



Mental Health Parity Compliance Plan

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Presentation Outline

1. Medicaid Parity Rule

2. Parity Analysis Approach

3. Parity Analysis Findings and Actions

4. Questions & Open Discussion



Medicaid Parity Rule

Background and Purpose

- Parity Rule was issued on March 29, 2016
- Applies certain requirements of the Mental Health Parity and Addiction Equity Act of 2008 (MHPAEA) to the Medicaid program

Scope of Application

- All individuals enrolled in a Medi-Cal managed care plan (MCP)
- Once the beneficiary is enrolled in an MCP, his/her entire benefit package is subject to parity including MH, SUD and/or FFS

Compliance Date

- October 2, 2017



Medicaid Parity Rule Overview

Parity Requirements

Aggregate lifetime and annual dollar limits

Financial requirements (FRs)

Quantitative treatment limitations (QTLs)

Non-quantitative treatment limitations (NQTLs)

Information requirements

Four Benefit Classifications

Inpatient

Outpatient

Prescription Drugs

Emergency Care



Parity Analysis Approach

CMS Guidance

- Parity Toolkit

Policy Evaluation

- Medicaid State Plan
- Waiver programs
- State and Federal statutes and regulations
- DHCS contracts
- All Plan Letters (APLs)
- County Information Notices
- Medi-Cal Provider Manual
- Drug Medi-Cal (DMC) Billing Manual
- Specialty Mental Health Services Billing Manual



Parity Analysis Approach Continued

Information Collection

- MCP survey, webinar, and technical assistance
- MHP and SUD counties survey, webinar, and technical assistance

Multidisciplinary Workgroup

- Executive
- Program
- Clinical
- Legal



Parity Analysis Findings & Actions



Financial Requirements

Parity Finding	Compliance Action	Delivery System
1. Uniform Method of Determining Ability to Pay (UMDAP)	1. Amend State statutes	MHP



QTLs

Parity Finding	Compliance Action	Delivery System
1. Alcohol Misuse Screening and Counseling (AMSC) quantitative limits on screenings and brief interventions	1. Issue guidance via APL	Medi-Cal Managed Care Plan (MCP)
	2. Update the Medi-Cal Provider Manual	Statewide



NQTLs

Parity Finding	Compliance Action	Delivery System
1. AMSC provider training requirement	<ul style="list-style-type: none"> • Issue guidance via APL • Update Medi-Cal Provider Manual 	<p>MCP</p> <p>Statewide</p>
2. Authorization processes and timeframes for specialty mental health services	<ul style="list-style-type: none"> • Issue guidance via Information Notice 	<p>Mental Health Plan (MHP)</p>
3. Prior authorization processes for non-specialty mental health services	<ul style="list-style-type: none"> • Issue guidance via APL 	<p>MCP</p>
4. Statewide Credentialing Policy	<ul style="list-style-type: none"> • Issue guidance via Information Notice 	<p>MHP and SUD</p>



NQTLs

Parity Finding	Compliance Action	Delivery System
5. Statewide Continuity of Care Policy	<ul style="list-style-type: none"> Issue guidance via Information Notice 	MHP and SUD
6. Statewide Network Adequacy Standards	<ul style="list-style-type: none"> Implement standards in statutes 	Statewide
7. Standardize Notice of Action Forms and disclosure requirements	<ul style="list-style-type: none"> Issue guidance via Information Notice 	MHP and SUD
8. Transportation policy for Non-MCP covered services	<ul style="list-style-type: none"> Issue guidance via APL Issue policy via MCP's Member Handbook 	MCP



Contract Amendments

Contracts	Provisions	Submission
MCP	<ul style="list-style-type: none">• General parity requirements• Network Adequacy Standards	Pending CMS approval 10/2/2017 7/2018
MHP	<ul style="list-style-type: none">• General parity requirements• Network Adequacy Standards	7/2018
SUD	<ul style="list-style-type: none">• General parity requirements• Network Adequacy Standards	7/2018



References

Compliance Summary

- http://www.dhcs.ca.gov/formsandpubs/Documents/ParityComplianceSummary_clean_rev%209.28.2017.pdf

Compliance Plan

- http://www.dhcs.ca.gov/formsandpubs/Documents/Parity_Compliance_Plan_9.29.2017.pdf

Final Rule Webpage

- <http://www.dhcs.ca.gov/formsandpubs/Pages/FinalRule.aspx>

Acronyms

- **AMSC:** Alcohol Misuse Screening and Counseling
- **APL:** All Plan Letter
- **DMC:** Drug Medi-Cal
- **DMC-ODS:** Drug Medi-Cal Organized Delivery System
- **MCP:** Medi-Cal Managed Care Plan
- **MHP:** Mental Health Plan
- **SUD:** Substance Use Disorders
- **SMHS:** Specialty Mental Health Services



Questions & Open Discussion