

Federal Mental Health Parity and Addiction Equity Filing

Table 5: Non-Quantitative Treatment Limitations

Submit a separate form for each benefit plan design.

|                                                                             |                                 |                                                       |  |
|-----------------------------------------------------------------------------|---------------------------------|-------------------------------------------------------|--|
| A. Plan Name: [REDACTED]                                                    |                                 | B. Date: March 1, 2021                                |  |
| C. Contact Name: [REDACTED]                                                 | D. Telephone Number: [REDACTED] | E. Email: [REDACTED]                                  |  |
| F. Line of Business (HMO, EPO, POS, PPO): <b>PPO</b>                        |                                 |                                                       |  |
| G. Contract Type (large group, small group, individual): <b>Small Group</b> |                                 |                                                       |  |
| H. Benefit Plan Effective Date: January 1, 2021                             |                                 | I. Benefit Plan Design(s) Identifier(s): <sup>1</sup> |  |

| Area                                                                                   | Medical/Surgical Benefits                                                   | Mental Health/Substance Use Disorder Benefits                               | Explanation                                                                                                                                                                                 |
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|                                                                                        | Summarize the plan’s applicable NQTLs, including any variations by benefit. | Summarize the plan’s applicable NQTLs, including any variations by benefit. | Describe the processes, strategies, evidentiary standards or other factors used to apply the NQTLs. Explain how the application of these factors is consistent with 45 CFR § 146.136(c)(4). |
| A. Definition of Medical Necessity<br><br>What is the definition of medical necessity? | See the provided file: [REDACTED] Exhibit 01.Medical Necessity              | Same as Medical/Surgical                                                    | See the provided file: [REDACTED] Exhibit 02.Final Medical Policy Creation NQTL                                                                                                             |

| Area                                                                                                                                                                                                                                                                                | Medical/Surgical Benefits                                                              | Mental Health/Substance Use Disorder Benefits                                                                                                                                             | Explanation                                                          |
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| <b>B. Prior-authorization Review Process</b><br>Include all services for which prior-authorization is required. Describe any step-therapy or “fail first” requirements and requirements for submission of treatment request forms or treatment plans.<br><br>Inpatient, In-Network: | See the provided file: [REDACTED] Exhibit 03.Precertification Prior Authorization List | See the provided file: [REDACTED] Exhibit 03.Precertification Prior Authorization List<br><br>Note, we do not apply fail first criteria to mental health/substance use disorder services. | See the provided file: [REDACTED] Exhibit 04.Combined UM Review NQTL |
| Prior Authorization - Outpatient, In-Network: Office Visits:                                                                                                                                                                                                                        | See the provided file: [REDACTED] Exhibit 03.Precertification Prior Authorization List | See the provided file: [REDACTED] Exhibit 03.Precertification Prior Authorization List                                                                                                    | See the provided file: [REDACTED] Exhibit 04.Combined UM Review NQTL |
| Prior Authorization - Outpatient, In-Network: Other Outpatient Items and Services:                                                                                                                                                                                                  | See the provided file: [REDACTED] Exhibit 03.Precertification Prior Authorization List | See the provided file: [REDACTED] Exhibit 03.Precertification Prior Authorization List                                                                                                    | See the provided file: [REDACTED] Exhibit 04.Combined UM Review NQTL |
| Prior Authorization - Inpatient, Out-of-Network:                                                                                                                                                                                                                                    | Same as in-network                                                                     | Same as in-network                                                                                                                                                                        | Same as in-network                                                   |

| Area                                                                                                                                                                                                                                                          | Medical/Surgical Benefits                                                                                                                                                                                                                                                                                                                                    | Mental Health/Substance Use Disorder Benefits                                                                                                                                                                                                                                                                                                                | Explanation                                                      |
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| Prior Authorization - Outpatient, Out-of-Network: Office Visits:                                                                                                                                                                                              | Same as in-network                                                                                                                                                                                                                                                                                                                                           | Same as in-network                                                                                                                                                                                                                                                                                                                                           | Same as in-network                                               |
| Prior Authorization - Outpatient, Out-of-Network: Other Items and Services:                                                                                                                                                                                   | Same as in-network                                                                                                                                                                                                                                                                                                                                           | Same as in-network                                                                                                                                                                                                                                                                                                                                           | Same as in-network                                               |
| <b>C. Concurrent Review Process</b> , including frequency and penalties for all services. Describe any step-therapy or “fail first” requirements and requirements for submission of treatment request forms or treatment plans.<br><br>Inpatient, In-Network: | If a certain number of days/visits has been authorized, ██████ does not conduct concurrent review during that course of treatment to determine if any additional approved days remain medically necessary. Instead, concurrent review is only conducted when the provider determines that days/visits in addition to those previously approved are required. | If a certain number of days/visits has been authorized, ██████ does not conduct concurrent review during that course of treatment to determine if any additional approved days remain medically necessary. Instead, concurrent review is only conducted when the provider determines that days/visits in addition to those previously approved are required. | See the provided file: ██████ Exhibit 04.Combined UM Review NQTL |



| Area                                                                             | Medical/Surgical Benefits                                                                                                                                                                                                                                                                                                                                    | Mental Health/Substance Use Disorder Benefits                                                                                                                                                                                                                                                                                                                | Explanation                                                      |
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| Concurrent Review - Outpatient, In-Network: Office Visits:                       | If a certain number of days/visits has been authorized, ██████ does not conduct concurrent review during that course of treatment to determine if any additional approved days remain medically necessary. Instead, concurrent review is only conducted when the provider determines that days/visits in addition to those previously approved are required. | If a certain number of days/visits has been authorized, ██████ does not conduct concurrent review during that course of treatment to determine if any additional approved days remain medically necessary. Instead, concurrent review is only conducted when the provider determines that days/visits in addition to those previously approved are required. | See the provided file: ██████ Exhibit 04.Combined UM Review NQTL |
| Concurrent Review - Outpatient, In-Network: Other Outpatient Items and Services: | If a certain number of days/visits has been authorized, ██████ does not conduct concurrent review during that course of treatment to determine if any additional approved days remain medically necessary. Instead, concurrent review is only conducted when the provider determines that days/visits in addition to those previously approved are required. | If a certain number of days/visits has been authorized, ██████ does not conduct concurrent review during that course of treatment to determine if any additional approved days remain medically necessary. Instead, concurrent review is only conducted when the provider determines that days/visits in addition to those previously approved are required. | See the provided file: ██████ Exhibit 04.Combined UM Review NQTL |
| Concurrent Review - Inpatient, Out-of-Network:                                   | Same as in-network                                                                                                                                                                                                                                                                                                                                           | Same as in-network                                                                                                                                                                                                                                                                                                                                           | Same as in-network                                               |
| Concurrent Review - Outpatient, Out-of-Network: Office Visits:                   | Same as in-network                                                                                                                                                                                                                                                                                                                                           | Same as in-network                                                                                                                                                                                                                                                                                                                                           | Same as in-network                                               |
| Concurrent Review - Outpatient, Out-of-Network: Other Items and Services:        | Same as in-network                                                                                                                                                                                                                                                                                                                                           | Same as in-network                                                                                                                                                                                                                                                                                                                                           | Same as in-network                                               |

| Area                                                                                                    | Medical/Surgical Benefits                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Mental Health/Substance Use Disorder Benefits                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Explanation                                                      |
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| <b>D. Retrospective Review Process, including timeline and penalties.</b><br><br>Inpatient, In-Network: | ██████ will conduct a retrospective review after a service takes place such as when a claim is submitted and it is determined that the service is on our preauthorization list and a preauthorization was not requested. When a preauthorization review for a service is conducted, our claim system is coded to reflect that the service was approved or denied. Thus, when a claim for the service is received, the claim system will identify whether the service has already been reviewed and authorized or denied or whether the claim needs to be flagged for a clinical review (i.e., a retrospective review is conducted). | ██████ will conduct a retrospective review after a service takes place such as when a claim is submitted and it is determined that the service is on our preauthorization list and a preauthorization was not requested. When a preauthorization review for a service is conducted, our claim system is coded to reflect that the service was approved or denied. Thus, when a claim for the service is received, the claim system will identify whether the service has already been reviewed and authorized or denied or whether the claim needs to be flagged for a clinical review (i.e., a retrospective review is conducted). | See the provided file: ██████ Exhibit 04.Combined UM Review NQTL |
| Retrospective Review - Outpatient, In-Network: Office Visits:                                           | ██████ will conduct a retrospective review after a service takes place such as when a claim is submitted and it is determined that the service is on our preauthorization list and a preauthorization was not requested. When a preauthorization review for a service is conducted, our claim system is coded to reflect that the service was approved or denied. Thus, when a claim for the service is received, the claim system will identify whether the service has already been reviewed and authorized or denied or whether the claim needs to be flagged for a clinical review (i.e., a retrospective review is conducted). | ██████ will conduct a retrospective review after a service takes place such as when a claim is submitted and it is determined that the service is on our preauthorization list and a preauthorization was not requested. When a preauthorization review for a service is conducted, our claim system is coded to reflect that the service was approved or denied. Thus, when a claim for the service is received, the claim system will identify whether the service has already been reviewed and authorized or denied or whether the claim needs to be flagged for a clinical review (i.e., a retrospective review is conducted). | See the provided file: ██████ Exhibit 04.Combined UM Review NQTL |



| Area                                                                                                                                                                                                                                                           | Medical/Surgical Benefits                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Mental Health/Substance Use Disorder Benefits                                                                                                                                                                                                                                | Explanation                                                                                                                                                                              |
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| Retrospective Review - Inpatient, Out-of-Network:                                                                                                                                                                                                              | Same as in-network                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Same as in-network                                                                                                                                                                                                                                                           | Same as in-network                                                                                                                                                                       |
| Retrospective Review - Outpatient, Out-of-Network: Office Visits:                                                                                                                                                                                              | Same as in-network                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Same as in-network                                                                                                                                                                                                                                                           | Same as in-network                                                                                                                                                                       |
| Retrospective Review - Outpatient, Out-of-Network: Other Items and Services:                                                                                                                                                                                   | Same as in-network                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Same as in-network                                                                                                                                                                                                                                                           | Same as in-network                                                                                                                                                                       |
| <b>E. Emergency Services</b>                                                                                                                                                                                                                                   | We do not require prior authorization for any emergency service. For medical services only, we conduct retrospective reviews for certain codes that have been determined to not generally be emergency situations to ensure the member received treatment in the correct setting. This code listing was approved by the Department. Additionally, if a member is admitted, they or their provider is requested to notify us as soon as possible so we can review the number of days medically necessary. | We do not do utilization review for any emergency service claims attributed to behavioral health conditions. However, if a member is admitted, they or their provider is requested to notify us as soon as possible so we can review the number of days medically necessary. | We treat MH/SUD conditions the same or better than medical/surgical conditions. For reviews done after a member is admitted as inpatient, please see the Retrospective Review responses. |
| <b>F. Pharmacy Services</b><br><br>Include all services for which prior-authorization is required, any step-therapy or “fail first” requirements, any other NQTLs.<br><br><b>Tier 1:</b> See provided file: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL | See the provided files: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL and [REDACTED] Exhibit 06.Final Drug Formulary NQTL                                                                                                                                                                                                                                                                                                                                                                           | See the provided files: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL and [REDACTED] Exhibit 06.Final Drug Formulary NQTL                                                                                                                                               | See the provided files: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL and [REDACTED] Exhibit 06.Final Drug Formulary NQTL                                                           |

| Area    | Medical/Surgical Benefits                                                                                                      | Mental Health/Substance Use Disorder Benefits                                                                                  | Explanation                                                                                                                    |
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| Tier 2: | See the provided files: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL and [REDACTED] Exhibit 06.Final Drug Formulary NQTL | See the provided files: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL and [REDACTED] Exhibit 06.Final Drug Formulary NQTL | See the provided files: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL and [REDACTED] Exhibit 06.Final Drug Formulary NQTL |
| Tier 3: | See the provided files: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL and [REDACTED] Exhibit 06.Final Drug Formulary NQTL | See the provided files: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL and [REDACTED] Exhibit 06.Final Drug Formulary NQTL | See the provided files: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL and [REDACTED] Exhibit 06.Final Drug Formulary NQTL |
| Tier 4: | See the provided files: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL and [REDACTED] Exhibit 06.Final Drug Formulary NQTL | See the provided files: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL and [REDACTED] Exhibit 06.Final Drug Formulary NQTL | See the provided files: [REDACTED] Exhibit 05.MH Parity Rx List 2020_FINAL and [REDACTED] Exhibit 06.Final Drug Formulary NQTL |

| Area                                                                                                                                                                                                                                                                                             | Medical/Surgical Benefits                                              | Mental Health/Substance Use Disorder Benefits                          | Explanation                                                            |
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| <b>G. Prescription Drug Formulary Design</b><br><br>How are formulary decisions made for the diagnosis and medical necessary treatment of medical, mental health and substance use disorder conditions?                                                                                          | See the provided file: [REDACTED] Exhibit 06.Final Drug Formulary NQTL | See the provided file: [REDACTED] Exhibit 06.Final Drug Formulary NQTL | See the provided file: [REDACTED] Exhibit 06.Final Drug Formulary NQTL |
| Describe the pertinent pharmacy management processes, including, but not limited to, cost-control measures, therapeutic substitution, and step therapy.                                                                                                                                          | See the provided file: [REDACTED] Exhibit 06.Final Drug Formulary NQTL | See the provided file: [REDACTED] Exhibit 06.Final Drug Formulary NQTL | See the provided file: [REDACTED] Exhibit 06.Final Drug Formulary NQTL |
| What disciplines, such as primary care physicians (internists and pediatricians) and specialty physicians (including psychiatrists) and pharmacologists, are involved in the development of the formulary for medications to treat medical, mental health and substance use disorder conditions. | See the provided file: [REDACTED] Exhibit 06.Final Drug Formulary NQTL | See the provided file: [REDACTED] Exhibit 06.Final Drug Formulary NQTL | See the provided file: [REDACTED] Exhibit 06.Final Drug Formulary NQTL |



| Area                                                                          | Medical/Surgical Benefits                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Mental Health/Substance Use Disorder Benefits                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Explanation                                                         |
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| <b>H. Case Management</b><br><br>What case management services are available? | ██████ provides case management for catastrophically ill or injured members who require extensive medical services and who have exceptional or complex needs. Case managers are responsible for evaluating and monitoring the efficiency, appropriateness and quality of all aspects of health care for members who have been accepted into the case management program. To achieve this objective, the case management program works in collaboration with the member's team of health care professionals to provide feedback, support and assistance during the utilization and case management process. | Behavioral Health Case Management is a comprehensive program supporting members of all ages who are impacted by their behavioral health condition. BH CM services include Post Discharge Management, Complex Case Management and Care Coordination. Members most appropriate for BH Case Management include those who are most at risk for readmission or likelihood of admission, high cost, high risk, chronic or comorbid conditions and need care coordination. The program assists members and their families with obtaining appropriate behavioral health treatment, offering community resources, providing education and telephonic support, and promoting provider collaboration. | See the provided file: ██████ Exhibit 07.Final Case Management NQTL |
| What case management services are required?                                   | None                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | None                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Case management is voluntary.                                       |
| What are the eligibility criteria for case management services?               | See Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | See Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | See the provided file: ██████ Exhibit 07.Final Case Management NQTL |

| Area                                                                                                    | Medical/Surgical Benefits                                                           | Mental Health/Substance Use Disorder Benefits                                       | Explanation                                                                                                                                                   |
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| <b>I. Process for Assessment of New Technologies</b><br><br>Definition of experimental/investigational: | See the provided file: [REDACTED] Exhibit 08.Policy_Investigational                 | See the provided file: [REDACTED] Exhibit 08.Policy_Investigational                 | See the provided file: [REDACTED] Exhibit 02.Final Medical Policy Creation NQTL                                                                               |
| Qualifications of individuals evaluating new technologies:                                              | See the provided file: [REDACTED] Exhibit 08.Policy_Investigational                 | See the provided file: [REDACTED] Exhibit 08.Policy_Investigational                 | We utilize the same process as utilized for medical necessity determinations. See the provided file: [REDACTED] Exhibit 02.Final Medical Policy Creation NQTL |
| Evidence consulted in evaluating new technologies:                                                      | See the provided file: [REDACTED] Exhibit 08.Policy_Investigational and Explanation | See the provided file: [REDACTED] Exhibit 08.Policy_Investigational and Explanation | We utilize the same process as utilized for medical necessity determinations. See the provided file: [REDACTED] Exhibit 02.Final Medical Policy Creation NQTL |



| Area                                                                                                                                                                                                        | Medical/Surgical Benefits                                                                       | Mental Health/Substance Use Disorder Benefits                                                                                          | Explanation                                                                                           |
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| <b>J. Standards for provider credentialing and contracting</b>                                                                                                                                              |                                                                                                 |                                                                                                                                        |                                                                                                       |
| Is the provider network open or closed?                                                                                                                                                                     | Our provider networks are open. They just need to agree to our standard terms of participation. | We do not have any closed networks for mental health or SUD providers. They just need to agree to our standard terms of participation. | All networks are open for all providers willing and able to meet our standard terms of participation, |
| What are the credentialing standards for physicians?                                                                                                                                                        | See Explanation                                                                                 | See Explanation                                                                                                                        | See the provided file: [REDACTED] Exhibit 09.Credentialing Program Summary_2020 v.3                   |
| What are the credentialing standards for licensed non-physician providers? Specify type of provider and standards; e.g., nurse practitioners, physician assistants, psychologists, clinical social workers. | See Explanation                                                                                 | See Explanation                                                                                                                        | See the provided file: [REDACTED] Exhibit 09.Credentialing Program Summary_2020 v.3                   |
| What are the credentialing/contracting standards for unlicensed personnel; e.g., home health aides, qualified autism service professionals and paraprofessionals?                                           | See Explanation                                                                                 | See Explanation                                                                                                                        | See the provided file: [REDACTED] Exhibit 09.Credentialing Program Summary_2020 v.3                   |

| Area                                                                                                                                                                                                                                   | Medical/Surgical Benefits                                                                                                                     | Mental Health/Substance Use Disorder Benefits                                                                                                 | Explanation                                                                                                                                                                                                                                                                                                                                                                                         |
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| <b>K. Exclusions for Failure to Complete a Course of Treatment</b><br><br>Does the Plan exclude benefits for failure to complete treatment?                                                                                            | No, the plan does not exclude benefits due to failure to complete treatment.                                                                  | No, the plan does not exclude benefits due to failure to complete treatment.                                                                  | We treat medical/surgical and MH/SUD conditions the same.                                                                                                                                                                                                                                                                                                                                           |
| <b>L. Restrictions that limit duration or scope of benefits for services</b><br><br>Does the Plan restrict the geographic location in which services can be received; e.g., service area, within California, within the United States? | No                                                                                                                                            | No                                                                                                                                            | These are PPO or POS plans that provide coverage both in and out-of-network. In-network providers include providers outside of CT that participate in the PPO network of other [REDACTED] or [REDACTED] plans through [REDACTED]. Coverage received outside of the U.S. is provided through [REDACTED] Global Core program, as described in the InterPlan Programs section of the booklet.          |
| Does the Plan restrict the type(s) of facilities in which enrollees can receive services?                                                                                                                                              | The facility must meet the definition of a covered facility in the booklet, which generally requires appropriate licensure and accreditation. | The facility must meet the definition of a covered facility in the booklet, which generally requires appropriate licensure and accreditation. | We require all covered providers, whether facility based or in-network or not, to be licensed by the applicable state and be appropriately accredited. See provided file: [REDACTED] Exhibit 13.Facility Definitions – Small and Large Group for defined terms in the Definitions section of the booklets: Facility, Hospital, Residential Treatment Center/Facility, and Skilled Nursing Facility. |



| Area                                                                                                             | Medical/Surgical Benefits                                                                                         | Mental Health/Substance Use Disorder Benefits                                                                     | Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| M. Does the Plan restrict the types of provider specialties that can provide certain M/S and/or MH/SUD benefits? | The provider must be operating within the scope of his/her license and meet the definition of a covered provider. | The provider must be operating within the scope of his/her license and meet the definition of a covered provider. | We treat medical/surgical and MH/SUD providers the same.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| N. Network Adequacy                                                                                              | See explanation                                                                                                   | See explanation                                                                                                   | PPO, HMO, on- and off-exchange networks are assessed annually for availability of providers throughout the state and appointment access to meet ██████ standards. For behavioral health availability standards (ratio of members to each provider), all provider specialties are measured, unlike medical which measures PCPs, high volume and critical specialties only, using geo-access software that maps proximity of providers to members by zip code. Accessibility is measured by provider surveys, using appropriate sample sizes, which ask providers to confirm appointment wait times for non-life-threatening, urgent, and routine visits. Members are also surveyed for satisfaction with both availability of providers who meet their cultural, language and gender requirements, and appointment wait times, and any member complaints related to either availability or accessibility of providers are reviewed. Corrective actions are taken if any survey results show that provider access and availability falls below ██████ standards. Similar information is provided to the State of Connecticut with slight differences in the measurement criteria as required by the State; both ██████ standards and State mandated criteria are measured and reported on an annual basis. |

| Area                                                              | Medical/Surgical Benefits                                                                   | Mental Health/Substance Use Disorder Benefits                                               | Explanation                                                                                                                                                                     |
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| O. In-Network Provider Reimbursement                              | See explanation                                                                             | See explanation                                                                             | See the provided file: [REDACTED] Exhibit 11.Final CT Provider Reimbursement NQTL                                                                                               |
| P. Method for determining usual, customary and reasonable charges | See provided file: [REDACTED] Exhibit 20.Maximum Allowed Amount – PPO Small and Large Group | See provided file: [REDACTED] Exhibit 20.Maximum Allowed Amount – PPO Small and Large Group | [REDACTED] does not base its out-of-network reimbursement on usual, customary and reasonable charges. See provided file: [REDACTED] Exhibit 10.Non Par Reimbursement Commercial |
| Q. Restrictions on provider billing codes                         | [REDACTED] does not impose any specific billing code restrictions on providers.             | [REDACTED] does not impose any specific billing code restrictions on providers.             |                                                                                                                                                                                 |