



April 7, 2022

Honorable Chairman John Hunt
House Commerce and Consumer Affairs Committee
Legislative Office Building Room 101
North Main St., Concord, NH 03301

RE: NAMI NH Support of SB 373

Dear Chairman and Committee Members:

Thank you for the opportunity to testify today. My name is Holly Stevens, and I am the Director of Public Policy at NAMI New Hampshire, the National Alliance on Mental Illness. On behalf of NAMI NH, I am here today to speak in support of SB 373, relative to coverage for certain mental illnesses. First, NAMI NH would like to thank the New Hampshire Insurance Department (NHID) for asking that this bill be brought forward.

Under current federal law, health insurance plans must “perform and document comparative analyses of the design and application” of nonquantitative treatment limitations (NQTLs) and make them available to the government agency that oversees the administration of the plans. SB 373 would allow the NHID to require self-funded plans, which they do not oversee, to submit these comparative analysis reports to the NHID as well as the overseeing federal agency. Since the insurance plans are already doing the analysis and compiling the report, there should be no additional burden on insurance plans to simply submit the same report they have compiled for the federal government to the NHID.

The NHID recently performed a market conduct exam regarding mental health parity and released a report in January 2020. The report stated that there was a “strong indicator of potential non-compliance with non-quantitative treatment limitation...requirements.” Allowing the NHID to have access to reports that the self-funded plans are already submitting to the federal government would provide it with one more tool to assure that NH’s fully insured plans are complying with federal mental health parity requirements.

Given the importance of parity enforcement, NAMI NH urges the committee to vote ought to pass on SB 373. I am happy to answer any questions that you may have.

Sincerely,

A handwritten signature in black ink that reads "Holly A. Stevens". The signature is fluid and cursive, with a long horizontal line extending from the end.

Holly A. Stevens, Esq.