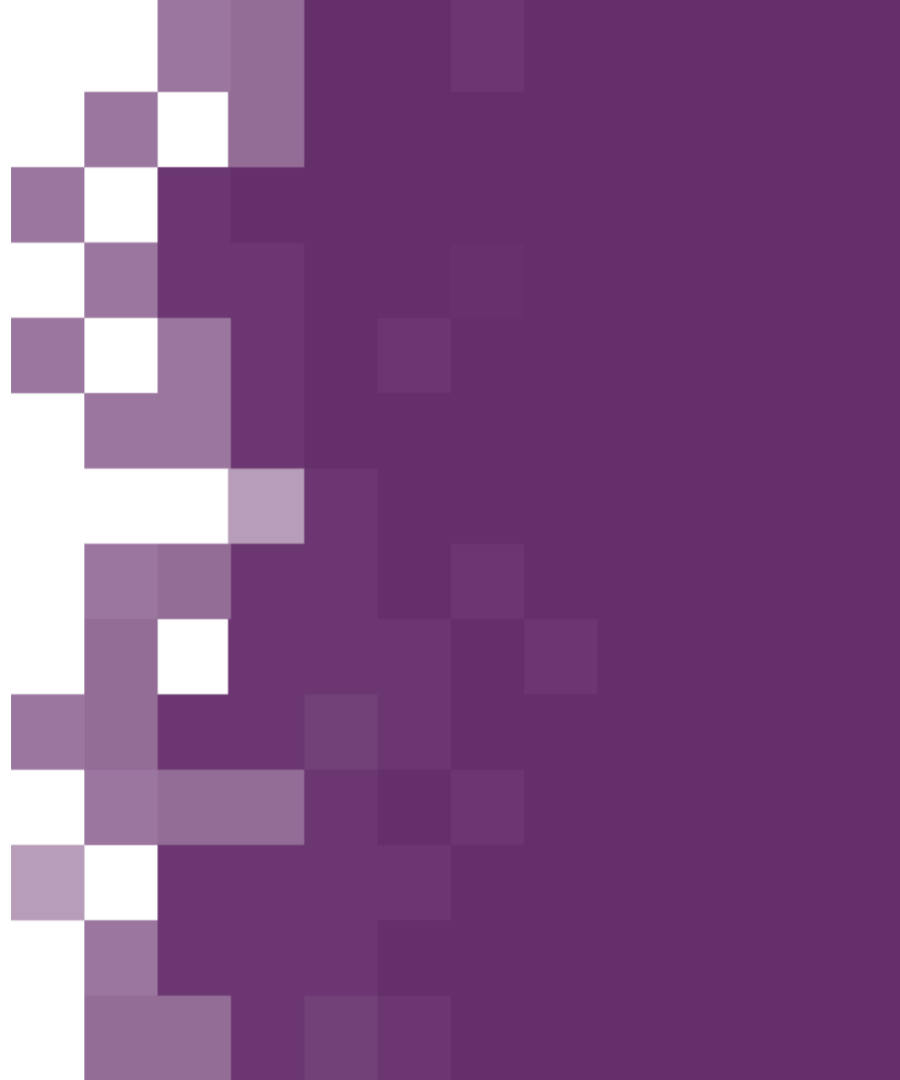




# National Health Policy Conference

## Using Form Filing Reviews to Enforce Mental Health Parity Regulations

Elizabeth Messenger-Jones, IMPAQ Health



# Learning Objective:

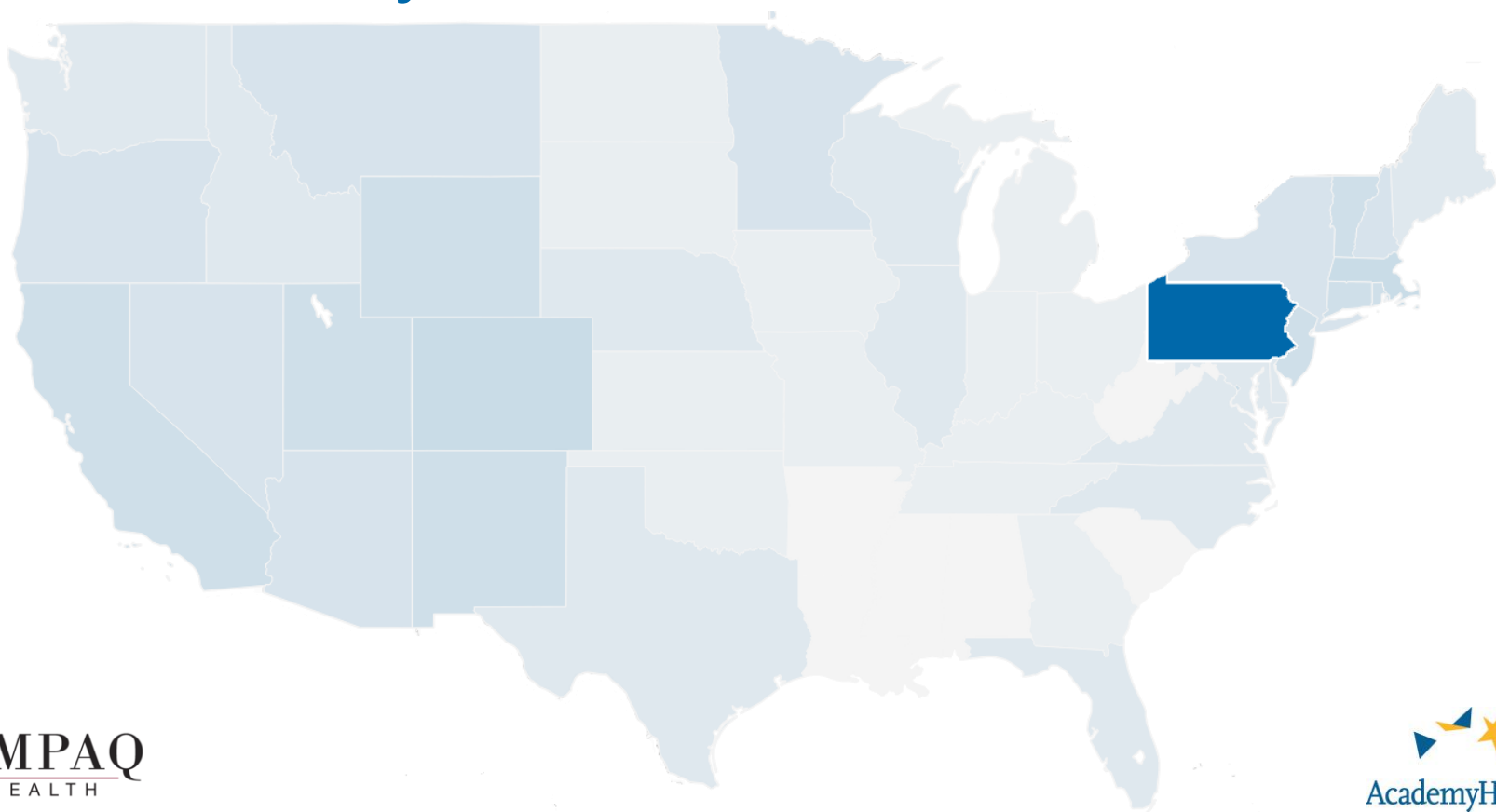
## ■ Learning Objective 1:

- Using process improvement tools, states can identify common mental health parity violations, differing interpretations and approaches, and opportunities for additional guidance on requirements.
- States can use existing regulatory authority to enforce mental health/substance use disorder (MH/SUD) parity regulations during form filing reviews through providing additional training to review teams and implementing simple process improvements.

## ■ Learning Objective 2:

- These process improvement tools can be used to help states enforce other types of regulations maintaining and improving consumer access and insurance coverage.

# Overview: Pennsylvania



# Overview:

The Mental Health Parity and Addiction Equity Act (MHPAEA) **does not mandate** Mental health or addiction coverage, however, **when provided it requires:**

Benefits



Financial Requirements or  
Treatment Limitations



# Overview:

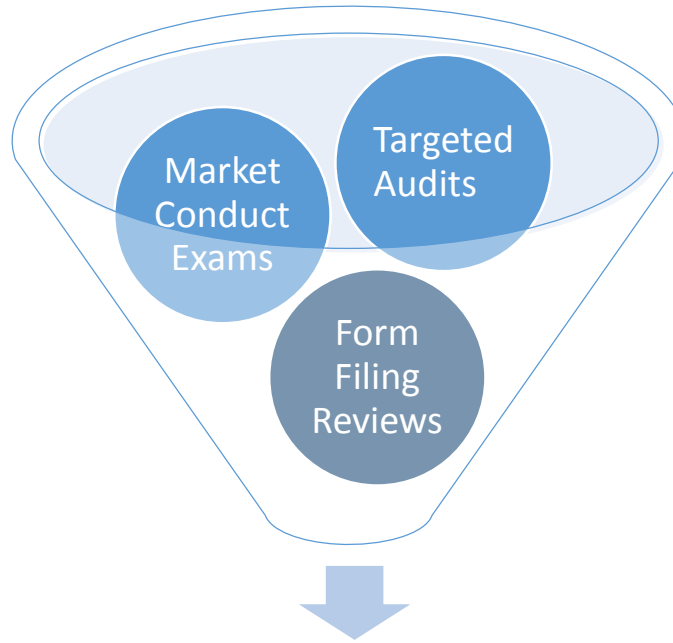
The ACA made **two major changes** to MH/SUD Coverage:



&



# Overview: State Role in MH/SUD Parity Enforcement



State MHPAEA Enforcement

# Overview: Form Filing Review

Policy examiners verify plan contracts for language required by federal and state law.



FORMS



FLAGS &  
VIOLATIONS



ISSUERS



AUDIT

# The Evidence:



\$50 office visit copay

**Higher Cost-Sharing**

\$30 office visit copay

36 visits per year

**Treatment Limits**

No outpatient visit restrictions

Applied behavioral analysis  
generally for autism

**Exclusions**

No comparable exclusion

For partial hospitalization or  
intensive outpatient services

**Prior Authorizations**

Not required for comparable  
services

Step therapy for MH/SUD  
prescriptions

**Non-Quantitative  
Treatment Limits**

No comparable limit



# Health Policy Implications:



## REGULATORY AUTHORITY

Using existing regulatory authority to identify potential violations without claims review.



## PROCESS IMPROVEMENT

Leveraging established tools to review for MH/SUD parity.

# Why This Matters:

Compliance monitoring improves consumer access.

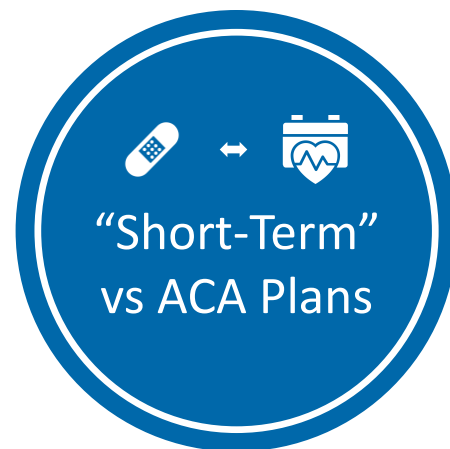


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# Why This Matters:

These process improvement methods can be applied across multiple settings.



# Contact Information/Acknowledgements:

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