



March 12, 2021

**VIA ELECTRONIC MAIL ([public\\_comments@difi.az.gov](mailto:public_comments@difi.az.gov))**

Mary E. Kosinski  
Department of Insurance and Financial Institutions  
100 N. 15th Ave., Suite 261  
Phoenix, AZ 85007-2630

**RE: Mental Health Parity and Addiction Equity Act and Jake's Law**

Dear Ms. Kosinski:

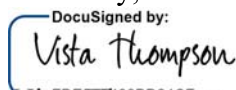
Blue Cross Blue Shield of Arizona (BCBSAZ) strongly supports the federal Mental Health Parity and Addiction Equity Act (MHPAEA) and Jake's Law. We believe in a holistic view of health care for our members that provides benefits for both medical and behavioral health care. We are committed to providing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

BCBSAZ has reviewed the March 12, 2021 letter submitted by Kutak Rock commenting on the 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.

BCBSAZ appreciates the challenges the Department of Insurance and Financial Institutions (DIFI) has faced in implementing this program and issuing rules in the short time frame allowed under the legislation. We do agree, however, that the proposed rules are not the right pathway to ensuring compliance with MHPAEA, and support the recommendation in the Kutak comment letter that DIFI withdraw them. BCBSAZ is committed to working with DIFI and other stakeholders to develop clear rules that are consistent with MHPAEA, not unduly burdensome, designed to help Arizonans receive all benefits of their health care coverage, and which will enhance transparency by providing DIFI and interested parties with needed information and tools to ensure parity for behavioral health and substance use disorder benefits.

Thank you for your consideration of the insurance industry comments in the Kutak letter, and these BCBSAZ comments.

Sincerely,

DocuSigned by:  
  
Vista Thompson

Vista Thompson  
Director, Legal Services  
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(602) 864-2257

VT/kt

cc: Deanna Salazar, Chief Administration Officer & General Counsel