



# Arizona MHPAEA Work

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# Arizona MHPAEA Overview



- In 2020, the Arizona legislature passed S.B. 1523 with unanimous support.
  - It gives the Division of Insurance the clear authority to enforce MHPAEA and ensure that insurance companies are complying with parity requirements.
  - It established the multi-discipline Mental Health Parity Advisory Committee to give all parties including families, providers, advocacy organizations and insurers an opportunity to provide input.
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- It created a Suicide Mortality Review Team in the Arizona Department of Health Services
  - It established a Mental Health parity Website. - <https://difi.az.gov/content/mental-health-parity-1>

# Arizona MHPAEA Process



- Arizona Statue requires a triennial report from insurers and the inaugural report submission was March 15, 2023.
- The first major hurdle was getting the rules approved.
- Developed our own template/checklist and used Texas and Oklahoma as guides for our development.
- Wanted the development process to be collaborative with the industry.
  - Call sessions to get input on the template/checklist
- Received input from the Mental Health Parity Advisory Committee
- The template/checklist can be found here:
  - <https://difi.az.gov/mental-health-parity-reporting>



# Arizona MHPAEA Process



- Approached the reporting process as a market conduct but with a twist.
  - Hired a consultant (Tim Clement) to train while assisting with review of reports.
  - Conducted entrance meetings with each insurer to explain the process and answer questions.
  - Conducted exit meetings with each insurer to review the findings and give recommendations.
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- Submissions included comparative analysis, member handbooks,
  - It took a year to review all of the reports.

# AZ Triennial MHPAEA Report Findings



- **Common Trends**

- ❖ Lumping together multiple NQTLs into one analysis, when each NQTL analysis needs to be separate (Ex. Prior Authorization and Concurrent Review)
- ❖ Definition Clarity (Ex. Not clear on how factors are defined or when they might be triggered. For example when does the “complexity of the condition” reach the level of complexity that would necessitate concurrent review?)
- ❖ Not showing the analysis
- ❖ Combining analyses (Ex. Prior Authorization, Concurrent Review and Retrospective Review.)



# Arizona MHPAEA Process Updates



- Next report submissions due March 15, 2026
- During the off years insurers only have to attest that nothing changed. Reviewing the implementation of New Mexico's self assessment tool.
- Reviewing updating our overall tool to something more like Pennsylvania to dig deeper into the comparative analysis.
- Our rules were in process of being updated to align with the final Federal 2024 rule, but that is on hold due to the Executive order.