

From: Christie@twinsandcompany.com <christie@twinsandcompany.com>
Date: Sat, Mar 6, 2021 at 9:37 AM
Subject: Jake's Law 3-1 ratio concern
To: <public_comments@difi.az.gov>

Good morning,

I wanted to bring to your attention the fact that the draft rules are using a 3-to-1 ratio (MH/SUD v med/surg) to trigger the extra reporting on claims denials, prior authorization, etc. and that it doesn't seem "equal."

By your own standards:

The conduct the rulemaking is designed to change is the practice of health care insurers that provide mental health or substance use disorder ("MH/SUD") benefits to provide those benefits on parity with the provision of medical and surgical ("Med/ Surg") benefits. This means that limitations insurers impose on MH/SUD benefits can be no more stringent or less favorable than the limitations the insurer imposes on Med/Surg benefits.

The failure of a health care insurer to provide MH/SUD benefits on parity with Med/Surg benefits may result in having an insured unable to obtain MH/SUD medical care because the limitations imposed on those benefits is more stringent or less favorable than imposed on other types of benefits.

Setting a 3-1 ratio does not seem to be on par with parity and a main portion of the law is to ensure parity. I truly hope this can be addressed.

Thanks for your time and consideration,

Christie



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