

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
Center for Consumer Information and Insurance Oversight
200 Independence Avenue SW
Washington, DC 20201



November 19, 2021

Jefferson Local Schools Health Benefit Plan (West Jefferson Local Schools) – OH

William Mullett, Superintendent
wmullett@westjeff.org

Re: Final Determination Letter - Mental Health Parity and Addiction Equity Act (MHPAEA)
Non-Quantitative Treatment Limitation (NQTL) Comparative Analysis Review –
Concurrent review for outpatient, in-network services

Dear Mr. Mullett:

On behalf of the Centers for Medicare & Medicaid Services (CMS), this notice is being sent to advise you that a MHPAEA NQTL Analysis Review (Review) is complete. The purpose of this Review was to assess Jefferson Local Schools Health Benefit Plan's (Plan) compliance with the following requirements under Title XXVII of the Public Health Service Act (PHS Act) and its implementing regulations for the specific NQTL comparative analysis reviewed:

42 U.S.C. § 300gg-26, 45 C.F.R. § 146.136 and 45 C.F.R. § 147.160 - Parity In Mental Health And Substance Use Disorder Benefits. The Review covered the 2021 plan year for concurrent review for outpatient, in-network services.

CMS conducted this Review pursuant to PHS Act § 2726(a)(8)(A) and (B), as added by Section 203 of Title II of Division BB of the Consolidated Appropriations Act, 2021.¹ CMS contracted with Examination Resources, LLC to conduct the Review in conjunction with CMS.

Based solely on this Review of the NQTL analysis information submitted by Jefferson Local Schools Health Benefit Plan, CMS did not note any areas of non-compliance in connection with this specific Review. As a result, no corrective action is required on behalf of the Jefferson Local Schools Health Benefit Plan in connection with this Review at this time. CMS's findings detailed in this letter pertain only to the NQTL under review and do not bind CMS (or any other government agency or entity) in any subsequent or further review of other Plan provisions or their application for compliance with governing law, including MHPAEA. If additional information is provided to CMS regarding this NQTL or Plan, CMS reserves the right to conduct an additional review for compliance with MHPAEA or other applicable PHS Act requirements.²

¹ Pub. L. 116-260 (Dec. 27, 2020).

² See PHS Act § 2726(a)(8)(B)(i). Also see 45 C.F.R. § 150.303.

CMS will include a summary of the comparative analysis and the results of this Review in its annual report to Congress pursuant to PHS Act § 2726(a)(8)(B)(iv).

Sincerely,

Mary Nugent
Director, Compliance and Enforcement Division
Oversight Group
Center for Consumer Information and Insurance Oversight
Centers for Medicare & Medicaid Services

cc: Ohio Department of Insurance