



TO: Our Valued Clients and Brokers
FROM: Health Plans, Inc.
DATE: July 7, 2021
RE: Enhancements to MHPAEA; Continued Monitoring and Client Assistance

Health Plans, Inc. (HPI) is issuing this Compliance *eBlast* to notify you of our continued monitoring of the new enhancements to the Mental Health Parity and Addiction Equity Act (MHPAEA) and the assistance that HPI can offer our clients. As mentioned in the Compliance *Alert* issued March 9, 2021 (click [here](#)), the federal Consolidated Appropriations Act 2021 (“the Act”) addresses new enhancements to the MHPAEA for group health plans that offer both medical and surgical benefits and mental health or substance use disorder (MH/SUD) benefits that impose non-quantitative treatment limitations (NQTLs) on MH/SUD benefits. The Act requires plans and issuers to perform and document comparative analyses of the design and application of NQTLs, upon request, to the secretaries of the Department of Health and Human Services (HHS), the Department of Labor (DOL), and the Department of the Treasury (Treasury).

HPI will provide assistance to our clients to help them comply with the new enhancements to MHPAEA by providing data and reporting for clients to use when they complete the Self-Compliance Tool for their plans (click [here](#) for the Tool). We are in the process of evaluating the requirements and working on the needed data, reporting and explanations, and we will advise further when the information is available. HPI will provide this assistance to those clients for whom we perform medical management services. If the client outsources its medical management to another vendor, the client will need to engage with that vendor for the NQTL analysis.

Furthermore, while the Act does not focus on plans’ quantitative treatment limitations (QTLs) (copays, deductibles, coinsurance, benefit maximums), the application of QTLs is included in the Self- Compliance Tool. HPI will assist our clients who wish to have the actuarial calculations completed in support of the application of the plan’s QTLs. HPI is in the process of engaging outside actuarial resources to perform the calculations upon a client’s request, and we will advise further when these services become available.

HPI is also assessing the costs we may incur in supporting our clients as noted above, and we will provide more information about any additional fees/expenses we will need to charge clients as soon as we have completed our review. If you have any questions, please reach out to your HPI Account Services Team.

Please do not reply to this email. Please contact the HPI Account Service Team directly if you have questions.

Regards,

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Director, Regulatory Affairs

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The information contained in this message is based on our current understanding of recent regulatory developments which may affect group benefit plans. It should not be construed as specific legal advice or legal opinion. The contents are for general informational purposes only and are not a substitute for the advice of legal counsel.