

May 14, 2024

The Honorable Mike Johnson
Speaker
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Hakeem Jeffries
Democratic Leader
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Tom Cole
Chairman
Committee on Appropriations
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Rose DeLauro
Ranking Member
Committee on Appropriations
U.S. House of Representatives
Washington, D.C. 20515

Dear Speaker Johnson, Leader Jeffries, Chairman Cole and Ranking Member DeLauro:

On behalf of the membership of the National Association of Insurance Commissioners (NAIC) we write to you on two important appropriations priorities – both of which will make health insurance work better for consumers nationwide. One will aid seniors and the other will help individuals who use mental health or addiction treatment services. We urge you to fully fund State Health Insurance Assistance Programs (SHIPs) and grants to states for enforcement of the Mental Health Parity and Addiction Equity Act of 2008 (MHPAEA).

As we have in past years, we ask Congress to assure that SHIP funding keeps pace with the needs of seniors nationwide in a complex marketplace for health plans. The primary goal of SHIPs is to advise, educate and empower individuals to navigate Medicare, Medicaid, Medigap and long-term care insurance and to help beneficiaries make choices that best meet their needs from the vast array of available options. SHIP assisters are well trained and are able to address consumer questions and complaints quickly and effectively.

The nation's state insurance regulators recognize the valuable role that SHIPs have played in helping America's seniors, people with disabilities, and their families through consumer education. The NAIC thanks Appropriators for the past support that has allowed SHIPs to continue their important work.

Congress authorized grants to states for enforcement of federal mental health parity laws just last year through section 1331 of the Consolidated Appropriations Act (CAA) of 2023. We ask these grants be fully funded at no less than \$10 million for fiscal year 2025. Because of the way Congress structured the Mental Health Parity and Addition Equity Act (MHPAEA), monitoring compliance requires more than just a comparison of benefits between mental health and substance use services and medical and surgical services. It requires a complex

analysis of quantitative and nonquantitative treatment limits embedded in plans' policies, procedures, operations, and evidentiary standards. States have worked hard to develop their capacity to conduct reviews under this federal law, but more resources are needed. Grants authorized by the CAA would allow many states to enhance their enforcement and hold more plans accountable for the MHPAEA standards. With record numbers of Americans seeking mental health services and an ongoing epidemic of addiction, the time is right to make sure health insurers are complying with these important consumer protections.

Partnering with states through this grant program is a key complement to enhanced MHPAEA enforcement efforts at the federal level. The relatively modest federal investment will support state efforts and help ensure that consumers enrolled in state-regulated health insurance are protected by MHPAEA as Congress intended.

Thank you for your attention to these priorities. NAIC staff would be happy to provide additional information or clarification on SHIPs and/or mental health parity enforcement upon request.

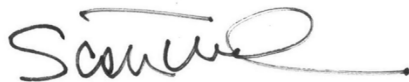
Sincerely,



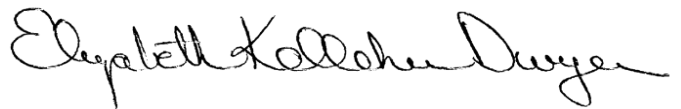
Andrew N. Mais (He/Him/His)
NAIC President
Commissioner
Connecticut Insurance Department



Jon Godfread
NAIC President-Elect
Commissioner
North Dakota Insurance Department



Scott White
NAIC Vice President
Commissioner
Virginia Insurance Department



Elizabeth Kelleher Dwyer
NAIC Secretary-Treasurer
Director
Rhode Island Department of Business

Regulation