



Access to Behavioral Health Services Grant

American Indian Health Commission

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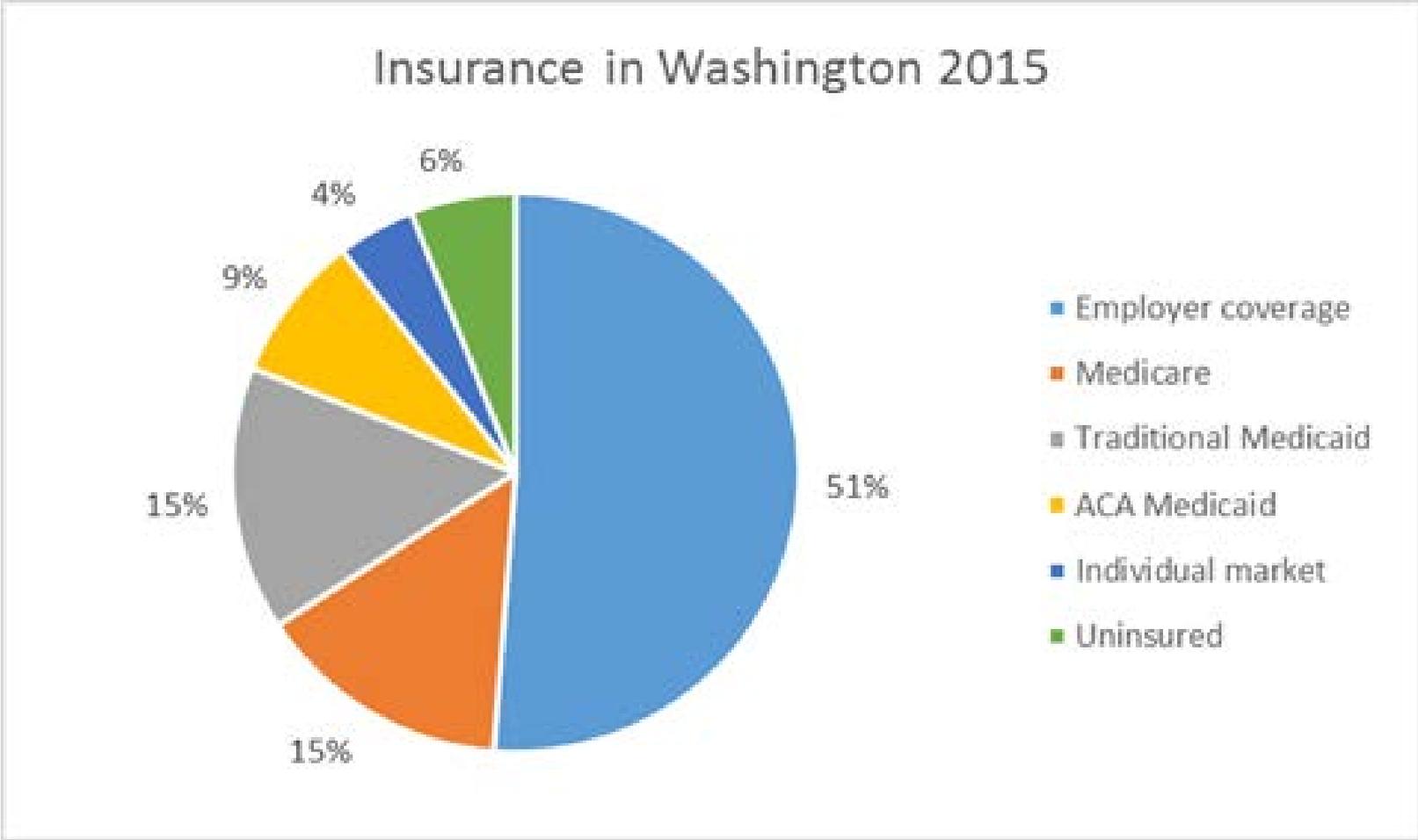


OFFICE of the
**INSURANCE
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WASHINGTON STATE

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.



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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:
 - 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



Access to Behavioral Health Services Grant

OIC will seek input and consultation throughout the grant from:

- Grant Advisory Committee: Composed of representatives of consumers, medical and behavioral health providers and insurers.
- The American Indian Health Commission, through periodic OIC updates as requested by OIC and the Commission.



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- The Advisory Committee and the American Indian Health Commission 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



Access to Behavioral Health Services Grant

- Today, we are seeking input from the Commission on the issues we should target for our initial market scan.
- Where have challenges been greatest?
 - Coverage of certain behavioral health services?
 - Access to care due to prior authorization requirements?
 - Sufficient supply of behavioral health providers, including tribal providers?
 - Coverage of alternatives to opioids for treatment of chronic pain?
 - Other?

Next steps

- Our goal is to send the first market scan to carriers by February 2019.
- After compiling the responses, review with the Commission.

Next steps in communication

- Website for the grant at:
- <https://www.insurance.wa.gov/behavioral-health-services-federal-grant>
 - Share research and materials
 - Provide an opportunity for public input