

May 16, 2022

The Honorable Frank Pallone  
Chairman  
Committee on Energy & Commerce  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Cathy McMorris Rodgers  
Ranking Member  
Committee on Energy & Commerce  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Patty Murray  
Chair  
Committee on Health, Education, Labor & Pensions  
United States Senate  
Washington, DC 20510

The Honorable Richard Burr  
Ranking Member  
Committee on Health, Education, Labor & Pensions  
United States Senate  
Washington, DC 20510

Dear Chairman Pallone, Ranking Member McMorris Rodgers, Chair Murray, and Ranking Member Burr:

The Mental Health Liaison Group, representing consumers, families, providers, and organizations advocating to strengthen access to high-quality mental and behavioral health care, strongly supports the bipartisan Parity Implementation Assistance Act (H.R. 3753/S.1962) and asks that your committees consider it as you debate mental health legislation in the coming weeks.

This legislation will ensure that states are able to implement the new requirements that were added to the Mental Health Parity and Addiction Equity Act (federal parity act). In December 2020, the federal parity act was amended by the Consolidated Appropriations Act to require health insurers to perform comparative analyses demonstrating that they comply with the law. And, the amendments gave states new authorities to request that insurers submit the analyses upon request.

However, collecting and reviewing these analyses can be time and labor intensive for state regulators and many may be reluctant to request the analyses without additional resources. The Parity Implementation Assistance Act will authorize \$25 million in annual grant funding to states for five years so that they can request and review the analyses. This will provide states with the capacity to fully implement the new requirements of the federal parity act as Congress intended.

State regulators have been at the forefront of parity compliance, and their investigations in recent years are what revealed that insurers were not doing what was needed to secure compliance. These investigations showed that insurers simply did not have any sort of comparative analyses proving that they met all of the requirements of the federal parity act. This is what spurred Congress to take action last year to add the new requirements that made the production of comparative analyses compulsory for insurers. Now that insurers must perform these analyses, and states can request them, the logical next step is to provide states with the funding they need to meaningfully review the analyses. This legislation does exactly that and will be instrumental in ensuring that the promise of parity is achieved.

The federal parity act has been in effect for over a dozen years but far too often individuals and families face unnecessary suffering and financial hardship because their insurance plans won't provide the same level of coverage for behavioral health care as they do for other medical care. This has helped fuel the fire of increased deaths from suicides and overdoses. The Parity

Implementation Assistance Act will help stem the tide of this crisis and ensure that people get the treatment they need and deserve.

The Mental Health Liaison Group asks that you build on the Energy & Commerce Committee's and HELP Committee's history of bipartisan leadership on mental health and substance use disorder parity and consider H.R. 3753/S.1962

Sincerely,

2020 Mom

American Art Therapy Association  
American Association for Psychoanalysis in Clinical Social Work  
American Association of Child and Adolescent Psychiatry  
American Association on Health and Disability  
American Counseling Association  
American Foundation for Suicide Prevention  
American Mental Health Counselors Association  
American Psychiatric Association  
American Psychological Association  
American Society of Addiction Medicine  
Anxiety and Depression Association of America  
Association for Ambulatory Behavioral Healthcare  
Centerstone  
Children and Adults with Attention-Deficit/Hyperactivity Disorder  
Children's Hospital Association  
Clinical Social Work Association  
College of Psychiatric and Neurologic Pharmacists  
Confederation of Independent Psychoanalytic Societies  
Depression and Bipolar Support Alliance  
Eating Disorders Coalition for Research, Policy & Action  
Global Alliance for Behavioral Health and Social Justice  
International OCD Foundation  
International Society for Psychiatric Mental health Nurses  
Lakeshore Foundation  
Maternal Mental Health Leadership Alliance  
NAADAC, the Association for Addiction Professionals  
NACBHDD  
NARMH  
National Alliance on Mental Illness National Association for Behavioral Healthcare National  
Association for Children's Behavioral Health  
National Association of Pediatric Nurse Practitioners  
National Association of Social Workers  
National Board for Certified Counselors  
National Council for Mental Wellbeing  
National Federation of Families  
Postpartum Support International  
REDC Consortium  
RI International  
SMART Recovery  
The Jewish Federations of North America



The Kennedy Forum  
The Trevor Project  
Well Being Trust  
Wounded Warrior Project

MENTAL HEALTH AND ADDICTION ADVOCATES ADVANCING POLICY, LEADING CHANGE