



Access to Behavioral Health Services Grant

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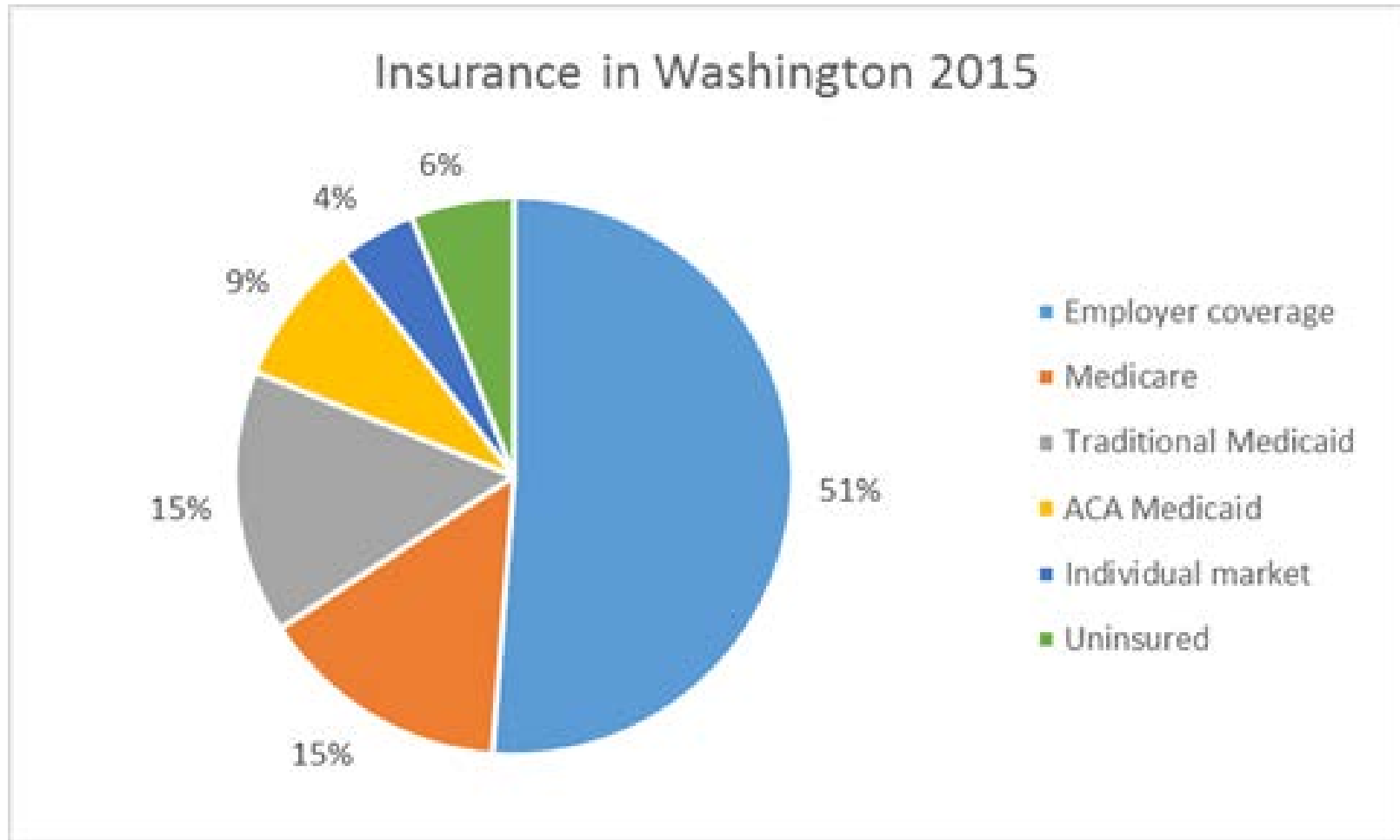


OFFICE of the
**INSURANCE
COMMISSIONER**
WASHINGTON STATE

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



Washington Covered Lives

		2015	
Employer coverage		51%	3,620,000
Medicare		15%	1,030,000
Traditional Medicaid		15%	1,085,000
ACA Medicaid		8%	600,000
Individual market		4%	335,000
Uninsured		6%	430,000
			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.



Access to Behavioral Health Services Grant

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:
 - health benefit plan design
 - health carriers' policies and procedures
 - 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.
 - The first market scan will be broad;
 - 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.

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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 11th, 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 13th, 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