

BEFORE THE INSURANCE COMMISSIONER  
FOR THE STATE OF DELAWARE

Connecticut General Life Insurance Company,	)	
American Specialty Health Networks, Inc.	)	Docket No. 1507-20210
CIGNA Health Care	)	DE DOINo. 114328

CONSENT ORDER

This Consent Order is entered into by and among Connecticut General Life Insurance Company, ("CGLIC"), American Specialty Health Networks, Inc. ("ASH") (CGLIC and ASH are hereinafter referred to as "Respondents") and the Delaware Department of Insurance (the "Department").

WHEREAS, Respondent CGLIC is a life and health insurer writing health insurance business in Delaware; and

WHEREAS, ASH is acting as a third party administrator to CGLIC for purposes of administering CGLIC's chiropractic benefits; and

WHEREAS, the Department has alleged in a Complaint and Notice of Hearing (the "Complaint") dated January 20, 2011 that Respondents have violated the following provisions of the Delaware Code or Insurance Department Regulations:

- (i) 18 Del.C. §2304(16)(b)
- (ii) 18 Del.C. §2304(16)(d)
- (iii) 18 Del.C. §2304(16)(f)
- (iv) Insurance Department Regulation 907
- (v) Insurance Department Regulation 1310(G.0); and

WHEREAS, Respondents have been informed that they are entitled to an administrative hearing and to be represented by counsel and that a decision to waive a hearing is a free and voluntary one; and

WHEREAS, Respondents and the Department desire to resolve all outstanding issues raised by the Complaint.

NOW THEREFORE the Respondents and the Department agree as follows

1. Within 60 days of the Complaint, Respondents did not respond in a manner satisfactory to the Department as pursuant to Regulation 907.

2. Respondents admit that between April 1, 2010 and March 31, 2011 they failed to pay multiple claims within 30 days as required by 18 De. Admin. C. § 1310; however Respondents neither admit nor deny the remainder of the Department's allegations set forth in the Complaint.
3. Respondents will take such measures as are reasonable and appropriate to ensure that all future chiropractic claims are paid in compliance with 18 De. Admin. C. § 1310.
4. Respondents will pay an administrative penalty of \$5,000.00 to the Department.
5. Notwithstanding that Dr. Michael Triglia, of Peninsula Chiropractic Center, Inc. has not filed Clinical Treatment Forms as required under his provider contract, Respondents agree to adjudicate all of Dr. Triglia's claims that were submitted between April 1, 2010 and the date hereof, and denied due to the lack of the required Clinical Treatment Form, without regard to the absence of said form. Notwithstanding anything herein to the contrary, Respondents entry into this consent is not a waiver of Dr. Triglia's obligations under the relevant provider contract and Respondents are under no obligation to pay Dr. Triglia's claims from and after the date hereof that are not accompanied by a Clinical Treatment Form where such form is required under the relevant provider contract.
6. Respondents will conduct training for Delaware contracted chiropractors on the use of the "ASH Link" web based system, and will assess provider feedback during this training for opportunities to make system improvements. Within 90 days of the date hereof, Respondent will meet with the Department to apprise the Department of its progress under this paragraph 5.
7. This Agreement contains all of the terms and conditions agreed to by the parties and constitutes the final agreement between the Respondents and the Department, and the resolution of all charges raised in the Complaint.
8. No change, amendment, or modification hereto shall be effective or binding unless it is in writing, dated, and signed by the parties.

*[Remainder of page intentionally left blank]*

ACKNOWLEDGED AND AGREED TO, this 21 day of June, 2011

Connecticut General Life Insurance Company

American Specialty Health Networks, Inc.

By: Edward P. Potarka  
Name: EDWARD P. POTARKA  
Title: ASSISTANT SECRETARY

By: George DeVries  
Name: George DeVries  
Title: Chairman and CEO

SO ORDERED, this 30 day of June, 2011

by Aine Reed deputy Insurance Commissioner  
Commissioner