	Clay	Rural Area	Southwest	377	0	0:377
031	Clayton	Urban	Atlanta	15198	30	1:507
032	Clinch	Rural Area	Southwest	718	1	1:718
033	Cobb	Urban	Atlanta	12539	77	1:163
034	Coffee	Urban	Southwest	2770	8	1:346
035	Colquitt	Urban	Southwest	4955	2	1:2478
037	Cook	Rural Area	Southwest	2077	7	1:297
038	Coweta	Urban	Atlanta	1865	27	1:69
039	Crawford	Rural Area	Central	472	0	0:472
040	Crisp	Rural Area	Central	1140	2	1:570
043	Decatur	Rural Area	Southwest	3855	4	1:964
044	DeKalb	Urban	Atlanta	29716	125	1:238
045	Dodge	Rural Area	Central	1210	6	1:202
046	Dooly	Rural Area	Central	917	6	1:153
047	Dougherty	Urban	Southwest	11549	20	1:577
048	Douglas	Urban	Atlanta	2956	21	1:141
049	Early	Rural Area	Southwest	1117	4	1:279
050	Echols	Rural Area	Southwest	401	0	0:401
056	Fayette	Urban	Atlanta	1474	10	1:147
058	Forsyth	Urban	Atlanta	1368	10	1:137
060	Fulton	Urban	Atlanta	27937	156	1:179
065	Grady	Rural Area	Southwest	2691	5	1:538
067	Gwinnett	Urban	Atlanta	27516	116	1:237
071	Haralson	Rural Area	Atlanta	1539	1	1:1539
072	Harris	Rural Area	Central	894	3	1:298
074	Heard	Rural Area	Central	632	0	0:632
075	Henry	Urban	Atlanta	5692	20	1:285
076	Houston	Urban	Central	2995	8	1:374
077	Irwin	Rural Area	Southwest	945	2	1:473

**Exhibit E**  
**Peach State Health Plan Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	PSHP Member Count	PSHP Prov. Count	Ratio of 0,1 provider :x members
079	Jasper	Rural Area	Atlanta	801	2	1:401
083	Johnson	Rural Area	Central	448	1	1:448
084	Jones	Rural Area	Central	1345	0	0:1345
085	Lamar	Rural Area	Central	891	1	1:891
086	Lanier	Rural Area	Southwest	972	1	1:972
087	Laurens	Urban	Central	2921	4	1:730
088	Lee	Rural Area	Southwest	1989	1	1:1989
092	Lowndes	Urban	Southwest	9218	21	1:439
094	Macon	Rural Area	Central	743	2	1:372
096	Marion	Rural Area	Central	407	1	1:407
099	Meriwether	Rural Area	Central	1555	2	1:778
100	Miller	Rural Area	Southwest	506	3	1:169
101	Mitchell	Rural Area	Southwest	2865	2	1:1433
102	Monroe	Rural Area	Central	868	2	1:434
106	Muscogee	Urban	Central	7626	27	1:282
107	Newton	Urban	Atlanta	4170	5	1:834
110	Paulding	Urban	Atlanta	1832	9	1:204
111	Peach	Rural Area	Central	909	2	1:455
112	Pickens	Rural Area	Atlanta	904	0	0:904
114	Pike	Rural Area	Central	833	1	1:833
116	Pulaski	Rural Area	Central	462	1	1:462
118	Quitman	Rural Area	Southwest	160	0	0:160
120	Randolph	Rural Area	Southwest	819	6	1:137
122	Rockdale	Urban	Atlanta	3188	36	1:89
123	Schley	Rural Area	Southwest	241	0	0:241
125	Seminole	Rural Area	Southwest	1077	1	1:1077
126	Spalding	Urban	Atlanta	5022	7	1:717
128	Stewart	Rural Area	Southwest	241	1	1:241
129	Sumter	Rural Area	Southwest	2518	3	1:839
130	Talbot	Rural Area	Central	360	2	1:180
133	Taylor	Rural Area	Central	528	0	0:528
134	Telfair	Rural Area	Central	608	3	1:203
135	Terrell	Rural Area	Southwest	1225	1	1:1225
136	Thomas	Urban	Southwest	5091	4	1:1273
137	Tift	Urban	Southwest	4689	11	1:426
140	Treutlen	Rural Area	Central	287	2	1:144
141	Troup	Urban	Central	5647	22	1:257
142	Turner	Rural Area	Southwest	1195	3	1:398
143	Twiggs	Rural Area	Central	473	0	0:473
145	Upson	Rural Area	Central	1778	3	1:593
147	Walton	Urban	Atlanta	2737	7	1:391
152	Webster	Rural Area	Southwest	131	0	0:131
153	Wheeler	Rural Area	Central	278	1	1:278
156	Wilcox	Rural Area	Central	501	3	1:167

**Exhibit E**  
**Peach State Health Plan Provider-to-Member Ratios, by County**

<b>County Code</b>	<b>County</b>	<b>Region Designation</b>	<b>CMO Region</b>	<b>PSHP Member Count</b>	<b>PSHP Prov. Count</b>	<b>Ratio of 0,1 provider :x members</b>
158	Wilkinson	Rural Area	Central	535	1	1:535
159	Worth	Rural Area	Southwest	2262	2	1:1131
<b>Totals</b>				285339	944	1:302

**Exhibit F**  
**WellCare Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	WellCare	WellCare Prov. Count	Ratio of 0,1 provider :x members
001	Appling	Rural Area	Southeast	1808	1	1:1808
002	Atkinson	Rural Area	Southwest	949	2	1:475
003	Bacon	Rural Area	Southeast	1248	0	0:1248
004	Baker	Rural Area	Southwest	155	0	0:155
005	Baldwin	Urban	Central	2894	4	1:724
006	Banks	Rural Area	North	1282	4	1:321
007	Barrow	Urban	Atlanta	3134	2	1:1567
008	Bartow	Urban	Atlanta	7384	14	1:527
009	Ben-Hill	Rural Area	Southwest	834	0	0:834
010	Berrien	Rural Area	Southwest	669	1	1:669
011	Bibb	Urban	Central	14398	25	1:576
012	Bleckley	Rural Area	Central	777	1	1:777
013	Brantley	Rural Area	Southeast	1676	2	1:838
014	Brooks	Rural Area	Southwest	576	0	0:576
015	Bryan	Rural Area	Southeast	1667	1	1:1667
016	Bulloch	Urban	Southeast	2599	5	1:520
017	Burke	Rural Area	East	2253	3	1:751
018	Butts	Rural Area	Atlanta	1318	2	1:659
019	Calhoun	Rural Area	Southwest	271	1	1:271
020	Camden	Urban	Southeast	2808	2	1:1404
021	Candler	Rural Area	Southeast	686	0	0:686
022	Carroll	Urban	Atlanta	5811	3	1:1937
023	Catoosa	Urban	North	3502	4	1:876
024	Charlton	Rural Area	Southeast	853	0	0:853
025	Chatham	Urban	Southeast	16329	38	1:430
026	Chattahoochee	Rural Area	Central	397	0	0:397
027	Chattooga	Rural Area	North	2372	4	1:593
028	Cherokee	Urban	Atlanta	4418	30	1:147
029	Clarke	Urban	North	6382	19	1:336
030	Clay	Rural Area	Southwest	249	0	0:249
031	Clayton	Urban	Atlanta	15265	33	1:463
032	Clinch	Rural Area	Southwest	395	1	1:395
033	Cobb	Urban	Atlanta	20929	89	1:235
034	Coffee	Urban	Southwest	3728	8	1:466
035	Colquitt	Urban	Southwest	2144	2	1:1072
036	Columbia	Urban	East	3736	14	1:267
037	Cook	Rural Area	Southwest	593	6	1:99
038	Coweta	Urban	Atlanta	6995	35	1:200
039	Crawford	Rural Area	Central	1052	0	0:1052
040	Crisp	Rural Area	Central	2799	2	1:1400
041	Dade	Rural Area	North	758	1	1:758

**Exhibit F**  
**WellCare Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	WellCare	WellCare Prov. Count	Ratio of 0,1 provider :x members
042	Dawson	Rural Area	North	1161	14	1:83
043	Decatur	Rural Area	Southwest	803	4	1:201
044	DeKalb	Urban	Atlanta	23796	151	1:158
045	Dodge	Rural Area	Central	1363	6	1:227
046	Dooly	Rural Area	Central	889	3	1:296
047	Dougherty	Urban	Southwest	4577	17	1:269
048	Douglas	Urban	Atlanta	6921	38	1:182
049	Early	Rural Area	Southwest	973	4	1:243
050	Echols	Rural Area	Southwest	136	0	0:136
051	Effingham	Urban	Southeast	2588	2	1:1294
052	Elbert	Rural Area	North	1712	4	1:428
053	Emanuel	Rural Area	East	2291	2	1:1146
054	Evans	Rural Area	Southeast	977	1	1:977
055	Fannin	Rural Area	North	1672	6	1:279
056	Fayette	Urban	Atlanta	1719	13	1:132
057	Floyd	Urban	North	8956	14	1:640
058	Forsyth	Urban	Atlanta	3245	22	1:148
059	Franklin	Rural Area	North	1679	3	1:560
060	Fulton	Urban	Atlanta	29762	242	1:123
061	Gilmer	Rural Area	North	1893	5	1:379
062	Glascokk	Rural Area	East	163	1	1:163
063	Glynn	Urban	Southeast	4715	11	1:429
064	Gordon	Urban	North	4111	7	1:587
065	Grady	Rural Area	Southwest	729	3	1:243
066	Greene	Rural Area	East	1029	3	1:343
067	Gwinnett	Urban	Atlanta	26342	161	1:164
068	Habersham	Urban	North	2965	4	1:741
069	Hall	Urban	North	11338	36	1:315
070	Hancock	Rural Area	East	715	2	1:358
071	Haralson	Rural Area	Atlanta	1581	2	1:791
072	Harris	Rural Area	Central	790	3	1:263
073	Hart	Rural Area	North	1537	3	1:512
074	Heard	Rural Area	Central	794	0	0:794
075	Henry	Urban	Atlanta	6485	32	1:203
076	Houston	Urban	Central	9979	11	1:907
077	Irwin	Rural Area	Southwest	476	2	1:238
078	Jackson	Urban	North	3140	4	1:785
079	Jasper	Rural Area	Atlanta	711	1	1:711
080	Jeff-Davis	Rural Area	Southeast	1758	2	1:879
081	Jefferson	Rural Area	East	1409	3	1:470
082	Jenkins	Rural Area	East	858	1	1:858

**Exhibit F**  
**WellCare Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	WellCare	WellCare Prov. Count	Ratio of 0,1 provider :x members
083	Johnson	Rural Area	Central	746	0	0:746
084	Jones	Rural Area	Central	1366	0	0:1366
085	Lamar	Rural Area	Central	848	1	1:848
086	Lanier	Rural Area	Southwest	319	0	0:319
087	Laurens	Urban	Central	3970	6	1:662
088	Lee	Rural Area	Southwest	578	1	1:578
089	Liberty	Rural Area	Southeast	3221	9	1:358
090	Lincoln	Rural Area	East	569	1	1:569
091	Long	Rural Area	Southeast	872	0	0:872
092	Lowndes	Urban	Southwest	2765	12	1:230
093	Lumpkin	Rural Area	North	1538	2	1:769
094	Macon	Rural Area	Central	913	4	1:228
095	Madison	Rural Area	North	1894	0	0:1894
096	Marion	Rural Area	Central	686	2	1:343
097	McDuffie	Rural Area	East	1645	4	1:411
098	McIntosh	Rural Area	Southeast	767	1	1:767
099	Meriwether	Rural Area	Central	1354	1	1:1354
100	Miller	Rural Area	Southwest	343	3	1:114
101	Mitchell	Rural Area	Southwest	919	2	1:460
102	Monroe	Rural Area	Central	1176	1	1:1176
103	Montgomery	Rural Area	Southeast	767	0	0:767
104	Morgan	Rural Area	North	1064	3	1:355
105	Murray	Urban	North	3493	5	1:699
106	Muscogee	Urban	Central	14894	23	1:648
107	Newton	Urban	Atlanta	4790	8	1:599
108	Oconee	Rural Area	North	926	3	1:309
109	Oglethorpe	Rural Area	North	943	0	0:943
110	Paulding	Urban	Atlanta	5714	7	1:816
111	Peach	Rural Area	Central	2390	1	1:2390
112	Pickens	Rural Area	Atlanta	1329	0	0:1329
113	Pierce	Rural Area	Southeast	1707	0	0:1707
114	Pike	Rural Area	Central	846	1	1:846
115	Polk	Urban	North	4314	6	1:719
116	Pulaski	Rural Area	Central	511	0	0:511
117	Putnam	Rural Area	East	1462	2	1:731
118	Quitman	Rural Area	Southwest	106	1	1:106
119	Rabun	Rural Area	North	1030	1	1:1030
120	Randolph	Rural Area	Southwest	206	4	1:52
121	Richmond	Urban	East	15863	112	1:142
122	Rockdale	Urban	Atlanta	4047	89	1:45
123	Schley	Rural Area	Southwest	356	0	0:356

**Exhibit F**  
**WellCare Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	WellCare	WellCare Prov. Count	Ratio of 0,1 provider :x members
124	Screven	Rural Area	East	964	0	0:964
125	Seminole	Rural Area	Southwest	588	2	1:294
126	Spalding	Urban	Atlanta	2712	8	1:339
127	Stephens	Rural Area	North	1940	3	1:647
128	Stewart	Rural Area	Southwest	394	1	1:394
129	Sumter	Rural Area	Southwest	3184	4	1:796
130	Talbot	Rural Area	Central	409	1	1:409
131	Taliaferro	Rural Area	East	151	0	0:151
132	Tattnall	Rural Area	Southeast	1530	2	1:765
133	Taylor	Rural Area	Central	627	1	1:627
134	Telfair	Rural Area	Central	1005	3	1:335
135	Terrell	Rural Area	Southwest	544	1	1:544
136	Thomas	Urban	Southwest	647	1	1:647
137	Tift	Urban	Southwest	1286	9	1:143
138	Toombs	Rural Area	Southeast	2759	2	1:1380
139	Towns	Rural Area	North	485	2	1:243
140	Treutlen	Rural Area	Central	783	1	1:783
141	Troup	Urban	Central	2092	21	1:100
142	Turner	Rural Area	Southwest	297	2	1:149
143	Twiggs	Rural Area	Central	607	0	0:607
144	Union	Rural Area	North	1073	10	1:107
145	Upson	Rural Area	Central	1729	3	1:576
146	Walker	Urban	North	4806	2	1:2403
147	Walton	Urban	Atlanta	3829	12	1:319
148	Ware	Urban	Southeast	3437	9	1:382
149	Warren	Rural Area	East	529	3	1:176
150	Washington	Rural Area	East	1558	1	1:1558
151	Wayne	Rural Area	Southeast	2388	4	1:597
152	Webster	Rural Area	Southwest	186	0	0:186
153	Wheeler	Rural Area	Central	498	0	0:498
154	White	Rural Area	North	1678	13	1:129
155	Whitfield	Urban	North	7601	14	1:543
156	Wilcox	Rural Area	Central	600	2	1:300
157	Wilkes	Rural Area	East	802	3	1:267
158	Wilkinson	Rural Area	Central	843	1	1:843
159	Worth	Rural Area	Southwest	519	2	1:260
<b>Totals</b>				<b>475158</b>	<b>1661</b>	<b>1:286</b>

**Exhibit G**  
**Combined CMO Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	Combined CMO Member Count	Combined CMO Prov. Count	Ratio of 0,1 provider :x members
001	Appling	Rural Area	Southeast	2602	1	1:2602
002	Atkinson	Rural Area	Southwest	1528	2	1:764
003	Bacon	Rural Area	Southeast	1420	0	0:1420
004	Baker	Rural Area	Southwest	546	0	0:546
005	Baldwin	Urban	Central	4317	4	1:1079
006	Banks	Rural Area	North	2050	3	1:683
007	Barrow	Urban	Atlanta	6931	2	1:3466
008	Bartow	Urban	Atlanta	10980	16	1:686
009	Ben-Hill	Rural Area	Southwest	3086	0	0:3086
010	Berrien	Rural Area	Southwest	2685	1	1:2685
011	Bibb	Urban	Central	23301	33	1:706
012	Bleckley	Rural Area	Central	1369	3	1:456
013	Brantley	Rural Area	Southeast	2396	2	1:1198
014	Brooks	Rural Area	Southwest	2410	0	0:2410
015	Bryan	Rural Area	Southeast	2365	1	1:2365
016	Bulloch	Urban	Southeast	5971	6	1:995
017	Burke	Rural Area	East	4196	3	1:1399
018	Butts	Rural Area	Atlanta	2625	2	1:1313
019	Calhoun	Rural Area	Southwest	827	2	1:414
020	Camden	Urban	Southeast	3857	3	1:1286
021	Candler	Rural Area	Southeast	1569	0	0:1569
022	Carroll	Urban	Atlanta	12744	4	1:3186
023	Catoosa	Urban	North	5204	4	1:1301
024	Charlton	Rural Area	Southeast	1255	0	0:1255
025	Chatham	Urban	Southeast	23270	46	1:506
026	Chattahoochee	Rural Area	Central	561	0	0:561
027	Chattooga	Rural Area	North	3149	4	1:787
028	Cherokee	Urban	Atlanta	10904	45	1:242
029	Clarke	Urban	North	10019	21	1:477
030	Clay	Rural Area	Southwest	624	0	0:624
031	Clayton	Urban	Atlanta	40356	56	1:721
032	Clinch	Rural Area	Southwest	1113	1	1:1113
033	Cobb	Urban	Atlanta	45435	123	1:369
034	Coffee	Urban	Southwest	6484	10	1:648
035	Colquitt	Urban	Southwest	7082	2	1:3541
036	Columbia	Urban	East	6273	14	1:448
037	Cook	Rural Area	Southwest	2668	7	1:381
038	Coweta	Urban	Atlanta	9828	44	1:223
039	Crawford	Rural Area	Central	1525	0	0:1525
040	Crisp	Rural Area	Central	3937	2	1:1969
041	Dade	Rural Area	North	1057	1	1:1057
042	Dawson	Rural Area	North	1673	15	1:112
043	Decatur	Rural Area	Southwest	4653	4	1:1163

**Exhibit G**  
**Combined CMO Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	Combined CMO Member Count	Combined CMO Prov. Count	Ratio of 0,1 provider :x members
044	DeKalb	Urban	Atlanta	68216	203	1:336
045	Dodge	Rural Area	Central	2568	7	1:367
046	Dooly	Rural Area	Central	1806	5	1:361
047	Dougherty	Urban	Southwest	16104	23	1:700
048	Douglas	Urban	Atlanta	13222	52	1:254
049	Early	Rural Area	Southwest	2088	4	1:522
050	Echols	Rural Area	Southwest	534	0	0:534
051	Effingham	Urban	Southeast	4111	2	1:2056
052	Elbert	Rural Area	North	2466	4	1:617
053	Emanuel	Rural Area	East	3438	2	1:1719
054	Evans	Rural Area	Southeast	1509	1	1:1509
055	Fannin	Rural Area	North	2500	7	1:357
056	Fayette	Urban	Atlanta	4145	19	1:218
057	Floyd	Urban	North	10751	14	1:768
058	Forsyth	Urban	Atlanta	5750	29	1:198
059	Franklin	Rural Area	North	2674	3	1:891
060	Fulton	Urban	Atlanta	78360	296	1:265
061	Gilmer	Rural Area	North	3251	6	1:542
062	GlascocK	Rural Area	East	358	1	1:358
063	Glynn	Urban	Southeast	7434	12	1:620
064	Gordon	Urban	North	6026	7	1:861
065	Grady	Rural Area	Southwest	3419	5	1:684
066	Greene	Rural Area	East	1898	3	1:633
067	Gwinnett	Urban	Atlanta	69424	207	1:335
068	Habersham	Urban	North	3886	4	1:972
069	Hall	Urban	North	19905	38	1:524
070	Hancock	Rural Area	East	1112	2	1:556
071	Haralson	Rural Area	Atlanta	3382	2	1:1691
072	Harris	Rural Area	Central	1681	3	1:560
073	Hart	Rural Area	North	2918	3	1:973
074	Heard	Rural Area	Central	1424	0	0:1424
075	Henry	Urban	Atlanta	16138	47	1:343
076	Houston	Urban	Central	12949	11	1:1177
077	Irwin	Rural Area	Southwest	1420	2	1:710
078	Jackson	Urban	North	5332	4	1:1333
079	Jasper	Rural Area	Atlanta	1848	2	1:924
080	Jeff-Davis	Rural Area	Southeast	2519	2	1:1260
081	Jefferson	Rural Area	East	2721	4	1:680
082	Jenkins	Rural Area	East	1619	1	1:1619
083	Johnson	Rural Area	Central	1186	1	1:1186
084	Jones	Rural Area	Central	2710	0	0:2710
085	Lamar	Rural Area	Central	1734	1	1:1734
086	Lanier	Rural Area	Southwest	1290	1	1:1290

**Exhibit G**  
**Combined CMO Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	Combined CMO Member Count	Combined CMO Prov. Count	Ratio of 0,1 provider :x members
087	Laurens	Urban	Central	6849	7	1:978
088	Lee	Rural Area	Southwest	2567	1	1:2567
089	Liberty	Rural Area	Southeast	5365	10	1:537
090	Lincoln	Rural Area	East	918	1	1:918
091	Long	Rural Area	Southeast	1433	0	0:1433
092	Lowndes	Urban	Southwest	11946	22	1:543
093	Lumpkin	Rural Area	North	2393	2	1:1197
094	Macon	Rural Area	Central	1651	4	1:413
095	Madison	Rural Area	North	3152	0	0:3152
096	Marion	Rural Area	Central	1092	3	1:364
097	McDuffie	Rural Area	East	3281	4	1:820
098	McIntosh	Rural Area	Southeast	1255	2	1:628
099	Meriwether	Rural Area	Central	2901	2	1:1451
100	Miller	Rural Area	Southwest	849	3	1:283
101	Mitchell	Rural Area	Southwest	3774	2	1:1887
102	Monroe	Rural Area	Central	2037	3	1:679
103	Montgomery	Rural Area	Southeast	1079	0	0:1079
104	Morgan	Rural Area	North	1872	3	1:624
105	Murray	Urban	North	5644	5	1:1129
106	Muscogee	Urban	Central	22409	34	1:659
107	Newton	Urban	Atlanta	11615	8	1:1452
108	Oconee	Rural Area	North	1423	4	1:356
109	Oglethorpe	Rural Area	North	1408	0	0:1408
110	Paulding	Urban	Atlanta	9668	11	1:879
111	Peach	Rural Area	Central	3294	2	1:1647
112	Pickens	Rural Area	Atlanta	2768	0	0:2768
113	Pierce	Rural Area	Southeast	2350	0	0:2350
114	Pike	Rural Area	Central	1678	1	1:1678
115	Polk	Urban	North	5356	7	1:765
116	Pulaski	Rural Area	Central	970	1	1:970
117	Putnam	Rural Area	East	2333	2	1:1167
118	Quitman	Rural Area	Southwest	265	1	1:265
119	Rabun	Rural Area	North	1514	1	1:1514
120	Randolph	Rural Area	Southwest	1025	10	1:103
121	Richmond	Urban	East	27859	118	1:236
122	Rockdale	Urban	Atlanta	9529	117	1:81
123	Schley	Rural Area	Southwest	595	0	0:595
124	Screven	Rural Area	East	1915	3	1:638
125	Seminole	Rural Area	Southwest	1666	2	1:833
126	Spalding	Urban	Atlanta	8385	12	1:699
127	Stephens	Rural Area	North	3012	3	1:1004
128	Stewart	Rural Area	Southwest	625	1	1:625
129	Sumter	Rural Area	Southwest	5662	4	1:1416

**Exhibit G**  
**Combined CMO Provider-to-Member Ratios, by County**

<b>County Code</b>	<b>County</b>	<b>Region Designation</b>	<b>CMO Region</b>	<b>Combined CMO Member Count</b>	<b>Combined CMO Prov. Count</b>	<b>Ratio of 0,1 provider :x members</b>
130	Talbot	Rural Area	Central	765	2	1:383
131	Taliaferro	Rural Area	East	250	0	0:250
132	Tattnall	Rural Area	Southeast	2439	2	1:1220
133	Taylor	Rural Area	Central	1154	1	1:1154
134	Telfair	Rural Area	Central	1605	3	1:535
135	Terrell	Rural Area	Southwest	1769	1	1:1769
136	Thomas	Urban	Southwest	5727	5	1:1145
137	Tift	Urban	Southwest	5968	11	1:543
138	Toombs	Rural Area	Southeast	4499	2	1:2250
139	Towns	Rural Area	North	898	2	1:449
140	Treutlen	Rural Area	Central	1065	2	1:533
141	Troup	Urban	Central	7729	27	1:286
142	Turner	Rural Area	Southwest	1491	3	1:497
143	Twiggs	Rural Area	Central	1079	0	0:1079
144	Union	Rural Area	North	1898	10	1:190
145	Upson	Rural Area	Central	3504	3	1:1168
146	Walker	Urban	North	6796	2	1:3398
147	Walton	Urban	Atlanta	8294	15	1:553
148	Ware	Urban	Southeast	4676	11	1:425
149	Warren	Rural Area	East	916	4	1:229
150	Washington	Rural Area	East	2442	1	1:2442
151	Wayne	Rural Area	Southeast	3900	4	1:975
152	Webster	Rural Area	Southwest	314	0	0:314
153	Wheeler	Rural Area	Central	774	1	1:774
154	White	Rural Area	North	2386	14	1:170
155	Whitfield	Urban	North	13498	15	1:900
156	Wilcox	Rural Area	Central	1101	5	1:220
157	Wilkes	Rural Area	East	1421	3	1:474
158	Wilkinson	Rural Area	Central	1368	1	1:1368
159	Worth	Rural Area	Southwest	2771	2	1:1386
<b>Totals</b>				<b>964550</b>	<b>2095</b>	<b>1:460</b>

**Exhibit H**  
**Fee-For-Service (FFS) Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	FFS Member Count	FFS Prov. Count	Ratio of 0,1 provider :x members
001	Appling	Rural Area	Southeast	1986	1	1:1986
002	Atkinson	Rural Area	Southwest	823	3	1:274
003	Bacon	Rural Area	Southeast	1050	1	1:1050
004	Baker	Rural Area	Southwest	409	0	0:409
005	Baldwin	Urban	Central	3426	7	1:489
006	Banks	Rural Area	North	1371	7	1:196
007	Barrow	Urban	Atlanta	3830	8	1:479
008	Bartow	Urban	Atlanta	6004	16	1:375
009	Ben-Hill	Rural Area	Southwest	2091	3	1:697
010	Berrien	Rural Area	Southwest	1810	1	1:1810
011	Bibb	Urban	Central	14940	73	1:205
012	Bleckley	Rural Area	Central	966	2	1:483
013	Brantley	Rural Area	Southeast	1500	2	1:750
014	Brooks	Rural Area	Southwest	1760	1	1:1760
015	Bryan	Rural Area	Southeast	1302	1	1:1302
016	Bulloch	Urban	Southeast	3964	13	1:305
017	Burke	Rural Area	East	2556	4	1:639
018	Butts	Rural Area	Atlanta	1675	5	1:335
019	Calhoun	Rural Area	Southwest	678	2	1:339
020	Camden	Urban	Southeast	2236	9	1:248
021	Candler	Rural Area	Southeast	1235	0	0:1235
022	Carroll	Urban	Atlanta	7064	7	1:1009
023	Catoosa	Urban	North	3458	4	1:865
024	Charlton	Rural Area	Southeast	930	0	0:930
025	Chatham	Urban	Southeast	15305	78	1:196
026	Chattahoochee	Rural Area	Central	314	0	0:314
027	Chattooga	Rural Area	North	2391	4	1:598
028	Cherokee	Urban	Atlanta	5587	28	1:200
029	Clarke	Urban	North	6364	35	1:182
030	Clay	Rural Area	Southwest	484	0	0:484
031	Clayton	Urban	Atlanta	17032	149	1:114
032	Clinch	Rural Area	Southwest	923	1	1:923
033	Cobb	Urban	Atlanta	21774	165	1:132
034	Coffee	Urban	Southwest	3904	8	1:488
035	Colquitt	Urban	Southwest	4364	1	1:4364
036	Columbia	Urban	East	3420	25	1:137
037	Cook	Rural Area	Southwest	1634	7	1:233
038	Coweta	Urban	Atlanta	4985	46	1:108
039	Crawford	Rural Area	Central	1026	2	1:513
040	Crisp	Rural Area	Central	2686	2	1:1343
041	Dade	Rural Area	North	1120	4	1:280
042	Dawson	Rural Area	North	914	12	1:76
043	Decatur	Rural Area	Southwest	2996	6	1:499
044	DeKalb	Urban	Atlanta	38139	426	1:90
045	Dodge	Rural Area	Central	1968	8	1:246
046	Dooly	Rural Area	Central	1240	5	1:248
047	Dougherty	Urban	Southwest	10193	24	1:425
048	Douglas	Urban	Atlanta	6501	48	1:135
049	Early	Rural Area	Southwest	1517	3	1:506
050	Echols	Rural Area	Southwest	254	0	0:254
051	Effingham	Urban	Southeast	2290	3	1:763

**Exhibit H**  
**Fee-For-Service (FFS) Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	FFS Member Count	FFS Prov. Count	Ratio of 0,1 provider :x members
052	Elbert	Rural Area	North	2165	3	1:722
053	Emanuel	Rural Area	East	2754	4	1:689
054	Evans	Rural Area	Southeast	1131	2	1:566
055	Fannin	Rural Area	North	1693	5	1:339
056	Fayette	Urban	Atlanta	2508	48	1:52
057	Floyd	Urban	North	7803	16	1:488
058	Forsyth	Urban	Atlanta	2894	19	1:152
059	Franklin	Rural Area	North	1998	6	1:333
060	Fulton	Urban	Atlanta	51163	454	1:113
061	Gilmer	Rural Area	North	1783	9	1:198
062	Glascocock	Rural Area	East	288	1	1:288
063	Glynn	Urban	Southeast	4922	22	1:224
064	Gordon	Urban	North	3789	8	1:474
065	Grady	Rural Area	Southwest	2299	6	1:383
066	Greene	Rural Area	East	1385	6	1:231
067	Gwinnett	Urban	Atlanta	27304	275	1:99
068	Habersham	Urban	North	2372	9	1:264
069	Hall	Urban	North	8569	68	1:126
070	Hancock	Rural Area	East	1060	3	1:353
071	Haralson	Rural Area	Atlanta	2432	2	1:1216
072	Harris	Rural Area	Central	1239	2	1:620
073	Hart	Rural Area	North	2037	6	1:340
074	Heard	Rural Area	Central	1093	2	1:547
075	Henry	Urban	Atlanta	7523	70	1:107
076	Houston	Urban	Central	7049	15	1:470
077	Irwin	Rural Area	Southwest	1027	2	1:514
078	Jackson	Urban	North	3269	5	1:654
079	Jasper	Rural Area	Atlanta	916	5	1:183
080	Jeff-Davis	Rural Area	Southeast	1556	2	1:778
081	Jefferson	Rural Area	East	2168	4	1:542
082	Jenkins	Rural Area	East	1032	1	1:1032
083	Johnson	Rural Area	Central	1074	1	1:1074
084	Jones	Rural Area	Central	1710	2	1:855
085	Lamar	Rural Area	Central	1327	3	1:442
086	Lanier	Rural Area	Southwest	878	1	1:878
087	Laurens	Urban	Central	4672	9	1:519
088	Lee	Rural Area	Southwest	1153	1	1:1153
089	Liberty	Rural Area	Southeast	3093	10	1:309
090	Lincoln	Rural Area	East	631	2	1:316
091	Long	Rural Area	Southeast	883	0	0:883
092	Lowndes	Urban	Southwest	7527	68	1:111
093	Lumpkin	Rural Area	North	1556	4	1:389
094	Macon	Rural Area	Central	1539	2	1:770
095	Madison	Rural Area	North	2116	0	0:2116
096	Marion	Rural Area	Central	729	3	1:243
097	McDuffie	Rural Area	East	2038	5	1:408
098	McIntosh	Rural Area	Southeast	1004	2	1:502
099	Meriwether	Rural Area	Central	2261	4	1:565
100	Miller	Rural Area	Southwest	672	3	1:224
101	Mitchell	Rural Area	Southwest	2646	2	1:1323
102	Monroe	Rural Area	Central	1683	5	1:337

**Exhibit H**  
**Fee-For-Service (FFS) Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	FFS Member Count	FFS Prov. Count	Ratio of 0,1 provider :x members
103	Montgomery	Rural Area	Southeast	820	1	1:820
104	Morgan	Rural Area	North	1119	2	1:560
105	Murray	Urban	North	3321	5	1:664
106	Muscogee	Urban	Central	14703	96	1:153
107	Newton	Urban	Atlanta	6118	12	1:510
108	Oconee	Rural Area	North	884	4	1:221
109	Oglethorpe	Rural Area	North	1026	1	1:1026
110	Paulding	Urban	Atlanta	4773	6	1:796
111	Peach	Rural Area	Central	1932	6	1:322
112	Pickens	Rural Area	Atlanta	1633	1	1:1633
113	Pierce	Rural Area	Southeast	1733	2	1:867
114	Pike	Rural Area	Central	960	2	1:480
115	Polk	Urban	North	3811	9	1:423
116	Pulaski	Rural Area	Central	877	1	1:877
117	Putnam	Rural Area	East	1250	4	1:313
118	Quitman	Rural Area	Southwest	287	1	1:287
119	Rabun	Rural Area	North	1127	3	1:376
120	Randolph	Rural Area	Southwest	1069	9	1:119
121	Richmond	Urban	East	17036	157	1:109
122	Rockdale	Urban	Atlanta	4306	97	1:44
123	Schley	Rural Area	Southwest	362	0	0:362
124	Screven	Rural Area	East	1639	3	1:546
125	Seminole	Rural Area	Southwest	1073	3	1:358
126	Spalding	Urban	Atlanta	5847	8	1:731
127	Stephens	Rural Area	North	2537	12	1:211
128	Stewart	Rural Area	Southwest	646	1	1:646
129	Sumter	Rural Area	Southwest	3436	5	1:687
130	Talbot	Rural Area	Central	634	4	1:159
131	Taliaferro	Rural Area	East	244	0	0:244
132	Tattnall	Rural Area	Southeast	2084	2	1:1042
133	Taylor	Rural Area	Central	945	1	1:945
134	Telfair	Rural Area	Central	1434	5	1:287
135	Terrell	Rural Area	Southwest	1248	1	1:1248
136	Thomas	Urban	Southwest	4635	7	1:662
137	Tift	Urban	Southwest	3453	9	1:384
138	Toombs	Rural Area	Southeast	3167	3	1:1056
139	Towns	Rural Area	North	692	4	1:173
140	Treutlen	Rural Area	Central	793	3	1:264
141	Troup	Urban	Central	5760	34	1:169
142	Turner	Rural Area	Southwest	1129	3	1:376
143	Twiggs	Rural Area	Central	1069	2	1:535
144	Union	Rural Area	North	1383	11	1:126
145	Upson	Rural Area	Central	2741	7	1:392
146	Walker	Urban	North	5181	3	1:1727
147	Walton	Urban	Atlanta	4430	8	1:554
148	Ware	Urban	Southeast	4161	13	1:320
149	Warren	Rural Area	East	712	6	1:119
150	Washington	Rural Area	East	2096	4	1:524
151	Wayne	Rural Area	Southeast	2516	6	1:419
152	Webster	Rural Area	Southwest	192	0	0:192
153	Wheeler	Rural Area	Central	578	1	1:578

**Exhibit H**  
**Fee-For-Service (FFS) Provider-to-Member Ratios, by County**

County Code	County	Region Designation	CMO Region	FFS Member Count	FFS Prov. Count	Ratio of 0,1 provider :x members
154	White	Rural Area	North	1513	16	1:95
155	Whitfield	Urban	North	6375	70	1:91
156	Wilcox	Rural Area	Central	905	3	1:302
157	Wilkes	Rural Area	East	1055	5	1:211
158	Wilkinson	Rural Area	Central	781	3	1:260
159	Worth	Rural Area	Southwest	1774	4	1:444
Totals				572807	3156	1:182

**Exhibit I**  
**CMO Member Utilization with Adjusted Provider-to-Member Ratios, by County**

County Code	County Name	Region Designation	CMO Region	CMO Prov. Count	Member Count	Ratio of 0,1 Provider :x Members	Member Utilization Count	Percentage of Members with Encounters	Utilization Ratio of 0,1 Provider: x Members
001	Appling	Rural	Southeast	1	2602	1:2602	870	33.4%	1:870
002	Atkinson	Rural	Southwest	2	1528	1:764	658	43.1%	1:329
003	Bacon	Rural	Southeast	0	1420	0:1420	547	38.5%	0:547
004	Baker	Rural	Southwest	0	546	0:546	247	45.2%	0:247
005	Baldwin	Urban	Central	4	4317	1:1079	1493	34.6%	1:373
006	Banks	Rural	North	3	2050	1:683	936	45.7%	1:312
007	Barrow	Urban	Atlanta	2	6931	1:3466	2627	37.9%	1:1314
008	Bartow	Urban	Atlanta	16	10980	1:686	4945	45.0%	1:309
009	Ben-Hill	Rural	Southwest	0	3086	0:3086	1025	33.2%	0:1025
010	Berrien	Rural	Southwest	1	2685	1:2685	993	37.0%	1:993
011	Bibb	Urban	Central	33	23301	1:706	8707	37.4%	1:264
012	Bleckley	Rural	Central	3	1369	1:456	381	27.8%	1:127
013	Brantley	Rural	Southeast	2	2396	1:1198	774	32.3%	1:387
014	Brooks	Rural	Southwest	0	2410	0:2410	912	37.8%	0:912
015	Bryan	Rural	Southeast	1	2365	1:2365	943	39.9%	1:943
016	Bulloch	Urban	Southeast	6	5971	1:995	1737	29.1%	1:290
017	Burke	Rural	East	3	4196	1:1399	1632	38.9%	1:544
018	Butts	Rural	Atlanta	2	2625	1:1313	900	34.3%	1:450
019	Calhoun	Rural	Southwest	2	827	1:414	414	50.1%	1:207
020	Camden	Urban	Southeast	3	3857	1:1286	1046	27.1%	1:349
021	Candler	Rural	Southeast	0	1569	0:1569	538	34.3%	0:538
022	Carroll	Urban	Atlanta	4	12744	1:3186	4607	36.2%	1:1152
023	Catoosa	Urban	North	4	5204	1:1301	1642	31.6%	1:411
024	Charlton	Rural	Southeast	0	1255	0:1255	303	24.1%	0:303
025	Chatham	Urban	Southeast	46	23270	1:506	9485	40.8%	1:206
026	Chattahoochee	Rural	Central	0	561	0:561	155	27.6%	0:155
027	Chattooga	Rural	North	4	3149	1:787	1183	37.6%	1:296
028	Cherokee	Urban	Atlanta	45	10904	1:242	5032	46.1%	1:112
029	Clarke	Urban	North	21	10019	1:477	3752	37.4%	1:179
030	Clay	Rural	Southwest	0	624	0:624	276	44.2%	0:276
031	Clayton	Urban	Atlanta	56	40356	1:721	12942	32.1%	1:231
032	Clinch	Rural	Southwest	1	1113	1:1113	524	47.1%	1:524
033	Cobb	Urban	Atlanta	123	45435	1:369	18045	39.7%	1:147
034	Coffee	Urban	Southwest	10	6484	1:648	2605	40.2%	1:261
035	Colquitt	Urban	Southwest	2	7082	1:3541	2885	40.7%	1:1443
036	Columbia	Urban	East	14	6273	1:448	2945	46.9%	1:210
037	Cook	Rural	Southwest	7	2668	1:381	1179	44.2%	1:168
038	Coweta	Urban	Atlanta	44	9828	1:223	3721	37.9%	1:85
039	Crawford	Rural	Central	0	1525	0:1525	675	44.3%	0:675
040	Crisp	Rural	Central	2	3937	1:1969	1594	40.5%	1:797
041	Dade	Rural	North	1	1057	1:1057	377	35.7%	1:377
042	Dawson	Rural	North	15	1673	1:112	836	50.0%	1:56
043	Decatur	Rural	Southwest	4	4653	1:1163	1993	42.8%	1:498
044	DeKalb	Urban	Atlanta	203	68216	1:336	21901	32.1%	1:108
045	Dodge	Rural	Central	7	2568	1:367	950	37.0%	1:136
046	Dooly	Rural	Central	5	1806	1:361	655	36.3%	1:131
047	Dougherty	Urban	Southwest	23	16104	1:700	5923	36.8%	1:258

**Exhibit I**  
**CMO Member Utilization with Adjusted Provider-to-Member Ratios, by County**

County Code	County Name	Region Designation	CMO Region	CMO Prov. Count	Member Count	Ratio of 0,1 Provider :x Members	Member Utilization Count	Percentage of Members with Encounters	Utilization Ratio of 0,1 Provider: x Members
048	Douglas	Urban	Atlanta	52	13222	1:254	5178	39.2%	1:100
049	Early	Rural	Southwest	4	2088	1:522	982	47.0%	1:246
050	Echols	Rural	Southwest	0	534	0:534	170	31.8%	0:170
051	Effingham	Urban	Southeast	2	4111	1:2056	1485	36.1%	1:743
052	Elbert	Rural	North	4	2466	1:617	992	40.2%	1:248
053	Emanuel	Rural	East	2	3438	1:1719	1292	37.6%	1:646
054	Evans	Rural	Southeast	1	1509	1:1509	551	36.5%	1:551
055	Fannin	Rural	North	7	2500	1:357	1107	44.3%	1:158
056	Fayette	Urban	Atlanta	19	4145	1:218	1548	37.3%	1:81
057	Floyd	Urban	North	14	10751	1:768	4115	38.3%	1:294
058	Forsyth	Urban	Atlanta	29	5750	1:198	2710	47.1%	1:93
059	Franklin	Rural	North	3	2674	1:891	1060	39.6%	1:353
060	Fulton	Urban	Atlanta	296	78360	1:265	24923	31.8%	1:84
061	Gilmer	Rural	North	6	3251	1:542	1087	33.4%	1:181
062	Glascocock	Rural	East	1	358	1:358	145	40.5%	1:145
063	Glynn	Urban	Southeast	12	7434	1:620	2181	29.3%	1:182
064	Gordon	Urban	North	7	6026	1:861	2415	40.1%	1:345
065	Grady	Rural	Southwest	5	3419	1:684	1522	44.5%	1:304
066	Greene	Rural	East	3	1898	1:633	842	44.4%	1:281
067	Gwinnett	Urban	Atlanta	207	69424	1:335	29349	42.3%	1:142
068	Habersham	Urban	North	4	3886	1:972	1781	45.8%	1:445
069	Hall	Urban	North	38	19905	1:524	8336	41.9%	1:219
070	Hancock	Rural	East	2	1112	1:556	368	33.1%	1:184
071	Haralson	Rural	Atlanta	2	3382	1:1691	1296	38.3%	1:648
072	Harris	Rural	Central	3	1681	1:560	663	39.4%	1:221
073	Hart	Rural	North	3	2918	1:973	978	33.5%	1:326
074	Heard	Rural	Central	0	1424	0:1424	595	41.8%	0:595
075	Henry	Urban	Atlanta	47	16138	1:343	5753	35.6%	1:122
076	Houston	Urban	Central	11	12949	1:1177	4466	34.5%	1:406
077	Irwin	Rural	Southwest	2	1420	1:710	533	37.5%	1:267
078	Jackson	Urban	North	4	5332	1:1333	2175	40.8%	1:544
079	Jasper	Rural	Atlanta	2	1848	1:924	727	39.3%	1:364
080	Jeff-Davis	Rural	Southeast	2	2519	1:1260	826	32.8%	1:413
081	Jefferson	Rural	East	4	2721	1:680	1164	42.8%	1:291
082	Jenkins	Rural	East	1	1619	1:1619	681	42.1%	1:681
083	Johnson	Rural	Central	1	1186	1:1186	489	41.2%	1:489
084	Jones	Rural	Central	0	2710	0:2710	1058	39.0%	0:1058
085	Lamar	Rural	Central	1	1734	1:1734	606	34.9%	1:606
086	Lanier	Rural	Southwest	1	1290	1:1290	463	35.9%	1:463
087	Laurens	Urban	Central	7	6849	1:978	2308	33.7%	1:330
088	Lee	Rural	Southwest	1	2567	1:2567	1024	39.9%	1:1024
089	Liberty	Rural	Southeast	10	5365	1:537	1726	32.2%	1:173
090	Lincoln	Rural	East	1	918	1:918	466	50.8%	1:466
091	Long	Rural	Southeast	0	1433	0:1433	478	33.4%	0:478
092	Lowndes	Urban	Southwest	22	11946	1:543	4487	37.6%	1:204
093	Lumpkin	Rural	North	2	2393	1:1197	1049	43.8%	1:525
094	Macon	Rural	Central	4	1651	1:413	519	31.4%	1:130

**Exhibit I**  
**CMO Member Utilization with Adjusted Provider-to-Member Ratios, by County**

County Code	County Name	Region Designation	CMO Region	CMO Prov. Count	Member Count	Ratio of 0,1 Provider :x Members	Member Utilization Count	Percentage of Members with Encounters	Utilization Ratio of 0,1 Provider: x Members
095	Madison	Rural	North	0	3152	0:3152	1275	40.5%	0:1275
096	Marion	Rural	Central	3	1092	1:364	352	32.2%	1:117
097	McDuffie	Rural	East	4	3281	1:820	1591	48.5%	1:398
098	McIntosh	Rural	Southeast	2	1255	1:628	434	34.6%	1:217
099	Meriwether	Rural	Central	2	2901	1:1451	1074	37.0%	1:537
100	Miller	Rural	Southwest	3	849	1:283	398	46.9%	1:133
101	Mitchell	Rural	Southwest	2	3774	1:1887	1363	36.1%	1:682
102	Monroe	Rural	Central	3	2037	1:679	661	32.4%	1:220
103	Montgomery	Rural	Southeast	0	1079	0:1079	403	37.3%	0:403
104	Morgan	Rural	North	3	1872	1:624	881	47.1%	1:294
105	Murray	Urban	North	5	5644	1:1129	2101	37.2%	1:420
106	Muscogee	Urban	Central	34	22409	1:659	6527	29.1%	1:192
107	Newton	Urban	Atlanta	8	11615	1:1452	4652	40.1%	1:582
108	Oconee	Rural	North	4	1423	1:356	601	42.2%	1:150
109	Oglethorpe	Rural	North	0	1408	0:1408	643	45.7%	0:643
110	Paulding	Urban	Atlanta	11	9668	1:879	4336	44.8%	1:394
111	Peach	Rural	Central	2	3294	1:1647	1277	38.8%	1:639
112	Pickens	Rural	Atlanta	0	2768	0:2768	1136	41.0%	0:1136
113	Pierce	Rural	Southeast	0	2350	0:2350	748	31.8%	0:748
114	Pike	Rural	Central	1	1678	1:1678	711	42.4%	1:711
115	Polk	Urban	North	7	5356	1:765	2358	44.0%	1:337
116	Pulaski	Rural	Central	1	970	1:970	240	24.7%	1:240
117	Putnam	Rural	East	2	2333	1:1167	878	37.6%	1:439
118	Quitman	Rural	Southwest	1	265	1:265	60	22.6%	1:60
119	Rabun	Rural	North	1	1514	1:1514	575	38.0%	1:575
120	Randolph	Rural	Southwest	10	1025	1:103	441	43.0%	1:44
121	Richmond	Urban	East	118	27859	1:236	11567	41.5%	1:98
122	Rockdale	Urban	Atlanta	117	9529	1:81	3648	38.3%	1:31
123	Schley	Rural	Southwest	0	595	0:595	180	30.3%	0:180
124	Screven	Rural	East	3	1915	1:638	543	28.4%	1:181
125	Seminole	Rural	Southwest	2	1666	1:833	732	43.9%	1:366
126	Spalding	Urban	Atlanta	12	8385	1:699	2692	32.1%	1:224
127	Stephens	Rural	North	3	3012	1:1004	1067	35.4%	1:356
128	Stewart	Rural	Southwest	1	625	1:625	158	25.3%	1:158
129	Sumter	Rural	Southwest	4	5662	1:1416	1980	35.0%	1:495
130	Talbot	Rural	Central	2	765	1:383	278	36.3%	1:139
131	Taliaferro	Rural	East	0	250	0:250	121	48.4%	0:121
132	Tattnall	Rural	Southeast	2	2439	1:1220	864	35.4%	1:432
133	Taylor	Rural	Central	1	1154	1:1154	369	32.0%	1:369
134	Telfair	Rural	Central	3	1605	1:535	613	38.2%	1:204
135	Terrell	Rural	Southwest	1	1769	1:1769	539	30.5%	1:539
136	Thomas	Urban	Southwest	5	5727	1:1145	2216	38.7%	1:443
137	Tift	Urban	Southwest	11	5968	1:543	2083	34.9%	1:189
138	Toombs	Rural	Southeast	2	4499	1:2250	1672	37.2%	1:836
139	Towns	Rural	North	2	898	1:449	371	41.3%	1:186
140	Treutlen	Rural	Central	2	1065	1:533	384	36.1%	1:192
141	Troup	Urban	Central	27	7729	1:286	3146	40.7%	1:117

**Exhibit I**  
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County Code	County Name	Region Designation	CMO Region	CMO Prov. Count	Member Count	Ratio of 0,1 Provider :x Members	Member Utilization Count	Percentage of Members with Encounters	Utilization Ratio of 0,1 Provider: x Members
142	Turner	Rural	Southwest	3	1491	1:497	553	37.1%	1:184
143	Twiggs	Rural	Central	0	1079	0:1079	411	38.1%	0:411
144	Union	Rural	North	10	1898	1:190	817	43.0%	1:82
145	Upson	Rural	Central	3	3504	1:1168	1300	37.1%	1:433
146	Walker	Urban	North	2	6796	1:3398	2193	32.3%	1:1097
147	Walton	Urban	Atlanta	15	8294	1:553	3572	43.1%	1:238
148	Ware	Urban	Southeast	11	4676	1:425	1394	29.8%	1:127
149	Warren	Rural	East	4	916	1:229	411	44.9%	1:103
150	Washington	Rural	East	1	2442	1:2442	957	39.2%	1:957
151	Wayne	Rural	Southeast	4	3900	1:975	1176	30.2%	1:294
152	Webster	Rural	Southwest	0	314	0:314	116	36.9%	0:116
153	Wheeler	Rural	Central	1	774	1:774	338	43.7%	1:338
154	White	Rural	North	14	2386	1:170	1111	46.6%	1:79
155	Whitfield	Urban	North	15	13498	1:900	4744	35.1%	1:316
156	Wilcox	Rural	Central	5	1101	1:220	416	37.8%	1:83
157	Wilkes	Rural	East	3	1421	1:474	596	41.9%	1:199
158	Wilkinson	Rural	Central	1	1368	1:1368	550	40.2%	1:550
159	Worth	Rural	Southwest	2	2771	1:1386	1152	41.6%	1:576
Totals				2095	964550	1:460	359925	38.1%	1:172

**Exhibit J**

**Fee-for-Service (FFS) Member Utilization with Adjusted Provider-to-Member Ratios, by County**

County Code	County Name	Region Designation	CMO Region	FFS Prov. Count	Member Count	Ratio of 0,1 Provider :x Members	Member Utilization Count	Percentage of Members with Encounters	Utilization Ratio of 0,1 Provider: x Members
001	Appling	Rural	Southeast	1	1986	1:1986	262	13.2%	1:262
002	Atkinson	Rural	Southwest	3	823	1:274	129	15.7%	1:43
003	Bacon	Rural	Southeast	1	1050	1:1050	112	10.7%	1:112
004	Baker	Rural	Southwest	0	409	0:409	56	13.7%	0:56
005	Baldwin	Urban	Central	7	3426	1:489	561	16.4%	1:80
006	Banks	Rural	North	7	1371	1:196	139	10.1%	1:20
007	Barrow	Urban	Atlanta	8	3830	1:479	529	13.8%	1:66
008	Bartow	Urban	Atlanta	16	6004	1:375	948	15.8%	1:59
009	Ben-Hill	Rural	Southwest	3	2091	1:697	241	11.5%	1:80
010	Berrien	Rural	Southwest	1	1810	1:1810	249	13.8%	1:249
011	Bibb	Urban	Central	73	14940	1:205	2403	16.1%	1:33
012	Bleckley	Rural	Central	2	966	1:483	91	9.4%	1:46
013	Brantley	Rural	Southeast	2	1500	1:750	208	13.9%	1:104
014	Brooks	Rural	Southwest	1	1760	1:1760	203	11.5%	1:203
015	Bryan	Rural	Southeast	1	1302	1:1302	188	14.4%	1:188
016	Bulloch	Urban	Southeast	13	3964	1:305	631	15.9%	1:49
017	Burke	Rural	East	4	2556	1:639	410	16.0%	1:103
018	Butts	Rural	Atlanta	5	1675	1:335	237	14.1%	1:47
019	Calhoun	Rural	Southwest	2	678	1:339	95	14.0%	1:48
020	Camden	Urban	Southeast	9	2236	1:248	241	10.8%	1:27
021	Candler	Rural	Southeast	0	1235	0:1235	155	12.6%	0:155
022	Carroll	Urban	Atlanta	7	7064	1:1009	932	13.2%	1:133
023	Catoosa	Urban	North	4	3458	1:865	370	10.7%	1:93
024	Charlton	Rural	Southeast	0	930	0:930	93	10.0%	0:93
025	Chatham	Urban	Southeast	78	15305	1:196	2585	16.9%	1:33
026	Chattahoochee	Rural	Central	0	314	0:314	27	8.6%	0:27
027	Chattooga	Rural	North	4	2391	1:598	275	11.5%	1:69
028	Cherokee	Urban	Atlanta	28	5587	1:200	945	16.9%	1:34
029	Clarke	Urban	North	35	6364	1:182	1199	18.8%	1:34
030	Clay	Rural	Southwest	0	484	0:484	61	12.6%	0:61
031	Clayton	Urban	Atlanta	149	17032	1:114	2851	16.7%	1:19
032	Clinch	Rural	Southwest	1	923	1:923	129	14.0%	1:129
033	Cobb	Urban	Atlanta	165	21774	1:132	3471	15.9%	1:21
034	Coffee	Urban	Southwest	8	3904	1:488	612	15.7%	1:77
035	Colquitt	Urban	Southwest	1	4364	1:4364	734	16.8%	1:734
036	Columbia	Urban	East	25	3420	1:137	634	18.5%	1:25
037	Cook	Rural	Southwest	7	1634	1:233	250	15.3%	1:36
038	Coweta	Urban	Atlanta	46	4985	1:108	743	14.9%	1:16
039	Crawford	Rural	Central	2	1026	1:513	152	14.8%	1:76
040	Crisp	Rural	Central	2	2686	1:1343	412	15.3%	1:206
041	Dade	Rural	North	4	1120	1:280	99	8.8%	1:25
042	Dawson	Rural	North	12	914	1:76	137	15.0%	1:11
043	Decatur	Rural	Southwest	6	2996	1:499	462	15.4%	1:77
044	DeKalb	Urban	Atlanta	426	38139	1:90	5870	15.4%	1:14
045	Dodge	Rural	Central	8	1968	1:246	276	14.0%	1:35
046	Dooly	Rural	Central	5	1240	1:248	191	15.4%	1:38
047	Dougherty	Urban	Southwest	24	10193	1:425	1753	17.2%	1:73

**Exhibit J**

**Fee-for-Service (FFS) Member Utilization with Adjusted Provider-to-Member Ratios, by County**

County Code	County Name	Region Designation	CMO Region	FFS Prov. Count	Member Count	Ratio of 0,1 Provider :x Members	Member Utilization Count	Percentage of Members with Encounters	Utilization Ratio of 0,1 Provider: x Members
048	Douglas	Urban	Atlanta	48	6501	1:135	1160	17.8%	1:24
049	Early	Rural	Southwest	3	1517	1:506	287	18.9%	1:96
050	Echols	Rural	Southwest	0	254	0:254	33	13.0%	0:33
051	Effingham	Urban	Southeast	3	2290	1:763	338	14.8%	1:113
052	Elbert	Rural	North	3	2165	1:722	340	15.7%	1:113
053	Emanuel	Rural	East	4	2754	1:689	366	13.3%	1:92
054	Evans	Rural	Southeast	2	1131	1:566	181	16.0%	1:91
055	Fannin	Rural	North	5	1693	1:339	183	10.8%	1:37
056	Fayette	Urban	Atlanta	48	2508	1:52	375	15.0%	1:8
057	Floyd	Urban	North	16	7803	1:488	1174	15.0%	1:73
058	Forsyth	Urban	Atlanta	19	2894	1:152	434	15.0%	1:23
059	Franklin	Rural	North	6	1998	1:333	212	10.6%	1:35
060	Fulton	Urban	Atlanta	454	51163	1:113	7153	14.0%	1:16
061	Gilmer	Rural	North	9	1783	1:198	217	12.2%	1:24
062	Glascocok	Rural	East	1	288	1:288	23	8.0%	1:23
063	Glynn	Urban	Southeast	22	4922	1:223	778	15.8%	1:35
064	Gordon	Urban	North	8	3789	1:473	537	14.2%	1:67
065	Grady	Rural	Southwest	6	2299	1:383	353	15.4%	1:59
066	Greene	Rural	East	6	1385	1:231	160	11.6%	1:27
067	Gwinnett	Urban	Atlanta	275	27304	1:99	4250	15.6%	1:15
068	Habersham	Urban	North	9	2372	1:264	325	13.7%	1:36
069	Hall	Urban	North	68	8569	1:126	1253	14.6%	1:18
070	Hancock	Rural	East	3	1060	1:353	132	12.5%	1:44
071	Haralson	Rural	Atlanta	2	2432	1:1216	252	10.4%	1:126
072	Harris	Rural	Central	2	1239	1:620	158	12.8%	1:79
073	Hart	Rural	North	6	2037	1:340	267	13.1%	1:45
074	Heard	Rural	Central	2	1093	1:547	135	12.4%	1:68
075	Henry	Urban	Atlanta	70	7523	1:107	1194	15.9%	1:17
076	Houston	Urban	Central	15	7049	1:470	1093	15.5%	1:73
077	Irwin	Rural	Southwest	2	1027	1:514	134	13.0%	1:67
078	Jackson	Urban	North	5	3269	1:654	443	13.6%	1:89
079	Jasper	Rural	Atlanta	5	916	1:183	147	16.0%	1:29
080	Jeff-Davis	Rural	Southeast	2	1556	1:778	190	12.2%	1:95
081	Jefferson	Rural	East	4	2168	1:542	305	14.1%	1:76
082	Jenkins	Rural	East	1	1032	1:1032	152	14.7%	1:152
083	Johnson	Rural	Central	1	1074	1:1074	139	12.9%	1:139
084	Jones	Rural	Central	2	1710	1:855	249	14.6%	1:125
085	Lamar	Rural	Central	3	1327	1:442	177	13.3%	1:59
086	Lanier	Rural	Southwest	1	878	1:878	129	14.7%	1:129
087	Laurens	Urban	Central	9	4672	1:519	657	14.1%	1:73
088	Lee	Rural	Southwest	1	1153	1:1153	212	18.4%	1:212
089	Liberty	Rural	Southeast	10	3093	1:309	606	19.6%	1:61
090	Lincoln	Rural	East	2	631	1:316	101	16.0%	1:51
091	Long	Rural	Southeast	0	883	0:883	161	18.2%	0:161
092	Lowndes	Urban	Southwest	68	7527	1:111	1461	19.4%	1:21
093	Lumpkin	Rural	North	4	1556	1:389	180	11.6%	1:45

**Exhibit J**

**Fee-for-Service (FFS) Member Utilization with Adjusted Provider-to-Member Ratios, by County**

County Code	County Name	Region Designation	CMO Region	FFS Prov. Count	Member Count	Ratio of 0,1 Provider :x Members	Member Utilization Count	Percentage of Members with Encounters	Utilization Ratio of 0,1 Provider: x Members
094	Macon	Rural	Central	2	1539	1:770	200	13.0%	1:100
095	Madison	Rural	North	0	2116	0:2116	302	14.3%	0:302
096	Marion	Rural	Central	3	729	1:243	68	9.3%	1:23
097	McDuffie	Rural	East	5	2038	1:408	363	17.8%	1:73
098	McIntosh	Rural	Southeast	2	1004	1:502	165	16.4%	1:83
099	Meriwether	Rural	Central	4	2261	1:565	308	13.6%	1:77
100	Miller	Rural	Southwest	3	672	1:224	102	15.2%	1:34
101	Mitchell	Rural	Southwest	2	2646	1:1323	364	13.8%	1:182
102	Monroe	Rural	Central	5	1683	1:337	233	13.8%	1:47
103	Montgomery	Rural	Southeast	1	820	1:820	148	18.0%	1:148
104	Morgan	Rural	North	2	1119	1:560	174	15.5%	1:87
105	Murray	Urban	North	5	3321	1:664	409	12.3%	1:82
106	Muscogee	Urban	Central	96	14703	1:153	2214	15.1%	1:23
107	Newton	Urban	Atlanta	12	6118	1:510	1126	18.4%	1:94
108	Oconee	Rural	North	4	884	1:221	166	18.8%	1:42
109	Oglethorpe	Rural	North	1	1026	1:1026	140	13.6%	1:140
110	Paulding	Urban	Atlanta	6	4773	1:796	823	17.2%	1:137
111	Peach	Rural	Central	6	1932	1:322	339	17.5%	1:57
112	Pickens	Rural	Atlanta	1	1633	1:1633	196	12.0%	1:196
113	Pierce	Rural	Southeast	2	1733	1:867	175	10.1%	1:88
114	Pike	Rural	Central	2	960	1:480	147	15.3%	1:74
115	Polk	Urban	North	9	3811	1:423	573	15.0%	1:64
116	Pulaski	Rural	Central	1	877	1:877	81	9.2%	1:81
117	Putnam	Rural	East	4	1250	1:313	174	13.9%	1:44
118	Quitman	Rural	Southwest	1	287	1:287	33	11.5%	1:33
119	Rabun	Rural	North	3	1127	1:376	123	10.9%	1:41
120	Randolph	Rural	Southwest	9	1069	1:119	168	15.7%	1:19
121	Richmond	Urban	East	157	17036	1:109	3100	18.2%	1:20
122	Rockdale	Urban	Atlanta	97	4306	1:44	832	19.3%	1:9
123	Schley	Rural	Southwest	0	362	0:362	54	14.9%	0:54
124	Screven	Rural	East	3	1639	1:546	279	17.0%	1:93
125	Seminole	Rural	Southwest	3	1073	1:358	209	19.5%	1:70
126	Spalding	Urban	Atlanta	8	5847	1:731	847	14.5%	1:106
127	Stephens	Rural	North	12	2537	1:211	259	10.2%	1:22
128	Stewart	Rural	Southwest	1	646	1:646	54	8.4%	1:54
129	Sumter	Rural	Southwest	5	3436	1:687	526	15.3%	1:105
130	Talbot	Rural	Central	4	634	1:159	70	11.0%	1:18
131	Taliaferro	Rural	East	0	244	0:244	34	13.9%	0:34
132	Tattall	Rural	Southeast	2	2084	1:1042	313	15.0%	1:157
133	Taylor	Rural	Central	1	945	1:945	126	13.3%	1:126
134	Telfair	Rural	Central	5	1434	1:287	223	15.6%	1:45
135	Terrell	Rural	Southwest	1	1248	1:1248	145	11.6%	1:145
136	Thomas	Urban	Southwest	7	4635	1:662	706	15.2%	1:101
137	Tift	Urban	Southwest	9	3453	1:384	441	12.8%	1:49
138	Toombs	Rural	Southeast	3	3167	1:1056	438	13.8%	1:146
139	Towns	Rural	North	4	692	1:173	41	5.9%	1:10

**Exhibit J**

**Fee-for-Service (FFS) Member Utilization with Adjusted Provider-to-Member Ratios, by County**

County Code	County Name	Region Designation	CMO Region	FFS Prov. Count	Member Count	Ratio of 0,1 Provider :x Members	Member Utilization Count	Percentage of Members with Encounters	Utilization Ratio of 0,1 Provider: x Members
140	Treutlen	Rural	Central	3	793	1:264	94	11.9%	1:31
141	Troup	Urban	Central	34	5760	1:169	963	16.7%	1:28
142	Turner	Rural	Southwest	3	1129	1:376	183	16.2%	1:61
143	Twiggs	Rural	Central	2	1069	1:535	157	14.7%	1:79
144	Union	Rural	North	11	1383	1:126	157	11.4%	1:14
145	Upson	Rural	Central	7	2741	1:392	359	13.1%	1:51
146	Walker	Urban	North	3	5181	1:1727	534	10.3%	1:178
147	Walton	Urban	Atlanta	8	4430	1:554	711	16.0%	1:89
148	Ware	Urban	Southeast	13	4161	1:320	532	12.8%	1:41
149	Warren	Rural	East	6	712	1:119	85	11.9%	1:14
150	Washington	Rural	East	4	2096	1:524	294	14.0%	1:74
151	Wayne	Rural	Southeast	6	2516	1:419	338	13.4%	1:56
152	Webster	Rural	Southwest	0	192	0:192	18	9.4%	0:18
153	Wheeler	Rural	Central	1	578	1:578	79	13.7%	1:79
154	White	Rural	North	16	1513	1:95	205	13.5%	1:13
155	Whitfield	Urban	North	70	6375	1:91	805	12.6%	1:12
156	Wilcox	Rural	Central	3	905	1:302	119	13.1%	1:40
157	Wilkes	Rural	East	5	1055	1:211	119	11.3%	1:24
158	Wilkinson	Rural	Central	3	781	1:260	107	13.7%	1:36
159	Worth	Rural	Southwest	4	1774	1:444	240	13.5%	1:60
Totals				3156	572807	1:182	86267	14.1%	1:27