

MEMBERS OF THE
NATIONAL ALLIANCE
OF HEALTHCARE
PURCHASER
COALITIONS

Alabama Employer Health Consortium
Business Health Care Group (WI)
California Health Care Coalition
Central Penn Business Group on Health
Colorado Business Group on Health
Connecticut Business Group on Health
DFW Business Group on Health
Employers' Advanced Cooperative on Healthcare (AR)
Employers' Forum of Indiana
Employers Health Coalition of Idaho
Employers Like Me (GA)
Florida Alliance for Healthcare Value
FrontPath Health Coalition (OH)
Greater Philadelphia Business Coalition on Health
Health Services Coalition (NV)
Healthcare Purchaser Alliance of Maine
HealthCare21 Business Coalition (TN)
Houston Business Coalition on Health
Kansas Business Group on Health
Kentuckiana Health Collaborative
Lehigh Valley Business Coalition on Healthcare
Memphis Business Group on Health
Mid-America Coalition on Health Care (KS)
MidAtlantic Business Group on Health
Midwest Business Group on Health
Mississippi Business Group on Health
Montana Association of Health Care Purchasers
Nevada Business Group on Health
New Hampshire Purchaser Group on Health
New Mexico Coalition for Healthcare Value
North Carolina Business Group on Health
Northeast Business Group on Health
Purchaser Business Group on Health
Pittsburgh Business Group on Health
Rhode Island Business Group on Health
San Diego Purchasers Cooperative
Savannah Business Group on Health
Silicon Valley Employers Forum
St. Louis Area Business Health Coalition
The Alliance (WI)
The Economic Alliance for Michigan
Virginia Business Coalition on Health
Washington Health Alliance
WellOK, the Oklahoma Business Coalition on Health

July 28, 2022

Subject: Plan Sponsor Mental Health Access to Care and Parity Recommendations

Employers for years have been concerned about the access to quality mental health services available through their TPAs. More recently, they have been challenged by DOL requirements to ensure compliance with the Mental Health Parity and Addiction Equity Act. This [particular requirement](#) has been accelerated as a result of the Consolidated Appropriations Act, 2021 (CAA).

The National Alliance and The Path Forward for Mental Health and Substance Use team have developed a series of recommendations consistent with both of these concerns: [Plan Sponsor Mental Health Access and Parity Recommendations](#).

While some employers have taken extraordinary steps to supplement access, these still may not be adequate to satisfy fiduciary requirements related to MHPAEA and CAA. While DOL guidance is still very broad related to these requirements, we believe that employers and other plan sponsors who implement the attached recommendations should be viewed favorably as acting in good faith regarding their fiduciary responsibilities.

To improve your plan performance related to mental health access and parity oversight, we recommend that each plan sponsor review in detail these recommendations and exercise them with their TPA(s). While we appreciate the complexity of some of the issues associated with MH/SU, we also highly recommend that coalitions and plan sponsors across the country act uniformly and collectively to assess and, as appropriate, insist on TPA improvement plans consistent with these recommendations.

Sincerely,



Michael Thompson
President & CEO