



Peer Assistance Services

Dedicated to quality, accessible prevention and intervention services in workplaces and communities, focusing on substance abuse and related issues

August 3, 2012

Department of Regulatory Agencies
Division of Insurance
1560 Broadway, Ste. 850
Denver, CO 80203

RE: Essential Health Benefits

To whom it may concern:

Peer Assistance Services, Inc. (PAS) appreciates this opportunity to participate in the decision making process for the selection of the Essential Health Benefits Benchmark Plan in Colorado. PAS is a Colorado 501(c)(3) non-profit agency dedicated to quality, accessible prevention and intervention services in workplaces and communities, focusing on substance use and related issues. PAS provides intervention services to a wide range of licensed health care professionals including nurses, dentists, pharmacists and veterinarians, other at-risk working adults and offenders in reentry from incarceration. PAS also provides substance use prevention programming with strategies aimed at serving at-risk populations.

Preferences for Colorado's Essential Health Benefits (EHB) Package Benchmark Plan include Option D, the Kaiser Plan A230 or Option E, the Kaiser Plan State Employee Plan. Both plans include coverage for chemical dependency services including residential rehabilitation and mental health services; health educations services; and, preventive care services, all essential services to individuals we serve as an organization in the Colorado community.

Regarding the mentioned preferred plans, there are three important steps the state should engage in to further define Essential Health Benefits in Colorado. These steps will ensure full coverage is provided across the continuum of care to address substance use and mental health issues. The first step is to enforce the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008 (the parity act) in the selected plan and in the Health Benefits Exchange. Enforcing the parity act will require insurance plans that cover mental health and substance use disorder treatment to provide coverage to the same extent that the plans cover other medical or surgical treatment. People suffering from chronic health conditions often suffer from substance use and mental health disorders and these issues cannot be separated. To effectively identify, treat and provide the best care possible to individuals, it is necessary that insurance plans include parity to ensure that behavioral health needs are met.

PROGRAMS

Dental Peer Health Assistance Program
Nursing Peer Health Assistance Program/
Nurse Alternative to Discipline Program
Pharmacy Peer Health Assistance
Diversion Program
Paul D. Coverdell Drug-Free Workplace Program
Workplace Prevention Services
Prescription Drug Abuse Prevention Program
Colorado TASC
Treatment Accountability for Safer Communities
Western TASC
Northeast TASC
Southeast TASC
Mile High TASC

STATE INITIATIVE

SBIRT Colorado
Screening, Brief Intervention
and Referral to Treatment

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CHIEF EXECUTIVE OFFICER
Elizabeth M. Pace, MSM, RN, CEAP

Start believing.

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Another important area to address is defining telemedicine benefits. Telemedicine benefits are currently not defined in the mentioned plans. If one of these plans is chosen, it will be important to further define the telemedicine benefits and services included. Telemedicine services are important for providing services to individuals living in rural communities, one of the targeted goals of “accessing impact on rural Colorado” as outlined in the PowerPoint presentation provided at the July 31 public meeting. Telemedicine services should not only include physical health benefits but also substance use and mental health benefits including for example screening and early intervention services.

A final topic to address is to further define preventive care services. The preferred Kaiser plans mentioned include preventive care services as covered services that do one or more of the following: 1. Protect against disease; 2. Promote health; and/or 3. Detect disease in its earliest stages before noticeable symptoms develop. The recommendation is to ensure specific prevention and wellness services are defined to address behavioral health needs. Including services such as screening and early intervention for substance use and depression recommended by the United States Preventive Services Task Force will further support providers in delivering these services by offering a mechanism for reimbursement. Screening and early intervention is an evidence-based approach to addressing substance use and related issues in healthcare settings. Healthcare settings offer optimal settings to intervene early with individuals who struggle with substance use and mental health disorders.

Thank you again for this opportunity to offer public comment on the Essential Health Benefits Benchmark Plan. We look forward to continuing work towards improving the health and lives of all Coloradans. If you have any questions or would like more information regarding our recommendations, please feel free to contact me at your convenience.

Sincerely,

Elizabeth M. Pace, MSM, RN, CEAP

Chief Executive Officer

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