

## **Bryman, Mitch (CMS/OSORA)**

---

**From:** Greiner, Keith <Keith.Greiner@fallonhealth.org>  
**Sent:** Thursday, August 17, 2017 9:07 AM  
**To:** OS OIRA (HHS/OS)  
**Subject:** Comments on Three-Year Network Adequacy Review for Medicare Advantage Organizations

Good morning:

Our organization [Fallon Health – H9001] has reviewed the proposed changes to Network Adequacy and would like to suggest that CMS clarify how Medicare Advantage plans would be chosen for the network adequacy review should they have already had a network adequacy review in the last 3 years associated with the submission of an application.

Thank you,

Keith Greiner | Medicare Product Regulatory Consultant  
Fallon Health | 10 Chestnut Street | Worcester, MA 01608  
Ph: 1-508-368-9722 | Fax: 1-508-368-9981  
[fallonhealth.org](http://fallonhealth.org) | [www.summiteldercare.org](http://www.summiteldercare.org) | [www.navicare.org](http://www.navicare.org)  
[Follow Fallon on Twitter](#) | [“Like” Fallon on Facebook](#)

CONFIDENTIALITY NOTICE: This e-mail is intended only for the person or entity to which it is addressed and may contain information that is privileged, confidential or otherwise protected from disclosure under applicable law. Any use, disclosure, distribution, or copying of this e-mail or the information contained herein by anyone other than the intended recipient is prohibited and may be a violation of state and/or Federal privacy laws. If you have received this e-mail in error, please delete any copies of it from your computer system and contact the Privacy Officer at [compliance@fallonhealth.org](mailto:compliance@fallonhealth.org).

Fallon Health is the leading health care services organization that supports the diverse and changing needs of those it serves. In addition to providing innovative health insurance solutions for businesses and consumers, and a variety of Medicaid and Medicare products, we excel in unique health care programs and services that coordinate care for seniors and individuals with complex health needs. Consistently ranked as one of the country's top health plans, Fallon was one of the first HMO's in the country to provide insurance to Medicare beneficiaries, as well as the first health plan in America to offer a Program of All-inclusive Care for the Elderly. For more information, visit [www.fallonhealth.org](http://www.fallonhealth.org)