



November 30, 2021

VIA ELECTRONIC MAIL to public_comments@difi.az.gov

Dr. Leanette Henagan, DBH, LCSW
Behavioral Health Administrator
AZ Department of Insurance and Financial Institutions

RE: MHPAEA II Draft Rules to Implement Jake's Law

Dear Dr. Henagan:

Blue Cross Blue Shield of Arizona (BCBSAZ) strongly supports the federal Mental Health Parity and Addiction Equity Act (MHPAEA) and Jake's Law. We believe in a holistic view of health care for our members that provides benefits for both medical and behavioral health care. We are committed to providing parity in mental health and substance use disorder benefits.

BCBSAZ has reviewed the November 30, 2021 letter submitted by Kutak Rock commenting on the second version of proposed mental health parity rules to implement SB 1523 (Jake's Law). BCBSAZ contributed to the Kutak comment letter and joins in the submitted comments and recommendations.

BCBSAZ appreciates the efforts the Department of Insurance and Financial Institutions (DIFI) has made to align state rules with federal requirements. BCBSAZ remains committed to working with DIFI and other stakeholders to finalize rules that are consistent with MHPAEA, are not unduly burdensome, help Arizonans receive all benefits of their health care coverage, and give DIFI and interested parties the information and tools needed to ensure parity for behavioral health and substance use disorder benefits.

Sincerely,

DocuSigned by:

FDE52F488BD24CF...

Vista Thompson
Director, Legal Services
vista.thompson@azblue.com
(602) 864-5207

VT/kt