City of Tuscaloosa PROPOSED MENTAL HEALTH AND SUBSTANCE ABUSE EPF CONVERSION FOR COMPLIANCE WITH THE INTERIM FINAL REGULATIONS UNDER THE PAUL WELLSTONE AND PETE DOMENICI MENTAL HEALTH PARITY AND ADDICTION EQUITY ACT OF 2008

BLUE CROSS AND BLUE SHIELD OF ALABAMA

	BLUE CROSS AND BLUE SHIELD OF A	MHP Compliant Benefits
	Current Benefits	Effective 10/1/2010
MENTAL HEALTH AND SUBSTANCE ABUSE		
Inpatient Hospital Note: Out-of-Network in Alabama not covered	In-Network: 100% after \$250 per admission deductible; \$50 per day hospital copay days 2-11 for each admission Out-of-Network: 80% after \$500 per admission deductible	In-Network: 100% after \$250 per admission deductible; \$50 per day hospital copay days 2-11 for each admission Out-of-Network: 80% after \$500 per admission deductible
	 Mental Health benefits limited to lifetime maximum of 15 days of inpatient treatment per person Substance Abuse benefits for inpatient and outpatient treatment is limited to a combined lifetime maximum of \$10,000 per person. Inpatient substance abuse is covered only upon prior approval from the group. 	
Inpatient Physician	In-Network: 80%; no copay or deductible Out-of-Network: 80% subject to calendar year deductible Mental Health benefits limited to lifetime maximum of 15 days of inpatient treatment per person Substance Abuse benefits for inpatient and outpatient treatment is limited to a combined lifetime maximum of \$10,000 per person. Inpatient substance abuse is covered only upon prior approval from the group.	In-Network:100%; no copay or deductible Out-of-Network: 80%; no copay or deductible
Outpatient Hospital	 In-Network: 50% subject to calendar year deductible Out-of-Network: 50% subject to calendar year deductible Mental Health benefits limited to 40 visits per person per calendar year; Lifetime maximum of 200 visits per person Substance Abuse benefits for inpatient and outpatient treatment is limited to a combined lifetime maximum of \$10,000 per person 	Covered like all other medical outpatient hospital benefits except as noted below. Emergency Room Facility (Medical Emergency) Out-of-Network: 100% after \$50 hospital copay; in Alabama, not covered Emergency Room Facility (Accidental Injury) Out-of-Network: 100%; no copay or deductible Emergency Room Physician Out-of-Network: 100% after \$30 physician copay
Outpatient Physician	In-Network: 50% subject to calendar year deductibleOut-of-Network: 50% subject to calendar year deductibleMental Health benefits limited to 40 visits per person per calendar year; Lifetime maximum of 200 visits per personSubstance Abuse benefits for inpatient and outpatient treatment is limited to a combined lifetime maximum of \$10,000 per person	In-Network: 100% after \$30 physician copay Out-of-Network: 80% subject to calendar year deductible

The above comparison shows your current mental health and substance abuse (MH/SA) benefits with limitations and restrictions versus your proposed benefits to be in compliance with the Interim Final Regulations under the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008.

Your MH/SA benefits will now be maximized when using a provider who participates in the Blue Choice Behavioral Health Network (BCBHN) within the state of Alabama. Our BCBHN services are provided through Managed Health Care Administration (MHCA). MH/SA professionals who have contracted with MHCA to participate in this network have agreed to accept the fee schedule as payment and members will be held harmless. Some PMD/PPO providers may be utilized for certain MH/SA diagnoses. When neither a BCBHN provider nor a PMD/PPO provider is used, the services will be covered at the out-of-network level of benefits. Interim Final Regulations state that MH/SA benefits may not have separate but equal cost sharing provisions from medical/surgical benefits.

Services provided in other states will process according to regular contract benefits at the network level submitted by the local Blue Cross and Blue Shield plan.

Based on the actuarial analysis performed to comply with the Interim Final Regulations under the Paul Wellstone and Pete Domenici Mental Health Parity Equity Act of 2008, the copay allowed for Mental Health Substance Abuse office visits cannot exceed the copay charged for Outpatient facility (Non-Emergency) for this copay to be equal to that of the medical office visit copay, and to encourage office treatment over treatment in an Outpatient facility, we recommend implement a Preferred Outpatient Facility copay that is equal to or greater than your PPO Physician office visit copay.

As a courtesy, Blue Cross and Blue Shield of Alabama has prepared this preliminary financial and quantitative treatment limitations testing analysis that you may use to determine whether your plan is compliant with the Mental Health Parity and Addiction Equity Act and implementing regulations (MHPAEA). The plan administrator and plan sponsor of your plan have the sole legal responsibility to determine whether your plan complies with MHPAEA. Blue Cross and Blue Shield of Alabama is not the plan administrator nor the plan sponsor of your plan. None of the actions taken by Blue Cross and Blue Shield of Alabama is not the plan administrator's/plan sponsor's responsibilities under MHPAEA or any other applicable law.

Initials____