## QTL/Financial Requirement Template

### **Plan Year 2022 Instructions**

The information requested in this template will assist in determining a plan's compliance with benefit classification requirements and Quantitative Treatment Limitation and Financial Requirement (QTL) testing outcomes required under the Mental Health Parity and Addiction Equity Act (MHPAEA). As an initial step, identification of all covered services, both medical/surgical and MH/SUD, is critical for complete QTL analyses.

## **Covered Services Tab**

**Step 1.** Provide the requested Company Name, Plan Name/ID, Plan Year, and Coverage Type (i.e., HMO, PPO, EPO, POS, etc.), and select the appropriate dropdown box (large group, small group, or individual) for the Plan Market information.

Cell	Notes on Response
C2	Provide Company Name
C3	Plan Name/ID (e.g., HIOS #)
C4	Plan Year
E4	Select from Dropdown (Small, Large, Individual)
F4	Provide Coverage type

**Step 2.** Answer the following questions by selecting either Yes or No in the appropriate dropdown box:

- "Are outpatient services sub-classified into "office visit" and "other"?"
  This question must be answered in order to populate the classification cells in column E.
  - "Is there a tiered network?" If Yes, continue to the next question. If no, move to Step 3.
    Tiered network refers to multiple levels of tiering with respect to contracted providers. Out-of-network is not considered a tier.
- "If yes, please select the number of tiers:" Select the appropriate number of tiers from the dropdown box.
- NOTE: This template does not automatically separate multiple networks for purposes of analysis. If the company chose to subclassify based on networks (pursuant to 45 C.F.R. §146.136(c)(3)(iii)(B)), the analysis will have to be completed manually.

Cell	Notes on Response
E6	Select from Dropdown:
	Yes or No regarding outpatient sub-classification
E7	Select from Dropdown:
	Yes or No regarding tiering
E8	If Yes above, select number of tiers (excluding out-of-
	network)

Step 3. List all Covered Services in Column B

Cell	Notes on Response
Beginning with B10	List all Covered Services

- All services included in Certificates of Coverage and Schedules of Benefits should be identifiable in the list of covered services.
- Covered services should have their own line based on network (in and out, as well as tiering if applicable), cost-sharing type, applicable visit or day limits, FR or QTL level, and classification.

**Network**: Include a separate covered service line for services that are covered in-network and out-ofnetwork, e.g., one line for PCP office visit-in network, and a separate line for PCP office visit-out of network.

	Medical/Surgical		
	or	Expected Claim Dollar	
Covered Services	MH/SUD	Amount	Classification
PCP Office Visit, In-network	Med/Surg	\$XX,XXX,XXX	OutPt, IN-Office
Specialist Office Visit, In-network	Med/Surg	\$XX,XXX,XXX	OutPt, IN-Office
PCP Office Visit, Out-of-network	Med/Surg	\$XX,XXX,XXX	OutPt, OON-Office
Specialist Office Visit, Out-of-network	Med/Surg	\$XX,XXX,XXX	OutPt, OON-Office

• Services should be separated by tier when there is more than one network tier, e.g., preferred specialist on one line, non-preferred specialist on a separate line.

	Medical/Surgical		
	or	Expected Claim Dollar	
Covered Services	MH/SUD	Amount	Classification
PCP Office Visit, Preferred Tier	Med/Surg	\$XX,XXX,XXX	OutPt, IN-Office
PCP Office Visit, Non-preferred Tier	Med/Surg	\$XX,XXX,XXX	OutPt, IN-Office
PCP Office Visit, Out-of-network	Med/Surg	\$XX,XXX,XXX	OutPt, OON-Office

**Cost-Sharing**: Include a separate covered service line for services that have different cost sharing that is dependent upon site of service or diagnostic vs. preventive. For example, CDC-recommended immunizations are \$0 cost-sharing but may be provided in a PCP's office or at a pharmacy, while other immunizations (e.g., for travel) may be provided by a PCP but may have cost-sharing applied. Each instance would need to have its own line for reporting covered services.

Covered Services	Medical/Surgical or MH/SUD	List the Expected Claim Dollar Amount for Each Medical/Surgical Benefit	Classification
Immunizations - ACA preventive - PCP office	Med/Surg	\$XX,XXX,XXX	OutPt, IN-Office
Immunizations - non-ACA preventive - PCP office	Med/Surg	\$KX, KXX, XXX	OutPt, IN-Office
Immunizations - ACA preventive - non-PCP	Med/Surg	SACK, KORK, MACK	OutPt, IN-Other

**Classification**: For purposes of MHPAEA analysis, classification of benefits, and any corresponding limitations, should be based on the underlying diagnosis, regardless of site of service or the system through which claims are processed. For example, occupational therapy may be appropriate for both medical/surgical and MH/SUD diagnoses, and processed through a medical claims system. For purposes of the analysis, however, the occupational therapy claims processed for underlying medical/surgical diagnoses should be classified as medical/surgical and occupational therapy processed for underlying MH/SUD (e.g., ADHD, Autism, as defined in product information) should be classified as MH/SUD.

Covered Services	Medical/Surgical or MH/SUD	List the Expected Claim Dollar Amount for Each Medical/Surgical Benefit	Classification
Occupational Therapy - office	Med/Surg	Şener, nen i	OutPt, IN-Office
Occupational Therapy - ADHD office	MH/SUD		OutPt, IN-Office
Occupational Therapy - ASD office	MH/SUD		OutPt, IN-Office
Occupational Therapy - ASD community	MH/SUD		OutPt, IN-Other

and

	Medical/Surgical		
	or	Expected Claim Dollar	
Covered Services	MH/SUD	Amount	Classification
Speech therapy, ASD	MH/SUD		OutPt, IN-Office
Speech therapy, Medical/Surgical	Med/Surg	\$XX,XXX,XXX	OutPt, IN-Office
Speech therapy, ASD	MH/SUD		OutPt, OON-Office
Speech therapy, Medical/Surgical	Med/Surg	\$XX,XXX,XXX	OutPt, OON-Office

**Step 4.** Designate whether each covered service is Medical/Surgical or MH/SUD in Column C, **taking the following into consideration:** 

- Services must be identified as medical/surgical or MH/SUD as defined under the terms of the plan and in accordance with applicable state and federal law.
- NOTE: every medical/surgical service classification must have corresponding MH/SUD covered services

Cell	Notes on Response
Beginning with C10	Select from Dropdown:
	Medical/surgical or MH/SUD for each Covered Service
	listed in Column B

**Step 5.** Enter Expected Claim Dollar Amounts in Column D for each listed covered service that is identified as medical/surgical.

• All covered medical/surgical services, including those services with zero-dollar cost sharing for members, must have an associated expected plan claim dollar amount listed. Also, expected claim dollar amounts must be based on the dollar amount of all plan payments for medical/surgical benefits in the classification expected to be paid under the plan for the plan year; expected claim dollar amounts are not cost sharing amounts paid by members.

Cell	Notes on Response
Beginning with D10	List expected claim dollar amount for each Covered
	Service listed in Column B

**Step 6.** Choose the appropriate Classification or Sub-Classification in Column E by selecting the appropriate responses in the dropdown boxes.

- Location of service <u>may be</u> a permissible distinction, e.g., immunizations in PCP's office may be placed in the outpatient, office visit subclassification while immunizations in a pharmacy may be placed in the outpatient, all other subclassification.
- Similar services should be classified together unless the location or other distinction can be identified, e.g., breastfeeding supplies and diabetic supplies may be in the same classification

unless diabetic supplies are covered under pharmacy benefits and breastfeeding supplies are considered DME.

Cell	Notes on Response
Beginning with E10	Select classification or sub-classification from dropdown
	for each Covered Service listed in Column B

**Step 7.** In Column F and Column G, provide citations in the form of page numbers and sections in both the Certificate of Coverage and Schedule of Benefits where the services included in each line of the listed Covered Services can be found. - OPTIONAL

• Insurers may populate these columns, but the Department will not be requiring this information at this time.

Cell	Notes on Response
Beginning with F10	List COC page number related to each Covered Service
	listed in Column B
Beginning with G10	List SOB page number related to each Covered Service
	listed in Column B

COC Cites:	SOB Cites:
pg. 14, Section III	pg. 3, Section II
pg. 25, Section V	pg. 4, Section III

# Step 8. In Column H, list NQTLs specific to the covered service in the corresponding line. - OPTIONAL

• Insurers may populate these columns, but the Department will not be requiring this information at this time.

Are there any NQTLs
specific to the covered
service (e.g., prior
auth, step therapy)
No
No
Prior Auth
No
No
Step Therapy
Step Therapy

#### **Analysis Tabs**

Data entered in columns B through G will auto-populate the corresponding tabs for purposes of reporting QTLs and Financial Requirements.

For each tab, enter the corresponding cost-sharing or visit limit information in the lines with covered services. Where limits are not applied or the cost-sharing is \$0, enter "N."

• Note that only medical/surgical services carry over to the calculation tabs.

Service Categories within the Sub-Classification of:	COLUMN 1	COLUMN 2	COLUMIN 3	COLUMIN 4	COLUMN 5
OPTION-OUTPATIENT, IN, OFFICE	EXPECTED CLAIM DOLLAR AMOUNT	COPAY APPLICATION	COINSURANCE APPLICATION	DEDUCTIBLE APPLICATION	SESSION LIMITS APPLICATION
		INSTRUCTIONS: Is a copay applied to this	INSTRUCTIONS: Is a coinsurance applied to	INSTRUCTIONS: Is a deductible applied	INSTRUCTIONS: Is a session limit
		service category? If yes, list the copay	this service category? If yes, list coinsurance	to this service category? If yes, put a "Y"	applied to this service category? If
	INSTRUCTIONS:	dollar amount applied to the Service	Percentage Amount Applied to the Service	for every Service Category with a	yes, put the session limit for every
INSTRUCTIONS:	List Claim Expected Allowed Dollar	Category. If no, put a "N" for every	Category. If no, put a "N" for every Service	deductible application. If no, put a "N"	Service Category. If no, put a "N" for
All MEDICAL/SURGICAL service categories provided within	Amounts (Annual) for each service	Service Category where there is no	Category where there is no coinsurance	for every Service Category where there	every Service Category where there
this sub-classification are listed below.	category listed.	copay application.	application.	is no deductible application.	is no session limit application.
Occupational Therapy - office	\$45,545,522.00	\$40.00	N	N	N
Speech Therapy - office	\$48,552,679.00	\$40.00	N	N	N
Immunization- ACA - PCP office	\$1,525,588.00	N	Ň	N	N
Immunization - Travel - PCP office	\$544,899.00	\$25.00	Ň	N	N

When Columns 2-6 (D-H) are filled out, formulas will auto-calculate the substantially all and predominant level tests. The user will be prompted if the substantially all threshold is not met and which level is the predominant level, if applicable.