

01/28/2022

Hello REDC Members,

Here is your weekly policy update.

Telehealth

- Thank you to the REDC members that submitted comments for your centers in response to the 2023 Notice of Benefit and Payment Parameter Rule!
 - We received confirmations from Eating Recovery Center, SunCloud Health, Farrington Specialty Centers, Walden Behavioral Care, The Emily Program, Veritas Collaborative, The Renfrew Center, and Timberline Knolls.
 - **If your center did submit a comment and you're not listed above, please let us know by emailing Allison at allison.ivie@centerroadsolutions.com.**
 - Now that the comment period is closed, all comments will be read and we anticipate a final rule coming out in the next 6 months.
- **High Deductible Health Plan Coverage for Telehealth**
 - The REDC joined a letter to Congressional leadership urging for the continuation of coverage within certain HDHPs for telehealth services before patients meet their deductible. This provision expired on December 21, 2021. With the 2022 government funding deadline set for February 18, we are pushing for this coverage to continue throughout the year by including it within the final funding package for 2022.
 - The letter was open for one additional week to garner additional cosigners and is attached for reference. Future of Employer-Sponsored Health Care webinar. I have attached them in a document as well.
 - The Kaiser Family suggests that more than 30 million Americans have enrolled in high deductible plans in 2021, or about one in five of the total enrolled in employer-based insurance.

Parity

- **New Parity Report Released from U.S. Department of Labor**
 - ICYMI, the U.S. Department of Labor, CMS, and Treasury just released their [parity compliance report to Congress](#). **Overall, we'd describe it as "there's a new sheriff in town" and the plans/insurance are in hot water with DOL & CMS.** Attached you'll find a summary of the 54-page report and key highlights.
 - **Big Picture:**

- 100% of the compliance reviews resulted in an initial determination of parity violation
- The comparative analysis that almost all plans did was inadequate
- You'll note within this short document the highlights of parity non-compliance
- Most notably- eating disorders were mentioned, particularly as a parity violation for a NY plan that did not cover nutrition counseling! There are also a few residential treatment parity violations explained.
- **State Parity Working Group**
 - Attached are the slides from the monthly state parity working group call.
 - Lots of new state parity bills have introduced and summarized in the deck.
 - While we have been pushing/in support for parity provisions with the Build Back Better Act that would levy civil monetary penalties from the U.S. Department of Labor to insurers for parity violations, the entire BBB package is in doubt.
 - The Kennedy Forum is still looking at introducing legislation to end self-funded non-federal government plans (i.e., state and local government plans) opt-out of MHPAE.

Insurance

• ACA Enrollment Hits Record High

- A record 14.5 million Americans have signed up for ACA coverage since November 1, including more than 10 million through Healthcare.gov.
- The provisions within the American Rescue Plan did more to lower costs and expand access to health care.
 - On average families will save \$2,400 on their annual premiums and 4 out of 5 consumers will be able to find quality coverage for under \$10 per month.
- **Bipartisan Policy Center Holds Briefing on the Future of Employer-Sponsored Insurance**
 - Key takeaways from the discussion:
 - Around 60% of employees under the age of 65 in America are currently covered by employer-sponsored insurance (ESI) and is slowly declining over the past decades.
 - Demographic change and expanded eligibility of public programs have contributed to decline. This is not attributable to the pandemic as the majority of those losing jobs did have ESI coverage.

- Insurance coverage rates overall have stayed steady, but have not grown in recent years.
- ESI coverage declined in small employers from 50% coverage in 2000 to 30% coverage in 2021.
- Insurance premiums have increased 50% in the last decade.
 - Have remained steady in 2021 at a 4% increase.
 - Deductible costs have increased 70% in the last decade with an average of \$1,600 per year for individuals.
- 80% of employees with rank benefits satisfaction as extremely or very high.
- 83% of employees weigh health benefits heavily when considering leaving or taking a new job.
- 80% of employees would keep a job with health insurance benefits rather than take a new job with higher pay but no benefits.
- With increasing costs, 1 in 3 businesses struggle to keep healthcare coverage
 - 16% have had to completely change coverage.
 - Some employees have had to forgo wage increases to keep health coverage.
 - Small businesses benefiting from PPE loans may skew numbers- might see changes now that that has ended.
- Workforce shortage has increased the desire to maintain ESI and offer more benefits (i.e., gym membership) to retain employees.
- Association health plans get the majority of cost saving by shifting risk to older people from younger people and sicker people from healthy people.

SERVE Act

- We are still crafting a letter from REDC to the Department of Defense to encourage speedy implementation that is aligned with our and Congress' intent.