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The Honorable Katie Dzurec
Chair
The Honorable Jane Beyer
Vice Chair
MHPAEA (B) Working Group of the
Regulatory Framework (B) Task Force
National Association of Insurance Commissioners
444 North Capitol Street NW, Suite 700
Washington, DC 20001

Dear Chair Dzurec and Vice Chair Beyer:

On behalf of the American Medical Association (AMA) and our physician and medical student members, I am writing in strong support of the work being done to provide meaningful tools and resources to state departments of insurance (DOIs) for enforcing the Mental Health Parity and Addiction Equity Act (MHPAEA). The National Association of Insurance Commissioners (NAIC) MHPAEA Working Group (Working Group) has undertaken important work that the AMA believes is necessary to end more than a decade of MHPAEA non-compliance.

The tools and resources being developed by the Working Group will be important to help ensure patients receive the mental health and substance use disorder (SUD) benefits that they are due. These tools will help increase access to care and have a direct, positive impact to help reverse the nation's drug overdose and death epidemic, suicide and other harms that may result from not receiving timely, evidence-based care for a mental illness or SUD.

The AMA was particularly pleased to see the Working Group's detailed analytical approach to ensuring DOIs are provided sufficient—and accurate—information from health insurance companies. This information is essential to help with identification of all covered services, both medical/surgical and mental health/SUD. As the Working Group has discussed, this information “is critical” for comprehensive analysis of quantitative treatment limitations and non-quantitative treatment limitations. We believe this approach is not only reasonable, but it will help DOIs to better evaluate, monitor and enforce parity requirements under state and federal parity laws.

We look forward to providing additional feedback and support for the Working Group's efforts to help DOIs develop best practices, improve coordination with other stakeholders and ensure meaningful compliance and enforcement with the MHPAEA. Please contact Daniel Blaney-Koen, JD, Senior Legislative Attorney, at daniel.blaney-koen@ama-assn.org or Emily Carroll, JD, Senior Legislative Attorney, at emily.carroll@ama-assn.org in the AMA's Advocacy Resource Center with any questions.

Sincerely,

James L. Madara, MD

cc: Jolie Matthews, NAIC Senior Health and Life Policy Counsel