

State Snapshot on Parity Implementation

CONNECTICUT

September 2015

OVERVIEW

For the Parity Implementation Coalition's (PIC) September 2015 edition on promising practices in state implementation of The Mental Health Parity and Addiction Equity Act (MHPAEA) and the parity provisions of the Affordable Care Act (ACA), we chose Connecticut. We interviewed Vicki Veltri from the Connecticut Office of the Healthcare Advocate and Luis Perez from Mental Health Connecticut.



Parity Implementation Coalition

Coalition members include: American Academy of Child and Adolescent Psychiatry, American Psychiatric Association, American Society of Addiction Medicine, Cumberland Heights, Depression and Bipolar Support Alliance, Faces and Voices of Recovery, Hazelden Betty Ford Foundation, MedPro Billing, Mental Health America, National Alliance on Mental Illness, National Association of Addiction Treatment Providers, National Association of Psychiatric Health Systems, Teen Screen, The Watershed Addiction Treatment Programs, Inc.

PROMISING PRACTICES

- **Has your Insurance Department issued a bulletin and/or compliance survey on parity? To view Connecticut's compliance survey, see [here](#)**
- **Create a consumer report card. To view Connecticut's, see [here](#)**

Need Help Understanding your new rights under the Federal Parity Law?
Click [HERE](#)

Click [HERE](#) for how to complain if you think your health plan has violated MHPAEA

OVERVIEW

The Parity Implementation Coalition (PIC) provides bimonthly state profiles of promising practices in state implementation of The Mental Health Parity and Addiction Equity Act (MHPAEA) and the parity provisions of the Affordable Care Act (ACA).

For our September 2015 edition, we interviewed Vicki Veltri, Healthcare Advocate, the Connecticut Office of the Healthcare Advocate and Luis Perez, President and Chief Executive Officer at Mental Health Connecticut.

First Interview: Vicki Veltri

1) Would you say Connecticut is actively implementing the Mental Health Parity and Addiction Equity Act?

Ms. Veltri: Yes, we have been working hard to actively implement parity and the parity provisions in the ACA. The Insurance Department is moving along in the right direction - they came up with a compliance survey, a result of the Gun Violence Prevention and Children's Safety Act (for a link to the bill see [here](#)). They have not posted the results of that survey, but the survey is a good start. A new Insurance Commissioner started a few months ago and has expressed her willingness to advance the discussion further on consumer issues, so we hope that under her leadership the state's parity compliance efforts will be improved.

2) Has Connecticut issued guidance for implementing the federal parity law?

Ms. Veltri: Connecticut has not issued any formal guidelines for compliance with the federal parity law. The compliance survey is a step in the right direction, but we need more explicit guidance. The Office of the Healthcare Advocate asked for legislation that would require plans operating in Connecticut to comply with federal parity regulations, but that effort never came to fruition, primarily because the bill was tied to the gun control law. No explicit requirement for compliance with the federal parity law passed, but the plans must comply. Some may consider the compliance survey formal guidance since it clearly directs the insurers to review their plans for compliance with the final MHPAEA regulations and to demonstrate how they are complying. Without easy access to the survey results, it is hard for consumer advocates to review compliance.

3) Has the state legislature considered legislation updating state laws to comply with federal parity laws?

Ms. Veltri: There have been no laws passed that are specific to "MHPAEA," but [P.A. 15-144](#), as amended by Special Session [P.A. 15-5](#) starts to address equalizing mental health and addiction public and private coverage. Although it does not mention MHPAEA specifically, the Governor's bill expanded autism services up to 21 years of age to mirror Medicaid. And a provision of Special Session, PA 15-5 establishes a broad based work group that includes consumer advocates, providers, the Insurance Commissioner, the Comptroller and insurers, among others to address data requirements on utilization and quality to be used to ensure the protections of "parity," which we read as "MHPAEA."

To view the full Senate bill amended in our state's implementer bill see sections 43-46, [here](#). For individual insurance statutes which are separate from the group statute, see [here](#).

4) What have been the biggest challenges Connecticut has faced as parity and parity provisions in the ACA have been implemented?

Ms. Veltri: Four things: 1) The lack of consumer knowledge that the law exists. 2) The lack of consumer and provider knowledge of regulations and what they mean (there needs to be simplification of the law). 3) More stringent application of medical necessity criteria. 4) Lack of disclosure.

5) What resources have been most useful to you as these laws have been implemented in your state?

Ms. Veltri: The Parity Implementation Coalition, the National Alliance on Mental Illness (NAMI), Mental Health Connecticut, and collaboration with others states (especially New York) has been tremendously helpful.

6) What resources would be useful to you to improve implementation of the laws in your state?

Ms. Veltri: Better guidance from the federal government, as well as more and better publicly accessible data from providers and plans.

7) Have you noticed improvement in access to behavioral health care as a result of these changes?

Ms. Veltri: Access to clinical peers and turnaround times have improved through our passage of PA 13-3, and there have been fewer complaints from those who are fully insured. The report card has been a helpful tool in that regard.

8) Would you be willing to answer questions from others doing state parity implementation and enforcement work?

Ms. Veltri: Yes, definitely. (E-mail is: Victoria.Veltri@ct.gov)

Second Interview: Luis Perez

1) Would you describe Connecticut as actively implementing parity and the parity provisions in the Affordable Care Act (ACA)?

Mr. Perez: If I were to compare Connecticut to other states, I would say yes, we are actively implementing parity, but I believe we have a ways to go. Connecticut was ahead of the game by passing a state parity law prior to the federal law being passed, and we are awaiting the results of a survey from the Insurance Department on how the federal law is being implemented.

2) What are some examples you have seen of how parity is being actively implemented?

Mr. Perez: We have seen a decrease in complaints from consumers and an increase in access to services. However, because the law is not being monitored nor reported upon, we cannot see the reasons behind those changes. It would be helpful to have that data so we could see continued improvement in access to care.

3) What have been your biggest challenges in parity implementation?

Mr. Perez: There is not enough data and guidance on implementation and enforcement, a lack of transparency from the Connecticut Insurance Department (CID), lack of collaboration between CID and consumer and provider groups.

4) What resources have been most helpful in implementing and enforcing the parity law?

Mr. Perez: The Office of the Healthcare Advocate (OHA) and the Department of Mental Health and Addiction Services have been excellent resources and extremely helpful in actively implementing parity.

5) Would you be willing to be a resource to other state advocates?

Mr. Perez: I would be happy to take calls. (E-mail is: LPerez@mhconn.org)

6) Would you be willing to participate in a webinar with other states to share your promising practices?

Mr. Perez: Yes.