



AUTISM ALLIANCE OF MICHIGAN PRESENTS

# MiNavigator

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Presented by Autism Alliance of Michigan

[www.AAOMI.org](http://www.AAOMI.org)

Help. *Hope.* Answers. Today.

## PARITY 101

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### What is Parity?

Very basically, “parity” is derived from “on par”, meaning equal, or on the same level.

In the autism community, the issue of parity has surfaced more frequently since autism insurance laws have been implemented across the country. Autism is a mental health condition, which is why it is subject to parity provisions. Many families and service providers are asking if autism is being treated the same as/on par/equally to other medical and physical health benefit coverages.

The Mental Health Parity Addiction Equity Act (MHPAEA) was first enacted in Congress in 1996, with extension to substance abuse in 2008. President Obama, in conjunction with implementation of the Affordable Care Act, instituted a number of policy and funding initiatives to better address parity protections, including creation of the Parity Task Force in 2016. For a comprehensive, historical review of parity and work of the task force, see: <http://bit.ly/2iisvbu>

cont.





## Why is It Important?

Parity of benefits and treatment is an important compliance issue. However, many clinical and community mental health providers, payers (i.e., insurers, Medicaid) and regulatory bodies [(Department of Insurance, Department of Labor, and Center for Medicaid & Medicare Services (CMS))] have not fully understood how parity violations affect service provision and payment. Since 2014, several initiatives have been implemented to improve parity enforcement. Michigan Department of Finance and Insurance (DIFS) received a \$1.3M grant to train and educate their representatives regarding parity violations.

## Who is Affected?

Every family receiving autism services paid for by a private insurance company, a self-funded plan, or Medicaid is potentially affected by parity violations, which is why a clear understanding of the “parity test” is the responsibility of every clinician providing services to this population. Parity applies to the condition, not the service. In other words, a health plan cannot limit behavioral health therapy services if the same limitations are not enforced for at least 2/3 of other medical and surgical benefits when the primary treating condition is autism, a mental health condition.

## How is it Implemented?

The “parity test” is actually a simple comparison of benefit coverage for physical and mental health services. If a health plan includes coverage for ANY mental health condition, the services provided for those conditions MUST be “on par” with or equal to at least 2/3 of all physical/medical health services. What does “on par” mean? There are 2 categories of equitable treatment in this scenario;

- Quantitative Treatment Limits: Relates to quantity, such as; copays, deductibles, out-of-pocket limitations, visit limits, dollar caps, etc.
- Non-Quantitative Treatment Limits: Relates to qualitative criteria or impositions which are more restrictive than what is expected from medical/physical benefits, such as; authorizations, management strategies, fail first policies, and excessive documentation/treatment requests.

## How is it Enforced?

Various state and federal offices enforce parity compliancy.

- For state mandated insurance plans, DIFS is responsible for responding to parity violations [<http://bit.ly/1J40SI3>]
- For fully funded/ERISA/self-funded plans, regulated by federal law, the Department of Labor is responsible [<http://bit.ly/2cKCzsn>]
- Under Medicaid, CMS is the regulatory body overseeing parity violations.
- [<http://go.cms.gov/22XKGmW>]

cont.





## Who to Contact if You Suspect a Parity Violation?

AAoM can help by walking you through the steps needed to file a grievance. First and foremost, a provider (working with a family receiving services), must request, **IN WRITING**, a denial of services for the parity violation.

### State Mandates

In 2012 Michigan passed the first health care legislation in over 13 years when it passed the Autism Insurance Legislation, mandating coverage of autism therapies. Given the large number of self-funded companies in Michigan, access for this segment of the population remains limited. However, a national study of Health Affairs recently published results from three national insurers indicating a 3.4% increase in monthly use of services and a \$77 increase in monthly spending on ASD-specific services, suggesting that state mandates are an effective tool for broadening access to autism treatment under commercial insurance. Currently 46 states have enacted insurance mandates that require commercial insurers to cover autism.

### Save the dates! Open Enrollment for 2018

Note this year Open Enrollment period, when people can enroll in a health insurance plan, runs from November 1- December 15, 2017. Enrollment outside of that date range is only available to those who have 'Life Event', such as getting married, having a baby, or losing health insurance associated with a job. People can apply for Medicaid or Children's Health Insurance Program (CHIP) at any time of the year. Given the federal and state delays in releasing details of the 2018 plans to be sold, and the shortened time period of open enrollment, those looking to purchase from the exchange must do so efficiently. Individual plans can be purchased through [healthcare.gov](https://healthcare.gov) or an insurance broker. Be patient with insurance brokers, they will be working through the night during open enrollment. Communicate by email when possible and have all documentation ready to go.





# NOVEMBER AT A GLANCE

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			<b>1</b> - Mental Health First Aid Course (Grayling) - Respite Education and Support Tools Training (Houghton)	<b>2</b> - Too Anxious to Learn: Addressing Anxiety both at School and at Home (Birmingham) - Estate Planning for your Future (Westland)	<b>3</b> - The Fowler Center WEEKEND RESPITE CAMPS (Mayville)	<b>4</b> - Stuffed Animal Program at Circle Rocking "S" Children's Farm (Free Soil) - FALCONERS - Getting Ready for Winter (Lansing)
<b>5</b> - Super Spark: All Access (Detroit) - Family Fun Morning (Bloomfield Township)	<b>6</b> - ADI-R Introductory Clinical Workshop (Ann Arbor)	<b>7</b> - Rethinking Guardianship - Facilitating Life-Long Self Determination (Kalamazoo)	<b>8</b> - ADOS-2 Booster (Ann Arbor) - Planning for High School and Beyond (Hillsdale)	<b>9</b> - Common Ground Legal Aid Clinic (Pontiac)	<b>10</b> - <a href="#">Pine Rest Autism Symposium (Grand Rapids)</a> - <a href="#">Daniel Vogt RAINB Brown Bag (East Lansing)</a>	<b>11</b> - The ABCs of ABA (Southfield) - The Fowler Center WEEKEND RESPITE CAMPS (Mayville)
<b>12</b> - A Sensory Friendly Sunday at the University of Michigan Museum Of Natural History by My Turn (Ann Arbor)	<b>13</b> - Parenting Awareness Michigan Conference (East Lansing)	<b>14</b> - Creating Confident Caregivers (Houghton) - <a href="#">2017 Annual Waiver Conference (East Lansing)</a>	<b>15</b> - Language Acquisition through Motor Planning (LAMP) Extended Course (Ann Arbor)	<b>16</b> - Novi Hoedown (Novi) - Transition Planning (Westland)	<b>17</b> - Spartans Stores YMCA Family Hope Program (Wyoming)	<b>18</b> - Camp Zip Winter Cooking (Ann Arbor)
<b>19</b> - Camp Fish Tales - Respite Weekend (Pinconning)	<b>20</b> - Spanish-Language Workshop Series (Detroit)	<b>21</b>	<b>22</b> - Be Heard Communication Launch (Southfield)	<b>23</b>	<b>24</b> HAPPY THANKSGIVING!	<b>25</b>
<b>26</b> - Rejoicing Spirits - no-shush worship service (Birmingham)	<b>27</b> - MiWorks Outreach (Ypsilanti)	<b>28</b>	<b>29</b> <a href="#">Dr. Reimers Brownbag: Prospects, Promises and Perils of Human Mind-Reading (East Lansing)</a>	<b>30</b> - Rethinking Guardianship (Menominee, Iron River, Kingsford, Manistique,	<b>31</b>	

## Save the Date!

2018 Navigating Autism Today

FREE Parent Conference

March 9th, 2018 Wayne County Community College - Belleville Campus

Parents, please join us March 8th for a special evening of networking with other parents and expert presenters.

[www.AAoMconference.org](http://www.AAoMconference.org)

