

**Working Group Regarding
Treatment and Coverage of Substance Abuse
Disorders and Mental Illness**



Annual Report

**Produced by:
State of Illinois
Department of Insurance**



Illinois Department of Insurance

JB Pritzker
Governor

KEVIN FRY
Acting Director

February 2019

To: Members of the General Assembly
Governor JB Pritzker

From: Kevin Fry, Acting Director of the Department of Insurance

Re: Annual Report of the Working Group Regarding Treatment and Coverage of Substance Abuse Disorders and Mental Illness

The Department of Insurance (DOI) is pleased to submit its Annual Report of the Working Group Regarding Treatment and Coverage of Substance Abuse Disorders and Mental Illness as required by The Heroin Crisis Act (Public Act 99-0480) and specifically pursuant to 215 ILCS 5/370c.1(h)(2).

DOI is committed to ensuring mental health parity in the health plans we regulate through compliance, market conduct examinations, consumer complaints, and consumer education.

In 2018, DOI received federal grant funds to research and potentially revise future EHB-benchmark plans to assist Illinois consumers. The federally approved revised EHB-benchmark Plan included five new requirements to help address substance use disorders and the opioid crisis. It aimed at reducing addiction and overdose by covering alternative therapies for chronic pain, improving the way opioids are prescribed, and expanding access to mental health and substance use disorder treatment and services. This innovative approach could have a life-changing impact on the insurance industry and other states are now looking to Illinois to review our model.

In 2018, DOI became the first state insurance department to conduct targeted mental health market conduct exams on insurance companies that sell on the Exchange. DOI is also drafting

the standard for other states to utilize during these examinations at the National Association of Insurance Commissioners (NAIC).

DOI supported laws that would put the ability to treat people and get them well back in the hands of providers. We supported laws to improve insurance companies' coverage of mental health and substance use disorder treatments and strengthens DOI's ability to protect consumers and allow providers to give immediate access to outpatient treatment by removing prior authorization barriers.

DOI was an active member of the governor's Opioid Task Force that lead the state's response to this deadly epidemic. DOI staff personally distributed materials on mental health parity and external reviews in all 102 counties in Illinois two years in a row.

In the fall of 2018, Illinois was the only state to receive an 'A' grade (100/100) on the test of compliance with the Federal Parity Law in the assessment 'Evaluating State Mental Health and Addiction Parity Statutes' jointly released by the Kennedy-Satcher Center for Mental Health Equity, The Kennedy Forum, The Carter Center, and Well Being Trust (WBT) Center. Tennessee was second in the grading with a 'C' (79/100) and thirty-two states received failing grades. Illinois' report card specifically notes we have 'strong implementation of [Illinois'] newly enacted parity statute.' Our 'A' grade on parity demonstrates how we have committed to ensuring that insurance companies cover mental health and substance use disorders the same as other chronic physical conditions.

We will continue to lead by example and push the country forward through progress in achieving mental health and substance use disorder parity. The attached Annual Report demonstrates how DOI is pursuing its mission with respect to Substance Abuse Disorders and Mental Illness. DOI looks forward to any comments or suggestions you may have.

Respectfully submitted,



**WORKING GROUP
TREATMENT & COVERAGE OF SUBSTANCE ABUSE DISORDERS &
MENTAL ILLNESS**

Annual Report

Date

In 2015, Public Act 99-0480 (The Heroin Crisis Act) created a Working Group with participants from other relevant state agencies, health care insurance carriers, mental health advocacy groups, substance abuse patient advocacy groups, and treatment providers to discuss issues related to the treatment and coverage of substance abuse disorders and mental illness.

The Illinois Department of Insurance (DOI) manages the oversight of, and provides staff support for, the Working Group in coordination with the Department of Human Services (DHS), the Department of Healthcare and Family Services (HFS) and the Department of Public Health (DPH). The Working Group meets in accordance with the Illinois Open Meetings Act. Meeting Agendas and Approved Minutes are available on the DOI website.

<http://insurance.illinois.gov/hirc/HealthReformMain.html>

Working Group Participants:

- Health care insurance carriers
- Mental health advocacy groups
- Substance abuse patient advocacy groups
- Mental health and substance use disorder treatment providers
- Representatives from relevant state regulatory and human service agencies

Working Group meetings covered in this Annual Report:

- Tuesday July 31, 2018, 3:00 p.m. to 5:00 p.m. CST
- Tuesday, November 28, 2018 3:00 p.m. to 5:00 p.m. CST



WORKING GROUP

TREATMENT & COVERAGE OF SUBSTANCE ABUSE DISORDERS & MENTAL ILLNESS

Illinois Department of Insurance
Meeting Minutes of House Bill 1, [Public Act 099-0480](#)
Working Group Regarding Treatment and Coverage of Substance Abuse Disorders and Mental Illness
Open Meeting
Tuesday, July 31, 2018
3:00 p.m. to 5:00 p.m. CST

Video Conference location: Illinois Department of Public Health Video Conference Room at 69 W. Washington Street, 35th Floor, Chicago, Illinois 60601.

Video Conference location: Illinois Department of Public Health Video Conference Room at 535 W. Jefferson Street, 5th floor, Springfield, Illinois 62767.

Working Group Members		Present Y/N	CHI/SPI
Director Jennifer Hammer	Illinois Department of Insurance	N	
Secretary James Dimas	Illinois Department of Human Services	N	
Director Felicia Norwood	Illinois Department of Healthcare and Family Services	N	
Director Nirav D. Shah	Illinois Department of Public Health	Y	CHI
Vern Rowen	Aetna	N	
Laura Minzer	Executive Director, Blue Cross and Blue Shield of IL	Y	CHI
Jill Wolowitz	Blue Cross Blue Shield	N	
Kim Maisch	CIGNA	Y	CHI
Marvin Lindsey	CEO, Community Behavioral Healthcare Association of IL	N	
Mark Loafman	Cook County Health and Hospitals System	N	
Stephanie Place	Erie Foster Avenue Health Center	N	
Dr. Thomas Britton	CEO, Gateway Foundation	N	
Harmony Harrington	Humana	N	
Vincent Keenan	Illinois Academy of Family Physicians	N	
Sara Howe	CEO, Illinois Association for Behavioral Health <i>(formerly the Illinois Alcoholism and Drug Dependence Association)</i>	N	
Eric Foster	Illinois Association for Behavioral Health <i>(formerly the Illinois Alcoholism and Drug Dependence Association)</i>	Y	SPI
Sam Gillespie	Illinois Department of Children and Family Services	N	
Susan Fonfa	Illinois Department of Healthcare and Family Services	N	
Dan Wasmer	Illinois Department of Human Services	N	
Maria Bruni	Illinois Department of Human Services/Division of Alcoholism and Substance Abuse	N	
Paulette Dove	Illinois Department of Insurance	N	
Representative Lou Lang	Illinois General Assembly	N	
Rajesh Parikh	Illinois Primary Health Care Association	N	
Meryl Sosa	Illinois Psychiatric Society	N	
Dr. Fahmy Abdel	Illinois Society of Addiction Medicine	N	
Scott Reimers	Illinois State Medical Society	N	

Working Group Members		Present Y/N	CHI/SPI
Renée Popovits	Popovits & Robinson	N	
Kelly O'Brien	The Kennedy Forum	N	
David Lloyd	Director of Policy and Programs, The Kennedy Forum	Y	CHI
Heather O'Donnell	Senior VP of Advocacy and Public Policy at Thresholds	N	
Catherine Bresler	Vice President Counsel Government Relations at Trustmark Insurance Company	N	
Brendan Hostetler	United HealthCare	N	

Illinois Department of Insurance Staff Present	
Michael Batkins	Illinois Department of Insurance
Karen Woods	Illinois Department of Insurance
Carol West	Illinois Department of Insurance
Michael Rohan	Illinois Department of Insurance
Brian Gorman	Illinois Department of Insurance

Interested Parties in Attendance		CHI/SPI
Catherin Dimou	CIGNA	CHI
Carol Trocinski	UnitedHealth	CHI
Kim Perry	UnitedHealth	CHI
Shelly Schuman	Supervising Insurance Examiner – INS Companies	CHI
Andrew Smith	Depression Bipolar Support Alliance	CHI
Cheryl Potts	Kennedy Forum	CHI
Lia Daniels	IHA	CHI
Abdi Tinwalla	IlliniCare	CHI
Hector Barendt	IlliniCare	CHI
Nicole Wemhoff	Popovits Law Group	CHI
Steve Sproat	IlliniCare	CHI
Tom Allen	BCBS	CHI
Neli Vazquez Rowland	A Safe Haven	CHI
Tere Garate	Gateway Foundation	CHI
Kaisha Young	Northwestern University Graduate Student	CHI
Linda Laugges	Aetna	SPI
Dan Klopfenstein	Health Alliance	SPI
Brian Smolich	Health Alliance	SPI
John Beck	Health Alliance	SPI
Eric Foster	IABH	SPI

Bi-Annual Meeting July 2018

Issuer Presentation Summary:

The Working Group Regarding Treatment and coverage of Substance Abuse disorder and Mental Illness was held on July 31, 2018 at 3:00 p.m. to 5:00 p.m. The agenda for this meeting was specifically focused on what actions the major issuers within the State of Illinois were doing to combat the Opioid Epidemic in our state. Issuers presenting were:

- Aetna
- Blue Cross Blue Shield of Illinois
- Centene
- Cigna
- Health Alliance
- United Healthcare

Issuers were asked to present their overall strategy and key initiatives. Each issuer presented a multi-pronged approach. Key items presented focused on prevention, access, support, education, monitoring and feedback. All issuers acknowledged there is more work to be done.

Stakeholder Presentations:

A Safe Haven's mission: A Safe Haven Foundation is a 501(c)3 not for profit, social enterprise that helps people aspire, transform and sustain their lives as they transition from homelessness to self-sufficiency with pride and purpose. A Safe Haven provides the tools for each individual to overcome the root causes of homelessness through a holistic and scalable model. A Safe Haven's visible social and economic impact unites families, stabilizes neighborhoods, and creates vibrant, viable communities. A Safe Haven presents:

- History of their work to combat the opioid crisis
- Sponsor of the 1115 waiver
- Services provided include
 - Physical treatment
 - Behavioral treatment
 - Education
 - Housing
 - Job Training
 - Holistic support

The Kennedy Forum:

David Lloyd speaks to the importance of parity analysis especially regarding non- quantitative limitation, quantitative limitations, and financial requirements stating that plan analysis must consider how each limitation is designed and applied for both medical and behavioral. He highlights a six-step guide; what plans must do to demonstrate compliance. How it's being designed and what are the thresholds to trigger certain limitations.

He discusses the elimination of prior authorization in for consumers on Illinois Medicaid and questions whether this will occur in the commercial sector.

In relation to provider networks David Lloyd shares that at 2015 study conducted by The Kennedy Forum discovered that patients sought treatment for behavioral health out of network twice as often as in network.

Additionally, Lloyd mentioned the self-compliance tool for mental health and addiction equity act issued by the Department of Labor.

Department of Insurance/Get Covered Illinois Presentation

The Illinois Department of Insurance (DOI) is committed to combatting our state's deadly opioid epidemic by enforcing mental health parity while improving access to treatment of mental, emotional, nervous, and substance use disorders and conditions.

As part of this effort, DOI made available the Access to Coverage and Treatment (ACT) Program. The ACT Program is an educational program for citizens to learn about opioid abuse, mental health parity, and the tools available from the DOI and others to assist on the path to recovery.

Karen Woods summarized what DOI is doing through the ACT Educational Program, to combat the growing opioid crisis in Illinois. She also explained that DOI revised the benchmark health plan for plan year 2020 and is awaiting approval from federal CMS.

Background: In April 2018, the Federal Centers for Medicare & Medicaid Services (CMS) announced that states have until July 2, 2018 to change their Benchmark plan effective in plan year 2020 (including three options that weren't previously available). The Illinois Department of Insurance (DOI) anticipated these changes in February 2018 and secured approval from the Governor's Office to pursue changing the Benchmark plan to address the opioid crisis. DOI then contracted with three external groups to assist in the drafting of the new plan (SIU School of Medicine (researcher and provider experts), PCG (subject matter experts), and Oliver Wyman (actuaries)).

Bi-Annual Meeting November 2018

Illinois Department of Insurance
Meeting Minutes of House Bill 1, [Public Act 099-0480](#)
Working Group Regarding Treatment and Coverage of Substance Abuse Disorders and Mental Illness
Open Meeting
Tuesday, November 27, 2018
3:00 p.m. to 5:00 p.m. CST

Video Conference location: Illinois Department of Public Health Video Conference Room at 69 W. Washington Street, 35th Floor, Chicago, Illinois 60601.

Video Conference location: Illinois Department of Public Health Video Conference Room at 535 W. Jefferson Street, 5th floor, Springfield, Illinois 62767.

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Director Felicia Norwood	Illinois Department of Healthcare and Family Services	N	
Director Nirav D. Shah	Illinois Department of Public Health	N	
Vern Rowen	Aetna	N	
Laura Minzer	Executive Director, Blue Cross and Blue Shield of IL	N	
Jill Wolowitz	Blue Cross Blue Shield	N	
Kim Maisch	CIGNA	N	
Marvin Lindsey	CEO, Community Behavioral Healthcare Association of IL	N	
Mark Loafman	Cook County Health and Hospitals System	N	
Stephanie Place	Erie Foster Avenue Health Center	N	
Dr. Thomas Britton	CEO, Gateway Foundation	N	
Harmony Harrington	Humana	N	
Vincent Keenan	Illinois Academy of Family Physicians	N	
Sara Howe	CEO, Illinois Association for Behavioral Health <i>(formerly the Illinois Alcoholism and Drug Dependence Association)</i>	Y	CHI
Eric Foster	Illinois Association for Behavioral Health <i>(formerly the Illinois Alcoholism and Drug Dependence Association)</i>	N	
Sam Gillespie	Illinois Department of Children and Family Services	N	
Susan Fonfa	Illinois Department of Healthcare and Family Services	N	
Dan Wasmer	Illinois Department of Human Services	N	
Maria Bruni	Illinois Department of Human Services/Division of Alcoholism and Substance Abuse	Y	CHI
Paulette Dove	Illinois Department of Insurance	N	
Representative Lou Lang	Illinois General Assembly	N	
Rajesh Parikh	Illinois Primary Health Care Association	N	
Meryl Sosa	Illinois Psychiatric Society	N	
Dr. Fahmy Abdel	Illinois Society of Addiction Medicine	N	
Scott Reimers	Illinois State Medical Society	N	
Renée Popovits	Popovits & Robinson	N	
Kelly O'Brien	The Kennedy Forum	N	
David Lloyd	Director of Policy and Programs, The Kennedy Forum	Y	CHI
Heather O'Donnell	Senior VP of Advocacy and Public Policy at Thresholds	N	
Catherine Bresler	Vice President Counsel Government Relations at Trustmark Insurance Company	N	

Working Group Members		Present Y/N	CHI/SPI
Brendan Hostetler	United HealthCare	N	

Illinois Department of Insurance Staff Present	
Michael Batkins	Illinois Department of Insurance
Karen Woods	Illinois Department of Insurance
Karin Zosel	Illinois Department of Insurance
Stephanie Fuller	Illinois Department of Insurance

Interested Parties in Attendance		CHI/SPI
Renee Popovits	Popovits Law Group	CHI
Jud Deloss	DHS	CHI
Lia Daniels	IHA	CHI
Lynsey Robertson	Molina	CHI
Tina Bhaga	IDHS	CHI
Gabriella Maroney	IDHS	CHI
Adam Park	Gateway	CHI
Blanca Campos	CBHA	CHI
Kelly Cunningham	HFS	SPI

New Behavioral Health Legislation Presentation

Gerald (Jud) E. DeLoss, Legal Counsel to IABH and Sara M. Howe, CEO

On January 1, 2019, two new laws effecting insurers of mental health and substance use services went into effect: [Public Act 100-1023](#) and [Public Act 100-1024](#). The Illinois Association for Behavioral Health was instrumental in the negotiation and passage of these new laws. Below is a brief analysis of the Acts as they apply to health insurance plans to assist you as you prepare for implementation.

Public Act 100-1023 – Emergency Opioid and Addiction Treatment Access Act

PA 100-1023 allows for immediate access to Illinois treatment providers by **removing the prior authorization requirement for commercial health plans and Medicaid managed care organizations (MCOs)**. The elimination of prior authorization applies to the following ASAM Levels of Treatment:

Plans:
2.1 (Intensive Outpatient)
2.5 (Partial Hospitalization)
3.1 (Clinically Managed Low-Intensity Residential)
3.3 (Clinically Managed Population-Specific High-Intensity Residential)
3.5 (Clinically Managed High-Intensity Residential)
3.7 (Medically Monitored Intensive Inpatient)
OMT (Opioid Maintenance Therapy)

Instead of obtaining prior authorization for those treatment levels, providers and facilities will **only need to provide notice** within the law's timeframes in the manner specified under the plan agreement (within two business days).

Providers will need to comply with Rule 2060 requirements for treatment plans and will be subject to all plan utilization review and medical necessity requirements following notice and admission. If the provider fails to provide notice as required above, then the plan may impose its normal prior authorization process.

PA 100-1023 provides for an **additional expedited appeal process** for plans under the framework of the Health Carrier External Review Act. If a plan determines that treatment is not medically necessary, the insured may request, within 24 hours, an expedited external review. The reviewing entity will issue a determination within 72 hours. If the appeal upholds the decision denying benefits, **the plan must still pay for treatment through the date of the decision** (96 hours/4 days).

The provider is required to notify the plan of the intended discharge of the client 7 business days prior to the anticipated discharge and at the time of discharge.

The law also requires that **plans comply with all Parity requirements** set forth under sections 370c and 370c.1 of the Insurance Code. Those sections of the Insurance Code impose mandatory minimum coverages and benefits for behavioral health services and include substantial Parity protections – as further enhanced under PA 100-1024, described below.

Public Act 100-1024 – Amendments to Illinois Parity Law

PA 100-1024 makes several enhancements to Illinois' existing Parity laws, which were already considered among the most stringent in the nation based upon PA 99-0480. PA 100-1024 clarifies which State agency will be responsible for oversight and enforcement of various plans and MCOs. The Department of Insurance (DOI) will oversee various commercial plans while the Department of Healthcare and Family Services (HFS) will be responsible for Medicaid MCOs. (MCOs are covered by the Insurance Code Parity provisions by reference in the Public Aid Code). In addition to confirming the oversight agency, the **law expands the coverage of the Parity laws to include school employee health insurance plans**, which previously could opt out of Parity requirements in Illinois.

PA 100-1024 confirms that **only ASAM criteria may be utilized for medical necessity determinations for MAT**. The law then confirms that plans **may not impose prior authorization upon substance use disorder (SUD) prescription medications** except as required under ASAM criteria. Further, there may be no step therapy requirements imposed upon such medications. PA 100-1024 mandates that the plans place all brand SUD medications on the lowest tier of the drug formulary for brand SUD medications and place all generic SUD medications on the lowest tier of the generic formulary for generic SUD medications. Finally, the plan may not exclude coverage for such SUD medications or the associated counseling/wraparound services based upon the grounds that such medication and treatment was court-ordered.

PA 100-1024 requires **plans to submit comparative analysis and other detailed information and reports on their own internal Parity compliance processes and results**. The plans must also report Parity compliance information on their websites. DOI and HFS must perform regular Parity market conduct examinations/audits of plans and MCOs. The agencies will enforce Illinois Parity as well as the Federal Parity laws. Following the completion of all market conduct examinations and audits, and the review of reports by plans and MCOs required by the law, DOI and HFS must report to the General Assembly each year on Parity enforcement efforts and results.

In addition to the reporting and compliance exercises, DOI and HFS will convene a **Parity workgroup** made up of advocates, providers, plans, and MCOs. The workgroup will provide recommendations to the General Assembly on plan reporting requirements and other compliance and enforcement opportunities. The workgroup will spell out the requirements of a

new annual Parity reporting requirement that will be effective in 2020. The workgroup is provided a detailed and rigid review and reporting agenda.

The law also now requires the ***Auditor General to examine DOI and HFS compliance with Parity*** enforcement requirements under Illinois law.

For additional information:

Jud DeLoss, Greensfelder Law
(312) 345-5012 – office
gdeloss@greensfelder.com

Sara M. Howe, IABH
(217) 528-7335 ext. 11
sara@ilabh.org

Get Covered Illinois Access to Care and Treatment Parity Outreach and Education

The ACT team, in partnership with other state agencies, conducted face-to-face meetings with citizens across Illinois. The ACT team delivered formal presentations, provided printed materials, and offered one-on-one guidance to educate citizens on obtaining the coverage and treatment they need.

Why-ACT

- Drug overdoses claim more lives than anything else
- 13,395 non-fatal overdoses in 2017*
- 2,110 fatal overdoses 2017*
- State of Illinois Opioid Action Plan

This education initiative provides essential information to help consumers navigate their health insurance by: providing key insurance terms, sharing what Mental Health Parity and the consumers rights and responsibilities are as well as, who to contact when consumers need assistance navigating insurance or when a consumer's rights may have been violated.

- Includes quantitative and non-quantitative examples
- OCHI Hotline 1-877-527-9431 (General questions)
- External Review 1-877-850-4740 (Medical/Experimental denials)
- Medicaid, Medicare, SHIP and Department of Labor information

Results of ACT Events

- Partnership
 - Legislators – letters and phone calls were made to each elected official
 - County Leaders
 - State Agencies
 - Department of Corrections
 - Department of Human Services
 - SUPR
 - NAMI (National Alliance on Mental Health)
 - Illinois Psychological Association
 - Illinois State Fair Outreach
 - Continued Education of DOI Staff
- Completed more than 35 events in communities across the state engaging approximately 4,500 consumers throughout 2018

Changes to Illinois' Benchmark Plan

Federal CMS approved the Illinois Department of Insurance's request to change the Benchmark Plan. The approved changes to the Benchmark Plan will compliment steps that have already been taken to tackle the opioid epidemic in Illinois. Members of the Governor's Opioid Overdose Prevention and Intervention Task Force, created through Executive Order 17-05, toured the state listening to people who are impacted by the crisis and has made recommendations on how the state can intervene.

Based on the research, expert recommendations, and feedback from the two public comment periods, IDOI made five revisions to the existing plan. Beginning in 2020, private health insurance companies in Illinois offering plans on the individual and small group market will be required to:

- Cover alternative therapies for pain;
- Limit opioid prescriptions for acute pain;
- Remove barriers to obtaining Buprenorphine products for medically assisted treatment (MAT) of opioid use disorder;
- Cover prescriptions for at least one intranasal spray opioid reversal agent when initial prescriptions of opioids are dosages of 50MME or higher; and
- Cover tele-psychiatry care by both a prescriber and a licensed therapist.

Additional Actions:

The teams at the Department of Human Services connected more than 5k people to critical resources through the Opioid Helpline. The Prescription Monitoring Program has helped scale back people's ability to doctor shop for dangerous opioid medications and, through the issuance of standing order, we continue to put life-saving medications in the hands of people whose loved ones are struggling with opioid use. Nearly 2,000 overdose reversals have been reported over the past year.

Throughout 2018 the focus was primarily on outreach and education for Illinois consumers to provide information regarding access, care and treatment to as many Illinoisans as possible. This work continues into 2019. We look forward to expanding our reach and messaging so that everyone with a mental health, substance use disorder or opioid crisis touching themselves or their family know there are resources committed to provided that assistance.

The next two Working Group Regarding Treatment and Coverage of Substance Abuse Disorders and Mental Illness meetings are set for 2019. Tuesday, July 30, 2019 and Tuesday December 3, 2019 from 3:00 p.m. to 5:00 p.m. Central Time, at the Conference Room of the State of Illinois, Department of Public Health Office, 69 W. Washington Street, 35th Floor, Chicago, Illinois

60602 and via video conference at the Conference Room of the State of Illinois, Department of Public Health Office, 535 W. Jefferson Street, Springfield, Illinois 62767 for the purpose of discussing issues related to the treatment and coverage of substance abuse disorders and mental illness pursuant to Public Act 99-0480.

Helpful Resources:

Parity Track – www.paritytrack.org

Parity Registry – www.parityregistry.org

Illinois Parity Survey Report – <https://thekennedyforum.org/wp-content/uploads/2017/09/20170919-IL-MHSUD-Coverage-Provider-Survey-Report-Final.pdf>

Parity Appeals Issue Brief – <https://thekennedyforum.org/wp-content/uploads/2017/09/20170615-The-Kennedy-Forum-Filing-an-Appeal-Issue-Brief-Final.pdf>

Formulary Issue Brief – https://thekennedyforum.org/wp-content/uploads/2017/09/170824-KF-Consumer-Guide-Drug-Form-Issue-Brief-0817_4.pdf

Parity Resource Guide – https://thekennedyforum.org/wp-content/uploads/2017/06/KennedyForum-ResourceGuide_FINAL_2.pdf

Six-Step Parity Compliance Guide – <https://paritytrack.org/resources/model-resources/six-step-parity-compliance-guide/>

Link to the full meeting minutes:

<http://insurance.illinois.gov/hirc/2018JulyMeetingMinutes.pdf>