

Mental Health Parity Rules: What Employers Need to Know

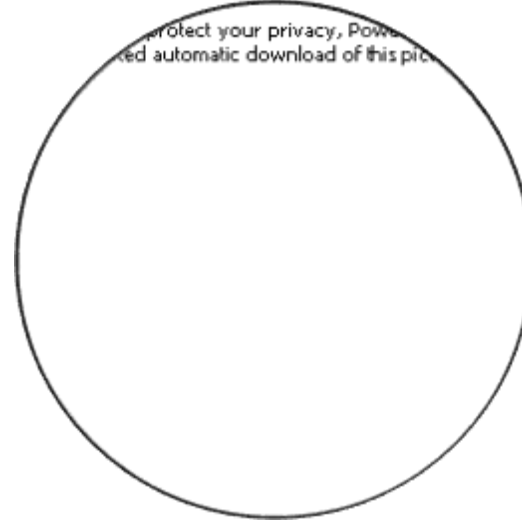
May 21, 2024



Speakers




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Anticipated Final Mental Health Parity Rule



- Expected in 2024
- Will likely impose new mental health parity obligations on employer health plans.
- Many implications for employer plans including:
 -  Impact on reimbursement rates
 - Increase in administrative and compliance costs

Mental Health Parity Background

- Mental Health Parity and Addiction Act (MHPAEA) requires employer health plans that cover MH/SUD benefits to provide coverage on par with medical/surgical benefits
- Congress amended the Mental Health Parity and Addiction Act (MHPAEA) in 2020
 - Employers required to perform and document complex analyses of non-quantitative treatment limitations (NQTLs)
 - Result was considerable confusion on employer parity obligations and how to adequately complete the analyses

Proposed Parity Rules

Clarifies that MHPAEA requires employers to ensure plan participants can **access** their MH/SUD benefits in parity with medical/surgical benefits and that they provide “meaningful” benefits

Increases the standards related to network composition and network adequacy

Requires employers to certify the comparative analysis for each NQTL

Requires employer plans to collect and evaluate specific data points related to network composition

Requires employer plans to take “reasonable action” when they find “material differences” in benefits

Complex Analysis Requirements

Substantially all/predominant test: NQTL must equally apply to two-thirds of all med/surg and MH/SUD benefits

No definition of “meaningful benefits”

Provider shortages complicate ability to ensure access parity

Key Takeaways for Employers



Plan Design

- *Scrutiny of benefit design will intensify*

Care Delivery

- *Timely access to mental health and substance use disorder providers is expected to marginally improve*

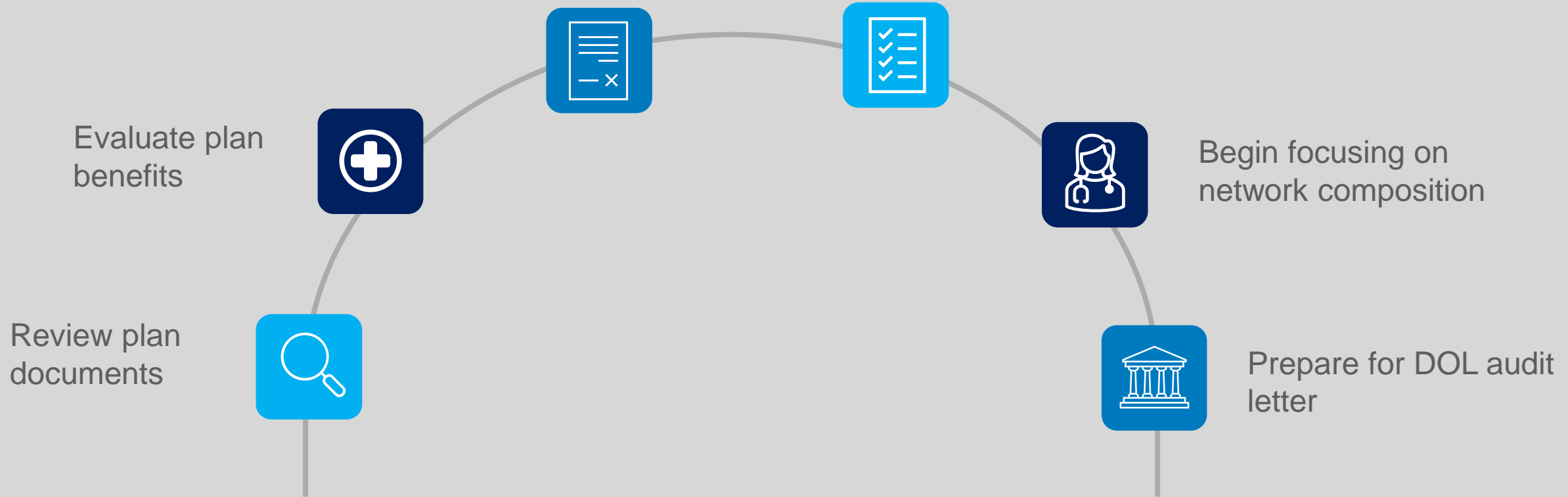
Financial

- *Expect higher costs*
- *Premiums will increase*
- *Out-of-pocket costs will be reduced*

Actions for Employers

Assess TSA and ASO contracts – delegate responsibility for parity compliance

Confirm all comparative analyses have been performed



Organizational Positioning on MHP



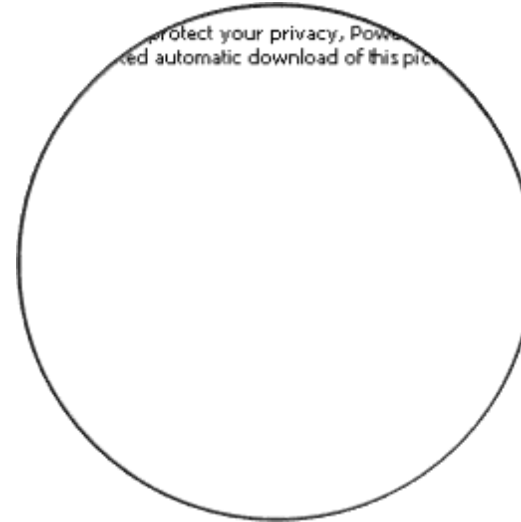
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Meetings and Events

Webinars:

- **June 20** (noon-12:30 p.m. ET)
Employer Case Study: Designing Benefits that Support Women's Health
- **June 25** (2 p.m.-3 p.m. ET)
US Business Action to End HIV and Advance Health Equity
- **July 16** (noon-1 p.m.)
Women's Health in the Workplace: How UI Affects Wellbeing



National Alliance Offers Diverse Professional Development Opportunities

Webinar participants say these speed-learning events supplement their skills and education and provide unique opportunities to get answers to today's pressing healthcare and benefits questions. Scroll down to register for our next webinars about the latest on **women's health and ending new HIV infections!**

Employer Case Study:
Designing Benefits that Support Women's Health

June 20, 2024 | noon-12:30 p.m. (ET)

Lumen Technologies fosters a diverse and inclusive culture through its employee resource groups (ERGs), such as Women Empowered. Participants have opportunities to network, mentor, and take advantage of professional development opportunities, as well as raise awareness and advocate for issues that matter to them.

Lumen's premise is that women's health and wellbeing is not only a personal matter, but also a business imperative. Healthy, happy employees are more productive, engaged and innovative, contributing to their own success and that of their families, communities, and the company and its customers.

REGISTER

Panelists welcome your women's health success stories and benefits implementation questions!

Meet the Panelists:

Tanika Smith
MODERATOR
Greater Philadelphia Business Coalition on Health

Michele Arnette
Lumen Technologies

Shelly Lanning
Visana Health

REGISTER

- **Coalition Strategy Summit**
June 10-11

SAVE THE DATE

- **Annual Forum**
November 18-20