

# Access to Behavioral Health Services in Washington State's Commercial Health Insurance Market

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## CMS/CCIIO State Flexibility to Stabilize the Market Grant

The Office of Insurance Commissioner (OIC) has been awarded a \$284,000 grant from the Centers for Medicare and Medicaid Services (CMS)/Center for Consumer Information and Insurance Oversight (CCIIO) through its State Flexibility to Stabilize the Market grant program. The goal of this project is to confirm that health insurers offer comprehensive and affordable health benefit designs by examining access to mental health and substance use disorder treatment in the fully-insured individual, small group and large group health insurance markets.

The grant also provides an opportunity to review insurers' implementation of state and federal behavioral health parity statutes and rules. As part of reviewing access to substance use disorder treatment, the OIC will examine access to pain treatment modalities that are alternatives to using opioid medications, given the association between the use of these medications and increased risk of substance use disorder.

The project will provide the OIC with information needed to determine whether there are gaps in access to behavioral health services coverage, and if there are, their causes and actions needed to address them. The project period is August 2018 to July 2020.

The project will assess whether comprehensive and affordable behavioral health services are offered through examination of health benefit plan design, health insurers' policies and procedures, and claims data related to access to mental health and substance use disorder treatment services.

- The first phase of the project will focus on creating and issuing two successive market scans that will be used to identify any barriers, including 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. The OIC also will contract with a consultant to review insurers' medical necessity and prior authorization criteria and procedures related to selected behavioral health services.
- The second phase of the project, occurring in the second year, will involve detailed claims analysis, informed by the results of the market scans and the consultant's findings.

The outcome of the first and second phases will be compiled into a report detailing any issues detected and recommended solutions.

The OIC's work under the grant will be informed by an Access to Behavioral Health Services Grant Advisory Committee, composed of representatives of consumers, insurers, and medical and behavioral health providers. Advisory committee members will be asked to share their expertise and provide input into design and implementation of the grant activities described above.

The OIC will share aggregated results of the market scans, the consultant's review, and the claims analysis with the advisory committee. Advisory committee members will be asked to offer input as to how the OIC can best address any challenges to behavioral health services access or behavioral health parity compliance identified through these activities.