

Exhibit: Selected examples of apparent discrepancies in application of federal parity in health plans offered on two state exchanges

	Exemplar language in exchange plans' summary documents		Concerns for parity regulation
	Medical/Surgical Benefits	Behavioral Health Benefits	
1	<i>Inpatient stay requires copayment</i>	<i>Inpatient stay requires coinsurance</i>	Discrepancy in type of financial requirement imposed
2	<i>No charge for a combined total of 3 primary care or outpatient mental health care visits; additional visits are no charge after deductible.</i>	<i>No charge after deductible for substance use disorder outpatient services.</i>	Discrepancy in generosity of mental health and medical versus substance abuse benefit
3	<i>Medical office visit requires \$30 copay. Outpatient surgery requires 30% coinsurance.</i>	<i>All behavioral health visits requires 30% coinsurance.</i>	Discrepancy in subdivision of behavioral health benefit
4	<i>For outpatient visits, no limitations and exceptions</i>	<i>For outpatient visits, prior authorization is required</i>	Discrepancy in use of NQTLs