**Federal Mental Health Parity and Addiction Equity Act Filing**

**Non-Quantitative Treatment Limitations (NQTL) Comparative Analysis**

Complete the following information and the document header.

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| --- | --- | --- |
| A. Health Plan Name: | | B. Date: |
| C. Contact Name: | D. Telephone Number: | E. Email: |
| F. Line of Business (HMO, EPO, POS, PPO): | | |
| G. Contract Type (large group, small group, individual): | | |
| H. Benefit Plan Effective Date: | | I. Benefit Plan Design(s) Identifier(s): |

Consolidated Appropriations Act-Comparative Analysis: Beginning February 10, 2021, the Consolidated Appropriations Act requires plans to make available to the applicable State authority, upon request, the comparative analyses along with other required information.[[1]](#footnote-2) As part of the comparative analyses, plans must demonstrate compliance by providing the following information in the following five steps:

**Step 1**: The specific plan or coverage terms or other relevant terms regarding the NQTLs and a description of all mental health or substance use disorders (MH/SUD) and medical or surgical benefits to which each such term applies in each respective benefits classification.

**Step 2**: The factors used to determine that the NQTLs will apply to MH/SUD benefits and medical or surgical benefits.

**Step 3**: The evidentiary standards used for the factors identified, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits and medical or surgical benefits.

**Step 4**: The comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, as written and in operation, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits in the benefits classification.

**Step 5**: The specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.[[2]](#footnote-3)

Please complete the table for each NQTL. For each NQTL, list the documents and page numbers in Steps 1-3, as applicable that describe the NQTLs for medical/surgical and MH/SUD benefits. Please also ensure to list in Steps 4 and 5 the documents and page numbers that substantiate the health plan’s comparative analysis.

# Prior Authorization Review Process

| **NQTL – Prior Authorization Review Process** | **Medical/Surgical Benefits** | **Mental Health/**  **Substance Use Disorder (MH/SUD) Benefits** |
| --- | --- | --- |
| 1. Inpatient, In-Network: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health   Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 2. Outpatient, In-Network: Office Visits: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 3. Outpatient, In-Network: Other Outpatient Items and Services: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 4. Inpatient, Out-of-Network: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 5. Outpatient, Out-of-Network: Office Visits: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 6. Outpatient, Out-of-Network: Other Items and Services: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |

# Concurrent Review Process

| **NQTL – Concurrent Review Process** | **Medical/Surgical Benefits** | **Mental Health/**  **Substance Use Disorder (MH/SUD) Benefits** |
| --- | --- | --- |
| 1. Inpatient, In-Network: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]**  **Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 2. Outpatient, In-Network: Office Visits: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]**  **Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
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| 3. Outpatient, In-Network: Other Outpatient Items and Services: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
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| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 4. Inpatient, Out-of-Network: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 5. Outpatient, Out-of-Network: Office Visits: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.   Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 6. Outpatient, Out-of-Network: Other Items and Services: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health   Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |

# Retrospective and Claims Utilization Management Review[[3]](#footnote-4)

| **NQTL – Retrospective and Claims Utilization Management Review** | **Medical/Surgical Benefits** | **Mental Health/**  **Substance Use Disorder (MH/SUD) Benefits** |
| --- | --- | --- |
| 1. Inpatient, In-Network: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 2. Outpatient, In-Network: Office Visits: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.   Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]**  **Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health   Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 3. Outpatient, In-Network: Other Outpatient Items and Services: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]**  **Substance Use Disorder  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements   Health plan’s response to Step 5: **[Insert Here]** | |
| 4. Inpatient, Out-of-Network: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]**  **Substance Use Disorder  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 5. Outpatient, Out-of-Network: Office Visits: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]**  **Substance Use Disorder  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 6. Outpatient, Out-of-Network: Other Items and Services: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]**  **Substance Use Disorder  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 7. Emergency Services: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]**  **Substance Use Disorder  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |

# Pharmacy Services

| **NQTL – Pharmacy Services** | **Medical/Surgical Benefits** | **Mental Health/**  **Substance Use Disorder (MH/SUD) Benefits** |
| --- | --- | --- |
| 1. Formulary Tiering/Design | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTL, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]**  **Substance Use Disorder  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 2. Prior Authorization | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]**  **Substance Use Disorder  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.   Health plan’s response to Step 5: **[Insert Here]** | |
| 3. Step Therapy | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]**  **Substance Use Disorder  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]**  **Substance Use Disorder  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 4. Quantity Limit | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |

# Provider Reimbursement Methodology

| **NQTL – Provider Reimbursement Methodology** | **Medical/Surgical Benefits** | **Mental Health/**  **Substance Use Disorder (MH/SUD) Benefits** |
| --- | --- | --- |
| 1. Inpatient, In-Network: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 2. Outpatient, In-Network: Office Visits: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits. |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 3. Outpatient, In-Network: Other Outpatient Items and Services: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 4. Inpatient, Out-of-Network: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 5. Outpatient, Out-of-Network: Office Visits: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 6. Outpatient, Out-of-Network: Other Items and Services: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 7. Emergency Services: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |

# Network Adequacy

| **NQTL – Network Adequacy** | **Medical/Surgical Benefits** | **Mental Health/**  **Substance Use Disorder (MH/SUD) Benefits** |
| --- | --- | --- |
| 1. Inpatient, In-Network: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]**  **Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.  Health plan’s response to Step 5: **[Insert Here]** | |
| 2. Outpatient, In-Network: Office Visits: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder  Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.   Health plan’s response to Step 5: **[Insert Here]** | |
| 3. Outpatient, In-Network: Other Outpatient Items and Services: | **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all medical or surgical benefits to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** | **Mental Health**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]  Substance Use Disorder**  **Step 1:** Specify the specific plan or coverage terms or other relevant terms regarding the NQTLs, that apply to such plan or coverage, and provide a description of all MH/SUD to which the NQTLs apply.  Health plan’s response to Step 1: **[Insert Here]** |
| **Step 2:** Identify all the factors used to determine that the NQTLs will apply to medical or surgical benefits.  Health plan’s response to Step 2: **[Insert Here]** | **Mental Health  Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]  Substance Use Disorder**  **Step 2:** Identify all the factors used to determine that the NQTLs will apply to MH/SUD benefits.  Health plan’s response to Step 2: **[Insert Here]** |
| **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 3: **[Insert Here]** | **Mental Health  Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]  Substance Use Disorder**  **Step 3:** Provide the evidentiary standards used for the factors identified in Step 2, when applicable, provided that every factor shall be defined, and any other source or evidence relied upon to design and apply the NQTLs to MH/SUD benefits.  Health plan’s response to Step 3: **[Insert Here]** |
| **Step 4:** Provide the comparative analyses demonstrating that the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to MH/SUD benefits, **as written and in operation**, are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, and other factors used to apply the NQTLs to medical or surgical benefits.  Health plan’s response to Step 4: **[Insert Here]** | |
| **Step 5:** Provide the specific findings and conclusions reached by the health plan, including any results of the analyses that indicate that the plan or coverage is or is not in compliance with the MHPAEA requirements.   Health plan’s response to Step 5: **[Insert Here]** | |

1. 42 U.S.C. §300gg-26(a)(8)(A). [↑](#footnote-ref-2)
2. 42 U.S.C. § 300gg-26(a)(8)(A)(i)-(v). [↑](#footnote-ref-3)
3. Retrospective and claims utilization management review includes utilization review as defined in Section 1374.721(f)(3). [↑](#footnote-ref-4)