



STATE OF WASHINGTON  
**HEALTH CARE AUTHORITY**

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October 2, 2017

Brian Neale, Director  
Center for Medicaid and CHIP Services  
Centers for Medicare and Medicaid Services  
200 Independence Avenue, Southwest  
Washington, DC 20201

Dear Mr. Neale:

**SUBJECT: Washington State Parity Analysis**

On March 30, 2016 the Center for Medicare and Medicaid Services (CMS) issued the Mental Health Parity and Addiction Equity Act (MHPAEA): The act required states to analyze financial requirements and treatment limitations applied to behavioral health (BH) services, in order to ensure that those limitations are no more restrictive than those under medical/surgical (M/S) benefits. States must also ensure that certain availability of information requirements are met. The initial parity analysis is due by October 2, 2017, and this report is meant to meet the analysis and reporting requirements of MHPAEA.

The parity analysis was a joint effort between the Department of Social and Health Service's (DSHS) Division of Behavioral Health Resources (DBHR) and the Health Care Authority (HCA). The structure and content of this report is based on information from the Medicaid and Children's Health Insurance Program (CHIP) Parity Policy Academy, the Mental Health Parity Toolkit, coaching calls from our CMS assigned coach, and SAMHSA Parity Policy Academies Medicaid/CHIP Learning Network Documentation and Hot Topic Webinars. The report covers requirements of the parity rule and an overview of our state's system, including:

1. The process used to determine our benefit packages.
2. How mental health (MH) and substance use disorder (SUD) conditions and benefits are defined and mapped.
3. Analysis of financial requirements, quantitative treatment limitations, aggregate lifetime and annual dollar limits.
4. The process for identifying and analyzing non-quantitative treatment limitations;
5. Analysis of the current system and work that will need to be done to bring the state into full compliance.
6. The plan for community outreach and education.
7. How the state will meet availability of information requirements.

Sincerely,

Preston W. Cody  
Division Director, Medicaid Program Operations and Integrity

Enclosure

cc: MaryAnne Lindeblad, Medicaid Director, HCA  
Chris Imhoff, Director, Behavioral Health Administration, DSHS  
Taylor Linke, Deputy Assistant Director, MPOI, HCA