



Mental Health Parity Compliance and Oversight

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Introduction

The Minnesota Department of Commerce (Commerce) and Minnesota Department of Health (MDH) are tasked with reviewing health insurance plans' compliance with mental health parity requirements to cover care for mental health and substance use disorder (MH/SUD) at the same level (or higher) as medical and surgical care. Mental health parity is required for many benefit components, including copays and other cost-sharing requirements, access to care, medical necessity reviews and determinations, and more.

Minnesota Statutes Section 62Q.47, subdivision (h), requires Commerce, in consultation with MDH, to produce an annual report on the departments' efforts to regulate mental health parity.

This report encompasses compliance and oversight efforts by Commerce and MDH related to mental health parity for calendar year 2022.

Background: Mental Health Parity Laws

State and federal laws requiring mental health parity have grown considerably over the past twenty-five years. Today, between state and federal law, the level and types of coverage offered for mental health and substance use disorders must be equal to the level and types of coverage offered for medical and surgical services for nearly all health plans. This means copayments, visit limitations, prior authorizations, pharmacy benefits, and more cannot be more restrictive for mental health services than for medical and surgical benefits.

Minnesota Law

Minnesota first enacted a mental health parity requirement in 1995. This law applies to state-regulated health plans, which generally are all non-grandfathered, fully-insured individual and group health plans. While Minnesota's original law has been modified over the past 25 years, the parity requirement itself remains intact. Alcoholism services were included in 2008. In 2013, Minnesota added references to three (3) federal parity laws: The Mental Health Parity Act of 1996 (MHPA), the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008 (MHPAEA), and the Affordable Care Act (ACA).

Federal Law

In 1996, Congress passed the MHPA, which prohibited large group plans from imposing stricter annual and lifetime financial limits on mental health benefits than those applied to medical and surgical benefits. MHPAEA built on MHPA and expanded mental health parity protections considerably. Although it only applied to group health plans, it expanded the types of benefits for MH/SUD ensuring that they be no more limiting than medical and surgical benefits. Generally, MHPAEA expanded the MHPA by doing the following:

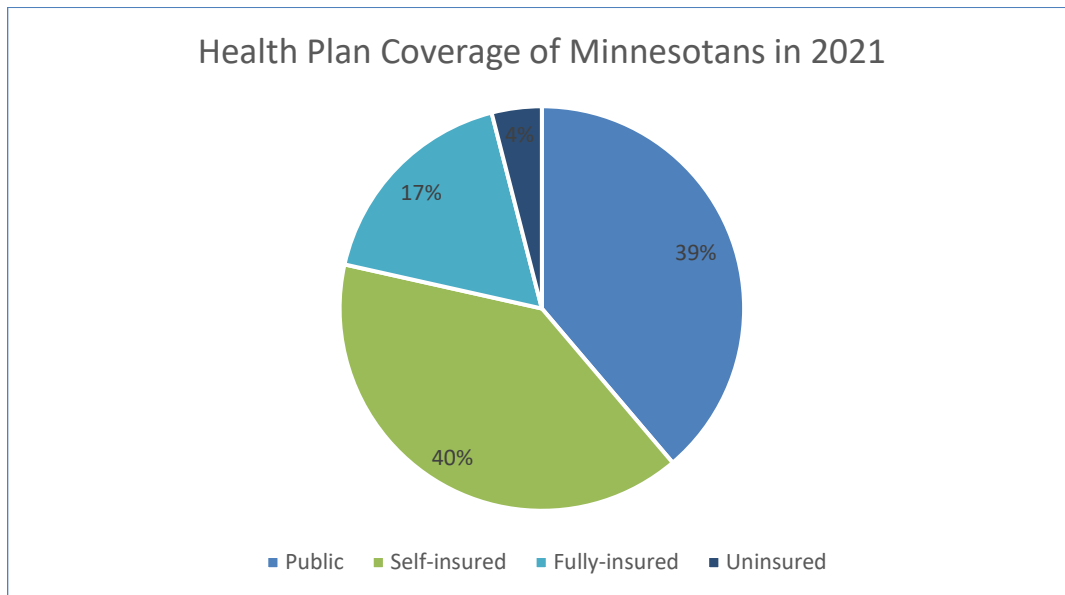
- Carrying forward the parity requirement on annual and lifetime financial limits,
- Expanding requirements to substance use disorders (in addition to mental health),
- Adding parity for other financial requirements (e.g., deductibles and co-payments),
- Adding parity for treatment limitations (e.g., number of visits or days of coverage),
- Adding parity for other benefit structures (e.g., in/out-of-network coverage and utilization management techniques), and
- Adding a requirement for plans to disclose their medical necessity criteria and, upon request, the rationale for claim denials.

The applicability of these requirements was expanded in 2010 to individual health plans through the ACA. The ACA also applied mental health parity requirements to small group plans by requiring nearly all plans to cover MH/SUD through Essential Health Benefit categories. This effectively required mental health coverage and parity for nearly all health plans. These requirements only apply to plans that offer mental health and substance use disorder benefits.

Background: Regulatory Authority of the Departments of Commerce and Health

Commerce and MDH have regulatory authority over Minnesota’s fully insured health plans, comprising 17 percent of the covered population (See **Exhibit 1** below). Commerce regulates health insurance companies and MDH regulates Health Maintenance Organizations (HMOs).

Exhibit 1: Health plan coverage of Minnesotans in 2021¹



¹ Chartbook Section 2: Trends and Variation in Health Insurance Coverage. Minnesota Department of Health. Accessed at: <https://www.health.state.mn.us/data/economics/chartbook/docs/section2.pdf>

Collaboration and Planning

In 2022, both Commerce and MDH continued to work with Management Analysis and Development (MAD) consultants from the Minnesota Management and Budget Office (MMB) to improve upon compliance and oversight efforts related to mental health parity. Generally, MAD consultants assist agencies with:

- Determining key questions to address and appropriate stakeholders;
- Communications and logistics; and
- Facilitating group discussion to maximize participation and assure effective decision making.

Work with MAD consultants helped identify areas of improvement for both intra- and inter-agency communication. These changes have allowed for the Departments to discuss and address mental health parity issues more efficiently.

Both Departments continue to participate with other states through the National Association of Insurance Commissioners (NAIC). NAIC meetings are an important part of continuing to push conversations about mental health parity among other state regulators. In partnership with other states, the NAIC has a formal subcommittee to work specifically with mental health parity issues. Minnesota continues to be a member of this subgroup with the NAIC.

The mental health parity subgroup holds several meetings each year. Most meetings are open to regulators and non-regulators. The open meetings allow for stakeholders and industry to provide their perspective with regulators. The subgroup also holds regulator-only meetings to discuss issues regulators in other states are experiencing regarding compliance with mental health parity laws. These meetings allow for sharing of best practices for data collection on mental health parity and allow for regulators to learn from the experiences of other states.

Process for Compliance Reviews

Commerce and MDH use many tools and processes to review for mental health parity. Some review takes place before health policies are offered to enrollees and some review takes place after enrollees are signed-up and utilizing their health policy. These are referred to as the pre-market and post-market phases.

Pre-market reviews from the Departments have included use of tools from the Centers for Medicare & Medicaid Services (CMS) that flag possible issues with plan and formulary design. Specifically, the Departments have, and continue to use, tools that assess plan benefits and ensure that certain financial requirements (such as copayments and out-of-pocket limitations) are no more restrictive on the MH/SUD side than they are on the medical/surgical side. The Departments also analyze health plan formularies utilizing CMS tools that specifically look for unexpectedly large numbers of prescription drugs subject to utilization review requirements—including mental health drugs.

Both Departments continue to evaluate how to best review for mental health parity compliance. In 2022, the Commerce and MDH requested that all health plans provide evidence of their compliance with quantitative treatment limitations (QTLs) utilizing a standardized tool from CMS. All health plans filing in 2022 for the 2023 plan year complied with the Departments' request to both utilize the tool and submitted their results for review. The results from each carrier, accompanied by health plan-submitted rationale, did not indicate any issues with QTL compliance.

Exhibit 2 outlines Minnesota's regulatory requirements associated with MH/SUD parity and how the state's existing processes address these requirements.

Exhibit 2: Minnesota State Requirements

Statute	Requirement	Minnesota Review
§ 62Q.47(b) and (c)	Requires cost sharing and benefit limits for outpatient and inpatient MH/SUD benefits be no more restrictive than analogous inpatient and outpatient medical benefits.	As part of pre-market reviews, Commerce and MDH review cost sharing and benefit limits within issuer filings to identify potential parity issues that warrant further analysis.
§ 62Q.47(d)	Prohibits health plans from imposing non-quantitative treatment limitations (NQTLs) more restrictive for MH/SUD benefits than the medical benefits within the same classification.	Minnesota continues to review and assess what data should be collected regarding NQTLs that will not be overly-burdensome to plans providing data, and can be properly analyzed.
§ 62Q.47(e)	Requires all health plans meet parity requirements of MHPAEA in enforcement of: <ul style="list-style-type: none"> • Quantitative treatment limitations (QTLs) • Annual and lifetime dollar limits • Cost sharing • Financial requirements • Out-of-pocket limits • Deductibles • Use of substantially all/predominant test for six classifications of benefits • NQTLs (E.g., pre-authorization, medical necessity) 	Commerce and MDH require issuers to attest to meeting cost sharing and QTL parity requirements. Issuers may voluntarily provide results of the Centers for Medicare & Medicaid Services (CMS) mental health parity tool. ² In addition, pre-market reviews of benefit NQTLs assess for compliance with federal requirements. MDH's post-market quality assurance exams assess health maintenance organization (HMO) utilization management to ensure their application of medical necessity meets parity requirements.

² Centers for Medicare & Medicaid Services. (2020). *MHPAEA Tool*. Available from the state of Minnesota upon request.

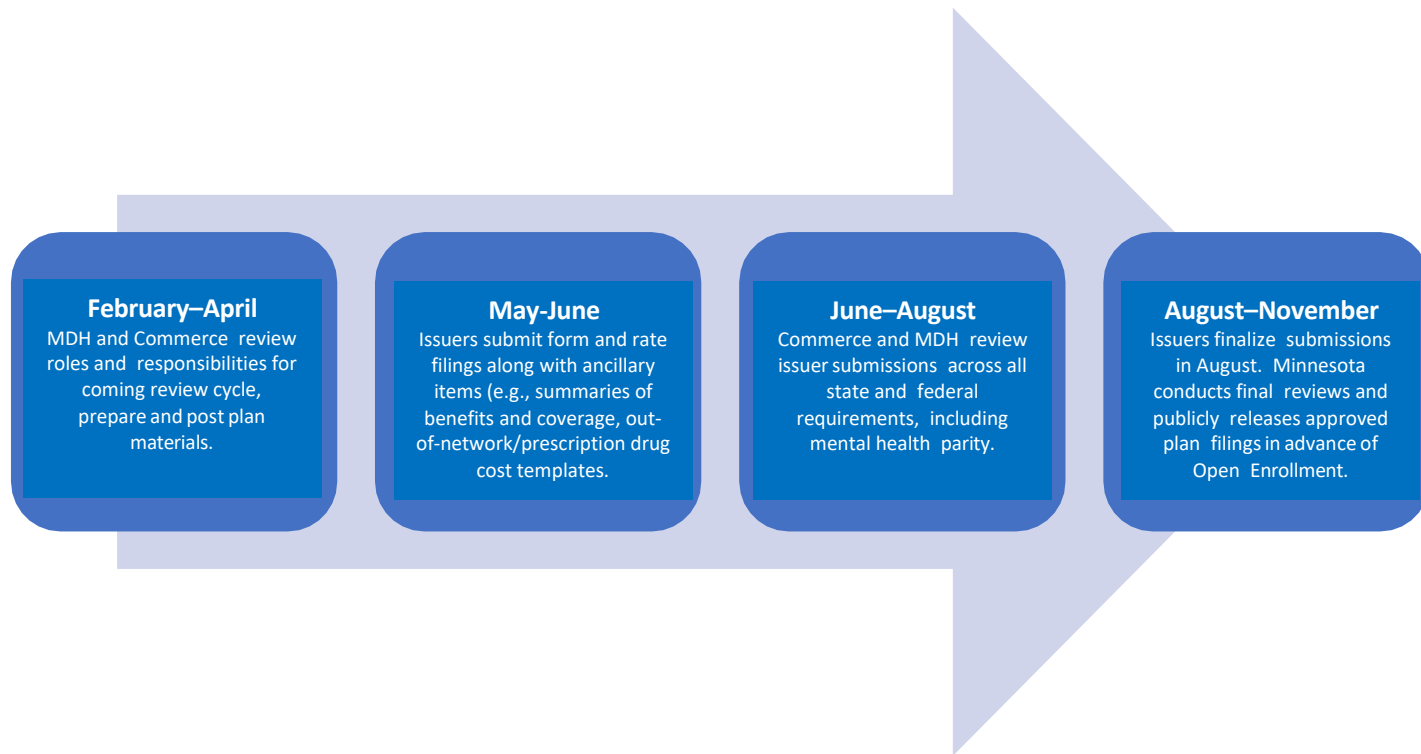
Statute	Requirement	Minnesota Review
§ 62Q.47(f)	Provides Commerce and MDH commissioners with authority to collect information and data necessary to confirm health plan compliance with Minnesota Statutes, § 62Q.47 and § 62Q.53.	As part of pre-market reviews, Commerce and MDH collect a wide range of documents and data outlining health plan coverage including benefit coverage, cost sharing, QTLs, NQTLs, provider networks, and drug coverage. In addition, MDH’s post-market quality assurance exams review issuer data on complaints, prior authorization, and other utilization management processes to assess for any parity concerns.
§ 62Q.47(g)	Requires health plans to treat mental health therapy visits and medication maintenance visits as primary care visits for the purpose of applying any enrollee cost sharing requirements.	Non-compliance is identified by pre-market reviews of issuers’ filings.
§ 62Q.53	Establishes a definition of “medically necessary care.” Prohibits health plans from enforcing more stringent definitions of medical necessity in their utilization management of MH/SUD benefits.	Issuers are required to attest that they comply with Minn. Stat., § 62Q.53, and specifically with providing plan coverage for all medically necessary mental health prescriptions prescribed for enrollees. Issuers also attest that their utilization review guidelines pertaining to the definition of medical necessity are no more restrictive than the definition. Pre-market filing reviews also assess medical necessity language for MH/SUD benefits to ensure medical necessity language is either consistent with § 62Q.53’s definition or no more stringent. MDH’s post-market quality assurance exams’ assessment of HMOs’ utilization management ensures medical necessity definition is incorporated in utilization review policy and is no more stringent than defined under this statute.

Pre-Market Reviews

On an annual basis, Commerce and MDH collect a range of forms and data from issuers prior to a given benefit year to ensure that all individual and small group health insurance offerings meet state and federal regulatory requirements, including mental health parity requirements. As detailed in the Annual Instructions Guide distributed to health insurers before filing for approval to sell products, Minnesota collects forms and health plan data that outline the benefits, limitations, provider networks, rates, and other health plan attributes for all small group and individual health plans issuers intend to offer for an upcoming benefit year.

Staff from both Departments review these submissions; notify issuers of any identified data integrity or compliance deficiencies; and, upon resolution of any identified deficiencies, finalize all plan submissions prior to Open Enrollment. Exhibit 3 outlines the high-level timeline for this process.

Exhibit 3 – Individual and Small Group Regulatory Review Timeline



The following sections outline Commerce and MDH pre-market review processes, with special focus on MH/SUD parity.

Review Preparation and Issuer Data Submission

Commerce and MDH staff meet near the end of each year to update the Annual Instructions Guide for issuers' submissions as well as to confirm each agency's roles and responsibilities for the coming review cycle. A preliminary Annual Instructions Guide, with instructions and deadlines for submitting form, rate and binder filings for all individual and small group health plans to be offered in the coming benefit year, is typically distributed to issuers in January. A final guide is typically distributed in April.

MDH is responsible for conducting benefit reviews of the HMO-submitted templates, as well as reviewing all provider networks to ensure compliance with network adequacy and essential community provider requirements. Commerce is responsible for conducting benefit reviews for all non-HMO plans as well as rate and submitted template review (e.g., confirming issuers provide working hyperlinks to provider directories and confirming the submission of accurate Transparency in Coverage information). In general, issuers submit the following through the

System for Electronic Rates & Forms Filing (SERFF):

- **Form Filings:** These documents provide evidence of coverage or individual policy information, describe the schedule of benefits for each product the health insurer intends to offer, and include other supporting documents.
- **Rate Filings:** These documents outline a health insurer's proposed rate schedule for their plans. They provide the actuarial justification for proposed rates. Commerce's review of rates is not relevant to the State's enforcement of MH/SUD parity compliance.
- **Binder Submission:** Health insurers' binder submissions are a series of completed templates that include benefit coverage, cost sharing, rates, network, drug coverage, service area, and other relevant data for individual and small group health insurance plans. Summary of Benefits and Coverage (SBC), which describes plans' coverage through a standardized template required under the Affordable Care Act (ACA) are included in the binder submissions as well. This data is also used to populate health plan information on Minnesota's health insurance exchange, MNsure.

Review Execution

Commerce and MDH staff reviews of filings are designed to ensure compliance with federal and state MH/SUD parity compliance. The sections that follow outline these components.

Form Filing Reviews

Both Commerce and MDH perform benefit-level reviews of form filings with the intent to identify any clear parity violations (such as differential in copayments between MH/SUD and medical/surgical services on an outpatient level), as well as any QTLs or NQTLs that may be more stringent for MH/SUD services than for their analogous medical benefits. NQTLs may include any treatment limit that is non-quantitative in nature, including prior authorization requirements, medical necessity requirements, exclusions, and other utilization management policies.

Commerce and MDH read through all exclusions and flag any that are MH/SUD-related. In addition, Minnesota requires that issuers' definition of medical necessity applied to mental health and SUD benefits be no more restrictive than the definition established under Minnesota Statutes § 62Q.53.8. Commerce and MDH review any medical necessity language provided within the issuers' forms to ensure the issuer defines medical necessity using the language provided by Minnesota statute or, if using different language, that the issuer's definition is no more stringent than the State's definition.

While not directly related to MH/SUD parity reviews, Commerce and MDH staff also ensure that MH/SUD benefits are covered in a manner that is consistent with the state's essential health benefit benchmark plan.

Binder Reviews

As part of binder submissions, Minnesota requires health insurers to submit an actuary's attestation to their compliance with "substantially all and predominant" MH/SUD parity requirements. The issuers may complete the CMS MHPAEA tool, though Minnesota does not require them to do so.

The CMS tool allows issuers to upload their completed Plan & Benefits Template, which contains information on their plans' benefit coverage, cost sharing, and limitations and classifies benefits into inpatient in-network, inpatient out-of-network, outpatient in-network, outpatient out-of-network, emergency care, and prescription drug categories for the purposes of comparing MH/SUD benefits to analogous medical benefits. The tool detects possible compliance issues with quantitative parity requirements under the MHPAEA regulations at 45 CFR 146.136(c)(2), which generally provide that a plan may not impose a financial requirement or QTL applicable to MH/SUD benefits in any classification that is more restrictive than the predominant financial requirement or QTL of that type applied to substantially all medical/surgical benefits in the same classification.

Network Adequacy Reviews

MDH conducts reviews of network data included for all plans (both HMOs and non-HMOs). Geographic access standards, according to Minn. Stat. § 62K.10, require that the maximum travel distance or time to a mental health provider be the lesser of 30 miles or 30 minutes. This same standard applies to general hospital providers, primary care providers, and pediatric primary care providers, while the geographic access standard for all other provider types is 60 miles or 60 minutes. Health plans marketing networks unable to meet geographic access standards may apply for waivers, which are granted when no providers are present in the given area, the health plan and provider cannot come to contract terms, the provider cannot meet credentialing standards, and/or the network is an Accountable Care Organization (ACO) or narrow network. Waivers are not used as an enforcement mechanism and are applied equally to MH/SUD and medical and surgical providers.

Objection Resolution Process

Across filing and binder submission reviews, Commerce and MDH document any compliance concerns in the Master Medical Forms Checklist. The checklist requires reviewers to confirm compliance with all federal and state requirements to include mental health and SUD benefits. Upon completion of the checklist, Commerce and MDH staff compose a letter outlining any compliance concerns identified. Health insurers can either revise the benefit coverage, cost sharing, and limitations or submit a justification that addresses the compliance concern. These issues are resolved between the Departments and the health insurer on a case-by-case basis.

Review Finalization and Open Enrollment

Pre-market reviews and associated health insurer updates are typically completed by Commerce and MDH staff by mid-August. Following the completion of reviews, plan data is submitted to MNSure. MNSure reviews internal attestations from Commerce and MDH that

document their review and approval for compliance across federal and state requirements, including mental health parity. MNSure staff also carry out some high-level reviews of plan submissions for compliance. If MNSure flags any potential issues, they work with MDH and Commerce to review and address them with issuers. Upon completion of all reviews from Commerce, MDH, and MNSure and the final submission of health plan data, Open Enrollment begins on November 1st during which consumers can enroll in health care coverage for the coming benefit year.

Post-Market

MHPAEA requires issuers to demonstrate compliance with NQTLs “as written and in operation,” and the post-market exams are essential to ensuring compliance “in operation.”³ Minnesota does this through market conduct exams conducted by Commerce and quality assurance exams conducted by MDH. Complaints play a key role in how the agencies identify, and respond to, issues affecting Minnesotans.

MDH conducts post-market enforcement activities for HMO plans. MDH conducts quality assurance exams for all Minnesota licensed HMOs and county-based purchasers every three years. MH/SUD parity enforcement is incorporated across all components of these exams. See Exhibit 4 for the four components of these exams and how MH/SUD parity review is incorporated.

Exhibit 4: Current MH/SUD Parity Review in Quality Exams

Component	Incorporation of MH/SUD Parity
Quality	<ul style="list-style-type: none"> • Ensure that mental health quality is incorporated into their quality oversight programs, including an ongoing quality evaluation of mental health services, along with other medical services, and the health plan’s efforts to monitor and improve behavioral health care.
Complaint System	<ul style="list-style-type: none"> • Identify trends in consumer complaints received by the HMO regarding access to mental health services. • Ensure the HMO has adequate policies and procedures for addressing complaints.
Access and Availability	<ul style="list-style-type: none"> • Review HMO provider networks to ensure that maximum travel distance or time for an enrollee to the nearest primary care, mental health, or general hospital service is less than 30 miles or 30 minutes. • Review policies to ensure that HMO standards are established to provide timely access to health services, including mental health services.

³ Final Rules Under the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008; Technical Amendment to External Review for Multi-State Plan Program. <https://www.govinfo.gov/content/pkg/FR-2013-11-13/pdf/2013-27086.pdf>

<p>Utilization Management</p>	<ul style="list-style-type: none"> • Identify any policies that may indicate an MH/SUD parity issue (e.g., prior authorization policies and procedures that are more stringent for mental health services). • Ensure that utilization determinations concerning mental health care are reviewed by peer providers with mental health expertise. • Pull a sample of enrollee files and review the adjudication of utilization management processes to identify any evidence of unequal enforcement of utilization management.
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Any findings from the review require the HMO to produce a corrective action plan. As part of the corrective action plan, the HMO may provide quarterly status updates to MDH on progress made toward rectifying any identified issues and may involve penalty fees. MDH issues administrative monetary penalties for findings of violations of Minnesota statutes and rules.

Commerce's Enforcement Division is primarily responsible for post-market reviews regarding mental health parity compliance. The Enforcement Division includes the Consumer Services Center (CSC), civil investigators and the Market Conduct Examination Team.

The Commissioner of Commerce has the authority to issue an examination order to examine the market conduct of any insurance company operating in Minnesota. Market conduct examinations are intensive reviews and are governed by a specific section of state law. The content of market conduct examinations are confidential until the examination is completed or resolved. In May 2023, the Commerce Department resolved one market conduct examination through an enforcement action against a health plan related to mental health parity compliance. Most of this investigation took place in 2022.

Additionally, the Market Conduct unit is working with other Commerce and MDH staff to develop existing health plan reporting requirements into useful data sources for market analysis and surveillance. The Market Conduct team is also working with MDH staff to develop useful provider reimbursement benchmarks from the All-Payer Claims Databases similar to CMS provider reimbursement benchmarks. The Market Conduct team utilizes national databases and other data sources to compare findings in Minnesota. The unit also conducts interviews with third parties that can provide relevant information to the investigation. For mental health parity, market conduct examiners have interviewed mental health providers to obtain information relevant to an exam, and to confirm compliance with applicable law.

Complaints and Appeals

As part of ensuring that health plans maintain compliance, Minnesota also tracks complaints from consumers and providers. MDH and Commerce track all complaints and inquiries received. At MDH these complaints are also tracked for patterns.

MDH assigns external appeals to independent review organizations and reviews and investigates complaints. MDH asks general clarifying questions and may request call transcripts or copies of all correspondence sent to a health plan enrollee. Each complaint received is

reviewed and investigated. MDH contacts the appropriate health plan to resolve the enrollee's concerns and ensure applicable state and federal regulations are being followed. Due to the wide range of types of complaints received, investigations also vary depending on the grievance.

Commerce's Enforcement Division includes Consumer Services Center (CSC) representatives that field inquiries as well as complaints and facilitate external appeals. As mentioned previously, representatives of the CSC refer complaints to investigators for follow-up as appropriate within the scope of the Department's regulatory authority. The work done by CSC representatives and investigators aligns closely with the work done by staff at MDH resolving complaints. Commerce's CSC and civil enforcement staff both review and investigate complaints. Complaint patterns can inform subsequent market conduct examinations.

MDH and Commerce review appeals related to MH/SUD services, including QTLs and NQTLs. Minnesota law allows consumers in fully-insured plans to appeal to state agencies, who jointly contract with external reviewers for both clinical and non-clinical cases. Under federal law, participants in self-funded plans only have rights to an external reviewer for cases in which medical judgment is required.

Recent Federal Legislation

The Consolidated Appropriations Act, 2021 (CAA) amended MHPAEA to require certain plans to perform and document an analysis that demonstrates compliance with the NQTL requirements of the MHPAEA. As of February 10, 2021, group health plans and issuers that cover mental health/substance use disorder and medical/surgical benefits must provide this comparative analysis to plan participants and state and federal government agencies, upon request. The Departments are continuing to assess which types of NQTL data should be requested.

Coordination Between Commerce, MDH, and MNsure

Commerce, MDH, and MNsure collaborate to ensure the state reviews health plans for MH/SUD compliance both before and after plans are available to consumers. As described above, MDH does benefit-level filing reviews for HMOs in pre-market reviews as well as network adequacy reviews across all plans, including those regulated by Commerce. HMOs are subject to stringent quality assurance exams by MDH, and all other plans are subject to market conduct exams by Commerce. Commerce does benefit-level form filing reviews for insurance companies and reviews binder submissions from insurance companies and HMOs for MH/SUD parity by requiring an attestation and reviewing formulary templates. MNsure works with Commerce and MDH to confirm that plans available on the exchange do not have any apparent parity violations.

The Departments also work together to communicate about potential issues/enforcement. Any issues raised in form reviews are communicated across Departments. Commerce and MDH share and discuss the types of complaints received on an ad hoc basis. If Commerce or MDH notices a pattern among complaints received, the agencies will coordinate to see if they have

encountered similar issues and to determine if a joint enforcement communication or action is required. The results of a Commerce market conduct exam are not public until the exam is complete. Likewise, quality assurance exam results are not public until the report is finalized. MDH publishes quality assurance reports on the [MDH website](#), and shares issues with Commerce if pertinent to Commerce lines of business.

Information Provided to the Public

The Minnesota Department of Health provides resources to the public relating to mental health parity using several formats. The MDH website displays information on separate pages which can be found here:

- [Mental Health and Substance Use Disorder Parity: Know Your Benefits](https://www.health.state.mn.us/facilities/insurance/managedcare/parity.html)
<https://www.health.state.mn.us/facilities/insurance/managedcare/parity.html>
- [Opioids Prescribing Practices Parity Legislation - Minnesota Department of Health](https://www.health.state.mn.us/communities/opioids/prevention/parity.html)
<https://www.health.state.mn.us/communities/opioids/prevention/parity.html>

MDH has promoted its online information relating to parity using its social media platforms in the past and will continue to do so in the future.

Lastly, Commerce has information on its website relating to parity and insurance coverage. That information can be found here:

- [Mental Health & Substance Use Disorder Treatment](https://mn.gov/commerce/insurance/health/mental-health-substance-use)
<https://mn.gov/commerce/insurance/health/mental-health-substance-use>