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September 13, 2021

Lisa Larson
Director of Regulatory Affairs
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, MD 21202

Sent via email to InsuranceRegReview.mia@maryland.gov

Re: [Comments on Supporting Documents for Draft COMAR 31.10.51
Mental Health Benefits and Substance Use Disorder Benefits -
Reports on Nonquantitative Treatment Limitations and Data](#)

Dear Ms. Larson,

The Community Behavioral Health Association (CBH) was unable to provide written comments on Maryland Insurance Administration's proposed Parity regulations within the required timeline. However, we wish to go on record in support of the comments submitted by the Mental Health Association of Maryland.

CBH represents 90 organizations serving Maryland residents. Our members provide outpatient mental health and addiction treatment, a continuum of community-based specialty services, vocational supports, and residential services to over 180,000 Maryland residents every year.

CBH is appreciate of the MIA and Commissioner Birrane for reflecting the concerns of the behavioral health provider community in the proposed regulations. We appreciate the balancing act inherent between asking for all the facts, figures and supporting documentation that we might desire, and the carriers' time, attention, and expense needed to produce them, as well as the MIA's time and attention in reviewing the submissions. We believe that the MIA's proposed templates – with the addition of MHAMD's modifications - strike a reasonable balance while at the same time increasing the expectations on carriers to provide evidence of compliance with the federal Parity Act.

Thank you for this opportunity to register our thoughts. Please don't hesitate to reach out if you have any questions.

Sincerely,



Shannon Hall
Executive Director