Access to Behavioral Health Services Grant

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What health plans does OIC regulate?

- OIC regulates commercial health plans issued by health insurance carriers
  - Disability insurers, e.g. Cigna, Aetna
  - Health Care Service Contractors, e.g. Premera, Regence
  - Health Maintenance Organizations, e.g. Kaiser Permanente, Molina
- Individual, small group, large group and association health plan markets
- OIC cannot regulate self-funded group health plans, i.e. employer sponsored coverage in which the employer bears financial risk for their health benefit plan
Washington Covered Lives

<table>
<thead>
<tr>
<th>Coverage Type</th>
<th>2015</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employer coverage</td>
<td>51%</td>
<td>3,620,000</td>
</tr>
<tr>
<td>Medicare</td>
<td>15%</td>
<td>1,030,000</td>
</tr>
<tr>
<td>Traditional Medicaid</td>
<td>15%</td>
<td>1,085,000</td>
</tr>
<tr>
<td>ACA Medicaid</td>
<td>8%</td>
<td>600,000</td>
</tr>
<tr>
<td>Individual market</td>
<td>4%</td>
<td>335,000</td>
</tr>
<tr>
<td>Uninsured</td>
<td>6%</td>
<td>430,000</td>
</tr>
</tbody>
</table>

7,100,000

Of the 3.6m people with employer coverage:
• 1.03m commercial health insurance
• 460,000: FEHB or TriCare
• 2m: self-funded group health plans
Access to Behavioral Health Services Grant

• Federal grant from the Centers for Medicare and Medicaid Services (CMS/CCIIO) to examine access to behavioral health services in commercial fully-insured individual, small group and large group health plans

• Period of grant: August 2018 to July 2020
Access to Behavioral Health Services Grant

Goals of the grant:

• Uncover any gaps in access to behavioral health services
• Review carriers’ implementation of and compliance with state and federal behavioral health statutes and rules, including parity laws
• Examine coverage of and access to pain treatment modalities that are alternatives to using opioid medications
• Develop recommendations and define actions needed to address identified issues.
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Our legal framework:

• State mandated benefits for mental health and Substance Use Disorder (SUD) treatment services

• OIC provider network access rules

• Federal Affordable Care Act and Essential Health Benefits requirements
  - Our state regulations specify the scope of mental health and SUD services that must be offered in these plans.

• Federal Mental Health Parity and Addiction Equity Act
Behavioral Health Services Access Grant

• Through grant activities, determine whether mandated, comprehensive and affordable behavioral health services are covered and accessed by examining:
  o health benefit plan design
  o health carriers’ policies and procedures
  o claims data related to access to mental health and substance use disorder treatment services
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Phase 1:

• 2 market scans to identify any access barriers to mental health and substance use disorder treatment services, as well as modalities for treatment of pain.
  
  o The first market scan will be broad;
  
  o The second will dive deeper into any issues detected through the first scan.

• Contract with consultant to review carriers’ medical necessity and prior authorization criteria and procedures related to selected behavioral health services.
Phase 2:

• Conduct detailed claims analysis, informed by the results of the market scans and the consultant’s findings

• Issue a final report detailing the issues detected, actions OIC can take to respond and any additional policy recommendations
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Advisory Committee:

• Members will be asked to share their expertise and provide input into key grant activities, through:
  • Providing input into issues to focus on through market scans and consultant’s review of carrier policies and procedures
  • Reacting to aggregated results of market scans and claims analysis
  • Offering input on how to best address any challenges to behavioral health services access or parity compliance issues that are identified
Next steps

• For next Advisory Committee meeting on December 11\textsuperscript{th}, 2018:
  • Share OIC review of Independent Review Organization decisions related to behavioral health services
  • Share OIC research on other states’ commercial insurance behavioral health compliance activities
  • Seek input from committee on issues to focus on for initial market scan
• Presentation to the American Indian Health Commission on December 13\textsuperscript{th}, 2018
Next steps in communication

• Advisory Committee e-mail box: BHP_GrantAdvisoryCmte@oic.wa.gov

• Developing a website for the grant at www.insurance.wa.gov
  • Share research and materials
  • Provide an opportunity for public input