



March 3rd, 2022

Evans G. Daniels, Director
Arizona Department of Insurance and Financial Institutions
100 North 15th Avenue, Suite 261
Phoenix, AZ 85007

Dear Director Daniels,

The Arizona Peer and Family Coalition (APFC) was established in 2009 with a mission of advocating for, connecting, promoting, and developing leadership by peers and family members throughout our state. Today, the APFC has 180 members located throughout the state and represents the perspectives of individuals and family members who have first-hand lived experience navigating the integrated private and public health systems for themselves or on behalf of a loved one with mental illness.

On behalf of the Board of Directors for the Arizona Peer and Family Coalition, we want to echo the comments submitted by Mental Health America of Arizona (MHA Arizona) and the Arizona Council of Human Service Providers (the Council), which were submitted on March 2, 2022. We would like to thank you for considering these comments regarding the proposed rule operationalizing Laws 2020, Chapter 4 (SB 1523), also known as "Jake's Law."

As mental health peers (aka patients) and their family members, we are disappointed with the industry's attempts to undermine the intent of Jake's Law. This law has always been to enforce federal law and ensure transparency and accountability, especially where the most profound and consequential barriers to mental health and addiction coverage occur – medical necessity criteria and other non-quantitative treatment limitations (NQTLs).

We need you to ensure you are requiring strict reporting guidelines for NQTLs. There must be transparency. Without strong oversight by regulators as your office, the promise of parity cannot be achieved, and we will continue to see vulnerable people that require mental health services denied care. As more of our loved ones are denied care, the more likely they may be to resort to suicide. This is unacceptable.

Please do what you can for all of Arizona by requiring strict guidelines and transparency.

Sincerely,

A handwritten signature in black ink that reads "Kathy Bashor". The signature is written in a cursive, flowing style.

Kathy Bashor, Board President, APFC

APFC Board of Directors
Laurie Verdier, Northern APFC Chair
Kristina Sabetta and Eddie Sissons, APFC Advocacy Committee Co-Chairs

Please feel free to contact us at azpeerandfamily@gmail.com or 602-935-6079.