



National Association of Insurance Commissioners  
MHPAEA (B) Working Group  
444 North Capitol Street NW  
Suite 700  
Washington, DC 20001

**Re: Comments on Draft QTL Template and Instructions**

Dear MHPAEA (B) Working Group Members,

Thank you for the opportunity to submit comments on the draft quantitative treatment limitation (QTL) / financial requirement (FR) template and instructions currently being considered by the Working Group. The Kennedy Forum was founded by former Congressman Patrick J. Kennedy, author of the Mental Health Parity and Addiction Equity Act of 2008 (MHPAEA), in 2014 and is focused on improving the lives of individuals living with mental health and substance use conditions and promoting health equity for all.

The Kennedy Forum strongly supports the draft QTL/FR template and instructions, which it believes collect the information necessary to determine whether health insurance plans are in compliance with MHPAEA's QTL/FR requirements. We urge the Working Group Members to adopt the current template and not accept alterations that would weaken its requirements or otherwise alter its ability to determine compliance. We are grateful for the Working Group's efforts.

We also urge the Working Group to create new tools for non-quantitative treatment limitations (NQTLs). The most pervasive and serious issues with MHPAEA compliance continue to be with NQTLs. It is urgently needed to adopt tools that cover all NQTLs, incorporate a step-wise process that fully examines compliance with the federal NQTL rule, and collect relevant data to assist in evaluation of in-operation compliance. The Kennedy Forum strongly believes that the [six-step process](#) for evaluating an NQTL's compliance with MHPAEA is necessary to test each component of the federal NQTL rule.

Thank you again for your efforts. If you have questions, please do not hesitate to reach me at [david@thekennedyforum.org](mailto:david@thekennedyforum.org).

Sincerely,

David Lloyd  
Senior Policy Advisor