



BEHAVIORAL HEALTH PARITY – PERVASIVE DISPARITIES IN ACCESS TO IN-NETWORK CARE CONTINUE

Tami L. Mark, PhD, MBA William Parish, PhD

April 17, 2024

RTI International is a trade name of Research Triangle Institute.
RTI and the RTI logo are U.S. registered trademarks of Research Triangle Institute.

Contents

Exe	cutive Summary	
Intr	oduction	•
	Other Studies, Including Several with 2023 Data	. 13
	Current Study	15
Met	hods	
	Data	17
	Out-of-Network Use	. 17
	Medicare Provider Reimbursement Benchmarking	. 17
	Selecting Statistics to Summarize the Disparities	. 18
	Defining Clinician and Provider Types	.20
	Analysis of Disparities by Mental Health and Substance Use Disorder Separately and by Youth and Adults Separately	.21
	Analysis of In-Person and Telehealth Visits Separately	
Find	dings	:
	Disparities in Out-of-Network Use	.22
	Out-of-Network Use Was Materially Higher for Behavioral Health Care Than for Medical/Surgical Care	.22
	Out-of-Network Use for Behavioral Health Care Was Higher Than for Any Medical/Surgical Specialty	. 25
	Differences in Out-of-Network Use Disparities Vary by State	.27
	Disparities in In-Network Reimbursement Rates	.28
	Material Disparities in Reimbursement Persisted in 2021	. 28
	In 2019 and 2020, Behavioral Health Clinicians Were Reimbursed Less than Medicare	29
	Disparities in Reimbursement at the Higher End of Reimbursement Distribution Highlight That Health Plans Offer Greater Incentives to Medical/Surgical Clinicians for Network Participation	21
	Most States Exhibit Disparities in Reimbursement Levels Psychiatrists are Reimbursed Less Than Physician Assistants and Nurse Practitioners	
	Psychologists Are Reimbursed Less Than Physician Assistants and Nurse Practitioners	
	Not Indexed to Medicare, Psychiatrists Are Reimbursed Less Than Physician Assistants, and Almost the Same as Nurse Practitioners	
	It Is Inaccurate to Use a Subset of Billing Codes for Reimbursement and Out-of-Network Use Disparity Analyses	.36

	- 6-0-	al Populations	
		Patients Receive Care Out-of-Network More Often for Substance Use Disorders Than for Mental Health Conditions	38
		Behavioral Health Clinicians Were Reimbursed Less for Treating Mental Health Conditions Than for Substance Use Disorders	40
		Disparities in Reimbursements Are Higher for Adults Than for Children and Youth	41
	Teleh	ealth and Behavioral Health Disparities	42
		There Were Material Disparities in Out-of-Network Use for Telehealth Office Visits	43
		Disparities in Reimbursement Levels Are Lower but Growing for Telehealth Care	43
mi	tation	S	
on	clusio	ns	
ckı	nowled	dgements	
efe	rence	s	
efe	rence	s	
	rence endice		
pp	endice		
	endice Meth	es	
ppo	endice Meth 2021	es ods Detail	. B-1
ppo	Meth 2021 B-1a:	es ods Detail State-Level Disparities 2021 Acute Inpatient Facility—Out-of-Network Utilization Disparity	
ppo	Meth 2021 B-1a:	es ods Detail State-Level Disparities 2021 Acute Inpatient Facility—Out-of-Network Utilization Disparity Levels, All Plans	. B-3
ppo	Meth 2021 B-1a: B-1b:	cods Detail State-Level Disparities 2021 Acute Inpatient Facility—Out-of-Network Utilization Disparity Levels, All Plans	. В-3 . В-5

Exhibits

Numb	er	Page
1.	Summary of Studies of Behavioral Health Network Size	14
2.	Illustrative Depiction of Right Skewed Distributions	19
3.	Clinician and Provider Type Definitions	20
4.	Higher Proportion of Out-of-Network Use for Behavioral Health as Compared to Medical/Surgical for Office Visits and Facility Services	23
5a.	Out-of-Network Utilization Rates by Provider Type and Year, Office Visits	24
5b.	Out-of-Network Utilization Rates by Care Setting and Year, Facilities	24
6.	Higher Proportion of Out-of-Network Use for Psychiatrists and Psychologists as Compared to Medical/Surgical Physician Specialties and Primary Care Physicians, 2021	26
7.	Higher Proportion of Out-of-Network Use for Psychiatrist and Psychologist Office Visits as Compared to Medical/Surgical Specialist Physician and Primary Care Physician Office Visits, 2021	27
8.	Ratio of Out-of-Network Use for All Behavioral Health Clinician Office Visits as Compared to All Medical/Surgical Clinician Office Visits, 2021	28
9.	Office Visits: Average Percentage Higher In-Network Reimbursement Indexed to Medicare for Medical/Surgical Clinicians Compared to Behavioral Health Clinicians	29
10.	Average In-Network Reimbursement Indexed to Medicare for Medical/Surgical and Behavioral Health Clinician Office Visits	30
11a.	Office Visits—Average In-Network Provider Reimbursement Levels Relative to Medicare Reimbursement Levels: Medical/Surgical Clinicians as Compared to Behavioral Clinicians	31
11b.	Office Visits—Average In-Network Provider Reimbursement Levels Relative to Medicare Reimbursement Levels: All Medical/Surgical Specialist Physicians vs. Psychiatrists and Psychologists	31
12.	In-Network Reimbursement Indexed to Medicare for Medical/Surgical Clinician Office Visits and Behavioral Health Clinician Office Visits by Percentile, 2021	32
13.	Percentage Higher In-Network Reimbursement Indexed to Medicare for Medical/Surgical Clinician Office Visits as Compared to Behavioral Health Clinician Office Visits, by Percentile	32
14.	Higher In-Network Reimbursement Indexed to Medicare for All Medical/Surgical Clinician Office Visits Compared to All Behavioral Health Clinician Office Visits by State, 2021	34
15.	Indexed to Medicare: Percentage Higher or Lower Average In-Network Reimbursement for Office Visits with Physician Assistants and Nurse Practitioners Compared to Psychiatrists for All CPT Codes, 2021	35
16.	Indexed to Medicare: Percentage Higher or Lower Average In-Network Reimbursement for Office Visits with Physician Assistants and Nurse Practitioners Compared to Psychologists for All CPT Codes, 2021	35

17.	Not Indexed to Medicare: Percentage Higher or Lower Average In-Network Reimbursement for Physician Assistant and Nurse Practitioner Office Visits Compared to Psychiatrist Office Visits for Four Common Evaluation and Management Codes, 2021	36
18.	Percentages of Aggregate Reimbursement Represented by the Top 12 CPT Codes by Provider Specialty, In- and Out-of-Network, 2021	37
19.	Percentage Higher Reimbursement to Medical/Surgical Clinician Office Visits is Higher than Reimbursement to Behavioral Clinician Office Visits by Number of CPT Codes Used, 2021	38
20.	Higher Proportion of Out-of-Network Use for Substance Use Disorders as Compared to Mental Health, Each in Comparison to Medical/Surgical	40
21.	Office Visits: In-Network Average Reimbursement Indexed to Medicare Reimbursements, Separately for Substance Use Disorders and Mental Health	41
22.	Office Visits: Percentage Higher In-Network Reimbursement (Relative to Medicare) for Primary Care Physicians and Medical/Surgical Specialist Physicians Compared to Psychiatrists and Psychologists, By Age Group	42
23.	Higher Proportion of Out-of-Network Use for Behavioral Health as Compared to Medical/Surgical, In-Person Visits and Telehealth Visits	44
24.	Percentage of Higher Average In-Network Reimbursement Indexed to Medicare for Medical/Surgical Clinician Office Visits Compared to Behavioral Health Clinician Office Visits, Non-Telehealth Visits as Compared to Telehealth Visits	45

Executive Summary

The Mental Health Parity and Addictions Equity Act (MHPAEA) of 2008 aimed to eliminate discriminatory health plan coverage that prevents individuals from receiving effective mental health and substance use disorder treatment. MHPAEA requires that health plans not design or apply financial requirements and treatment limitations that impose a greater burden on access (that is, are more restrictive) to in-network mental health and substance use disorder benefits than plans and issuers impose on access to comparable medical/surgical benefits.

In this study, Research Triangle Institute (RTI) used 2019–2021 information from one of the largest commercial insurance claims databases to evaluate a key measure of health plan benefits that indicates whether individuals can access in-network behavioral health treatment as readily as medical/surgical treatment: the rate of use of out-of-network behavioral health providers.

Overview of Findings and Recommendations

Findings

- (1) Out-of-network use was many times higher for behavioral health treatment than medical/surgical treatment, which created a significantly greater financial burden for behavioral health patients. This was true even for telebehavioral visits as compared to telemedicine visits.
- (2) Office visit in-network reimbursement levels were much lower for behavioral health providers than for medical/surgical providers creating disincentives for behavioral health providers to participate in-network. For example, psychiatrists and psychologists had lower reimbursements than physician assistants.
- (3) The disparities in out-of-network use have remained large over the last 9 years for office visits, where most behavioral health care is delivered.
- (4) Provider shortages do not explain the disparities in out-of-network utilization and reimbursement.
- (5) These results demonstrate the need for more robust parity enforcement.

Recommendations

- (A) Health plans and states should expand their behavioral health networks, using higher reimbursement to behavioral providers to the extent required—as they do for medical/surgical providers—to incentivize behavioral health provider network participation and to decrease out-of-network use and its financial burden on patients.
- (B) Federal and state agencies should adopt the methodologies employed in this report to develop standardized templates with carefully worded definitions of all terms, to identify

and remedy parity violations pertaining to disparities in out-of-network utilization. Specifically, we recommend that regulatory and enforcement agencies should:

- (i) Compare behavioral health and medical/surgical reimbursement rates using Medicare benchmarks to allow valid and accurate comparisons across the service array.
- (ii) Evaluate reimbursement disparities by specific provider type.
- (iii) Utilize all procedure billing codes when evaluating out-of-network use and reimbursement disparities, and not just a few selected codes.
- (iv) Analyze not only average reimbursement (with claims weighted by dollar value), but also 50th percentile, 75th percentile, and 95th percentile reimbursements.

Findings

(1) Out-of-network use was many times higher for behavioral health treatment than medical/surgical treatment, which created a significantly greater financial burden for behavioral health patients. This was true even for telebehavioral visits as compared to telemedicine visits.

In 2021:

- Patients went out-of-network 3.5 times (13.4% as compared to 3.8%) more often for all behavioral health clinician office visits (i.e., to physicians and non-physicians combined) than patients went out-of-network for all medical/surgical clinician office visits.
- Patients went out-of-network <u>8.9 times</u> more often for psychiatrist office visits (15.3% as compared to 1.7%) and <u>10.6 times</u> more often for psychologist office visits (18.2% as compared to 1.7%) than for visits to medical/surgical specialist physicians (24 types, combined).
- In fact, patients went out-of-network more often for *psychiatrist* and *psychologist office visits* than for visits to every one of the 24 different types of *medical/surgical specialist physicians* (e.g., allergists/immunologists, ophthalmologists, cardiologists, and neurologists) and also for visits to *primary care physicians*. For example, patients went out-of-network <u>6.9 times</u> more often for *psychiatrist office visits* (15.3% as compared to 2.2%) and <u>8.2 times</u> more often for *psychologist office visits* (18.2% as compared to 2.2%) than for *primary care physician office visits*.
- Patients went out-of-network <u>6.2 times</u> more often (9.0% as compared to 1.5%) for behavioral health inpatient acute facility care as compared to medical/surgical inpatient acute facility care.
- Patients went out-of-network <u>19.9 times</u> more often (34.5% as compared to 1.7%) for behavioral health inpatient subacute facility care as compared to medical/surgical inpatient subacute facility care.
- Patients went out-of-network <u>1.5 times</u> more often (13.1% as compared to 8.5%) for behavioral health non-emergency room outpatient facility care as compared to medical/surgical non-emergency room outpatient facility care.

- Patients went out-of-network <u>4.7 times</u> more often (11.4% as compared to 2.4%) for telehealth office visits with behavioral health clinicians as compared to medical/surgical clinicians.
- When examined state-by-state, two states (Arizona and Idaho) had lower out-of-network use for behavioral health clinician office visits than for medical/surgical clinician office visits. In the five states with the greatest disparities (Maryland, Massachusetts, Maine, Rhode Island, and Washington) patients had out-of-network behavioral health clinician office visits more than 7 times more frequently than for office visits to medical/surgical clinicians. In the state with the greatest disparity (Massachusetts), patients went out-of-network for behavioral health office visits 14.1 times more often than for medical/surgical office visits (14.4% as compared to 1.0%).

High out-of-network use is a consequence of health plans contracting with too few providers. Many studies completed as recently as 2023 (and summarized in the "Introduction" of this report) demonstrate that behavioral health provider networks include too few providers. Studies also confirm that smaller provider networks (relative to the need for services) result in higher out-of-network use, higher patient out-of-pocket costs, and reduced access.

(2) Office visit in-network reimbursement levels were much lower for behavioral health providers than for medical/surgical providers creating disincentives for behavioral health providers to participate in-network. For example, psychiatrists and psychologists had lower reimbursements than physician assistants.

Health plans' key levers for establishing the size of their provider networks are the in-network reimbursement rates that they offer to providers. Providers who are offered low reimbursement from health plans are less likely to participate in networks, resulting in smaller provider networks, more out-of-network use, and less access to treatment.

With respect to reimbursement rates, we found that in 2021:

- Average reimbursement for all medical/surgical clinician office visits was 21.7% higher than for all behavioral health clinicians (124.8% of Medicare as compared to 102.5% of Medicare, respectively).
- Average reimbursement for medical/surgical specialist physician office visits was 24.9% higher (135.3% of Medicare as compared to 108.4% of Medicare, respectively) than for psychiatrist office visits and 28.8% higher than for psychologist office visits (135.3% as compared to 105.1% of Medicare, respectively).
- Average reimbursement for physician assistant office visits was 18.7% higher than for psychiatrists (128.7% of Medicare as compared to 108.4% of Medicare, respectively), and average reimbursement for nurse practitioners was 8.2% higher than for psychiatrists (117.2% of Medicare as compared to 108.4% of Medicare, respectively).
- Average reimbursement for physician assistant office visits was <u>22.4% higher</u> than for psychologists (105.1% of Medicare for psychologists as compared to 128.7% for physician assistants) and average reimbursement for nurse practitioners was <u>11.5% higher</u> than for psychologists (117.2% as compared to 105.1%).

In addition, average reimbursement does not tell the whole story. Health plans may need to pay significantly more to attract some providers than others to encourage them to accept in-network reimbursement. Therefore, it is important to consider not just what a health plan reimburses on average, but how much they reimburse at the tails of the reimbursement rate distribution. We found that:

• At the 75th percentile of the reimbursement distribution, medical/surgical clinician office visits were reimbursed at a level 48.0% higher than behavioral health clinician office visits (148.0% of Medicare as compared to 100.0% of Medicare, respectively). At the 95th percentile, reimbursement for medical/surgical clinicians was 70.4% higher than for behavioral health clinicians (279.9% of Medicare as compared to 164.2% of Medicare, respectively).

These ongoing disparities in reimbursement can explain the material differences in out-ofnetwork use.

(3) The disparities in out-of-network use remained large over the last 9 years for office visits, where most behavioral healthcare is delivered.

Milliman's analysis of private insurance claims data found that in 2013, office visits for all behavioral health clinicians were 3.7 times as likely to be out-of-network than for all medical/surgical specialist clinicians (Melek et al., 2019). The RTI analysis found that in 2021, office visits for all behavioral health clinicians were 3.5 times as likely to be out-of-network compared to those for all medical/surgical clinicians. Therefore, while the two studies are not entirely the same, over 9 years, from 2013 through 2021, it is clear that material disparities have persisted.

(4) Provider shortages do not explain the disparities in out-of-network utilization and reimbursement.

It is sometimes asserted that the reason for the higher out-of-network use for behavioral health providers is that there are too few behavioral health providers to meet the need. This assertion is undermined by the fact that primary care physicians are in shorter supply than behavioral health providers and have much lower out-of-network use than behavioral health providers. According to the U.S. Health Resources and Services Administration, as of December 31, 2023, there are 25% more shortage areas for primary care physicians than for mental health providers (8,544 vs. 6,822). Nonetheless, RTI's analysis showed that in 2021, there was much lower out-of-network use for primary care physician office visits (2.2%) than for psychiatrist (15.3%) and psychologist (18.2%) office visits. The 2.2% figure for primary care physicians is consistent with their relatively high reimbursement (especially at the 75th and 95th percentile levels, which are 155.9% and 297.4% of Medicare, respectively). In contrast, the 75th and 95th percentile levels for psychiatrists were 127.5% and 208.8%, respectively.

(5) These results demonstrate the need for more robust parity enforcement.

These RTI analyses establish that health plans could create robust networks for behavioral health providers in each region by increasing payments to those behavioral health providers

who are already available (as shown by the existence of out-of-network claims) but who are not in-network. Health plans should also take other measures, such as utilizing dedicated behavioral health recruiting teams and streamlining administrative burdens, such as time spent on prior authorization approvals. However, health plans are not doing so, and out-of-network care remains high. As set forth in prior regulatory guidance,

"Ensuring meaningful access to mental health and substance use disorder care is vital to addressing the Nation's mental health and substance use disorder crisis. A key component of access is the availability of an adequate number of appropriate providers within a plan's network."

(Departments of Treasury, Labor, and Health and Human Services. 2023)

disparities in reimbursement rates are an indicator, or warning sign, of potential parity noncompliance (Department of Labor, 2020). Further, as stated in recent *proposed* updates to MHPAEA regulations, disparities in how behavioral health and medical/surgical benefits provider networks are designed and network composition that result in material differences in access to mental health and substance use disorder benefits, as compared to medical/surgical benefits, indicate MHPAEA noncompliance (Departments of Treasury, Labor, and Health and Human Services, 2023).

Recommendations

To address these ongoing pervasive disparities and potential parity violations, we recommend the following:

(A) Health plans and states should expand their behavioral health networks, using higher reimbursement to behavioral providers to the extent required—as they do for medical/surgical providers—to incentivize behavioral health provider network participation and to decrease out-of-network use and its financial burden on patients.

Appropriately credentialed mental health and substance use providers at all levels of care should be added to commercial, Medicaid, and Medicare networks. In addition to raising reimbursement rates to increase behavioral health provider network size, health plans should undertake proactive network recruiting efforts driven by dedicated network expansion teams, fast-track credentialing and other network admission requirements for all mental health and substance use disorder providers, and decrease administrative burdens on behavioral healthcare providers. Furthermore, using independent third parties, health plans should implement auditing of (i) the accuracy of their behavioral healthcare provider network directories (e.g., using secret shopper surveys) and (ii) compliance with their network adequacy standards (e.g., time to find providers with availability of new patient appointments).

To ensure ongoing compliance with MHPAEA, we recommend that:

- (B) Federal and state agencies should adopt the methodologies employed in this report to develop standardized templates with carefully worded definitions of all terms, to identify and remedy parity violations pertaining to disparities in out-of-network utilization. In the MHPAEA Technical Release, federal regulators recommend evaluating out-of-network use and reimbursement rates (Department of Labor, 2023). To conduct this evaluation, we recommend that regulatory and enforcement agencies should:
 - (i) Compare behavioral health and medical/surgical reimbursement rates using Medicare benchmarks to allow valid and accurate comparisons across the service array. This was the approach used in this report and prior analyses by Milliman (Melek et al., 2019). It is the approach often used by commercial insurers to negotiate and set reimbursement rates in their provider networks. It is also the method set forth by the Departments of Labor, Health and Human Services, and Treasury in the 2020 MHPAEA Self-Compliance Tool (Department of Labor, 2020).
 - (ii) Evaluate reimbursement disparities by specific provider type. Oversight is needed to ensure that the full continuum of behavioral health services is available, including crisis services and treatment in residential settings, intensive outpatient settings (e.g., partial hospitalization and withdrawal management), and inpatient hospital facilities. In terms of professionals, regulatory and oversight agencies need to ensure that consumers have access to psychiatrists, psychologists, clinical social workers, and other independently licensed practitioners, such as mental health counselors and marriage and family therapists. Again, the objective in all cases is to bring parity of access to services, with increased reimbursement for needed behavioral providers being the key tool to achieve this objective.
 - (iii) Utilize all procedure billing codes when evaluating out-of-network use and reimbursement disparities, and not just a few selected codes. Using two or a few codes (such as evaluation and management codes) specified by the party reviewing a health plan (e.g., a regulator) is much more effective than leaving code selection to the party being reviewed. However, as shown in this report, comparing providers by using too few codes can give only an approximate indication of the scope and size of out-of-network use and reimbursement disparities. We found that, in most cases, using even up to 12 specified codes does not capture a majority of aggregate reimbursement paid to medical/surgical providers. Therefore, in this report, we use all procedure billing codes.
 - (iv) Analyze not only average reimbursement (with claims weighted by dollar value), but also 50th percentile, 75th percentile, and 95th percentile reimbursements. Using only average reimbursement or median reimbursement (50th percentile) to identify disparities in reimbursement ignores the rest of the reimbursement distribution and the importance of offering reimbursement rates above the average or median to incent some providers to participate in-network. Because reimbursements are right skewed, disparities between behavioral health and medical/surgical clinicians will be higher at the tails of the distribution (e.g., the disparities in the averages will be higher than the

disparities in the median; the disparities in the 75th percentile will be higher than the disparities in the median or mean).

Introduction

The Mental Health Parity and Addiction Equity Act (MHPAEA) of 2008 requires that health plans and issuers not design or apply financial requirements and treatment limitations that impose a greater burden on access and are more restrictive to mental health and substance use disorder benefits than medical/surgical benefits. Specifically, MHPAEA and its implementing rules require that any "nonquantitative treatment limitations" (NQTLs) used for behavioral healthcare benefits must be "comparable to and applied no more stringently than" those used for medical/surgical benefits. NQTLs include network adequacy and provider reimbursement levels, among many others.

As stated in proposed updates to MHPAEA regulations, disparities in how behavioral health and medical/surgical benefits provider networks are designed and network composition that result in material differences in access to mental health and substance use disorder benefits as compared to medical/surgical benefits are indicative of MHPAEA NQTL noncompliance (Departments of Treasury, Labor, and Health and Human Services, 2023).

Under MHPAEA, health plans are required to take comparable measures to ensure the same access to in-network behavioral health services as in-network medical/surgical services (Department of Labor, 2020). As stated in the 2023 MHPAEA Comparative Analysis Report to Congress, "[I]n its second year of CAA implementation, EBSA [DOL] has not seen a marked improvement in the sufficiency of the initial comparative analyses received. The same deficiencies and trends noted in the January 2022 Report are still commonly reflected in comparative analyses reviewed during the Reporting Period." DOL detailed that many plans failed to demonstrate comparability between mental health/substance use disorder and medical surgical benefits, including failing to provide data or adequate data to show operational compliance (Departments of Labor, Health & Human Services, and Treasury, 2023).

Other Studies, Including Several with 2023 Data

There is abundant evidence that behavioral health provider in-network access is worse than medical/surgical in-network access. As summarized in *Exhibit 1*, many published research studies were conducted across multiple states using a variety of different data sources and methods, and spanned the last 10 years. The studies demonstrate that behavioral health in-network provider access is worse than medical/surgical in-network provider access. For example, Milliman's analyses of 2013–2017 commercial claims data found that out-of-network use was much larger for behavioral health services than medical/surgical (Melek et al., 2019).

Recent surveys found that the majority of employers are not satisfied with the size of their behavioral health networks (National Alliance of Healthcare Purchaser Coalitions, 2023; Kaiser Family Foundation, 2022). Similarly, surveys of individuals with private health insurance found that consumers are more likely to rate their mental health network as "inadequate" as compared to their medical/surgical network (Busch et al., 2021). Other studies also show that behavioral health provider directories are often inaccurate, and these inaccuracies result in patients going out-of-network and receiving surprise out-of-network bills (Busch and Kyanko, 2020).

Exhibit 1. Summary of Studies of Behavioral Health Network Size

Analyses of 2013–2017 commercial claims data found that out-of-network use was much larger for behavioral health services than medical/surgical (Melek et al., 2019).

A 2023 survey of 220 employers conducted by the National Alliance of Healthcare Purchasers Coalition and the HR Policy Association found that only 31% of employers were satisfied with their members' access to in-network behavioral health providers (National Alliance of Healthcare Purchaser Coalitions, 2023).

The 2022 survey of 2,188 private and non-Federal public employers conducted by the Kaiser Family Foundation (Kaiser Family Foundation, 2022) found that although 82% of employers said that their largest health plan had enough primary care providers to provide timely access to services, only 44% said there were enough behavioral health providers to provide timely access to services.

A 2020–2021 survey study of 728 adults with private insurance receiving specialty mental health and medical care found that patients were significantly more likely to rate their mental health network as "inadequate" compared to their medical network (Busch et al., 2021).

A 2018 national survey of privately insured patients who received specialty mental health treatment found that 44% had used a mental health provider directory and that 53% of these patients had encountered directory inaccuracies (Busch and Kyanko, 2020). Those who encountered inaccuracies were more likely (40% as compared to 20%) to be treated by an out-of-network provider and four times more likely (16% as compared to 4%) to receive a surprise outpatient out-of-network bill (that is, they did not initially know that a provider was out-of-network).

A 2023 secret shopper study conducted by the Senate Finance Committee majority staff showed only an 18% success rate in making an appointment with a mental health provider from 12 different plans across six states, indicating the prevalence of inaccurate provider directories (U.S. Senate Finance Committee, 2023).

A 2023 secret shopper study found that 54.4% of 160 residential addiction treatment facilities that treated adolescents with opioid use had a bed immediately available (King et al., 2024). Among sites with a waitlist, the mean wait time for a bed was 28.4 days. Researchers were unable to identify any facilities for adolescents in 10 states or Washington, D.C.

In 2023, the Office of the New York State Attorney General conducted a statewide secret shopper survey of 13 health plans in 2023: Aetna, CDPHP, Cigna, Emblem, Empire BlueCross BlueShield, Excellus, Fidelis, Healthfirst, Independent Health, MetroPlus, Molina, MVP, and UnitedHealthcare. Staff reviewed directories from the plans, calling at least 20 providers in major cities served by the plans (New York City, Albany, Buffalo, and for one plan, Rochester). Callers attempted to schedule an appointment for an adult or child with a mental health provider who was listed in the directory as accepting new patients. The success rate for the 13 health plans surveyed ranged from 0% to 35%. Of the total 396 providers called across all plans, callers were offered appointments with only 14% of providers. Therefore, 86% of the listed, in-network mental health providers staff called were "ghosts," as they were unreachable, not in-network, or not accepting new patients (Office of the New York State Attorney General, 2023).

In a 2022 secret shopper study, researchers attempted to contact the 192 psychiatrist providers listed in the online directory of United Healthcare psychiatry providers in New York City (Tenner et al., 2022). They found that only 3.1% of calls resulted in researchers booking an appointment, 50.5% of calls resulted in "no response," 18.75% connected to psychiatrists not accepting new patients, and 8.8% of listed providers stated they were not in the United Healthcare network.

In a 2017 secret shopper study, researchers evaluated the availability of outpatient mental health care by calling and seeking mental health care from 601 individual pediatricians and 312 child psychiatrists located in five U.S. cities and listed as in-network by Blue Cross Blue Shield (Cama et al, 2017). Appointments were obtained with 40% of the pediatricians and 17% of the child psychiatrists; the mean wait time for psychiatry appointments was 30 days longer than for pediatric appointments. The most common reason for being unable to make an appointment was that the listed phone number was incorrect.

A 2016 secret shopper study on the availability of network psychiatrists among the largest health insurance carriers in Washington, D.C. showed that although most physicians were successfully contacted, only 15% were accepting new outpatients. (Belch et al., 2017).

A 2017 study that analyzed data from 531 unique provider networks in the Affordable Care Act Marketplaces found that on average, plan networks included 24.3% of all primary care providers and 11.3% of all mental health care providers practicing in a given state-level market (Zhu et al., 2017).

A study analyzing the National Ambulatory Medical Care Survey, January 2007–December 2016, found that non-psychiatrists participated in all insurance networks at higher rates than psychiatrists (Carlo, 2024). The gap in acceptance was wider for public insurance than for private insurance.

Recent secret shopper surveys conducted over multiple states and health plans found that the majority of patients who tried to make an appointment with an in-network behavioral health provider were unable to find an available behavioral health provider (U.S. Senate Finance Committee, 2023; King et al., 2024; Office of the New York State Attorney General, 2023; Tenner et al., 2022; Cama et al., 2017; Belch et al., 2017).

Finally, two studies showed that health plan participation is much lower among psychiatrists and other mental health professionals than among primary care physicians (Zhu et al., 2017; Carlo, 2024).

Narrower networks reduce access to behavioral health services and increase patients' financial burden. For example, a study using 2011–2014 claims data from a national-managed behavioral health organization's employer-sponsored insurance found that out-of-network use placed a significant financial burden on families (Friedman et al., 2022). Among the 50% of patients with balance billing, the mean balance billing was \$861 (median, \$175; 90th percentile, \$1,684). Balance billing was lower in states with more in-network providers per capita. Another study using 2007–2017 MarketScan commercial insurance data found that prices and cost sharing for psychotherapy were substantially higher out-of-network than they were in-network and these gaps widened during the 11-year period (Benson and Song, 2020).

Studies showed that behavioral health providers receive lower reimbursement rates for in-network care relative to medical/surgical providers, creating a disincentive for in-network participation by behavioral health providers. An analysis of the 2014 MarketScan commercial claims database found that psychiatrists were reimbursed in-network 13% and 20% less, respectively, than non-psychiatrist physicians for the two most used outpatient billing codes used by both psychiatrists and non-psychiatrists (Mark et al., 2018). An analysis by Milliman found that in-network provider reimbursement rates between 2013 and 2017 relative to Medicare-allowed levels were between 19.8% and 23.8% higher for primary care visits and between 17.0% and 18.9% higher for medical/surgical specialist visits than for behavioral healthcare office visits (Melek et al., 2019).

Current Study

This RTI study updated and expanded upon previous analyses that evaluated disparities in out-of-network utilization and reimbursement. We used the 2019 to 2021 MarketScan commercial insurance data. Prior studies evaluated disparities lumping all behavioral health clinicians together (physician and non-physician combined) and all medical/surgical clinicians together. This study does the same but, in addition, we analyzed disparities in office visit reimbursement and out-of-network utilization separately for 40 different provider types (including psychiatrists and psychologists), 25 different medical/surgical provider types, and 9 types of behavioral health and medical/surgical non-physicians. This approach reveals which specific types of behavioral health providers have the greatest disparities in out-of-network use and reimbursement. For example, in this report we compare reimbursement for psychiatrists and psychologists to physician assistants and nurse practitioners. We also compare reimbursement for therapists to physician assistants, and nurse practitioners to psychiatric nurses.

In contrast to prior studies, in this study we determined the distribution of in-network reimbursement rates to providers, such as the 75th and 95th percentiles of reimbursement, rather than only the average reimbursement rate. The high ends of the reimbursement distribution highlight how much health plans are willing to reimburse medical/surgical providers, which successfully incentivize additional providers to participate in-network, but health plans do not take the same measures for behavioral providers. This causes lower network participation by behavioral providers and results in much higher out-of-network use.

Finally, in this report, we present data on out-of-network use and reimbursement levels for telehealth-delivered services as compared to in-person-delivered services.

Methods

In this section and in Appendix A, we describe the data and methods used, including how variables were defined and measured.

Data

We used the 2019, 2020, 2021 Merative™ MarketScan® Commercial Database which contains data from active employees, early retirees, COBRA continuees, and dependents insured by employer-sponsored plans (Merative, 2024). The database captures person-specific clinical utilization, expenditures, and enrollment across inpatient, outpatient, prescription drug, and carve-out services. Medicare and Medicaid beneficiaries are not included in the Commercial Database. The database captures a variety of health plans, including HMOs and PPOs. Data were available for all 50 states. The database included 25.3 million, 23.3 million, and 22.8 million patients in 2019, 2020, and 2021, respectively.

All types of health plans were included in the analysis. Insurance claims from capitated plans that did not have a reimbursement amount were excluded from the reimbursement analyses and included in the out-of-network analyses.

Out-of-Network Use

Each individual insurance claim in the MarketScan Database includes a variable that indicates whether the claim was paid out-of-network or in-network. This variable was used to determine whether a service was paid as in-network or out-of-network.

Medicare Provider Reimbursement Benchmarking

Provider reimbursement as a percentage of the Medicare Physician Fee Schedule (MPFS), which lists fee-for-service (FFS) allowed amounts, often referred to as "rates," is one of the most widely accepted commercial reimbursement benchmarks used to compare commercial provider reimbursement levels and health plan contracts (Anderson et al, 2023). Using Medicare FFS rates as a benchmark allows valid and accurate comparisons across different provider types, services, and regions. Use of a benchmark to compare commercial reimbursement rates among different provider types is needed because although there are some billing codes that are used by all or most types of providers, these codes are a very small percentage of all codes.

The Medicare FFS' allowed amounts are based upon statutorily established payment formulas. For services covered by MPFS, Medicare pays a fixed amount per service, with adjustments for the relative amount of resources (e.g., physicians' effort, practice expenses, and liability insurance) typically used to provide a given service. Geographic cost differences of delivering care are also taken into account. Medicare reduces its rates if a service is provided by a non-physician professional, such as a physician assistant, nurse practitioner, or social worker, or if a physician serves as an assistant during a surgery.

In contrast, commercial insurers determine reimbursement rates through negotiations between the plan and the provider, which is then reflected in their contracts. Health plans can negotiate lower rates by offering to include providers in their networks. Providers have an incentive to accept an in-network rate if it leads them to have a higher volume of patients. Examining to what extent a commercial rate is below or above the Medicare FFS rate allows the negotiated reimbursement rates for different providers and services to be compared using a common benchmark (i.e., an "index").

To "index" Medicare FFS rates as the benchmark, RTI compared (a) the commercial reimbursed amount (the "allowed amount") for a particular service billing code as indicated on each individual insurance claim in the MarketScan data to (b) the amount that Medicare would have paid for the same service in the same geographic location. To do this, we used the MPFS file publicly available from the Centers for Medicare and Medicaid Services (CMS). Rates on the Medicare file were linked to each MarketScan claim by matching the provider type, current procedural terminology (CPT) code, CPT modification code, Medicare Administrative Contractor (MAC) locality, and by whether the place of service was a facility or a non-facility (as defined in the Medicare billing manual and explained in more detail in Appendix A: Methods).

MAC localities are the unique geographic location indicator used in the MPFS. The MAC locality variable was not available in the MarketScan data; therefore, we used a combination of the geographic variables available in the MarketScan data (state and metropolitan statistical area) to determine the MAC localities.

For claims billed by physician assistants, nurse practitioners, and psychiatric nurses, 85% of the allowed amount in the MPFS was used as the benchmark because this is what Medicare reimburses these provider types. For therapists (e.g., social workers, counselors, and marriage/family counselors), 75% of the Medicare-allowed amount was used because this is what Medicare reimburses clinical social workers.

To determine, for any provider type, the average ratio of commercial allowed amounts to the corresponding Medicare-allowed amount, we summed all the actual commercial allowed amounts of all non-capitated claims within the category of interest (e.g., psychiatrists professional office visit bills for all billing codes), to calculate a numerator. Then, we divided the numerator by the sum of all the allowed amounts as if the same claims had been submitted to Medicare. For example, if psychiatrists were reimbursed (i.e., received allowed amounts of) \$1.05 million for all their submitted insurance claims, and Medicare would have reimbursed them \$1.0 million for the same claims, then the ratio would be 1.05 (or, if expressed as a percentage, 105%). This means that, on average, psychiatrists were paid by commercial insurers 105% of what Medicare would have paid. In this case, 105% would be referred to as the average commercial allowed amount relative to (or "indexed to") Medicare, weighted by the dollar amount of each claim (or for short "average reimbursement").

Selecting Statistics to Summarize the Disparities

Ideally, regulators would be able to select one measure of central tendency to evaluate the extent of disparities in reimbursement rates, that is, a statistical measure that identifies a single

value as representative of an entire distribution of reimbursement rates and provides an accurate description of the entire data. There are three main measures of central tendency:

- 1. Mean is the average of all the values in a dataset, calculated by summing all the values and dividing by the number of values.
- 2. Median (also referred to as the 50th percentile) is the middle value in a dataset when the values are sorted in ascending or descending order.
- 3. Mode is the value that appears most frequently in a dataset.

For results that have a normal distribution, these three measures are identical.

However, health care reimbursements are skewed to the right, which means that, unlike a normal distribution, the mean, median, and mode will be as illustrated in *Exhibit 2*.

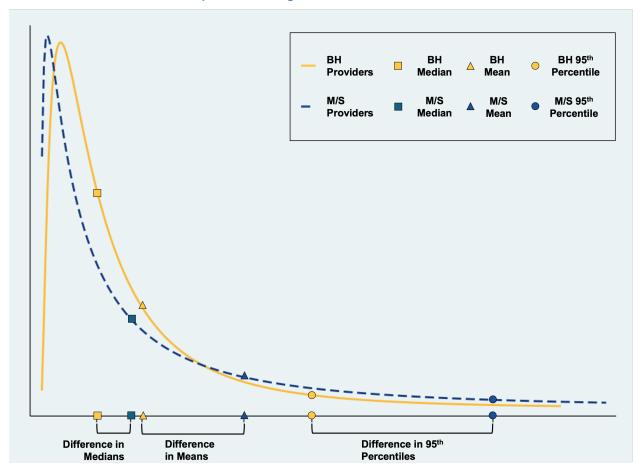


Exhibit 2. Illustrative Depiction of Right Skewed Distributions

Note: BH = Behavioral Health; M/S = Medical/Surgical

Moreover, the differences between the measures of central tendency, such as the differences between the mean, median, and 75th percentile reimbursement rates between behavioral health clinicians and medical/surgical clinicians, will be larger as one moves along the distribution from

median to mean, to 75th percentile and 95th percentile. For example, the difference between the means will be larger than the difference between the medians. The difference between the 75th percentiles, will be larger than the difference between the medians (50%) and the means.

Finally, it is important to note that if payers only rely on the median or mean, they may be unlikely to incentivize clinicians in the rest of the distribution to participate in-network.

The "50th percentile (median) ratio" is the ratio (i.e., "commercial allowed amount/MPFS allowed amount") of a claim (or group of claims with an identical ratio) with respect to which 50% of all other claims had a lower ratio (similarly calculated) and 50% had a higher ratio (similarly calculated).

The "75th percentile ratio" is the ratio (i.e., "commercial allowed amount/MPFS allowed amount") of a claim (or group of claims with an identical ratio) with respect to which 75% of all other claims had a lower ratio (similarly calculated) and 25% had a higher ratio (similarly calculated).

The "95th percentile ratio" is the ratio (i.e., "commercial allowed amount/MPFS allowed amount") of a claim (or group of claims with an identical ratio) with respect to which 95% of all other claims had a lower ratio (similarly calculated) and 5% had a higher ratio (similarly calculated).

Defining Clinician and Provider Types

RTI compared out-of-network use and reimbursement across a variety of types of services and provider types. *Exhibit 3* describes each mutually exclusive provider/service type.

Exhibit 3. Clinician and Provider Type Definitions

Office Visit: Individually billed professional services in locations (often doctors' offices) that are not designated as "facilities," such as hospitals

Acute Inpatient Medical/Surgical Facility: Inpatient hospital, inpatient long-term care, other inpatient care, comprehensive inpatient rehabilitation facility, or acute care hospital; not a rehabilitation facility, long-term care, or residential treatment facility; and not a medical specialist clinician

Acute Inpatient Behavioral Health Facility: Inpatient psychiatric facility; not a chemical dependency treatment center and not a medical specialist clinician

Subacute Inpatient Medical/Surgical Facility: Skilled nursing facility, nursing facility, custodial care facility, or intermediate care facility; not a hospital or a medical specialist clinician

Subacute Inpatient Behavioral Health Facility: Residential substance abuse facility, psychiatric residential treatment center, or chemical dependency treatment center; not a medical specialist clinician

Outpatient Medical/Surgical Facility Services: Outpatient hospital clinics, urgent care facilities, ambulatory surgical centers, outpatient rehabilitation facilities, and ambulatory surgery centers

Outpatient Behavioral Health Facility: Psychiatric facility partial hospitalizations, community mental health centers, and substance used disorder clinics

Behavioral Health Clinicians: Psychiatrists, child psychiatrists, psychologists, psychiatric nurses, therapists (e.g., social workers, counselors, and marriage/family counselors)

Medical/Surgical Clinicians: Primary care physicians, medical/surgical specialist physicians, nurse practitioners, and physician assistants

Medical/Surgical Specialist Physicians: Physicians in any medical or surgical specialty field (excludes primary care physicians and non-physician providers)

Primary Care Physicians: Physicians under the labels medical doctor (MD), including osteopathic medicine, internal medicine, palliative medicine, family practice, geriatric medicine, and pediatrician (excludes Medical/Surgical Specialist Physicians)

Psychiatrists: Psychiatrists and child psychiatrists

Psychologists: Psychologists

Physician Assistants: Physician assistants

Nurse Practitioners: Nurse practitioners

Analysis of Disparities by Mental Health and Substance Use Disorder Separately and by Youth and Adults Separately

In the first part of the report, we combined all mental health and substance use conditions into one "behavioral health" category. Subsequently, we examined disparities in out-of-network use and reimbursement separately for mental health conditions and substance use conditions. The primary diagnosis was used to determine whether the condition was a mental health or substance use disorder. We also evaluated disparities by age (<age 19 and age 19+).

Analysis of In-Person and Telehealth Visits Separately

In the first part of the report, all claims were evaluated, regardless of whether they involved an in-person visit or a telehealth visit using an indicator available on the MarketScan claims. Subsequently, we examined disparities in out-of-network use and reimbursement separately for in-person visits and telehealth visits.

Findings

Disparities in Out-of-Network Use

All else equal, higher levels of out-of-network use for behavioral health care leads to higher out-of-pocket spending for patients, which is a material barrier to accessing behavioral health services for most people who need these services. For this reason, RTI compared out-of-network use for services provided in behavioral health facilities and by behavioral health providers in office-based settings with services provided in medical/surgical facilities and by medical/surgical providers in office-based settings.

Out-of-Network Use Was Materially Higher for Behavioral Health Care Than for Medical/Surgical Care

Exhibit 4 shows that patients had out-of-network visits with behavioral health providers more frequently than with medical/surgical providers (**Exhibits 5a** and **5b** provide supporting detail). In 2021:

- Compared to office visits with medical/surgical specialist physicians, patients had out-of-network visits with psychiatrists 8.9 times more often (15.3% vs. 1.7%) and with psychologists 10.6 times more often (18.2% vs. 1.7%).
- Compared to office visits with all medical/surgical clinician (i.e., non-physician and physician providers combined), patients had out-of-network visits with all behavioral health clinician 3.5 times more often (13.4% vs. 3.8%).
- Compared to office visits with physician assistants, patients had out-of-network visits with therapists 4.1 times more often (11.3% vs. 2.8%).
- Compared to office visits with nurse practitioners, patients had out-of-network visits with psychiatric nurses 1.7 times more often (3.8% vs. 2.2%).

For psychiatrists, psychologists, therapists, and all behavioral health clinicians, there was little change in the relative rate of out-of-network use from 2019 to 2021. Trends in out-of-network use improved appreciably only for psychiatric nurses relative to nurse practitioners.

Behavioral health care delivered in facilities was also more frequently out-of-network than medical/surgical care delivered in facilities. In 2021, compared to medical/surgical care:

- Behavioral health care delivered in acute inpatient facilities was out-of-network 6.2 times more often (9.0% vs. 1.5%).
- Behavioral health care delivered in subacute inpatient facilities was out-of-network 19.9 times more often (34.5 vs. 1.7%).
- Behavioral health care delivered in outpatient facilities (excluding emergency rooms) was out-of-network 1.5 times more often (13.1% vs. 8.5%).

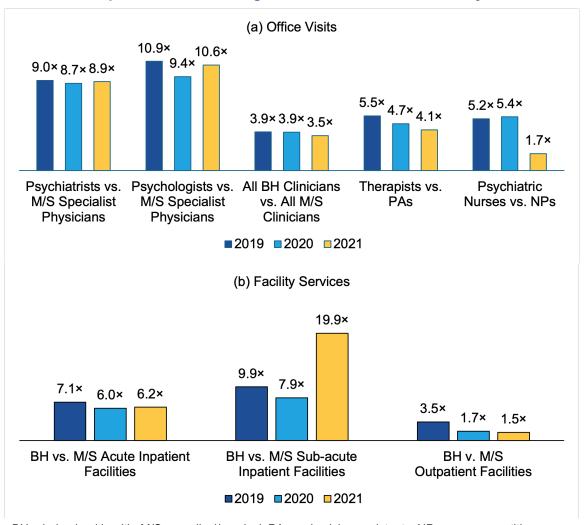


Exhibit 4. Higher Proportion of Out-of-Network Use for Behavioral Health as Compared to Medical/Surgical for Office Visits and Facility Services

Note: BH = behavioral health; M/S = medical/surgical; PAs = physician assistants; NPs = nurse practitioners

The change in disparities from 2019 to 2021 differed between subacute inpatient and outpatient facilities (excluding emergency rooms). Although there was little change in out-of-network utilization from 2019 to 2021 for behavioral health care delivered in subacute inpatient facilities (34.4%, 37.5%, and 34.5%, respectively), there was a noticeable reduction from 3.5% in 2019 to 1.7% in 2021 in out-of-network utilization for medical/surgical care delivered in subacute inpatient facilities. This is why the disparity increased from 9.9 times in 2019 to 19.9 times in 2021.

For outpatient facilities, the opposite occurred. There was little change in out-of-network utilization for medical/surgical care delivered in outpatient facilities (7.4% in 2019 and 8.5% in 2021), and a steep reduction from 25.6% in 2019 to 13.1% in 2021 in out-of-network utilization for behavioral health care delivered in outpatient facilities.

Exhibit 5a. Out-of-Network Utilization Rates by Provider Type and Year, Office Visits

Year	Medical/ Surgical Specialist Physicians	Psychiatrists	Psychologists	Higher Proportion of Psychiatrists Out-of-Network Use	Higher Proportion of Psychologists Out-of-Network Use	
2019	1.9%	16.8% 20.3%		9.0×	10.9×	
2020	2.0%	17.1%	18.4%	8.7×	9.4×	
2021	1.7%	15.3%	18.2%	8.9×	10.6×	
Year	All Medical/Surgical Clinicians	All Behavioral Clinicians			n of All Behavioral -of-Network Use	
2019	4.3%	16.5%		.9×		
2020	3.9%	15.1%		.9×		
2021	3.8%	13.4%		3.5×		
Year	Physician Assistants	Therapists			of Therapists Out-of- ork Use	
2019	2.7%	15.0%		5	.5×	
2020	2.8%	13.1%		4	.7×	
2021	2.8%	11.3%		4	.1×	
Year	Nurse Practitioners	Psychiatric Nurses			ion of Psychiatric of-Network Use	
2019	2.5%	12.7%		5	.2×	
2020	2.4%	13.2%		5	.4×	
2021	2.2%	3.8%		1.7×		

Exhibit 5b. Out-of-Network Utilization Rates by Care Setting and Year, Facilities

Medical/Surgical Acute Inpatient Facilities	Behavioral Acute Inpatient Facilities	Higher Proportion of Behavioral Acute Inpatient Facilities Out-of-Network Use
1.4%	10.2%	7.1×
1.6%	9.8%	6.0×
1.5%	9.0%	6.2×
Medical/Surgical Subacute Inpatient Facilities	Behavioral Subacute Inpatient Facilities	Higher Proportion of Behavioral Subacute Inpatient Facilities Out-of- Network Use
3.5%	34.4%	9.9×
4.7%	37.5%	7.9×
1.7%	34.5%	19.9×
	Inpatient Facilities 1.4% 1.6% 1.5% Medical/Surgical Subacute Inpatient Facilities 3.5% 4.7%	Inpatient Facilities 1.4% 10.2% 1.6% 9.8% 1.5% 9.0% Medical/Surgical Subacute Inpatient Facilities 3.5% 34.4% 4.7% 37.5%

Year	Medical/Surgical Outpatient Facilities	Behavioral Outpatient Facilities	Higher Proportion of Behavioral Outpatient Facilities Out-of-Network Use
2019	7.4%	25.6%	3.5×
2020	9.1%	15.9%	1.7×
2021	8.5%	13.1%	1.5×

Out-of-Network Use for Behavioral Health Care Was Higher Than for Any Medical/Surgical Specialty

Exhibits 6 and **7** show that office visits for psychiatrists and psychologists were more often out-of-network than office visits for every one of the 24 medical/surgical sub-specialties, and that there was significant variation in the disparity of out-of-network utilization across sub-specialties. For example, compared to visits with allergy and immunology specialists, patients had out-of-network visits with psychiatrists 22.2 times more often (15.3% vs. 0.7%) and with psychologists 26.5 times more often (18.2% vs. 0.7%). In contrast, compared to visits with anesthesiologists, patients had out-of-network visits with psychiatrists 2.2 times more often (15.3% vs. 7.1%) and with psychologists 2.6 times more often (18.2% vs. 7.1%).

Exhibit 6 also highlights the disparity between psychiatrists/psychologists and primary care physicians. Compared to visits with primary care physicians, patients had out-of-network visits with psychiatrists 6.9 times more often (15.3% vs. 2.2%) and with psychologists 8.2 times more often (18.2% vs. 2.2%).

Exhibit 6. Higher Proportion of Out-of-Network Use for Psychiatrists and Psychologists as Compared to Medical/Surgical Physician Specialties and Primary Care Physicians, 2021

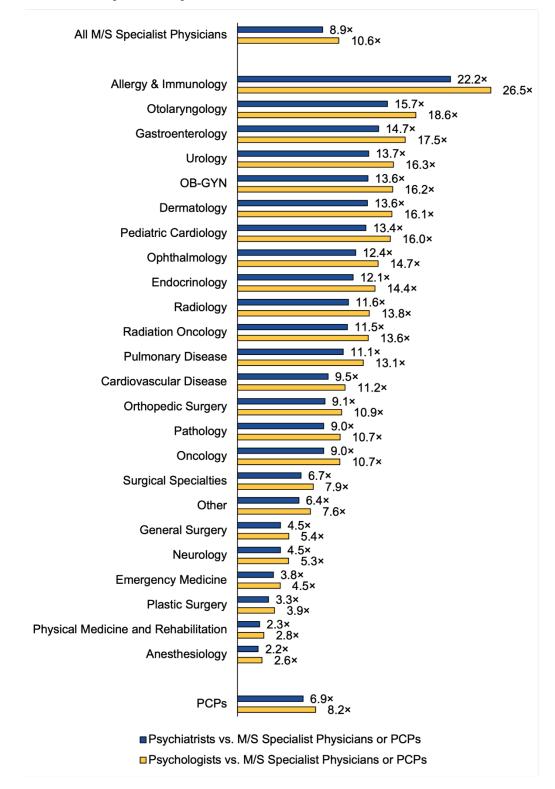


Exhibit 7. Higher Proportion of Out-of-Network Use for Psychiatrist and Psychologist Office Visits as Compared to Medical/Surgical Specialist Physician and Primary Care Physician Office Visits, 2021

Provider Specialty	Out-of-Network Use	Higher Proportion of Psychiatrists Out-of- Network Use	Higher Proportion of Psychologists Out-of- Network Use
Psychiatrists	15.3%	_	_
Psychologists	18.2%	_	_
All Medical/Surgical Specialist Physicians	1.7%	8.9×	10.6×
Primary Care Physicians	2.2%	6.9×	8.2×
Medical/Surgical Subspecialities			
Allergy & Immunology	0.7%	22.2×	26.5×
Otolaryngology	1.0%	15.7×	18.6×
Gastroenterology	1.0%	14.7×	17.5×
Urology	1.1%	13.7×	16.3×
OB-GYN	1.1%	13.6×	16.2×
Dermatology	1.1%	13.6×	16.1×
Pediatric Cardiology	1.1%	13.4×	16.0×
Ophthalmology	1.2%	12.4×	14.7×
Endocrinology	1.3%	12.1×	14.4×
Radiology	1.3%	11.6×	13.8×
Radiation Oncology	1.3%	11.5×	13.6×
Pulmonary Disease	1.4%	11.1×	13.1×
Cardiovascular Disease	1.6%	9.5×	11.2×
Orthopedic Surgery	1.7%	9.1×	10.9×
Pathology	1.7%	9.0×	10.7×
Oncology	1.7%	9.0×	10.7×
Surgical Specialty	2.3%	6.7×	7.9×
Other Physician Specialty	2.4%	6.4×	7.6×
General Surgery	3.4%	4.5×	5.4×
Neurology	3.4%	4.5×	5.3×
Emergency Medicine	4.1%	3.8×	4.5×
Plastic Surgery	4.7%	3.3×	3.9×
Physical Medicine and Rehabilitation	6.6%	2.3×	2.8×
Anesthesiology	7.1%	2.2×	2.6×

Differences in Out-of-Network Use Disparities Vary by State

Exhibit 8 shows that only two states (Arizona and Idaho) had less out-of-network use for behavioral health clinician office visits than for medical/surgical clinician office visits. In the five states with the greatest disparities (Maryland, Massachusetts, Maine, Rhode Island, and Washington), behavioral health clinician office visits were out-of-network more than seven times

as often as medical/surgical clinicians. Detailed out-of-network use information for each state is available in the Appendices. All differences were statistically significant.

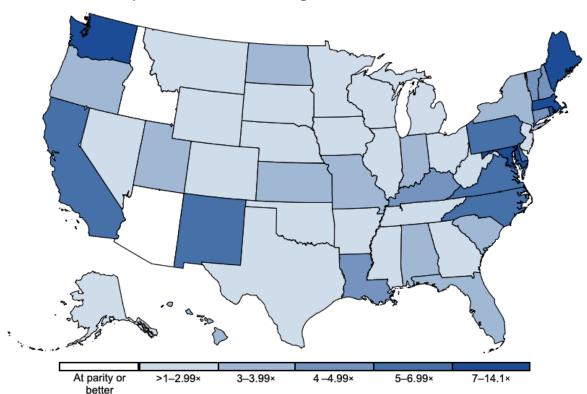


Exhibit 8. Ratio of Out-of-Network Use for All Behavioral Health Clinician Office Visits as Compared to All Medical/Surgical Clinician Office Visits, 2021

Disparities in In-Network Reimbursement Rates

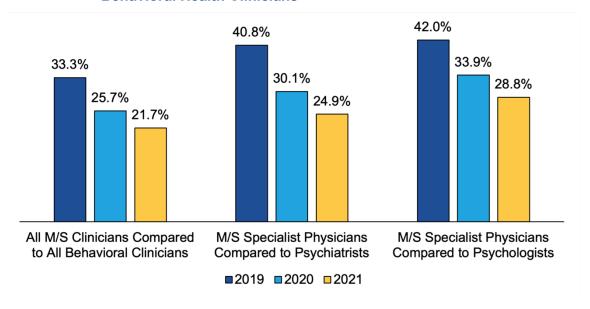
Reimbursement rates are a key lever that health plans use to encourage providers to participate in their networks. In this section, we describe the reimbursement rates (i.e., allowed amounts) paid to behavioral health clinicians for in-network office visits relative to medical/surgical clinician office visits. Except where explicitly noted to the contrary, all comparisons are based on reimbursement rates indexed to Medicare to ensure valid and accurate comparisons across specialties.

Material Disparities in Reimbursement Persisted in 2021

Exhibit 9 shows that relative to medical/surgical providers, in-network behavioral health clinicians are reimbursed substantially less for office visits. The difference in the reimbursement rates declined from 2019 to 2021 but remained material in 2021. Specifically, in 2021, after indexing all claims to Medicare, medical/surgical clinicians were reimbursed 22% more, on average, than behavioral health clinicians (125% of Medicare vs. 103% of Medicare, respectively). Similarly, after indexing all claims to Medicare, medical/surgical specialist

physicians were reimbursed on average 25% more than psychiatrists (135% of Medicare vs. 108% of Medicare, respectively) and 29% more than psychologists (135% of Medicare vs. 105% of Medicare, respectively).

Exhibit 9. Office Visits: Average Percentage Higher In-Network Reimbursement Indexed to Medicare for Medical/Surgical Clinicians Compared to Behavioral Health Clinicians



In 2019 and 2020, Behavioral Health Clinicians Were Reimbursed Less than Medicare

Exhibit 10 and **Exhibits 11a** and **11b** show that commercial health plans reimbursed behavioral health clinicians 11% and 4% less than Medicare reimbursement levels, on average, in 2019 and 2020 for in-network office visits. In 2021, commercial health plans reimbursed behavioral health providers 3% more than Medicare reimbursement levels. In contrast, medical/surgical clinicians were reimbursed 19% more than Medicare in 2019, 21% more than Medicare in 2020, and 25% more than Medicare in 2021.

A similar pattern was observed for medical/surgical specialist physicians and psychiatrists/psychologists. Specifically, medical/surgical specialist physicians were reimbursed 28% more than Medicare in 2019, 31% more than Medicare in 2020, and 35% more than Medicare in 2021. Over this same period, psychiatrists were reimbursed 9% less than Medicare in 2019, which grew to 8% more than Medicare in 2021. Psychologists were reimbursed 10% less than Medicare rates in 2019 and this increased to 5% more than Medicare in 2021.



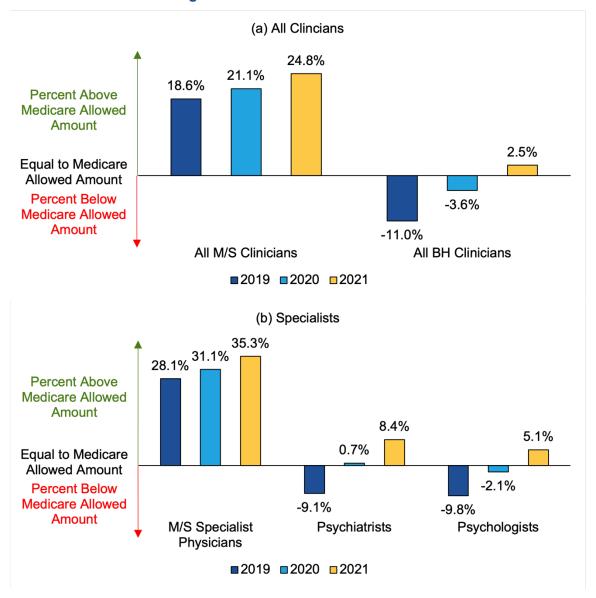


Exhibit 11a. Office Visits—Average In-Network Provider Reimbursement Levels Relative to Medicare Reimbursement Levels: Medical/Surgical Clinicians as Compared to Behavioral Clinicians

	Allowed Amounts Re	Percentage Higher Allowed — Amounts for	
Year	Medical/ Surgical Clinicians	Behavioral Clinicians	Medical/Surgical Compared to Behavioral Health Clinicians
2019	118.6%	89.0%	33.3%
2020	121.1%	96.4%	25.7%
2021	124.8%	102.5%	21.7%

Exhibit 11b. Office Visits—Average In-Network Provider Reimbursement Levels Relative to Medicare Reimbursement Levels: All Medical/Surgical Specialist Physicians vs. Psychiatrists and Psychologists

	Allowed Amo	ounts Relative to N	/ledicare	for All Medical/S Physicians (r Allowed Amounts urgical Specialist Compared to nd Psychologists
Year	All Medical/Surgical Specialist Physicians	Psychiatrists	Psychologists	Psychiatrists	Psychologists
2019	128.1%	90.9%	90.2%	40.8%	42.0%
2020	131.1%	100.7%	97.9%	30.1%	33.9%
2021	135.3%	108.4%	105.1%	24.9%	28.8%

Disparities in Reimbursement at the Higher End of Reimbursement Distribution Highlight That Health Plans Offer Greater Incentives to Medical/Surgical Clinicians for Network Participation

Exhibits 12 and **13** show that in-network reimbursement disparities for claims where the reimbursement level indexed to Medicare was at the 75th percentile were more pronounced than disparities at the mean and at the median. Moreover, the disparity was even larger at the 95th percentile. Specifically, in 2021, data on reimbursement levels indexed to Medicare show that:

- All medical/surgical clinician office visits were reimbursed 70.4% more than all behavioral health clinician office visits (279.9% vs. 164.2%) at the 95th percentile and 48.0% more (148.0% vs. 100.0%) at the 75th percentile.
- Medical/surgical specialist physicians were reimbursed 49.5% more than psychiatrists (312.1% vs. 208.8%) at the 95th percentile and 27.8% more (162.9% vs. 127.5%) at the 75th percentile.

- Medical/surgical specialist physicians were reimbursed 38.5% more than psychologists (312.1% vs. 225.4%) at the 95th percentile and 44.0% more (162.9% vs. 113.1%) at the 75th percentile.
- Physician assistants were reimbursed 101.6% more than therapists (231.4% vs. 114.8%) at the 95th percentile and 59.3% more (137.8% vs. 86.5%) at the 75th percentile.
- Nurse practitioners were reimbursed 34.3% more than psychiatric nurses (205.0% vs. 152.6%) at the 95th percentile and 18.4% more (128.9% vs. 108.9%) at the 75th percentile.

Exhibit 12. In-Network Reimbursement Indexed to Medicare for Medical/Surgical Clinician Office Visits and Behavioral Health Clinician Office Visits by Percentile, 2021

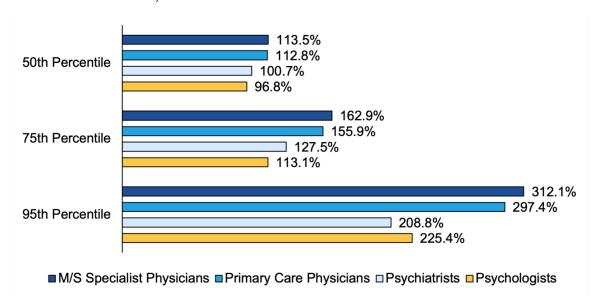


Exhibit 13. Percentage Higher In-Network Reimbursement Indexed to Medicare for Medical/Surgical Clinician Office Visits as Compared to Behavioral Health Clinician Office Visits, by Percentile

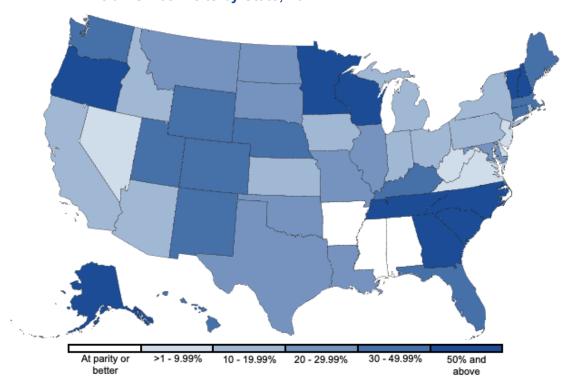
			Indexed to	Medicare			Per	centage Hig	iher
	All Medical/Surgical Clinicians			All Behavioral Health Clinicians			Reimbursement for All Medical/Surgical Clinicians		
Year	50 th	75 th	95 th	50 th	75 th	95 th	50 th	75 th	95 th
2019	99.7%	141.9%	271.7%	70.5%	88.4%	147.7%	41.4%	60.5%	83.9%
2020	100.8%	144.9%	275.1%	76.7%	95.9%	155.7%	31.3%	51.1%	76.7%
2021	102.2%	148.0%	279.9%	80.7%	100.0%	164.2%	26.6%	48.0%	70.4%

			Indexed to	Indexed to Medicare							
	Medica	l/Surgical S _l Physicians		Psychiatrists			Percentage Higher Reimbursement for Medical/Surgical Specialist Physicians				
Year	50 th	75 th	95 th	50 th	75 th	95 th	50 th	75 th	95 th		
2019	109.5%	154.4%	296.3%	82.8%	107.2%	171.0%	32.3%	44.0%	73.2%		
2020	110.8%	158.0%	302.2%	92.4%	120.9%	194.5%	20.0%	30.7%	55.4%		
2021	113.5%	162.9%	312.1%	100.7%	127.5%	208.8%	12.8%	27.8%	49.5%		
	Indexed to Medicare						Per	centage Hig	jher		
	Medical/Surgical Specialist Physicians			Psychologists			Reimbursement for Medical/Surgical Specialist Physicians				
Year	50 th	75 th	95 th	50 th	75 th	95 th	50 th	75 th	95 th		
2019	109.5%	154.4%	296.3%	83.1%	97.9%	177.7%	31.9%	57.7%	66.8%		
2020	110.8%	158.0%	302.2%	89.9%	105.7%	202.1%	23.2%	49.4%	49.6%		
2021	113.5%	162.9%	312.1%	96.8%	113.1%	225.4%	17.3%	44.0%	38.5%		
			Indexed to	Medicare				centage Hig			
	Phys	sician Assis	tants	Therapists			Reimbur	sement for I Assistants	Physician		
Year	50 th	75 th	95 th	50 th	75 th	95 th	50 th	75 th	95 th		
2019	92.1%	130.9%	221.4%	63.4%	74.1%	113.6%	45.2%	76.7%	94.8%		
2020	97.3%	137.0%	229.1%	68.9%	80.8%	112.8%	41.1%	69.5%	103.1%		
2021	98.8%	137.8%	231.4%	73.9%	86.5%	114.8%	33.8%	59.3%	101.6%		
			Indexed to	Medicare				centage Hig			
	Nur	se Practitio	ners	Psy	/chiatric Nur	ses	Reimbursement for Nurse Practitioners				
Year	50 th	75 th	95 th	50 th	75 th	95 th	50 th	75 th	95 th		
2019	87.3%	120.5%	216.0%	72.0%	86.5%	139.6%	21.2%	39.3%	54.7%		
2020	90.2%	125.9%	206.2%	86.1%	102.9%	150.0%	4.7%	22.3%	37.5%		
2021	92.0%	128.9%	205.0%	93.0%	108.9%	152.6%	-1.1%	18.4%	34.3%		

Most States Exhibit Disparities in Reimbursement Levels

Exhibit 14 shows that all states except three (Arkansas, Alabama, and Mississippi) exhibited disparities in average in-network reimbursement levels for medical/surgical clinician office visits compared to behavioral health clinician office visits. In several states, average reimbursement levels for medical/surgical clinician office visits were more than 50% higher than for behavioral health clinician office visits. Reports comparing disparities by state (high to low) and detailed information for each state are included in the Appendices. All differences were statistically significant.

Exhibit 14. Higher In-Network Reimbursement Indexed to Medicare for All Medical/Surgical Clinician Office Visits Compared to All Behavioral Health Clinician Office Visits by State, 2021



Psychiatrists are Reimbursed Less Than Physician Assistants and Nurse Practitioners

As shown in *Exhibit 15*, in 2021, across <u>all</u> procedure codes, indexed to Medicare, psychiatrists were reimbursed less in-network than physician assistants (108.4% of Medicare for psychiatrists vs. 128.7% for physician assistants), and less than nurse practitioners (108.4% as compared to 117.2%).

Exhibit 15. Indexed to Medicare: Percentage Higher or Lower Average In-Network Reimbursement for Office Visits with Physician Assistants and Nurse Practitioners Compared to Psychiatrists for All CPT Codes, 2021

	Psychiatrists	Physician Assistants	Nurse Practitioners
All CPT Codes*	108.4%	128.7%	117.2%
Percentage Higher or Lower Reimbursement as Compared to Psychiatrists	_	18.7%	8.2%

^{*} All CPT codes include all codes on the MPFS. Data on all CPT codes are reimbursement levels relative to Medicare reimbursement.

Psychologists Are Reimbursed Less Than Physician Assistants and Nurse Practitioners

As shown in *Exhibit 16*, in 2021, across <u>all</u> procedure codes and indexed to Medicare, psychologists were reimbursed less for in-network office visits than physician assistants (105.1% of Medicare for psychologists vs. 128.7% for physician assistants) and less than nurse practitioners (105.1% as compared to 117.2%).

Exhibit 16. Indexed to Medicare: Percentage Higher or Lower Average In-Network Reimbursement for Office Visits with Physician Assistants and Nurse Practitioners Compared to Psychologists for All CPT Codes, 2021

	Psychologists	Physician Assistants	Nurse Practitioners
All CPT Codes*	105.1%	128.7%	117.2%
Percentage Higher or Lower Reimbursement as Compared to Psychologists	_	22.4%	11.5%

^{*} All CPT codes include all codes on the MPFS. Data on all CPT codes are reimbursement levels relative to Medicare reimbursement.

Not Indexed to Medicare, Psychiatrists Are Reimbursed Less Than Physician Assistants, and Almost the Same as Nurse Practitioners

Exhibit 17 also compares in-network office visit reimbursements—not indexed to Medicare—between psychiatrists, physician assistants, and nurse practitioners across four important evaluation and management (E&M) codes used in common by all those clinicians. Compared to psychiatrists, physician assistants are reimbursed 2.5% more for 99204 (new patient office visits, 45–59 minutes), 6.0% more for 99213 (established patient office visits, 20–29 minutes), 0.2% more for 99214 (established patient office visits, 30–39 minutes), and 9.7% more for 99215 (established patient office visits, 40–54 minutes). Nurse practitioners were reimbursed less than psychiatrists for CPT codes 99204, 99213, and 99214, and 0.4% more for 99215.

Exhibit 17. Not Indexed to Medicare: Percentage Higher or Lower Average In-Network Reimbursement for Physician Assistant and Nurse Practitioner Office Visits Compared to Psychiatrist Office Visits for Four Common Evaluation and Management Codes, 2021

CPT Code(s)	Psychiatrists	Physician Assistants	Nurse Practitioners
99204	\$189.98	\$194.80	\$177.01
Percentage Higher or Lower Reimbursement as Compared to Psychiatrists	_	2.5%	-6.8%
99213	\$84.75	\$89.79	\$80.81
Percentage Higher or Lower Reimbursement as Compared to Psychiatrists	_	6.0%	-4.7%
99214	\$131.41	\$131.64	\$120.56
Percentage Higher or Lower Reimbursement as Compared to Psychiatrists	_	0.2%	-8.3%
99215	\$185.94	\$204.05	\$186.65
Percentage Higher or Lower Reimbursement as Compared to Psychiatrists	_	9.7%	0.4%

It is inaccurate to Use a Subset of Billing Codes for Reimbursement and Out-of-Network Use Disparity Analyses

Using two or only a few codes (such as E&M codes) specified by the party reviewing a health plan (e.g., a regulator) is much more effective than leaving code selection to the party being reviewed.

However, as shown in *Exhibit 18*, even use of the top 12 CPT codes captures a much smaller share of aggregate reimbursements for medical/surgical providers, in- and out-of-network, than for behavioral health providers. Specifically, data show that in 2021:

- The top 12 CPT codes captured 89.0% and 93.4% of aggregate reimbursements for psychiatrists and psychologists, respectively. In contrast, the top 12 CPT codes only captured 32.8% of aggregate reimbursements for medical/surgical specialist physicians.
- The top 12 CPT codes captured 90.6% of aggregate reimbursements for all behavioral health clinicians, whereas the top 12 CPT codes only captured 39.6% of aggregate reimbursements for all medical/surgical clinicians.
- The top 12 CPT codes captured 97.9% of aggregate reimbursements for therapists, whereas the top 12 CPT codes only captured 64.7% of aggregate reimbursements for physician assistants.
- The top 12 CPT codes captured 89.1% of aggregate reimbursements for psychiatric nurses, whereas the top 12 CPT codes only captured 61.3% of aggregate reimbursements for nurse practitioners.

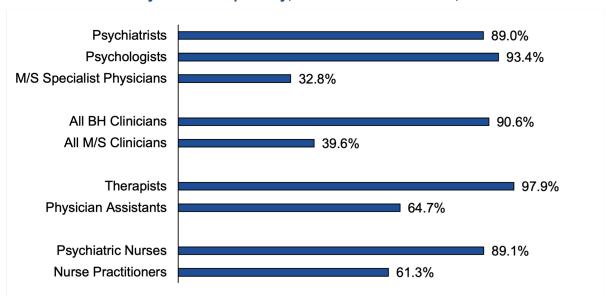


Exhibit 18. Percentages of Aggregate Reimbursement Represented by the Top 12 CPT Codes by Provider Specialty, In- and Out-of-Network, 2021

In addition, as shown in *Exhibit 19*, using a limited set of CPT billing codes in the analysis of reimbursement disparities can give only an approximate indication of the scope and size of out-of-network and reimbursement disparities. For example, including all CPT codes that are on the MPFS shows that medical/surgical specialist physicians receive in-network average commercial reimbursement that is 24.9% higher than for psychiatrists (135.3% vs. 108.4%). In contrast, if we limit the analysis to include only the top four CPT codes, this suggests that medical/surgical specialist physicians are reimbursed only 18.3% more than psychiatrists (124.3% vs. 105.1%). Other comparisons show that limiting to the top 8 or even the top 12 CPT codes also produces findings that frequently underestimate actual disparities.

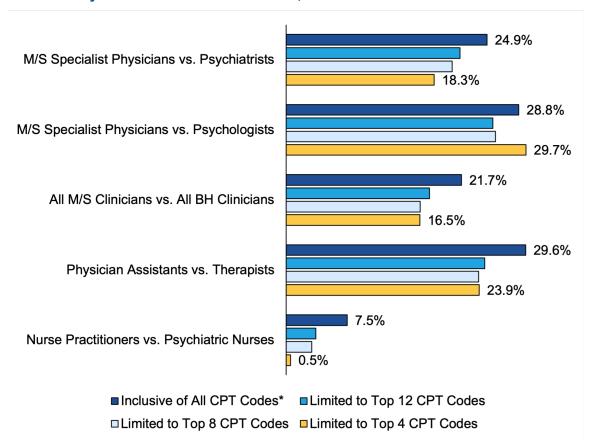


Exhibit 19. Percentage Higher Reimbursement to Medical/Surgical Clinician Office Visits is Higher than Reimbursement to Behavioral Clinician Office Visits by Number of CPT Codes Used, 2021

Special Populations

In this section, analyses are presented for two subpopulations. The first set of analyses examine parity separately for individuals who were treated for primary mental health diagnoses and individuals who were treated for primary substance use disorder diagnoses. The second set of analyses describe results separately for children and youth (age 18 or younger) and adult patients (age 19 or older).

Patients Receive Care Out-of-Network More Often for Substance Use Disorders Than for Mental Health Conditions

Exhibit 20 shows that the disparities in out-of-network use were higher for patients who received care for substance use disorders than for patients who received care for mental health conditions. In 2021, compared to medical/surgical care:

Substance use disorder care delivered in acute inpatient facilities was out-of-network
 12.4 times more often than for medical/surgical (18.1% vs. 1.5%), while mental health

^{*} All CPT codes include all codes on the MPFS. Data on all CPT codes are reimbursement levels relative to Medicare reimbursement.

- care delivered in acute inpatient facilities was out-of-network 3.0 times more often than for medical surgical (4.3% vs. 1.5%).
- Substance use disorder care delivered in subacute inpatient facilities was out-of-network 20.7 times more often than for medical/surgical (35.9% vs. 1.7%), while mental health care delivered in subacute inpatient facilities was out-of-network 18.2 times more often than for medical/surgical (31.7% vs. 1.7%).
- Substance use disorder care delivered in outpatient facilities (excluding emergency rooms) was out-of-network 4.2 times more often than for medical/surgical (35.6% vs. 8.5%), while mental health care delivered in outpatient facilities was out-of-network 1.4 times more often than for medical/surgical (12.2% vs. 8.5%).
- Substance use disorder care delivered in office visits was out-of-network 4.2 times more often than for medical/surgical (15.9% vs. 3.8%), while mental health care delivered in office visits was out-of-network 3.4 times more often than for medical/surgical (12.9% vs. 3.8%).

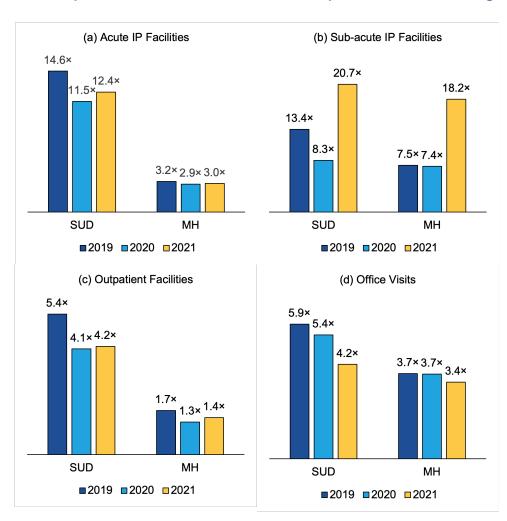


Exhibit 20. Higher Proportion of Out-of-Network Use for Substance Use Disorders as Compared to Mental Health, Each in Comparison to Medical/Surgical

Note: IP = Inpatient; SUD = Substance Use Disorder; MH = Mental Health

Behavioral Health Clinicians Were Reimbursed Less for Treating Mental Health Conditions Than for Substance Use Disorders

As shown in *Exhibit 21*, mental health clinician office visits were reimbursed in-network, on average, at a rate that was less than substance use disorder clinician office visits. Both mental health and substance use disorder clinician office visits were reimbursed less than medical/surgical clinician office visits. Specifically, in 2021:

- All medical/surgical clinician office visits were reimbursed 24.8% more than Medicare.
- All mental health clinician office visits were reimbursed 1.0% less than Medicare.
- All substance use disorder clinician office visits were reimbursed 4.3% more than Medicare.

Data for 2019 and 2020 showed similar patterns.

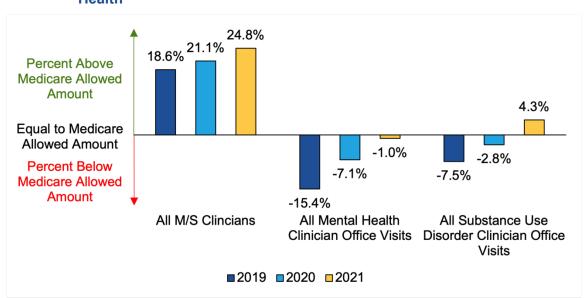


Exhibit 21. Office Visits: In-Network Average Reimbursement Indexed to Medicare Reimbursements, Separately for Substance Use Disorders and Mental Health

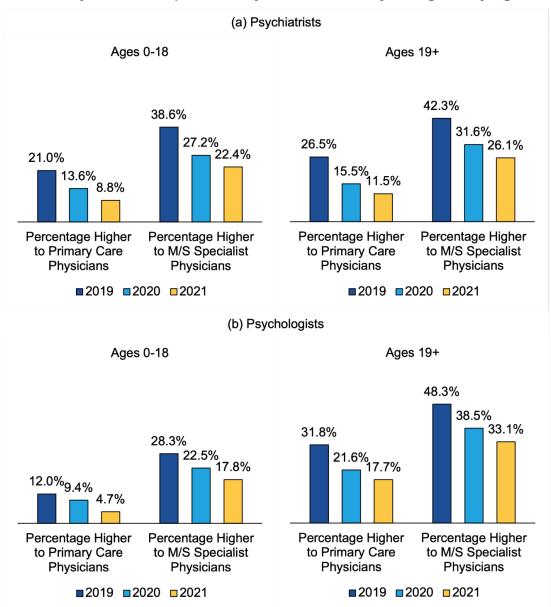
Disparities in Reimbursements Are Higher for Adults Than for Children and Youth

Exhibit 22 shows that adults aged 19 years and older had higher disparities in average innetwork office visit reimbursement than patients aged 18 years or younger. Specifically, in 2021:

- Among patients aged 18 years of age or younger, primary care physicians were reimbursed 9% more than psychiatrists, while medical/surgical specialist physicians were reimbursed 22% more than psychiatrists. In contrast, among patients aged 19 years of age or older, primary care physicians were reimbursed 11% more than psychiatrists, while medical/surgical specialist physicians were reimbursed 26% more than psychiatrists.
- Among patients aged 18 years of age or younger, primary care physicians were reimbursed 5% more than psychologists, while medical/surgical specialist physicians were reimbursed 18% more than psychologists. In contrast, among patients aged 19 years of age or older, primary care physicians were reimbursed 18% more than psychologists, while medical/surgical specialist physicians were reimbursed 33% more than psychologists.

Data from 2019 and 2020 showed similar contrasts.

Exhibit 22. Office Visits: Percentage Higher In-Network Reimbursement (Relative to Medicare) for Primary Care Physicians and Medical/Surgical Specialist Physicians Compared to Psychiatrists and Psychologists, By Age Group



Telehealth and Behavioral Health Disparities

During the three years covered in this study (2019–2021), we expected to see increased use of telehealth care because of changes in how people accessed health care services during the COVID-19 pandemic. For this reason, data on out-of-network use and reimbursements were analyzed separately for telehealth and office-based, non-telehealth visits.

There Were Material Disparities in Out-of-Network Use for Telehealth Office Visits

As shown in *Exhibit 23*, there were material disparities in out-of-network use in both telehealth office visits and in-person office visits. In 2021:

- Compared to all medical/surgical clinicians, in-person office visits with all behavioral health clinicians were out-of-network 4.1 times more often (15.8% vs. 3.9%) and telehealth visits with behavioral health clinicians were out-of-network 4.7 times more often (11.4% vs. 2.4%).
- Compared to medical/surgical specialist physicians, in-person office visits with psychiatrists were out-of-network 11.4 times more often (19.3% vs. 1.7%) and telehealth visits with psychiatrists were out-of-network 5.3 times more often (12.4% vs. 2.4%).
- Compared to medical/surgical specialist physicians, in-person office visits with psychologists were out-of-network 12.3 times more often (20.8% vs. 1.7%) and telehealth visits with psychologists were out-of-network 6.8 times more often (16.0% vs. 2.4%).

Disparities in Reimbursement Levels Are Lower but Growing for Telehealth Care

Exhibit 24 shows that the in-network reimbursement disparities for telehealth care were lower than observed with office-based, non-telehealth care. Specifically, in 2021:

- Compared to all behavioral health clinicians, all medical/surgical clinicians were reimbursed 31.0% more for non-telehealth visits (124.5% vs. 95.1%) and 18.2% more for telehealth visits (128.8% vs. 109.0%).
- Compared to psychiatrists, medical/surgical specialist physicians were reimbursed 45.9% more for non-telehealth visits (135.3% vs. 92.7%) and 12.6% more for telehealth visits (135.2% vs. 120.1%).
- Compared to psychologists, medical/surgical specialist physicians were reimbursed 30.8% more for non-telehealth visits (135.3% vs. 103.4%) and 27.1% more for telehealth visits (135.2% vs. 106.4%).



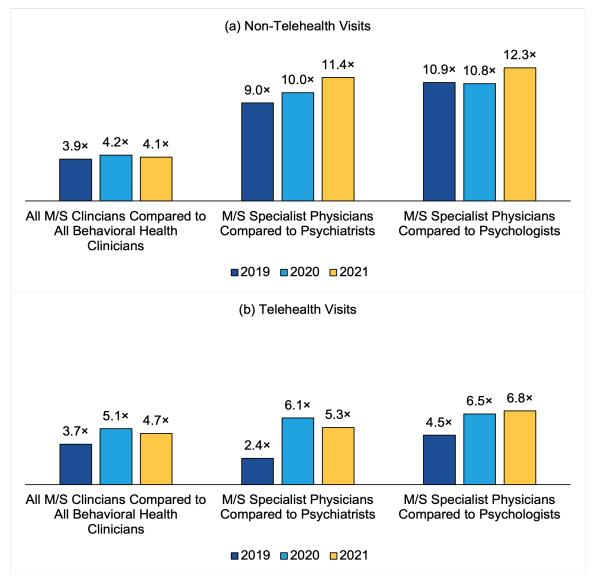
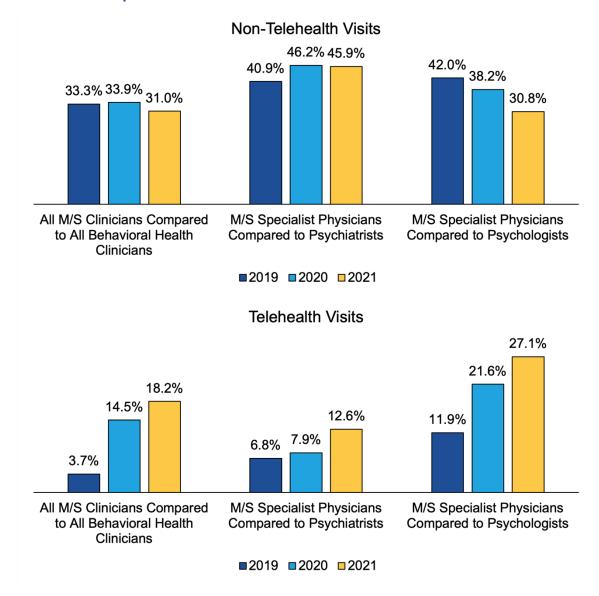


Exhibit 24. Percentage Higher Average In-Network Reimbursement Indexed to Medicare for Medical/Surgical Clinician Office Visits Compared to Behavioral Health Clinician Office Visits, Non-Telehealth Visits as Compared to Telehealth Visits



Limitations

Although large insurance claims databases, such as the one used in these analyses, are a critical tool in evaluating network adequacy and identifying parity violations, it is important to understand their limitations. One limitation is that claims data do not capture information regarding individuals who need but do not receive mental health or substance use treatment because it is not available, is not available in-network, or is not authorized by their health plan. According to the Substance Abuse and Mental Health Services Administration's (SAMHSA's) nationally representative survey, among the 52.9 million adults aged 18 or older in 2020 with a mental illness in the past year, 30.5% (or 16.1 million people) perceived an unmet need for mental health services (SAMHSA, 2021). Among these 16.1 million adults with any mental illness and a perceived unmet need for mental health services, 48% (or 7.7 million people) did not receive any mental health services in the past year.

Another limitation is that claims data do not capture information about people who received care but did not submit an insurance claim (e.g., self-pay).

A third limitation is that many claims databases that can be licensed for research, such as the MarketScan Database, exclude information on the total amount that patients had to pay when they went out-of-network. When a patient goes out-of-network, they not only pay a higher coinsurance or co-payment amount, but they also pay the difference between the allowed reimbursement and the actual reimbursement (i.e., "billed amount" or "charges"), which is typically much larger than the co-payment amount.

This claims data analysis also could not provide information on the amount of time that a patient had to spend finding an in-network provider, waiting for an appointment with an in-network provider, or traveling to an in-network appointment. Moreover, the analysis did not examine the relative "quality" of in-network as compared to out-of-network treatment.

Conclusions

RTI's analyses of the most recent, comprehensive private insurance claims data reveal material differences in access to mental health and substance use disorder benefits as compared to medical/surgical benefits, as reflected in much greater use of out-of-network providers and lower reimbursement rates for in-network services. These disparities indicate that behavioral health networks are clearly inadequate and signal potential noncompliance with the NQTL requirements of MHPAEA. The methodologies for comparability analyses presented in this report are recommended as the basis for templates to measure quantitative disparities.

Acknowledgements

This report was commissioned by the Mental Health Treatment and Research Institute, a taxexempt subsidiary of The Bowman Family Foundation. A portion of the cost of the report was funded by the American Psychiatric Association, the American Psychological Association, and the National Association for Behavioral Healthcare. The authors are responsible for the content of, and the views expressed in, the report.

References

- Anderson, C., Mills, C., Zhou, D., McBeth, A. (2023, November 20). Commercial reimbursement benchmarking. https://www.milliman.com/en/insight/commercial-reimbursement-benchmarking-payment-rates-medicare-fee-for-service
- Benson, N. M., & Song, Z. (2020). Prices and cost sharing for psychotherapy in network versus out of network in the United States. Health Affairs (Project Hope), 39(7), 1210–1218. https://doi.org/10.1377/hlthaff.2019.01468
- Blech et al. (2017). Availability of Network Psychiatrists Among the Largest Health Insurance Carriers in Washington, D.C. *Psychiatric Services*, *68*(9), 865–983. https://ps.psychiatryonline.org/doi/epdf/10.1176/appi.ps.201600454.
- Busch, S.H. et al. (2021). Assessment of Perceptions of Mental Health vs Medical Health Plan Networks Among US Adults with Private Insurance. *JAMA Network Open*, *4*(10), e2130770. https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2785383
- Busch, S. H., & Kyanko, K. A. (2020). Incorrect Provider Directories Associated With Out-Of-Network Mental Health Care And Outpatient Surprise Bills. Health affairs (Project Hope), 39(6), 975–983. https://doi.org/10.1377/hlthaff.2019.01501
- Cama, S., M. Malowney, A.J. Smith, M. Spottswood, F. Cheng, L. Ostrowsk, J. Rengifo, et al. (2017). Availability of Outpatient Mental Health Care by Pediatricians and Child Psychiatrists in Five U.S. Cities. *International Journal of Health Services*, 47(4), 621–635.
- Carlo, A.D., Basu, A., Unützer, J., Jordan, N. (2024). Acceptance of Insurance by Psychiatrists and Other Physicians, 2007–2016. *Psychiatric Services*, 75(1), 25–31. https://doi.org/10.1176/appi.ps.202100669.
- Department of Treasury, Internal Revenue Services. Department of Labor, Employee Benefits Security Administration, Department of Health and Human Services. (2023, August 3). Requirements Related to the Mental Health Parity and Addictions Equity Act. Federal Register, (88)148, Proposed Rules. https://www.federalregister.gov/documents/2023/08/03/2023-15945/requirements-related-to-the-mental-health-parity-and-addiction-equity-act
- Departments of Labor, Health & Human Services, and Treasury, MHPAEA Comparative Analysis: Report to Congress. (2023). https://www.dol.gov/sites/dolgov/files/EBSA/laws-and-regulations/laws/mental-health-parity/report-to-congress-2023-mhpaea-comparative-analysis.pdf
- Department of Labor, Technical Release 2023-01P. Request For Comment On Proposed Relevant Data Requirements For Nonquantitative Treatment Limitations (NQTLs) Related To Network Composition And Enforcement Safe Harbor For Group Health Plans And Health Insurance Issuers Subject To The Mental Health Parity And Addiction Equity Act. (2023). https://www.dol.gov/agencies/ebsa/employers-and-advisers/guidance/technical-releases/23-01

- Department of Labor. (2020). Self-Compliance Tool for MHPAEA & ERISA Requirements. https://www.dol.gov/sites/dolgov/files/EBSA/laws-and-regulations/laws/mental-health-parity/self-compliance-tool.pdf
- Friedman, S. A., Xu, H., Azocar, F., & Ettner, S. L. (2022). Quantifying Balance Billing for Out-of-Network Behavioral Health Care in Employer-Sponsored Insurance. *Psychiatric Services*, 73(9), 1019–1026. https://doi.org/10.1176/appi.ps.202100157
- Kaiser Family Foundation. (2022, October 27). 2022 Employer Health Benefits Survey. https://www.kff.org/report-section/ehbs-2022-summary-of-findings.
- King, C.A., Beetham, T., Smith, N., Englander, H., Button, D., Brown, P.C.M., Hadland, S.E., Bagley, S.M., Wright, O.R., Korthuis, P.T., & Cook, R. (2024). Adolescent Residential Addiction Treatment In The US: Uneven Access, Waitlists, And High Costs. *Health Affairs*, 43(1), 64-71. https://doi.org/10.1377/hlthaff.2023.00777.
- Mark, T.L., Olesiuk, W., Ali, M.M., Sherman, L.J., Mutter, R., & Teich, J.L. (2018). Differential Reimbursement of Psychiatric Services by Psychiatrists and Other Medical Providers. *Psychiatric Services*, *69*(3), 281-285. https://doi.org/10.1176/appi.ps.201700271.
- Melek, S., Davenport, S., & Gray T.J. (2019, November 19). Addiction and Mental Health Vs. Physical Health: Widening Disparities in Network Use and Provider Reimbursement. Merative MarketScan Research Databases.

 https://assets.milliman.com/ektron/Addiction_and_mental_health_vs_physical_health_Widening_disparities_in_network_use_and_provider_reimbursement.pdf
- Merative. MarketScan Explainer. https://www.merative.com/documents/brief/marketscan-explainer-general (Downloaded March 30, 2024).
- National Alliance of Healthcare Purchaser Coalitions, HR Policy Associates, and Path Forward. (2023). Voice of the Purchaser Survey on Behavioral Health Support. Spring 2023 Survey Results. https://higherlogicdownload.s3.amazonaws.com/NAHPC/3d988744-80e1-414b-8881-aa2c98621788/UploadedFiles/T514R490RouKpe2InF9J_VOP%20Public%20Report_Finalized%203.pdf
- Office of the New York State Attorney General Letitia James. (2023, December 7). Inaccurate and inadequate: Health plans' mental health provider network directories (ny.gov). https://ag.ny.gov/sites/default/files/reports/mental-health-report 0.pdf
- Substance Abuse and Mental Health Services Administration. (2021). Key substance use and mental health indicators in the United States: Results from the 2020 National Survey on Drug Use and Health (HHS Publication No. PEP21-07-01-003, NSDUH Series H-56). Rockville, MD: Center for Behavioral Health Statistics and Quality, Substance Abuse and Mental Health Services Administration. Retrieved from https://www.samhsa.gov/data/sites/default/files/reports/rpt35325/NSDUHFFRPDFWHTMLFiles2020/2020NSDUHFFR1PDFW102121.pdf

- Tenner et al. (2022). Secret Shopper Analysis Shows Getting Psychiatry Appointment in New York City is Well Kept Secret. *Community Mental Health J.*, 58, 290–291. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9287131/
- U.S. Senate Finance Committee. (2023, May 3). Wyden Calls for Action to Get Rid of Ghost Networks, Releases Secret Shopper Study. Chairman's News | Newsroom | The United States Senate Committee on Finance
- Zhu, J., Y. Zhang, & D. Polsky. (2017). Networks in ACA Marketplaces Are Narrower for Mental Health Care Than for Primary Care. *Health Affairs*, *36*(9), 1624–1631.

Appendix A: Methods Detail

For individually billed professional services using the CMS-1500 claims form in Medicare, under the Medicare Physician Fee Schedule (MPFS), Medicare designates whether a Place of Service (POS) uses either the "facility based" or "non-facility based" Physician Fee Schedule of allowed amounts. All Medicare POS codes are shown in Column 1 of *Exhibit A1*. When the MPFS is used as a benchmark for indexing, the POS of each individual claim must be examined and, if the POS of the claim is designated by Medicare as a facility, the Medicare "facility allowed amount" must be used as the denominator of the "commercial allowed amount/Medicare-allowed amount" calculation. If the POS of a claim is designated by Medicare as "non-facility," the Medicare "non-facility allowed amount" must be used as the denominator. The MPFS facility or non-facility designation of each POS is shown in Column 3 of Exhibit A1.

For the purposes of calculating out-of-network use and reimbursement disparities for individually billed professional services using the CMS-1500 claims form in this RTI study, we designated each POS to be either "office visit" or "non-office visit". These designations are listed in Column 4 of Exhibit A1.

For example, in this RTI analysis, as shown in Column 4 of Exhibit A1, we considered claims submitted from a Community Mental Health Center (POS 53) to be "office visit" claims for the purpose of the out-of-network use and reimbursement rate analyses in this report. Nonetheless, for indexing each POS 53 claim to Medicare, the MPFS "facility" allowed amount was used in the denominator of the "commercial allowed amount/Medicare-allowed amount" calculation because, in Column 3 of Exhibit A1, POS 53 is designated by Medicare as "facility".

Individually billed professional services using the CMS-1500 claims form submitted by providers in "non-office visit" POSs per Column 4 of Exhibit A1 were examined in our analyses but are not presented in this report because, in aggregate, such claims constitute only about 4% of individually billed professional service claims by all behavioral health clinicians and about 20% of individually billed professional service claims by all medical/surgical clinicians (the latter claims are, for example, claims for professional services of surgeons performed in hospitals). Relatively few individually billed CMS-1500 claims were submitted by facilities; these, too, were examined but are not presented in this report.

We recommend use of the RTI designations of "office visit" in Column 4 of Exhibit A1 for analyses of out-of-network use and reimbursement disparities with respect to individually billed professional services using the CMS-1500 claims form.

Facility claims for facility services, such as "per diems" and "DRGs," billed using the UB-04 claims form may include bundled professional services, but not individually billed professional services. In this RTI study, out-of-network use of facility services was calculated for claims submitted by facilities using UB-04 claims forms.

"Outpatient facility" claims are non-emergency room claims with a facility outpatient designation, submitted on a UB-04 claims form. For medical/surgical, an example of such services would be

outpatient surgery. For behavioral, examples are partial hospitalization and ambulatory withdrawal management.

All facility services that occurred in a behavioral provider type (per *Exhibit A2*) were included as behavioral. Behavioral health facility claims also include claims using POS codes 51, 52, 53, 55, 56, and 57, as well as any claims at medical/surgical facilities with a primary behavioral health diagnosis, such as a medical/surgical POS (e.g., a hospital) for which the claim indicated a primary diagnosis of a behavioral health condition. Such services designated as behavioral include, for example, intensive outpatient services.

We recommend use of the RTI method of identifying behavioral health facility services.

Exhibit A1. CMS-1500 Professional Claims POS Codes: Medicare Physician Fee Schedule Designations (used for indexing reimbursement to Medicare) as compared to "Office Visit" Designations in This Study

Column 1	Column 2	Column 3	Column 4
POS Code	POS Name	Medicare Designation: Non-Facility or Facility for Using the Physician Fee Schedule	Designations for This Study: Office Visit or Non-Office Visit
02	Telehealth Provided Other than in Patient's Home	Facility	Office visit
05	Indian Health Service, Free-Standing Facility	N/A	Office visit
06	Indian Health Service, Provider-Based Facility	N/A	Office visit
07	Tribal 638, Free-Standing Facility	N/A	Office visit
08	Tribal 638, Provider-Based Facility	N/A	Office visit
11	Office	Non-facility	Office visit
12	Home	Non-facility	Office visit
13	Assisted Living Facility	Non-facility	Non-office visit
14	Group Home	Non-facility	Non-office visit
15	Mobile Unit	Non-facility	Office visit
17	Walk-In Retail Health Clinic	Non-facility	Office visit
19	Off Campus-Outpatient Hospital	Facility	Non-office visit
20	Urgent Care Facility	Non-facility	Non-office visit
21	Inpatient Hospital	Facility	Non-office visit
22	On Campus-Outpatient Hospital	Facility	Non-office visit
23	Emergency Room – Hospital	Facility	Non-office visit
24	Ambulatory Surgical Center	Facility	Non-office visit
25	Birthing Center	Non-facility	Non-office visit
26	Military Treatment Facility	Facility	Non-office visit
27	Outreach Site/ Street	Non-facility	Non-office visit
31	Skilled Nursing Facility	Facility	Non-office visit
32	Nursing Facility	Non-facility	Non-office visit
33	Custodial Care Facility	Non-facility	Non-office visit

Column 1	Column 2	Column 3	Column 4
POS Code	POS Name	Medicare Designation: Non-Facility or Facility for Using the Physician Fee Schedule	Designations for This Study: Office Visit or Non-Office Visit
34	Hospice	Facility	Office visit
35	Adult Living Care Facility	Non-facility	Non-office visit
41	Ambulance (land)	Facility	Office visit
42	Ambulance (air or water)	Facility	Office visit
49	Independent Clinic	Non-facility	Office visit
50	Federally Qualified Health Center	Non-facility	Office visit
51	Inpatient Psychiatric Facility	Facility	Non-office visit
52	Psychiatric Facility-Partial Hospitalization	Facility	Non-office visit
53	Community Mental Health Center	Facility	Office visit
54	Intermediate Care Facility/ Individuals with Intellectual Disabilities	Non-facility	Non-office visit
55	Residential Substance Abuse Treatment Facility	Non-facility	Non-office visit
56	Psychiatric Residential Treatment Center	Facility	Non-office visit
57	Non-residential Substance Abuse Treatment Facility	Non-facility	Office visit
61	Comprehensive Inpatient Rehabilitation Facility	Facility	Non-office visit
62	Comprehensive Outpatient Rehabilitation Facility	Non-facility	Non-office visit
65	End-Stage Renal Disease Treatment Facility	Non-facility	Office visit
71	Public Health Clinic	Non-facility	Office visit
72	Rural Health Clinic	Non-facility	Office visit
95	Outpatient (Not Elsewhere Classified)	Non-facility	Office visit

n/a = Not applicable because uses other fee schedule

Source for Column 3 is the Medicare manual: https://www.cms.gov/Regulations-and-

Guidance/Guidance/Manuals/Downloads/clm104c12.pdf

Exhibit A2. Facility Provider Types from the MarketScan Data Dictionary that were Considered to be Behavioral Health Facilities in RTI's Analysis

Provider Type	Description
20	Mental Health/Chemical Dependence Not Elsewhere Classified
21	Mental Health Facilities
22	Chemical Depend Treatment Center
35	Residential Treatment Center
23	Mental Health/Chemical Dependence Day Care

This report also utilized other fields within the MarketScan data dictionary. For example, for the professional services ("office visit") claims reimbursement analysis regarding the CMS-1500

claims form, "all codes" means all lines on all non-capitated claims with any CPT or Healthcare Common Procedure Codes (HCPCS) code with any modifier.

For out-of-network analyses for both "Office Visits" and facility claim types (CMS-1500 and UB-04), "all codes" means any CMS-1500 claim line with any CPT or HCPCS code with any modifier and any UB-04 claim line including any revenue code, DRG, AP-DRG, APC, or other facility billing code included in the MarketScan Database. For both "office visit" and facility claims, out-of-network use was calculated as the percentage of all claims that were paid as out-of-network, rather than the percentage of total dollars of allowed amounts that related to out-of-network claims. In this context, "all claims" is not limited to only non-capitated claims.

RTI also utilized provider types within the MarketScan data dictionary as needed to clarify different categories of providers where the POS may not have reflected the provision of service.

The formula for calculating percentage higher or lower reimbursement was: ([Medical/Surgical provider] reimbursement rate - [Behavioral Health provider] reimbursement rate) / [Behavioral Health provider] reimbursement rate. A negative percentage indicates that the Medical/Surgical provider reimbursement rate was lower than the Behavioral Health provider reimbursement rate.

Appendix B: 2021 State-Level Disparities

Appendix B-1a: 2021 Acute Inpatient Facility—Out-of-Network Utilization Disparity Levels, All Plans

_	Out-of-Netw	ork Utilization, %	Behavioral — Health Out-of-Network Use	
State	Medical/ Surgical	Behavioral Health	Compared to Medical/Surgical	
Parity			1.0×	
All States	1.5	9.0	6.2×	
Connecticut	0.2	11.7	58.7×	
Delaware	0.1	6.3	51.3×	
Massachusetts	0.3	9.5	34.9×	
New Hampshire	0.4	13.6	31.6×	
Alabama	0.5	14.1	28.2×	
Florida	0.5	11.2	24.0×	
New Jersey	0.6	13.3	23.4×	
Maryland	0.3	6.7	20.8×	
Nevada	0.8	16.0	20.7×	
Rhode Island	0.2	4.4	20.6×	
Maine	0.4	8.7	20.3×	
North Carolina	0.7	12.3	17.7×	
Kentucky	0.2	4.0	17.2×	
Pennsylvania	0.4	7.5	16.8×	
Washington	0.8	13.5	16.7×	
Georgia	0.6	10.0	16.0×	
Indiana	0.9	12.6	14.8×	
Missouri	0.7	7.9	11.9×	
Virginia	0.4	5.0	11.2×	
Hawaii	2.5	26.3	10.6×	
New York	0.8	8.0	9.6×	
Montana	1.2	11.3	9.5×	
Kansas	0.8	7.8	9.4×	
California	1.2	11.1	9.3×	
Arizona	2.3	20.2	8.8×	
West Virginia	0.9	7.9	8.7×	
Mississippi	1.1	8.6	7.7×	
Oregon	1.0	7.5	7.5×	
Washington, D.C.	0.6	4.5	7.2×	
South Carolina	1.3	9.0	7.2×	
Tennessee	1.5	10.8	7.1×	
Colorado	1.4	9.6	6.8×	
Wyoming	2.4	13.4	5.6×	
Arkansas	2.2	12.2	5.6×	
Oklahoma	1.8	10.0	5.6×	
New Mexico	2.0	10.7	5.4×	

_	Out-of-Netw	ork Utilization, %	Behavioral —— Health Out-of-Network Use
State	Medical/ Surgical	Behavioral Health	Compared to Medical/Surgical
Nebraska	1.9	9.7	5.1×
Utah	1.7	8.7	5.1×
Louisiana	1.0	4.7	4.8×
Illinois	1.4	6.2	4.5×
Texas	2.4	10.1	4.3×
Minnesota	1.2	4.6	3.7×
Ohio	2.0	7.2	3.6×
South Dakota	4.1	13.4	3.3×
Vermont	3.4	7.4	2.2×
Wisconsin	2.7	4.8	1.8×
Michigan	3.2	4.9	1.5×
North Dakota	1.4	1.8	1.3×*
Alaska	14.2	11.6	0.8×
Iowa	35.0	26.7	0.8×
Idaho	n/a	n/a	n/a

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

Appendix B-1b: 2021 Subacute Inpatient Facility—Out-of-Network Utilization Disparity Levels, All Plans

Out-of-Network Utilization		k Utilization, %	Behavioral Health Out-of-
State	Medical/Surgical	Behavioral Health	Network Use Compared to Medical/Surgical
Parity			1.0×
All States	1.7	34.5	19.9×
Georgia	0.4	42.3	103.8×
Maryland	0.7	66.2	96.5×
Kentucky	0.2	15.9	85.6×
New Hampshire	0.7	52.5	73.8×
Florida	0.7	42.7	58.2×
Oregon	0.6	30.4	54.7×
Maine	0.4	23.4	52.8×
Missouri	0.8	39.3	51.1×
Texas	0.8	36.3	47.8×
Connecticut	1.1	51.6	47.5×
Vermont	0.5	18.4	36.5×
Mississippi	1.2	41.3	34.6×
Tennessee	1.0	32.3	31.4×
South Carolina	1.0	28.7	29.3×
West Virginia	1.7	48.3	28.3×
Nebraska	1.7	45.0	25.9×
Louisiana	2.6	58.1	22.2×
Nevada	2.7	58.8	21.4×
Idaho	1.3	27.9	21.0×
lowa	1.8	35.7	20.3×
Illinois	2.4	47.7	20.0×
Arkansas	1.3	24.2	18.4×
North Dakota	2.6	45.9	17.3×
California	2.4	40.3	16.5×
New Jersey	2.6	41.6	16.0×
New York	2.9	45.8	15.9×
Washington, D.C.	1.8	27.9	15.8×
Wisconsin	4.3	64.7	15.0×
Wyoming	4.3	64.7	15.0×*
Ohio	2.5	36.0	14.5×
Virginia	3.5	50.0	14.3×
Colorado	3.7	45.4	12.3×
South Dakota	1.9	22.0	11.8×
Kansas	2.2	25.5	11.6×
Washington	2.2	23.0	10.5×
Massachusetts	2.5	24.2	9.6×
Alabama	4.6	39.2	8.6×
Montana	1.9	15.6	8.2×
Pennsylvania	5.6	43.5	7.8×
Oklahoma	4.3	31.0	7.2×

	Out-of-Network Utilization, %		Behavioral Health Out-of-
State	Medical/Surgical	Behavioral Health	Network Use Compared to Medical/Surgical
Rhode Island	3.6	19.3	5.4×
New Mexico	8.2	42.1	5.2×
Arizona	12.7	55.5	4.4×
Michigan	3.1	8.7	2.8×
Alaska	76.7	79.8	1.0×*
Indiana	19.5	13.3	0.7×
Utah	n/a	n/a	n/a
North Carolina	n/a	n/a	n/a
Minnesota	n/a	n/a	n/a
Delaware	n/a	n/a	n/a
Hawaii	n/a	n/a	n/a

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

Appendix B-2: 2021 Outpatient Facility (Non-Emergency Room)—Outof-Network Utilization Disparity Levels, All Plans

	Out-of-Networ	k Utilization, %	Behavioral Health Out-of-
State	Medical/Surgical	Behavioral Health	Network Use Compared to Medical/Surgical
Parity			1.0×
All States	8.5	13.1	1.5×
Delaware	0.8	38.2	50.2×
Maine	0.6	18.6	33.4×
Montana	2.3	58.8	25.1×
Pennsylvania	1.1	23.2	21.0×
New Hampshire	1.9	40.2	20.7×
Colorado	1.2	21.6	18.5×
Florida	1.3	23.2	18.0×
Minnesota	0.5	9.3	17.0×
South Carolina	0.4	5.5	12.9×
Mississippi	1.4	17.5	12.7×
Rhode Island	1.2	15.4	12.7×
Washington	4.4	52.9	12.1×
California	2.9	31.0	10.6×
Virginia	1.0	10.8	10.4×
Nebraska	1.8	17.8	10.0×
West Virginia	0.3	3.2	9.7×
Massachusetts	3.5	29.2	8.3×
Indiana	1.3	10.4	8.0×
Missouri	1.3	10.2	7.5×
Alabama	2.1	15.3	7.2×
New Mexico	4.1	27.9	6.8×
Georgia	1.7	10.7	6.3×
South Dakota	1.6	8.8	5.6×
North Carolina	3.6	19.1	5.2×
Tennessee	4.5	21.9	4.9×
Oregon	4.5	21.4	4.7×
Kansas	4.7	19.1	4.0×
Wyoming	6.2	23.6	3.8×
Washington, D.C.	6.5	21.9	3.4×
Maryland	5.7	17.7	3.1×
Nevada	11.6	34.5	3.0×
Illinois	2.4	7.0	2.9×
Connecticut	1.9	5.2	2.7×
New Jersey	15.4	36.9	2.4×
Arizona	15.7	36.5	2.3×
Alaska	13.6	29.6	2.2×
Louisiana	0.3	0.7	2.1×
Kentucky	2.5	4.9	2.0×
Utah	5.5	10.4	1.9×
North Dakota	4.7	7.1	1.5×*

	Out-of-Networ	k Utilization, %	Behavioral Health Out-of-
State	Medical/Surgical	Behavioral Health	Network Use Compared to Medical/Surgical
Oklahoma	9.3	13.1	1.4×
Wisconsin	4.2	5.2	1.3×
Arkansas	3.5	4.0	1.1×*
Michigan	11.4	11.7	1.0×*
Texas	19.1	15.2	0.8×
Ohio	6.9	4.3	0.6×
lowa	39.0	19.6	0.5×
Vermont	4.2	2.1	0.5×*
New York	60.7	19.8	0.3×
Idaho	n/a	n/a	n/a
Hawaii	n/a	n/a	n/a

^{*} Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

Appendix B-3: 2021 Office Visits—Out-of-Network Utilization Disparity Levels, All Plans

All Medical/Surgical Clinicians Compared to All Behavioral Health Clinicians

	Out-of-Network	Utilization, %	_ All Behavioral Health Clinicians
State	All Medical/ Surgical Clinicians	All Behavioral Health Clinicians	Out-of-Network Use Compared to All Medical/Surgical Clinicians
Parity			1.0×
All States	3.8	13.4	3.5×
Massachusetts	1.0	14.4	14.1×
Maine	0.9	9.2	10.7×
Rhode Island	1.1	11.3	10.3×
Maryland	1.9	16.3	8.7×
Washington	5.1	36.3	7.1×
New Mexico	2.6	18.1	6.8×
Virginia	1.2	7.8	6.5×
Washington, D.C.	2.4	15.3	6.4×
California	5.9	34.2	5.8×
North Carolina	1.5	8.5	5.6×
Delaware	0.9	4.7	5.5×
Pennsylvania	1.9	9.8	5.2×
Kentucky	0.5	2.7	4.9×
Louisiana	1.2	6.0	4.8×
New Hampshire	1.9	8.9	4.7×
Vermont	2.5	11.1	4.4×
Connecticut	6.6	27.6	4.2×
Indiana	1.3	4.5	3.6×
Oregon	3.2	11.3	3.5×
Utah	1.7	5.8	3.4×
Missouri	2.1	6.9	3.3×
Kansas	2.6	8.4	3.3×
South Carolina	1.6	5.1	3.3×
North Dakota	2.7	8.5	3.2×
New York	9.3	29.3	3.1×
Florida	2.9	9.0	3.1×
Alabama	1.1	3.3	3.1×
Hawaii	5.2	15.7	3.0×
Tennessee	1.7	4.5	2.7×
Texas	2.3	6.0	2.6×
West Virginia	1.3	3.3	2.5×
Colorado	4.8	11.8	2.5×
Arkansas	2.1	5.0	2.4×
Montana	2.8	6.7	2.4×
Wyoming	3.8	8.8	2.3×
Georgia	2.9	6.4	2.2×
South Dakota	2.9	6.3	2.2×
New Jersey	15.6	31.0	2.0×

	Out-of-Network Utilization, %		All Behavioral Health Clinicians	
State	All Medical/ Surgical Clinicians	All Behavioral Health Clinicians	Out-of-Network Use Compared to All Medical/Surgical Clinicians	
Alaska	14.6	28.5	2.0×	
Illinois	2.3	4.4	1.9×	
Mississippi	1.2	2.3	1.9×	
Nebraska	2.5	4.4	1.8×	
Michigan	1.5	2.6	1.7×	
Nevada	5.2	8.8	1.7×	
Ohio	3.2	5.3	1.6×	
Oklahoma	3.8	5.9	1.5×	
Wisconsin	2.1	3.1	1.5×	
Minnesota	3.0	4.3	1.5×	
Iowa	41.4	54.5	1.3×	
Arizona	7.8	6.5	0.8×	
Idaho	8.0	1.1	0.1×	

n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

Medical/Surgical Specialist Physicians Compared to Psychiatrists

	Out-of-Network	Utilization, %	
State	Medical/Surgical Specialist Physicians	Psychiatrists	Psychiatrists Out-of-Network Use Compared to Medical/Surgical Specialist Physicians
Parity			1.0×
All States	1.7	15.3	8.9×
Massachusetts	0.5	22.8	42.1×
Rhode Island	0.5	20.4	37.9×
Kentucky	0.2	6.6	30.6×
Maryland	0.8	17.3	21.1×
Pennsylvania	0.7	13.5	18.1×
Louisiana	0.7	10.9	16.6×
Delaware	0.4	7.4	16.5×
California	2.2	34.8	15.9×
Washington	2.3	36.0	15.6×
Virginia	0.6	8.3	13.5×
Connecticut	2.6	33.0	12.7×
Colorado	1.3	16.0	12.0×
Indiana	0.8	9.7	11.6×
New Mexico	2.5	27.8	11.1×
North Carolina	0.7	7.9	10.9×
Washington, D.C.	1.7	18.6	10.9×
New Hampshire	1.1	11.3	10.6×
Minnesota	0.7	7.2	9.6×
South Dakota	1.2	10.7	9.2×
New York	3.5	31.5	9.1×
Maine	0.6	5.3	8.4×
Alabama	0.5	3.7	7.3×
Florida	1.0	6.7	7.0×
South Carolina	1.4	9.1	6.5×
New Jersey	4.5	28.3	6.3×
Tennessee	0.6	3.8	6.0×
Montana	1.5	8.4	5.5×
Vermont	1.9	9.4	5.0×
Hawaii	2.2	10.4	4.8×
Georgia	1.2	5.9	4.8×
Oregon	1.0	4.4	4.5×
Mississippi	1.1	4.6	4.4×
Illinois	1.4	6.0	4.3×
Arkansas	1.2	4.4	3.8×
Utah	0.9	3.1	3.4×
Texas	1.3	4.1	3.3×
Ohio	2.7	8.3	3.1×
North Dakota	0.5	1.5	2.7×*
Missouri	1.4	3.7	2.7×
Kansas	1.6	4.2	2.6×

	Out-of-Network Utilization, %		
State	Medical/Surgical Specialist Physicians	Psychiatrists	Psychiatrists Out-of-Network Use Compared to Medical/Surgical Specialist Physicians
Oklahoma	2.1	5.1	2.4×
Michigan	1.2	2.7	2.3×
Wyoming	2.9	6.6	2.3×
Nebraska	1.6	3.4	2.2×
West Virginia	1.3	2.6	2.1×
Wisconsin	1.0	1.9	1.9×
Arizona	2.2	4.0	1.8×
Alaska	5.3	8.6	1.6×
lowa	34.8	49.8	1.4×
Nevada	4.3	5.0	1.1×
Idaho	n/a	n/a	n/a

^{*} Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

Medical/Surgical Specialist Physicians Compared to Psychologists

	Out-of-Network	Utilization, %	Psychologists Out-of-Network Use Compared to Medical/Surgical Specialist Physicians
State	Medical/Surgical Specialist Physicians	Psychologists	
Parity			1.0×
All States	1.7	18.2	10.6×
Massachusetts	0.5	21.1	39.0×
Maryland	0.8	29.9	36.4×
Rhode Island	0.5	15.7	29.2×
North Carolina	0.7	17.6	24.3×
Washington	2.3	54.6	23.7×
Virginia	0.6	13.8	22.4×
Maine	0.6	13.3	21.0×
Pennsylvania	0.7	15.7	21.0×
Connecticut	2.6	45.5	17.5×
Alabama	0.5	8.7	17.4×
North Dakota	0.5	9.0	16.3×
Kentucky	0.2	3.4	15.7×
California	2.2	32.8	15.0×
Florida	1.0	13.5	14.0×
Oregon	1.0	12.7	13.0×
Delaware	0.4	5.8	12.9×
Tennessee	0.6	7.6	11.9×
Louisiana	0.7	7.3	11.1×
New York	3.5	35.9	10.3×
Colorado	1.3	13.4	10.0×
Washington, D.C.	1.7	16.5	9.7×
New Jersey	4.5	40.9	9.2×
Minnesota	0.7	6.4	8.6×
Georgia	1.2	10.5	8.5×
New Hampshire	1.1	8.7	8.2×
New Mexico	2.5	18.1	7.2×
Indiana	0.8	5.9	7.1×
South Carolina	1.4	9.6	7.0×
Alaska	5.3	35.8	6.7×
Vermont	1.9	12.1	6.5×
Hawaii	2.2	14.0	6.4×
Missouri	1.4	8.8	6.4×
Texas	1.3	7.9	6.2×
Utah	0.9	5.5	6.1×
Wisconsin	1.0	5.3	5.2×
Kansas	1.6	7.6	4.7×
Arizona	2.2	9.8	4.5×
Oklahoma	2.1	9.5	4.5×
Arkansas	1.2	5.1	4.4×
Illinois	1.4	5.9	4.2×

	Out-of-Network Utilization, %		
State	Medical/Surgical Specialist Physicians	Psychologists	Psychologists Out-of-Network Use Compared to Medical/Surgical Specialist Physicians
Wyoming	2.9	9.8	3.3×
South Dakota	1.2	3.6	3.1×
West Virginia	1.3	3.7	2.9×
Michigan	1.2	3.4	2.8×
Montana	1.5	4.2	2.8×
Nevada	4.3	10.3	2.4×
Ohio	2.7	5.5	2.0×
lowa	34.8	65.5	1.9×
Nebraska	1.6	2.2	1.4×
Mississippi	1.1	1.1	1.0×*
Idaho	n/a	n/a	n/a

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

Nurse Practitioners Compared to Psychiatric Nurses

	Out-of-Network	Out-of-Network Utilization, %	
State	Nurse Practitioners	Psychiatric Nurses	Network Use Compared to Nurse Practitioners
Parity			1.0×
All States	2.2	3.8	1.7×
Vermont	0.5	43.2	88.4×
New Hampshire	1.2	24.6	20.0×
Maine	1.0	9.9	10.1×
South Dakota	0.5	4.3	8.7×*
Arkansas	1.4	11.9	8.5×
Massachusetts	0.9	5.4	6.0×
Mississippi	0.8	4.1	5.1×
North Carolina	1.7	8.4	5.0×
Alabama	1.5	7.4	4.9×
Indiana	0.7	3.4	4.5×
Delaware	1.3	5.6	4.3×
Oregon	2.5	8.5	3.4×
Maryland	0.8	2.5	3.2×
Louisiana	2.3	6.8	3.0×
Connecticut	1.4	4.3	3.0×
Washington	1.5	3.7	2.5×
Pennsylvania	0.9	2.1	2.4×
Alaska	4.2	9.4	2.3×*
Ohio	1.4	3.0	2.2×
Missouri	2.1	4.3	2.1×
West Virginia	1.2	2.4	2.0×*
New Jersey	4.5	8.5	1.9×
Virginia	1.0	1.9	1.9×
South Carolina	0.9	1.5	1.7×*
Nevada	5.6	9.1	1.6×
Kansas	2.5	4.0	1.6×
Iowa	10.7	14.2	1.3×
Nebraska	1.5	1.9	1.3×*
Tennessee	2.2	2.3	1.1×*
California	3.5	3.7	1.1×*
Minnesota	1.0	1.0	1.0×*
Kentucky	0.4	0.4	1.0×*
New York	4.0	4.0	1.0×*
Illinois	1.0	0.9	1.0×*
Michigan	1.2	1.2	1.0×*
Washington, D.C.	2.0	1.9	1.0×*
Florida	3.0	2.7	0.9×*
Utah	4.1	3.3	0.8×*
Wyoming	3.0	2.4	0.8×*
Colorado	3.4	2.6	0.8×
Georgia	3.0	2.0	0.7×
Rhode Island	0.9	0.6	0.7×*

	Out-of-Network	k Utilization, %	Psychiatric Nurses Out-of-
State	Nurse Practitioners	Psychiatric Nurses	Network Use Compared to Nurse Practitioners
New Mexico	2.3	1.4	0.6×*
Oklahoma	4.6	2.6	0.6×
Texas	4.4	2.0	0.5×
Arizona	6.1	1.9	0.3×
Hawaii	n/a	n/a	n/a
Idaho	n/a	n/a	n/a
Montana	n/a	n/a	n/a
North Dakota	n/a	n/a	n/a
Wisconsin	n/a	n/a	n/a

 $^{^*}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

Physician Assistants Compared to Therapists

	Out-of-Network	Jtilization, %	Therapists Out-of-Network Use
State	Physician Assistants	Therapists	Compared to Physician Assistants
Parity			1.0×
All States	2.8	11.3	4.1×
Hawaii	0.3	21.9	64.3×
Washington	0.6	28.9	48.9×
Rhode Island	0.2	8.3	43.0×
New Hampshire	0.2	7.9	41.3×
Vermont	0.3	10.9	33.9×
Connecticut	0.8	21.6	25.6×
Massachusetts	0.4	9.4	24.7×
Virginia	0.3	6.2	18.1×
Pennsylvania	0.5	6.8	13.7×
New Mexico	1.4	17.1	11.8×
Kentucky	0.2	1.9	11.5×
Washington, D.C.	1.3	15.1	11.4×
New York	2.4	26.5	11.2×
Maryland	1.2	13.4	11.1×
Nebraska	0.5	5.2	10.6×
Colorado	1.0	10.8	10.6×
South Dakota	0.7	7.1	9.7×
North Carolina	0.7	6.6	9.2×
New Jersey	3.4	28.8	8.4×
Oregon	1.8	14.7	8.2×
Alaska	4.6	31.3	6.8×
South Carolina	0.5	3.1	6.6×
Illinois	0.5	3.5	6.5×
Indiana	0.5	3.2	6.1×
Maine	1.5	8.9	6.0×
North Dakota	1.5	8.9	5.9×
California	6.7	35.2	5.2×
Utah	1.3	6.3	4.8×
Arkansas	1.1	5.0	4.7×
Tennessee	0.9	4.0	4.6×
Kansas	2.3	9.9	4.3×
Montana	1.7	7.0	4.2×
Mississippi	0.5	1.9	4.2×
Ohio	1.1	4.2	4.0×
Wyoming	2.4	8.9	3.8×
Delaware	1.0	3.7	3.6×
Oklahoma	1.6	5.4	3.4×
Michigan	0.7	2.2	3.4×
Wisconsin	1.1	3.1	2.9×
Missouri	2.9	7.7	2.6×
Florida	3.4	8.8	2.6×
Texas	2.5	6.5	2.6×

	Out-of-Network Utilization, %		Therapists Out-of-Network Use
State	Physician Assistants	Therapists	Compared to Physician Assistants
West Virginia	1.3	3.4	2.5×
lowa	21.5	52.5	2.4×
Alabama	0.8	1.9	2.4×
Louisiana	1.9	4.5	2.3×
Nevada	5.9	10.0	1.7×
Georgia	4.5	5.5	1.2×
Minnesota	2.6	3.1	1.2×
Arizona	22.4	7.0	0.3×
Idaho	n/a	n/a	n/a

n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

Appendix B-4: 2021 Office Visits—In-Network Reimbursement Disparity Levels, All Plans

All Medical/Surgical Clinicians Compared to All Behavioral Health Clinicians

	Percent, %		
	Reimbursement Re	elative to Medicare	
State	All Medical/ Surgical Clinicians	All Behavioral Health Clinicians	Reimbursement for Medical/Surgical Compared to Behavioral Health
All States	124.8	102.5	21.7
Minnesota	207.0	107.2	93.1
Wisconsin	218.8	128.3	70.5
Alaska	237.7	145.7	63.2
Vermont	137.7	85.8	60.4
Tennessee	133.4	83.5	59.8
North Carolina	152.3	99.0	53.9
Oregon	198.9	130.8	52.1
Georgia	141.2	93.8	50.6
South Carolina	121.0	80.6	50.2
New Hampshire	159.5	106.2	50.2
Maine	147.6	99.9	47.7
Massachusetts	170.5	117.8	44.8
Washington	152.4	107.9	41.3
Connecticut	142.5	102.1	39.5
Utah	127.0	91.2	39.2
Wyoming	173.6	129.3	34.3
Florida	110.7	82.8	33.8
New Mexico	137.3	103.1	33.1
Hawaii	127.3	96.6	31.7
Nebraska	177.6	136.5	30.1
Colorado	129.2	99.3	30.1
Kentucky	110.7	85.1	30.1
Missouri	108.5	87.6	23.8
Texas	115.2	93.1	23.8
Maryland	112.0	90.7	23.4
Montana	158.8	129.2	22.9
Oklahoma	114.2	93.6	22.0
North Dakota	206.5	170.0	21.5
South Dakota	161.4	133.3	21.1
Illinois	132.0	109.0	21.0
Louisiana	111.8	93.1	20.2
Idaho	125.1	105.9	18.1
Ohio	113.8	96.4	18.0
Iowa	160.9	136.4	18.0
Washington, D.C.	111.3	94.5	17.7
New York	129.8	113.5	14.4
Pennsylvania	116.3	101.7	14.3

		Percent, %		
	Reimbursement Re	Reimbursement Relative to Medicare		
State	All Medical/ Surgical Clinicians	All Behavioral Health Clinicians	Reimbursement for Medical/Surgical Compared to Behavioral Health	
Arizona	104.9	92.0	14.0	
Indiana	109.6	97.2	12.7	
Michigan	116.2	104.3	11.4	
Kansas	118.1	106.2	11.2	
California	129.0	116.7	10.5	
Rhode Island	116.8	106.1	10.1	
New Jersey	115.3	105.1	9.7	
Virginia	122.3	111.9	9.3	
Nevada	105.4	98.8	6.7	
West Virginia	132.1	124.5	6.1	
Delaware	113.7	108.5	4.9	
Arkansas	125.2	130.1	-3.8	
Mississippi	124.3	132.5	-6.2	
Alabama	106.7	114.0	-6.4	

Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

Medical/Surgical Specialist Physicians Compared to Psychiatrists

		Percent, %	
	Reimbursement Re	lative to Medicare	
State	Medical/ Surgical Specialist Physicians	Psychiatrists	Reimbursement for Medical/Surgical Specialist Physicians Compared to Psychiatrists
All states	135.3	108.4	24.9
Wisconsin	233.1	125.5	85.7
Tennessee	137.2	81.4	68.6
South Carolina	122.7	74.0	65.8
Minnesota	222.8	134.9	65.2
North Carolina	160.9	107.1	50.2
Alaska	255.0	170.9	49.2
New Hampshire	171.5	119.1	44.0
Oregon	207.1	148.1	39.8
Massachusetts	189.5	136.4	38.9
Connecticut	147.7	107.7	37.1
Wyoming	178.6	131.2	36.1
Georgia	145.1	107.2	35.4
Florida	113.5	84.9	33.7
Hawaii	129.8	97.7	32.9
Vermont	139.4	105.2	32.6
Maine	157.5	119.7	31.5
Colorado	134.1	102.7	30.6
Kentucky	118.2	90.5	30.6
Missouri	114.7	89.5	28.1
Alabama	111.2	87.4	27.2
Washington	163.1	128.4	27.1
Michigan	120.7	95.2	26.8
Louisiana	112.6	88.9	26.7
Mississippi	122.2	96.7	26.3
Illinois	134.9	107.5	25.6
lowa	174.9	139.9	25.0
Indiana	115.2	92.5	24.5
Maryland	119.2	96.2	23.9
North Dakota	208.8	171.2	22.0
New Mexico	138.6	113.7	22.0
Kansas	123.0	101.0	21.8
Delaware	119.9	99.5	20.5
Ohio	119.4	99.9	19.5
Texas	118.2	99.3	19.0
South Dakota	166.4	141.3	17.7
West Virginia	130.6	111.8	16.8
Arizona	110.7	95.6	15.7
Utah	131.5	114.2	15.1

		Percent, %				
	Reimbursement Re	Reimbursement Relative to Medicare				
State	Medical/ Surgical Specialist Physicians	Surgical Specialist				
Virginia	126.9	110.9	14.5			
Nebraska	187.0	163.9	14.1			
New York	135.5	118.9	13.9			
New Jersey	121.4	108.5	11.9			
Oklahoma	117.1	105.1	11.4			
Rhode Island	121.4	108.9	11.4			
Arkansas	127.2	114.3	11.3			
Pennsylvania	121.0	109.5	10.6			
Nevada	106.9	97.2	9.9			
Washington, D.C.	118.5	112.9	5.0			
Montana	157.9	158.2	-0.2*			
California	136.5	140.6	-2.9			
Idaho	130.7	154.6	-15.4*			

^{*} Reimbursement levels are not statistically different between medical/surgical and behavioral health at a p < .05. Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test.

Medical/Surgical Specialist Physicians Compared to Psychologists

		Percent, %)	
	Reimbursement Re	elative to Medicare		
State	Medical/Surgical Specialist Physicians	Specialist		
All states	135.3	105.1	28.8	
Minnesota	222.8	99.4	124.1	
Idaho	130.7	66.6	96.4	
Vermont	139.4	74.4	87.3	
Wisconsin	233.1	129.7	79.7	
North Carolina	160.9	100.2	60.6	
Wyoming	178.6	111.5	60.1	
Oregon	207.1	130.6	58.6	
Tennessee	137.2	86.5	58.5	
New Hampshire	171.5	109.2	57.1	
Massachusetts	189.5	123.7	53.1	
New Mexico	138.6	93.3	48.6	
Washington	163.1	111.3	46.6	
Maine	157.5	108.3	45.4	
Colorado	134.1	92.3	45.2	
Georgia	145.1	100.4	44.6	
South Dakota	166.4	115.2	44.4	
Hawaii	129.8	93.1	39.4	
Connecticut	147.7	106.4	38.8	
Utah	131.5	95.8	37.3	
Nebraska	187.0	139.7	33.8	
Missouri	114.7	86.5	32.6	
Iowa	174.9	133.7	30.8	
Florida	113.5	87.1	30.2	
Kentucky	118.2	90.9	30.0	
South Carolina	122.7	96.4	27.3	
Illinois	134.9	106.6	26.6	
California	136.5	107.9	26.5	
Montana	157.9	126.3	25.1	
Kansas	123.0	98.4	25.0	
Maryland	119.2	97.0	22.8	
Arizona	110.7	92.4	19.7	
Pennsylvania	121.0	101.3	19.5	
Indiana	115.2	97.1	18.7	
North Dakota	208.8	177.2	17.8	
Ohio	119.4	101.5	17.7	
Michigan	120.7	102.8	17.4	
Virginia	126.9	108.4	17.1	
Oklahoma	117.1	100.8	16.2	
Texas	118.2	102.8	15.0	

		Percent, %				
	Reimbursement Re	Reimbursement Relative to Medicare				
State	Medical/Surgical Specialist Physicians	Psychologists	Reimbursement for Medical/Surgical Specialist Physicians Compared to Psychologists			
New Jersey	121.4	105.7	14.8			
New York	135.5	118.2	14.6			
Washington, D.C.	118.5	104.3	13.7			
Nevada	106.9	97.5	9.7			
West Virginia	130.6	119.7	9.1			
Rhode Island	121.4	111.7	8.6			
Louisiana	112.6	104.2	8.2			
Alaska	255.0	237.8	7.2			
Delaware	119.9	113.1	6.0			
Mississippi	122.2	122.6	-0.3			
Arkansas	127.2	129.5	-1.8			
Alabama	111.2	124.3	-10.5			

Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

Nurse Practitioners Compared to Psychiatric Nurses

	Percent, %				
	Reimbursement Re	elative to Medicare	Reimbursement for Nurse		
State	Nurse Practitioners	Psychiatric Nurses	Practitioners Compared to Psychiatric Nurses		
All states	117.2	109.0	7.5		
Wisconsin	214.7	132.7	61.8		
North Carolina	145.0	96.6	50.2		
Washington, D.C.	120.5	86.2	39.8		
Kentucky	103.7	74.2	39.7		
New Hampshire	161.5	117.2	37.8		
South Carolina	113.7	84.1	35.2		
West Virginia	139.1	104.4	33.3		
Alaska	202.4	153.3	32.0		
Vermont	143.3	110.6	29.5		
Virginia	131.1	101.2	29.5		
Michigan	104.7	81.3	28.7		
Tennessee	125.3	100.5	24.7		
Montana	157.1	126.6	24.1		
Massachusetts	147.5	118.9	24.0		
Washington	159.0	128.4	23.8		
Hawaii	100.4	81.3	23.4		
Oregon	213.3	174.1	22.5		
Maine	138.8	113.3	22.5		
Delaware	127.3	104.1	22.3		
Pennsylvania	121.1	99.8	21.3		
Illinois	125.6	104.2	20.6		
Maryland	113.8	95.0	19.8		
Colorado	129.6	109.1	18.8		
Mississippi	118.0	100.5	17.5		
Utah	119.5	102.9	16.2		
New Mexico	128.8	111.2	15.8		
South Dakota	182.3	159.4	14.3		
Wyoming	166.9	149.9	11.3		
New York	126.0	113.2	11.3		
Florida	109.0	98.1	11.1		
lowa	155.6	141.6	9.9		
Missouri	104.6	95.7	9.3		
Ohio	106.3	97.6	8.9		
New Jersey	117.1	107.7	8.8		
Indiana	97.7	89.8	8.7		

		Percent, %			
	Reimbursement Re	Reimbursement Relative to Medicare			
State	Nurse Practitioners	Nurse Practitioners Psychiatric Nurses			
Connecticut	124.8	115.1	8.4		
Georgia	118.9	110.0	8.2		
North Dakota	192.8	180.4	6.9		
Nebraska	175.7	165.3	6.3		
Minnesota	182.1	171.8	6.0		
Rhode Island	107.1	102.7	4.3		
Kansas	110.2	105.8	4.2		
Arkansas	109.0	105.4	3.4		
Oklahoma	105.6	102.2	3.4		
Texas	109.0	107.5	1.3		
Louisiana	99.8	100.5	-0.8		
Arizona	97.0	101.5	-4.5		
Nevada	103.9	114.7	-9.4		
California	106.6	131.8	-19.1		
Alabama	81.2	106.2	-23.5		
Idaho	n/a	n/a	n/a		

n/a = Data not available.

Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

Physician Assistants Compared to Therapists

		Percent, %				
	Reimbursement Rela	Reimbursement Relative to Medicare				
State	Physician Assistants	Therapists	Assistants Compared to Therapists			
All states	128.7	99.3	29.6			
Oregon	224.9	117.6	91.3			
Minnesota	198.1	106.5	86.0			
Alaska	223.4	120.2	85.9			
New Hampshire	186.2	102.0	82.5			
Wisconsin	231.6	129.7	78.6			
Washington, D.C.	153.4	86.4	77.5			
South Carolina	131.4	80.3	63.6			
Tennessee	134.9	82.7	63.1			
Washington	166.8	102.9	62.0			
Vermont	140.4	87.6	60.1			
Maine	152.0	95.2	59.7			
Georgia	133.4	85.9	55.3			
North Carolina	146.2	96.1	52.2			
Maryland	130.1	86.6	50.2			
Massachusetts	164.9	109.8	50.2			
Idaho	153.0	105.2	45.4			
Utah	123.6	86.3	43.3			
Nebraska	184.6	129.7	42.3			
New Mexico	146.4	104.2	40.4			
Florida	108.1	78.6	37.5			
Texas	118.3	86.1	37.4			
Colorado	134.9	100.1	34.7			
Connecticut	130.5	99.1	31.7			
South Dakota	186.4	145.6	28.0			
Wyoming	169.8	132.8	27.9			
Kentucky	104.4	82.8	26.1			
Missouri	109.3	87.1	25.6			
Pennsylvania	122.8	100.1	22.7			
Louisiana	109.7	90.9	20.7			
Montana	151.5	126.8	19.4			
Oklahoma	105.0	89.0	18.0			
Virginia	133.4	113.3	17.8			
lowa	160.0	136.4	17.3			
Hawaii	117.9	100.7	17.1			
North Dakota	194.0	166.8	16.3			

		Percent, %		
	Reimbursement Rela	Reimbursement Relative to Medicare		
State	Physician Assistants	Therapists	Reimbursement for Physician Assistants Compared to Therapists	
New York	125.0	108.2	15.5	
Illinois	127.0	110.5	14.9	
Arizona	102.4	89.4	14.7	
Nevada	113.0	99.0	14.1	
Ohio	106.5	93.6	13.8	
West Virginia	144.5	133.4	8.3	
Kansas	116.9	110.7	5.5	
Indiana	103.2	98.1	5.3	
Rhode Island	106.1	103.2	2.8	
California	105.2	102.9	2.3	
New Jersey	104.0	103.5	0.4	
Delaware	109.3	109.0	0.3	
Michigan	106.0	107.2	-1.1	
Mississippi	124.2	143.6	-13.5	
Arkansas	111.2	133.5	-16.7	
Alabama	72.5	122.9	-41.0	

Appendix C: State-Specific Disparity Analysis Results

Appendix C-1: Alabama Disparity Analysis, All Plans

Sample size in 2021: 262,665 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Alabama OON Behavioral Health	15.5	15.4	14.1
Alabama OON Medical/Surgical	0.5	0.5	0.5
Behavioral Health OON Compared to Medical/Surgical OON			
Alabama	30.2×	30.2×	28.2×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Alabama OON Behavioral Health	35.7	32.0	39.2
Alabama OON Medical/Surgical	0.8	8.3	4.6
Behavioral Health OON Compared to Medical/Surgical OON			
Alabama	43.7×	3.9×	8.6×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Alabama OON Behavioral Health	31.1	18.8	15.3
Alabama OON Medical/Surgical	4.0	0.9	2.1
Behavioral Health OON Compared to Medical/Surgical OON			
Alabama	7.8×	20.8×	7.2×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Alabama OON All Behavioral Health Clinicians	5.0	3.4	3.3
Alabama OON All Medical/Surgical Clinicians	1.2	1.2	1.1
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Alabama	4.4×	2.9×	3.1×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Alabama OON Psychiatrists	5.0	3.9	3.7
Alabama OON Medical/Surgical Specialist Physicians	0.7	0.6	0.5
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			

	2019	2020	2021
Alabama	7.5×	6.4×	7.3×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Alabama OON Psychologists	10.8	8.5	8.7
Alabama OON Medical/Surgical Specialist Physicians	0.7	0.6	0.5
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Alabama	16.0×	13.7×	17.4×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Alabama OON Psychiatric Nurses	2.0	15.8	7.4
Alabama OON Nurse Practitioners	1.3	1.4	1.5
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Alabama	1.5×*	11.2×	4.9×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Alabama OON Therapists	3.2	1.9	1.9
Alabama OON Physician Assistants	1.0	0.9	0.8
Therapists OON Compared to Physician Assistants OON			
Alabama	3.3×	2.1×	2.4×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Alabama All Medical/Surgical Clinicians	106.6	107.6	106.7
Alabama All Behavioral Health Clinicians	102.5	110.7	114.0
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Alabama	4.0	-2.8	-6.4
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Alabama Medical/Surgical Specialist Physicians	108.7	111.5	111.2
Alabama Psychiatrists	78.3	82.9	87.4
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Alabama	38.9	34.5	27.2
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Alabama Medical/Surgical Specialist Physicians	108.7	111.5	111.2
Alabama Psychologists	115.0	122.6	124.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Alabama	-5.5	-9.0	-10.5
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Alabama Nurse Practitioners	80.6	81.1	81.2
Alabama Psychiatric Nurses	89.0	101.3	106.2
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Alabama	-9.4	-19.9	-23.5
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Alabama Physician Assistants	71.2	72.1	72.5
Alabama Therapists	115.7	122.0	122.9
Physician Assistants Reimbursement Levels Compared to Therapists			
Alabama	-38.5	-40.9	-41.0
All States	40.6	34.5	29.6

Average		Percentile, %			
Alabama All Medical/Surgical Clinicians 106.7 102.2 141.5 243.4		Average		75th	95th
Alabama All Behavioral Health Clinicians					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Alabama	Alabama All Medical/Surgical Clinicians	106.7	102.2	141.5	243.4
Compared to Ail Behavioral Health Clinicians	Alabama All Behavioral Health Clinicians	114.0	91.6	102.6	134.7
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists Alabama Medical/Surgical Specialist Physicians 111.2 104.4 139.5 259.9 Alabama Psychiatrists 87.4 78.7 100.7 147.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 32.6 38.5 76.8 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 87.2 104.4 139.5 259.9 Alabama Medical/Surgical Specialist Physicians Versus Psychologists 111.2 104.4 139.5 259.9 Alabama Psychologists 124.3 113.1 127.0 364.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 112.2 104.4 139.5 259.9 Alabama -10.5 -7.7 9.8 80.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.2 65.0 92.3 200.9 Alabama Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses	Alabama	-6.4	11.5	38.0	80.7
Alabama Medical/Surgical Specialist Physicians	All States	21.7	26.6	48.0	70.4
Alabama Psychiatrists 87.4 78.7 100.7 147.0					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Alabama 27.2 32.6 38.5 76.8 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus Psychologists Alabama Medical/Surgical Specialist Physicians 111.2 104.4 139.5 259.9 Alabama Psychologists 124.3 113.1 127.0 364.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 124.3 113.1 127.0 364.1 Alabama -10.5 -7.7 9.8 80.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.2 65.0 92.3 200.9 Alabama Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 106.2 92.2 102.3 149.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -23.5 -29.5 -9.8 34.6 Allabama -23.5 -29.5 -9.8	Alabama Medical/Surgical Specialist Physicians	111.2	104.4	139.5	259.9
Reimbursement Levels Compared to Psychiatrists	Alabama Psychiatrists	87.4	78.7	100.7	147.0
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 111.2 104.4 139.5 259.9 Alabama Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 124.3 113.1 127.0 364.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists -7.7 9.8 80.7 Alabama -10.5 -7.7 9.8 80.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.2 65.0 92.3 200.9 Alabama Psychiatric Nurses 106.2 92.2 102.3 149.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -23.5 -29.5 -9.8 34.6 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 72.5 53.6 82.2 161.1 Alabama Physician Assistants Reimbursement Levels Compared to Therapists 122.9 91.6 102.6 109.3 Physici					
Medical/Surgical Specialist Physicians Versus Psychologists Alabama Medical/Surgical Specialist Physicians 111.2 104.4 139.5 259.9 Alabama Psychologists 124.3 113.1 127.0 364.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 105.5 -7.7 9.8 80.7 Alabama -10.5 -7.7 9.8 80.7 80.7 81.2 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.2 65.0 92.3 200.9 Alabama Psychiatric Nurses 106.2 92.2 102.3 149.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -23.5 -29.5 -9.8 34.6 Alabama -23.5 -29.5 -9.8 34.6 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 72.5 53.6 82.2 161.1 Alabama Therapists 122.9 91.6 102.6 109.3	Alabama	27.2	32.6	38.5	76.8
Psychologists	All States	24.9	12.8	27.8	49.5
Alabama Psychologists 124.3 113.1 127.0 364.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 80.7 90.8 80.7 Alabama -10.5 -7.7 9.8 80.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.2 65.0 92.3 200.9 Alabama Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 106.2 92.2 102.3 149.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -23.5 -29.5 -9.8 34.6 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 72.5 53.6 82.2 161.1 Alabama Physician Assistants 72.5 53.6 82.2 161.1 Alabama Therapists 122.9 91.6 102.6 109.3 Physician Assistants Reimbursement Levels Compared to Therapists -41.0 -41.6 -19.8 47.4					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Alabama -10.5 -7.7 9.8 80.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.2 65.0 92.3 200.9 Alabama Nurse Practitioners Peractitioners 81.2 65.0 92.3 200.9 Alabama Psychiatric Nurses 106.2 92.2 102.3 149.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -23.5 -29.5 -9.8 34.6 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 72.5 53.6 82.2 161.1 Alabama Physician Assistants Reimbursement Levels Compared to Therapists 122.9 91.6 102.6 109.3 Alabama -41.0 -41.6 -19.8 47.4	Alabama Medical/Surgical Specialist Physicians	111.2	104.4	139.5	259.9
Reimbursement Levels Compared to Psychologists Alabama -10.5 -7.7 9.8 80.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.2 65.0 92.3 200.9 Alabama Psychiatric Nurses 106.2 92.2 102.3 149.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -23.5 -29.5 -9.8 34.6 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 72.5 53.6 82.2 161.1 Alabama Therapists 122.9 91.6 102.6 109.3 Physician Assistants Reimbursement Levels Compared to Therapists -41.0 -41.6 -19.8 47.4	Alabama Psychologists	124.3	113.1	127.0	364.1
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.2 65.0 92.3 200.9 Alabama Psychiatric Nurses 106.2 92.2 102.3 149.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Compared to Psychiatric Nurses -23.5 -29.5 -9.8 34.6 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 72.5 53.6 82.2 161.1 Alabama Physician Assistants Reimbursement Levels Compared to Therapists 122.9 91.6 102.6 109.3 Physician Assistants Reimbursement Levels Compared to Therapists -41.0 -41.6 -19.8 47.4					
Nurse Practitioners Versus Psychiatric Nurses Alabama Nurse Practitioners 81.2 65.0 92.3 200.9 Alabama Psychiatric Nurses 106.2 92.2 102.3 149.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -23.5 -29.5 -9.8 34.6 Alabama -23.5 -29.5 -9.8 34.6 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 72.5 53.6 82.2 161.1 Alabama Physician Assistants 72.5 53.6 82.2 161.1 Alabama Therapists 122.9 91.6 102.6 109.3 Physician Assistants Reimbursement Levels Compared to Therapists -41.0 -41.6 -19.8 47.4	Alabama	-10.5	-7.7	9.8	80.7
Alabama Nurse Practitioners 81.2 65.0 92.3 200.9 Alabama Psychiatric Nurses 106.2 92.2 102.3 149.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -23.5 -29.5 -9.8 34.6 Alabama -23.5 -29.5 -9.8 34.6 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Alabama Physician Assistants 72.5 53.6 82.2 161.1 Alabama Therapists 122.9 91.6 102.6 109.3 Physician Assistants Reimbursement Levels Compared to Therapists -41.0 -41.6 -19.8 47.4	All States	28.8	17.3	44.0	38.5
Alabama Psychiatric Nurses 106.2 92.2 102.3 149.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -23.5 -29.5 -9.8 34.6 Alabama -23.5 -29.5 -9.8 34.6 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Alabama Physician Assistants 72.5 53.6 82.2 161.1 Alabama Therapists 122.9 91.6 102.6 109.3 Physician Assistants Reimbursement Levels Compared to Therapists -41.0 -41.6 -19.8 47.4	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Alabama -23.5 -29.5 -9.8 34.6 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Alabama Physician Assistants 72.5 53.6 82.2 161.1 Alabama Therapists 122.9 91.6 102.6 109.3 Physician Assistants Reimbursement Levels Compared to Therapists -41.0 -41.6 -19.8 47.4	Alabama Nurse Practitioners	81.2	65.0	92.3	200.9
Compared to Psychiatric Nurses Alabama -23.5 -29.5 -9.8 34.6 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Alabama Physician Assistants 72.5 53.6 82.2 161.1 Alabama Therapists 122.9 91.6 102.6 109.3 Physician Assistants Reimbursement Levels Compared to Therapists -41.0 -41.6 -19.8 47.4	Alabama Psychiatric Nurses	106.2	92.2	102.3	149.3
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Alabama Physician Assistants 72.5 53.6 82.2 161.1 Alabama Therapists 122.9 91.6 102.6 109.3 Physician Assistants Reimbursement Levels Compared to Therapists -41.0 -41.6 -19.8 47.4					
Physician Assistants Versus Therapists Alabama Physician Assistants 72.5 53.6 82.2 161.1 Alabama Therapists 122.9 91.6 102.6 109.3 Physician Assistants Reimbursement Levels Compared to Therapists Alabama -41.0 -41.6 -19.8 47.4	Alabama	-23.5	-29.5	-9.8	34.6
Alabama Physician Assistants 72.5 53.6 82.2 161.1 Alabama Therapists 122.9 91.6 102.6 109.3 Physician Assistants Reimbursement Levels Compared to Therapists -41.0 -41.6 -19.8 47.4	All States	7.5	-1.1	18.4	34.3
Alabama Therapists 122.9 91.6 102.6 109.3 Physician Assistants Reimbursement Levels Compared to Therapists Alabama -41.0 -41.6 -19.8 47.4	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists Alabama -41.0 -41.6 -19.8 47.4	Alabama Physician Assistants	72.5	53.6	82.2	161.1
Compared to Therapists Alabama -41.0 -41.6 -19.8 47.4		122.9	91.6	102.6	109.3
All States 29.6 33.8 59.3 101.6	Alabama	-41.0	-41.6	-19.8	47.4
	All States	29.6	33.8	59.3	101.6

Appendix C-2: Alaska Disparity Analysis, All Plans

Sample size in 2021: 7,294 covered lives

		Percent, %		
	2019	2020	2021	
Acute Inpatient Facility				
Alaska OON Behavioral Health	13.9	11.3	11.6	
Alaska OON Medical/Surgical	14.8	12.6	14.2	
Behavioral Health OON Compared to Medical/Surgical OON				
Alaska	0.9×*	0.9×*	0.8×	
All States	7.1×	6.0×	6.2×	
Parity Would Be	1.0×	1.0×	1.0×	
Subacute Inpatient Facility				
Alaska OON Behavioral Health	70.0	72.1	79.8	
Alaska OON Medical/Surgical	7.7	51.0	76.7	
Behavioral Health OON Compared to Medical/Surgical OON				
Alaska	9.1×	1.4×	1.0×*	
All States	9.9×	7.9×	19.9×	
Parity Would Be	1.0×	1.0×	1.0×	
Outpatient Facility (Non-Emergency Room)				
Alaska OON Behavioral Health	45.5	30.3	29.6	
Alaska OON Medical/Surgical	12.1	9.8	13.6	
Behavioral Health OON Compared to Medical/Surgical OON	.=	0.0		
Alaska	3.8×	3.1×	2.2×	
All States	3.5×	1.7×	1.5×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians				
Alaska OON All Behavioral Health Clinicians	38.9	26.4	28.5	
Alaska OON All Medical/Surgical Clinicians	12.2	11.7	14.6	
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON				
Alaska	3.2×	2.3×	2.0×	
All States	3.9×	3.9×	3.5×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians				
Alaska OON Psychiatrists	34.6	19.0	8.6	
Alaska OON Medical/Surgical Specialist Physicians	8.2	6.7	5.3	
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON				
Alaska	4.2×	2.8×	1.6×	
All States	9.0×	8.7×	8.9×	
Parity Would Be	1.0×	1.0×	1.0×	

		Percent, %		
	2019	2020	2021	
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians				
Alaska OON Psychologists	27.7	34.5	35.8	
Alaska OON Medical/Surgical Specialist Physicians	8.2	6.7	5.3	
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON				
Alaska	3.4×	5.2×	6.7×	
All States	10.9×	9.4×	10.6×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Psychiatric Nurses Versus Nurse Practitioners				
Alaska OON Psychiatric Nurses	37.8	52.5	9.4	
Alaska OON Nurse Practitioners	4.4	5.3	4.2	
Psychiatric Nurses OON Compared to Nurse Practitioners OON				
Alaska	8.6×	9.9×	2.3×*	
All States	5.2×	5.4×	1.7×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Therapists Versus Physician Assistants				
Alaska OON Therapists	42.0	26.1	31.3	
Alaska OON Physician Assistants	3.7	2.6	4.6	
Therapists OON Compared to Physician Assistants OON				
Alaska	11.3×	9.9×	6.8×	
All States	5.5×	4.7×	4.1×	
Parity Would Be	1.0×	1.0×	1.0×	

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

Ali Medical/Surgical Clinicians Versus Ali Behavioral Health Clinicians	, %	Percent, %		
Alaska All Medical/Surgical Clinicians 127.8 135.7	2021	2020	2019	
Alaska All Behavioral Health Clinicians				All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Alaska 73.3 63.7 All States 33.3 25.7 Medical/Surgical Specialist Physicians Versus Psychiatrists Alaska Medical/Surgical Specialist Physicians Alaska Psychiatrists 142.4 160.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Alaska 62.1 46.9 All States Alaska 62.1 46.9 All States Alaska Medical/Surgical Specialist Physicians Versus Psychologists Alaska Medical/Surgical Specialist Physicians Versus Psychologists Alaska Psychologists 163.7 193.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Alaska Alaska 41.0 21.5 All States Alaska 41.0 21.5 All States Alaska Nurse Practitioners Versus Psychiatric Nurses Alaska Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Alaska Psychiatric Nurses Alaska Psychiatric Nurses Alaska All States 23.3 18.8 All States Physician Assistants Versus Therapists Alaska Physician Assistants 223.2 218.0 Alaska Physician Assistants 223.2 218.0 Alaska Physician Assistants Alaska Physician Assistant Reimbursement Levels Compared to Therapists Alaska Allaska 97.2 83.1	237.7	222.1	221.5	Alaska All Medical/Surgical Clinicians
Behavioral Health Clinicians	145.7	135.7	127.8	Alaska All Behavioral Health Clinicians
All States Medical/Surgical Specialist Physicians Versus Psychiatrists Alaska Medical/Surgical Specialist Physicians 230.9 235.4 Alaska Psychiatrists 142.4 160.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 62.1 46.9 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists 230.9 235.4 Alaska Medical/Surgical Specialist Physicians 230.9 235.4 Alaska Psychologists 163.7 193.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 41.0 21.5 Alaska 41.0 21.5 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses 164.5 168.7 Alaska Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 164.5 168.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.3 18.8 Alaska 23.3 18.8 All States 28.3 12.8 Physician Assistants Versus Therapists 113.2 119.1 Ala				
Medical/Surgical Specialist Physicians Versus Psychiatrists Alaska Medical/Surgical Specialist Physicians 230.9 235.4 Alaska Psychiatrists 142.4 160.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 62.1 46.9 Alaska 62.1 46.9 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists 230.9 235.4 Alaska Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 163.7 193.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 41.0 21.5 Alaska 41.0 21.5 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses 164.5 168.7 Alaska Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 164.5 168.7 Aluses 23.3 18.8 All States 28.3 12.8 Physician Assistants Versus Therapists 223.2 218.0 Alaska Therapists 113.2 119.1	63.2	63.7	73.3	Alaska
Alaska Medical/Surgical Specialist Physicians 230.9 235.4 Alaska Psychiatrists 142.4 160.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 62.1 46.9 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists 230.9 235.4 Alaska Medical/Surgical Specialist Physicians Versus Psychologists 163.7 193.7 Alaska Psychologists 163.7 193.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 41.0 21.5 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses 202.7 200.4 Alaska Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 164.5 168.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 Alaska 23.3 18.8 41.0 23.3 18.8 All States 28.3 12.8 28.3 12.8 Physician Assistants Versus Therapists 113.2 119.1 Alaska	21.7	25.7	33.3	All States
Alaska Psychiatrists				Medical/Surgical Specialist Physicians Versus Psychiatrists
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Alaska 62.1 46.9 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists Alaska Medical/Surgical Specialist Physicians 230.9 235.4 Alaska Psychologists 163.7 193.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Alaska 41.0 21.5 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Alaska Nurse Practitioners 202.7 200.4 Alaska Psychiatric Nurses 164.5 168.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Alaska 23.3 18.8 All States 28.3 12.8 Physician Assistants Versus Therapists Alaska Physician Assistants 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists Alaska 97.2 83.1	255.0	235.4	230.9	Alaska Medical/Surgical Specialist Physicians
to Psychiatrists Alaska 62.1 46.9 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists Alaska Medical/Surgical Specialist Physicians 230.9 235.4 Alaska Psychologists 163.7 193.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 41.0 21.5 Alaska 41.0 21.5 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses 202.7 200.4 Alaska Nurse Practitioners 202.7 200.4 Alaska Psychiatric Nurses 164.5 168.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.3 18.8 Alaska 23.3 18.8 All States 28.3 12.8 Physician Assistants Versus Therapists 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists 41.0 20.2 Alaska 97.2 83.1	170.9	160.2	142.4	Alaska Psychiatrists
All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists Alaska Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 163.7 193.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 41.0 21.5 Alaska 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses 202.7 200.4 Alaska Psychiatric Nurses 164.5 168.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.3 18.8 All States 28.3 12.8 Physician Assistants Versus Therapists 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists 41.0 22.2 Alaska 97.2 83.1				Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists
Medical/Surgical Specialist Physicians Versus PsychologistsAlaska Medical/Surgical Specialist Physicians230.9235.4Alaska Psychologists163.7193.7Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists41.021.5Alaska41.021.5All States42.033.9Nurse Practitioners Versus Psychiatric Nurses202.7200.4Alaska Nurse Practitioners202.7200.4Alaska Psychiatric Nurses164.5168.7Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses23.318.8Alaska23.318.8All States28.312.8Physician Assistants Versus Therapists223.2218.0Alaska Therapists113.2119.1Physician Assistant Reimbursement Levels Compared to Therapists43.1Alaska97.283.1	49.2	46.9	62.1	Alaska
Alaska Medical/Surgical Specialist Physicians 230.9 235.4 Alaska Psychologists 163.7 193.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 41.0 21.5 Alaska 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Alaska Nurse Practitioners 202.7 200.4 Alaska Psychiatric Nurses 164.5 168.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.3 18.8 Alaska 23.3 18.8 All States 28.3 12.8 Physician Assistants Versus Therapists Alaska Physician Assistants 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists 97.2 83.1	24.9	30.1	40.8	All States
Alaska Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Alaska 41.0 21.5 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Alaska Nurse Practitioners 202.7 200.4 Alaska Psychiatric Nurses 164.5 168.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Alaska 123.3 18.8 All States 28.3 12.8 Physician Assistants Versus Therapists Alaska Physician Assistants 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists Alaska 97.2 83.1				Medical/Surgical Specialist Physicians Versus Psychologists
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Alaska 41.0 21.5 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Alaska Nurse Practitioners 202.7 200.4 Alaska Psychiatric Nurses 164.5 168.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Alaska 23.3 18.8 All States 28.3 12.8 Physician Assistants Versus Therapists Alaska Physician Assistants 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists Alaska 97.2 83.1	255.0	235.4	230.9	Alaska Medical/Surgical Specialist Physicians
to Psychologists Alaska 41.0 21.5 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Alaska Nurse Practitioners 202.7 200.4 Alaska Psychiatric Nurses 164.5 168.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.3 18.8 Alaska 23.3 12.8 Physician Assistants Versus Therapists 28.3 12.8 Physician Assistants Versus Therapists 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists 97.2 83.1	237.8	193.7	163.7	Alaska Psychologists
All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses 202.7 200.4 Alaska Nurse Practitioners 164.5 168.7 Alaska Psychiatric Nurses 164.5 168.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.3 18.8 Alaska 23.3 12.8 Physician Assistants Versus Therapists 28.3 12.8 Alaska Physician Assistants 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists 97.2 83.1				
Nurse Practitioners Versus Psychiatric Nurses Alaska Nurse Practitioners 202.7 200.4 Alaska Psychiatric Nurses 164.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Alaska 23.3 18.8 All States 28.3 12.8 Physician Assistants Versus Therapists Alaska Physician Assistants 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists Alaska 97.2 83.1	7.2	21.5	41.0	Alaska
Alaska Nurse Practitioners 202.7 200.4 Alaska Psychiatric Nurses 164.5 168.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.3 18.8 Alaska 23.3 12.8 Physician Assistants Versus Therapists 28.3 12.8 Alaska Physician Assistants 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists 97.2 83.1	28.8	33.9	42.0	All States
Alaska Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Alaska All States Physician Assistants Versus Therapists Alaska Physician Assistants Alaska Therapists Physician Assistant Reimbursement Levels Compared to Therapists Alaska Alaska 97.2 83.1				Nurse Practitioners Versus Psychiatric Nurses
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Alaska 23.3 18.8 All States 28.3 12.8 Physician Assistants Versus Therapists Alaska Physician Assistants 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists Alaska 97.2 83.1	202.4	200.4	202.7	Alaska Nurse Practitioners
Nurses 23.3 18.8 Alaska 23.3 12.8 Physician Assistants Versus Therapists Alaska Physician Assistants 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists 97.2 83.1	153.3	168.7	164.5	Alaska Psychiatric Nurses
All States 28.3 12.8 Physician Assistants Versus Therapists Alaska Physician Assistants 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists Alaska 97.2 83.1				· · · · · · · · · · · · · · · · · · ·
Physician Assistants Versus TherapistsAlaska Physician Assistants223.2218.0Alaska Therapists113.2119.1Physician Assistant Reimbursement Levels Compared to TherapistsAlaska97.283.1	32.0	18.8	23.3	Alaska
Alaska Physician Assistants 223.2 218.0 Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists Alaska 97.2 83.1	7.5	12.8	28.3	All States
Alaska Therapists 113.2 119.1 Physician Assistant Reimbursement Levels Compared to Therapists Alaska 97.2 83.1				Physician Assistants Versus Therapists
Physician Assistant Reimbursement Levels Compared to Therapists Alaska 97.2 83.1	223.4	218.0	223.2	Alaska Physician Assistants
Alaska 97.2 83.1	120.2	119.1	113.2	Alaska Therapists
				Physician Assistant Reimbursement Levels Compared to Therapists
All States	85.9	83.1	97.2	Alaska
All olates 40.6 34.5	29.6	34.5	40.6	All States

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Alaska All Medical/Surgical Clinicians	237.7	170.1	264.9	557.8
Alaska All Behavioral Health Clinicians	145.7	94.6	128.9	261.3
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Alaska	63.2	79.8	105.5	113.5
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Alaska Medical/Surgical Specialist Physicians	255.0	216.3	390.3	702.1
Alaska Psychiatrists	170.9	172.0	199.3	258.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Alaska	49.2	25.8	95.9	171.2
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Alaska Medical/Surgical Specialist Physicians	255.0	216.3	390.3	702.1
Alaska Psychologists	237.8	127.8	312.6	1208.6
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Alaska	7.2	69.3	24.9	113.5
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Alaska Nurse Practitioners	202.4	168.2	206.5	379.1
Alaska Psychiatric Nurses	153.3	127.5	152.7	230.6
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Alaska	32.0	31.9	35.2	64.4
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Alaska Physician Assistants	223.4	171.2	216.0	394.6
Alaska Therapists	120.2	87.0	100.2	142.2
Physician Assistant Reimbursement Levels Compared to Therapists				
Alaska	85.9	96.9	115.5	177.5
All States	29.6	33.8	59.3	101.6

Appendix C-3: Arizona Disparity Analysis, All Plans

Sample size in 2021: 215,925 covered lives

Acute Inpatient Facility		Percent, %		
Arizona OON Behavioral Health 19.2 22.0 20.2 Arizona OON Medical/Surgical 2.4 2.4 2.3 Behavioral Health OON Compared to Medical/Surgical OON 8.0× 9.2× 8.8× All States 7.1× 6.0× 6.2× Parity Would Be 1.0× 1.0× 1.0× 1.0× Subacute Inpatient Facility Arizona OON Behavioral Health 62.5 52.0 55.5 5.5 Arizona OON Medical/Surgical 12.9 7.9 12.7 12.7 Behavioral Health OON Compared to Medical/Surgical OON 4.8× 6.6× 4.4× All States 9.9× 7.9× 19.9× Parity Would Be 1.0×		2019	2020	2021
Arizona OON Medical/Surgical 2.4 2.4 2.3 Behavioral Health OON Compared to Medical/Surgical OON Arizona 8.0× 9.2× 8.8× All States 7.1× 6.0× 6.2× Parity Would Be 1.0× 1.0× 1.0× 1.0× Subacute Inpatient Facility Arizona OON Behavioral Health 62.5 52.0 55.5 Arizona OON Medical/Surgical 12.9 7.9 12.7 Behavioral Health OON Compared to Medical/Surgical OON Arizona 4.8× 6.6× 4.4× All States 9.9× 7.9× 19.9× Parity Would Be 1.0× 1.0× 1.0× 1.0× 1.0× Outpatient Facility (Non-Emergency Room) Arizona OON Medical/Surgical 24.9 23.8 15.7 Behavioral Health OON Compared to Medical/Surgical OON Arizona OON Medical/Surgical 24.9 23.8 15.7 Behavioral Health OON Compared to Medical/Surgical OON Arizona OON Medical/Surgical 24.9 23.8 15.7 Behavioral Health OON Compared to Medical/Surgical OON Arizona 2.0× 1.5× 2.3× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Arizona OON All Medical/Surgical Clinicians 9.8 7.7 7.8 All Sehavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Arizona 0.0N All Behavioral Health Clinicians 9.8 7.7 7.8 All Sehavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Arizona 0.0N All Medical/Surgical Specialist Physicians 2.3 2.4 2.2 Psychiatrists Versus Medical/Surgical Specialist OON Arizona 0.0N Psychiatrists Versus Medical/Surgical Specialist OON Arizona 0.0N Compared to Medical/Surgical Specialist OON Arizona 0.0N Compared to Medical/Surgical Specialist OON Arizona 0.0N All Sets 9.0× 8.7× 8.9× All States 9.0× 8.7× 8.9× Parity Would Be 1.0× 1.0× 1.0× 1.0×	Acute Inpatient Facility			
Behavioral Health OON Compared to Medical/Surgical OON	Arizona OON Behavioral Health	19.2	22.0	20.2
Arizona	Arizona OON Medical/Surgical	2.4	2.4	2.3
All States 7.1x 6.0x 6.2x Parity Would Be 1.0x 1.0x 1.0x 1.0x 1.0x 1.0x 1.0x Subacute Inpatient Facility Arizona OON Behavioral Health 62.5 52.0 55.5 Arizona OON Medical/Surgical 12.9 7.9 12.7 Behavioral Health OON Compared to Medical/Surgical OON Arizona 4.8x 6.6x 4.4x 4.1 States 9.9x 7.9x 19.9x	Behavioral Health OON Compared to Medical/Surgical OON			
Parity Would Be	Arizona	8.0×	9.2×	8.8×
Arizona OON Behavioral Health	All States	7.1×	6.0×	6.2×
Arizona OON Behavioral Health 62.5 52.0 55.5 Arizona OON Medical/Surgical 12.9 7.9 12.7 Behavioral Health OON Compared to Medical/Surgical OON 4.8× 6.6× 4.4× All States 9.9× 7.9× 19.9× Parity Would Be 1.0× 1.0× 1.0× Outpatient Facility (Non-Emergency Room) 49.0 35.8 36.5 Arizona OON Medical/Surgical 24.9 23.8 15.7 Behavioral Health OON Compared to Medical/Surgical OON 2.0× 1.5× 2.3× All States 3.5× 1.7× 1.5× 2.3× All States 3.5× 1.7× 1.5× 2.3× Parity Would Be 1.0× 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All 8.7 7.4 6.5 Arizona OON All Medical/Surgical Clinicians 8.7 7.4 6.5 Arizona OON All Medical/Surgical Clinicians 9.8 7.7 7.8 All States 3.9× 3.9× 3.5×	Parity Would Be	1.0×	1.0×	1.0×
Arizona OON Medical/Surgical 12.9 7.9 12.7	Subacute Inpatient Facility			
Behavioral Health OON Compared to Medical/Surgical OON	Arizona OON Behavioral Health	62.5	52.0	55.5
Arizona 4.8× 6.6× 4.4× All States 9.9× 7.9× 19.9× Parity Would Be 1.0× 1.0× 1.0× Outpatient Facility (Non-Emergency Room) 1.0× 1.0× 1.0× Arizona OON Behavioral Health 49.0 35.8 36.5 Arizona OON Medical/Surgical 24.9 23.8 15.7 Behavioral Health OON Compared to Medical/Surgical OON 2.0× 1.5× 2.3× All States 3.5x 1.7× 1.5× 2.3× All States 3.5x 1.7× 1.5× 2.3× Parity Would Be 1.0× 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians 8.7 7.4 6.5 Arizona OON All Medical/Surgical Clinicians 9.8 7.7 7.8 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 9.9× 1.0× 0.8× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× O	Arizona OON Medical/Surgical	12.9	7.9	12.7
All States 9.9× 7.9× 19.9× Parity Would Be 1.0× 1.0× 1.0× 1.0× Outpatient Facility (Non-Emergency Room) Arizona OON Behavioral Health 49.0 35.8 36.5 Arizona OON Medical/Surgical 24.9 23.8 15.7 Behavioral Health OON Compared to Medical/Surgical OON Arizona 2.0× 1.5× 2.3× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Arizona OON All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians 8.7 7.4 6.5 Arizona OON All Medical/Surgical Clinicians 9.8 7.7 7.8 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Arizona 0.9× 1.0× 0.8× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Arizona OON Medical/Surgical Specialist Physicians 2.3 2.4 2.2 Psychiatrists OON Compared to Medical/Surgical Specialist OON Arizona	Behavioral Health OON Compared to Medical/Surgical OON			
Parity Would Be	Arizona	4.8×	6.6×	4.4×
Outpatient Facility (Non-Emergency Room) Arizona OON Behavioral Health 49.0 35.8 36.5 Arizona OON Medical/Surgical 24.9 23.8 15.7 Behavioral Health OON Compared to Medical/Surgical OON 2.0× 1.5× 2.3× Arizona 2.0× 1.5× 2.3× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians 8.7 7.4 6.5 Arizona OON All Medical/Surgical Clinicians 9.8 7.7 7.8 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 0.9× 1.0× 0.8× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians 2.3 2.4 2.2 Psychiatrists OON Compared to Medical/Surgical Specialist OON Arizona 2.1× 1.9× 1.8× All States 9.0× 8.7× 8.9× <td>All States</td> <td>9.9×</td> <td>7.9×</td> <td>19.9×</td>	All States	9.9×	7.9×	19.9×
Arizona OON Behavioral Health	Parity Would Be	1.0×	1.0×	1.0×
Arizona OON Medical/Surgical 24.9 23.8 15.7	Outpatient Facility (Non-Emergency Room)			
Behavioral Health OON Compared to Medical/Surgical OON	Arizona OON Behavioral Health	49.0	35.8	36.5
Arizona 2.0× 1.5× 2.3× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Arizona OON All Behavioral Health Clinicians 8.7 7.4 6.5 Arizona OON All Medical/Surgical Clinicians 9.8 7.7 7.8 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 0.9× 1.0× 0.8× All States 3.9× 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Arizona OON Psychiatrists 4.6 4.6 4.0 Arizona OON Medical/Surgical Specialist Physicians 2.3 2.4 2.2 Psychiatrists OON Compared to Medical/Surgical Specialist OON 2.1× 1.9× 1.8× All States 9.0× 8.7× 8.9× Parity Would Be 1.0× 1.0× 1.0×	Arizona OON Medical/Surgical	24.9	23.8	15.7
All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Arizona OON All Behavioral Health Clinicians 8.7 7.4 6.5 Arizona OON All Medical/Surgical Clinicians 9.8 7.7 7.8 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Arizona 0.9× 1.0× 0.8× All States 3.9× 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Arizona OON Psychiatrists 4.6 4.6 4.0 Arizona OON Medical/Surgical Specialist Physicians 2.3 2.4 2.2 Psychiatrists OON Compared to Medical/Surgical Specialist OON Arizona 2.1× 1.9× 1.8× All States 9.0× 8.7× 8.9× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians	Behavioral Health OON Compared to Medical/Surgical OON			
Parity Would Be 1.0x 1.0x 1.0x Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Arizona OON All Behavioral Health Clinicians 8.7 7.4 6.5 Arizona OON All Medical/Surgical Clinicians 9.8 7.7 7.8 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Arizona 0.9× 1.0× 0.8× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Arizona OON Psychiatrists 4.6 4.6 4.0 Arizona OON Medical/Surgical Specialist Physicians 2.3 2.4 2.2 Psychiatrists OON Compared to Medical/Surgical Specialist OON Arizona 2.1× 1.9× 1.8× All States 9.0× 8.7× 8.9× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians 2.1 0.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians	Arizona	2.0×	1.5×	2.3×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Arizona OON All Behavioral Health Clinicians Arizona OON All Medical/Surgical Clinicians All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Arizona Arizona 0.9× 1.0× 0.8× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Arizona OON Psychiatrists 4.6 4.6 4.0 Arizona OON Medical/Surgical Specialist Physicians 2.3 2.4 2.2 Psychiatrists OON Compared to Medical/Surgical Specialist OON Arizona Arizona 2.1× 1.9× 1.8× All States 9.0× 8.7× 8.9× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians	All States	3.5×	1.7×	1.5×
Medical/Surgical CliniciansArizona OON All Behavioral Health Clinicians8.77.46.5Arizona OON All Medical/Surgical Clinicians9.87.77.8All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON0.9×1.0×0.8×Arizona0.9×1.0×0.8×All States3.9×3.9×3.5×Parity Would Be1.0×1.0×1.0×Office Visits - Psychiatrists Versus Medical/Surgical Specialist PhysiciansArizona OON Psychiatrists4.64.64.0Arizona OON Medical/Surgical Specialist Physicians2.32.42.2Psychiatrists OON Compared to Medical/Surgical Specialist OONArizona2.1×1.9×1.8×All States9.0×8.7×8.9×Parity Would Be1.0×1.0×1.0×Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians	Parity Would Be	1.0×	1.0×	1.0×
Arizona OON All Medical/Surgical Clinicians All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Arizona O.9× All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Arizona OON Psychiatrists Arizona OON Medical/Surgical Specialist Physicians 2.3 Psychiatrists OON Compared to Medical/Surgical Specialist OON Arizona All States 9.0× Arizona 2.1× 1.9× 1.8× All States 9.0× 8.7× 8.9× Parity Would Be 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians 2.1 1.0× 1.0× 0.8× 1.0× 1.0× 1.0× 1.0× 1.0× 1.0× 1.0× 1.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians				
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Arizona O.9× 1.0× 0.8× 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Arizona OON Psychiatrists Arizona OON Medical/Surgical Specialist Physicians 2.3 2.4 2.2 Psychiatrists OON Compared to Medical/Surgical Specialist OON Arizona All States 9.0× 8.7× 8.9× Parity Would Be 1.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians	Arizona OON All Behavioral Health Clinicians	8.7	7.4	6.5
Clinicians OON Arizona 0.9× 1.0× 0.8× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Arizona OON Psychiatrists 4.6 4.6 4.0 Arizona OON Medical/Surgical Specialist Physicians 2.3 2.4 2.2 Psychiatrists OON Compared to Medical/Surgical Specialist OON 2.1× 1.9× 1.8× All States 9.0× 8.7× 8.9× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians	Arizona OON All Medical/Surgical Clinicians	9.8	7.7	7.8
All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Arizona OON Psychiatrists 4.6 4.6 4.0 Arizona OON Medical/Surgical Specialist Physicians 2.3 2.4 2.2 Psychiatrists OON Compared to Medical/Surgical Specialist OON Arizona 2.1× 1.9× 1.8× All States 9.0× 8.7× 8.9× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians				
Parity Would Be 1.0× 1	Arizona	0.9×	1.0×	0.8×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Arizona OON Psychiatrists Arizona OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist OON Arizona Arizona 2.1× 1.9× 1.8× All States 9.0× 8.7× 8.9× Parity Would Be 1.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians	All States	3.9×	3.9×	3.5×
Physicians Arizona OON Psychiatrists 4.6 4.6 4.0 Arizona OON Medical/Surgical Specialist Physicians 2.3 2.4 2.2 Psychiatrists OON Compared to Medical/Surgical Specialist OON 2.1× 1.9× 1.8× All States 9.0× 8.7× 8.9× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians 1.0× 1.0×	Parity Would Be	1.0×	1.0×	1.0×
Arizona OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist OON Arizona All States Parity Would Be Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians 2.3 2.4 2.2 2.2 1.9× 1.9× 1.8× 8.9× 1.0× 1.0× 1.0× 1.0×				
Arizona OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist OON Arizona All States Parity Would Be Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians 2.3 2.4 2.2 2.2 1.9× 1.9× 1.8× 8.9× 1.0× 1.0× 1.0× 1.0×	Arizona OON Psychiatrists	4.6	4.6	4.0
Psychiatrists OON Compared to Medical/Surgical Specialist OON Arizona 2.1× 1.9× 1.8× All States 9.0× 8.7× 8.9× Parity Would Be 1.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians	•	2.3	2.4	2.2
Arizona 2.1× 1.9× 1.8× All States 9.0× 8.7× 8.9× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians 1.0× 1.0×				
Parity Would Be 1.0× 1.0× 1.0× 1.0× Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians		2.1×	1.9×	1.8×
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians	All States	9.0×	8.7×	8.9×
Physicians	Parity Would Be	1.0×	1.0×	1.0×
	Arizona OON Psychologists	10.4	8.1	9.8

		Percent, %		
	2019	2020	2021	
Arizona OON Medical/Surgical Specialist Physicians	2.3	2.4	2.2	
Psychologist OON Compared to Medical/Surgical Specialist OON				
Arizona	4.6×	3.3×	4.5×	
All States	10.9×	9.4×	10.6×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Psychiatric Nurses Versus Nurse Practitioners				
Arizona OON Psychiatric Nurses	5.6	3.8	1.9	
Arizona OON Nurse Practitioners	8.2	6.5	6.1	
Psychiatric Nurse OON Compared to Nurse Practitioners OON				
Arizona	0.7×	0.6×	0.3×	
All States	5.2×	5.4×	1.7×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Therapists Versus Physician Assistants				
Arizona OON Therapists	10.7	8.8	7.0	
Arizona OON Physician Assistants	24.3	20.1	22.4	
Therapists OON Compared to Physician Assistants OON				
Arizona	0.4×	0.4×	0.3×	
All States	5.5×	4.7×	4.1×	
Parity Would Be	1.0×	1.0×	1.0×	

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Arizona All Medical/Surgical Clinicians	99.0	103.2	104.9
Arizona All Behavioral Health Clinicians	83.1	88.8	92.0
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Arizona	19.2	16.2	14.0
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Arizona Medical/Surgical Specialist Physicians	103.5	108.2	110.7
Arizona Psychiatrists	87.7	90.7	95.6
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Arizona	18.0	19.2	15.7
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Arizona Medical/Surgical Specialist Physicians	103.5	108.2	110.7
Arizona Psychologists	82.6	88.0	92.4
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Arizona	25.4	22.8	19.7
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Arizona Nurse Practitioners	88.6	91.5	97.0
Arizona Psychiatric Nurses	82.6	98.2	101.5
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Arizona	7.3	-6.8	-4.5
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Arizona Physician Assistants	95.3	97.3	102.4
Arizona Therapists	79.9	87.5	89.4
Physician Assistants Reimbursement Levels Compared to Therapists			
Arizona	19.4	11.2	14.7
All States	40.6	34.5	29.6

Autorage		Percentile, %				
Arizona All Medical/Surgical Clinicians 104.9 86.2 112.5 214.8		Average		75th	95th	
Arizona All Behavioral Health Clinicians 92.0 76.3 94.2 129.2 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 14.0 13.0 19.5 66.3 Arizona 14.0 13.0 19.5 66.3 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists 48.0 70.4 Arizona Medical/Surgical Specialist Physicians Sembursement Levels Compared to Psychiatrists 47.2 11.5 156.7 Medical/Surgical Specialist Physicians Psychologists 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Physicians Psychologists 110.7 96.3 128.2 242.5 Arizona Medical/Surgical Specialist Physicians Psychologists 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians Psychiatric Physicians Psychologists 92.4 86.6 101.3 179.2 Arizona Psychiogists Physicians Psychiatric Physicians Psychiatric Physicians Psychiatric Physician Psychiatric Physical Psychiatric Physical Psychiatric Physical Psychiatr						
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Arizona 14.0 13.0 19.5 66.3 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Arizona Medical/Surgical Specialist Physicians 110.7 96.3 128.2 242.5 Arizona Psychiatrists 95.6 95.2 111.5 156.7 Medical/Surgical Specialist Physicians Psychiatrists Arizona Psychiatrists 95.6 95.2 111.5 156.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Arizona 15.7 1.2 15.0 54.8 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Arizona Medical/Surgical Specialist Physicians Versus Psychologists 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians Psychologists Arizona Psychologists 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians Psychologists Arizona Psychologists 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians Psychologists Physicians Psychologists Arizona Psychologists 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians Psychologists Physicians Psychologists 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians Psychologists Physician Psychologists Physician Psychologists Psychologis	Arizona All Medical/Surgical Clinicians	104.9	86.2	112.5	214.8	
Arizona	Arizona All Behavioral Health Clinicians	92.0	76.3	94.2	129.2	
All States						
Medical/Surgical Specialist Physicians Versus Psychiatrists Arizona Medical/Surgical Specialist Physicians 110.7 96.3 128.2 242.5 Arizona Psychiatrists 95.6 95.2 111.5 156.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 15.7 1.2 15.0 54.8 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 24.9 12.8 27.8 49.5 Arizona Medical/Surgical Specialist Physicians Versus Psychologists 8 110.7 96.3 128.2 242.5 Arizona Psychologists 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 19.7 11.2 26.6 66.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 97.0 75.7 109.1 175.6 Arizona Psychiatric Nurses 101.5 93.4 102.5 123.0	Arizona	14.0	13.0	19.5	66.3	
Psychiatrists	All States	21.7	26.6	48.0	70.4	
Arizona Psychiatrists 95.6 95.2 111.5 156.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Arizona 15.7 1.2 15.0 54.8 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Arizona Medical/Surgical Specialist Physicians Versus Psychologists Arizona Psychologists 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians Psecialist Physicians Reimbursement Levels Compared to Psychologists Arizona 19.7 11.2 26.6 66.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Arizona Nurse Practitioners 97.0 75.7 109.1 175.6 Arizona Psychiatric Nurses 101.5 93.4 102.5 123.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Arizona 4-4.5 -19.0 6.3 42.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Arizona Physician Assistants Nersus Therapists Arizona Physician Assistants Reimbursement Levels Compared to Psychiatric Nurses Reimbursement Levels Reimbursement						
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Arizona 15.7 1.2 15.0 54.8 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus Psychologists Arizona Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 110.7 96.3 128.2 242.5 Arizona Psychologists 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 19.7 11.2 26.6 66.3 Arizona 19.7 11.2 26.6 66.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Arizona Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 101.5 93.4 102.5 123.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -4.5 -19.0 6.3 42.8 Arizona Physician Assistants Versus Therapists 102.4 75.8 95.1 194.3 Arizona Therapists 89.4 67.7 <td>Arizona Medical/Surgical Specialist Physicians</td> <td>110.7</td> <td>96.3</td> <td>128.2</td> <td>242.5</td>	Arizona Medical/Surgical Specialist Physicians	110.7	96.3	128.2	242.5	
Reimbursement Levels Compared to Psychiatrists	Arizona Psychiatrists	95.6	95.2	111.5	156.7	
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians 110.7 96.3 128.2 242.5 Arizona Medical/Surgical Specialist Physicians 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Arizona 19.7 11.2 26.6 66.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Arizona Nurse Practitioners 97.0 75.7 109.1 175.6 Arizona Practitioners Reimbursement Levels Compared to Psychiatric Nurses Arizona 4.5 -19.0 6.3 42.8 All States 7.5 -1.1 18.4 3.4 3.2 19.2 <th colspan<="" td=""><td></td><td></td><td></td><td></td><td></td></th>	<td></td> <td></td> <td></td> <td></td> <td></td>					
Medical/Surgical Specialist Physicians Versus Psychologists Arizona Medical/Surgical Specialist Physicians 110.7 96.3 128.2 242.5 Arizona Psychologists 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 46.6 66.3 Arizona 19.7 11.2 26.6 66.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 97.0 75.7 109.1 175.6 Arizona Psychiatric Nurses 101.5 93.4 102.5 123.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.0 4.5 -19.0 6.3 42.8 Arizona 4.5 -19.0 6.3 42.8 4.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 102.4 75.8 95.1 194.3 Arizona Physician Assistants Reimbursement Levels Compared to Therapists 89.4	Arizona	15.7	1.2	15.0	54.8	
Psychologists	All States	24.9	12.8	27.8	49.5	
Arizona Psychologists 92.4 86.6 101.3 179.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 19.7 11.2 26.6 66.3 Arizona 19.7 11.2 26.6 66.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 97.0 75.7 109.1 175.6 Arizona Psychiatric Nurses 101.5 93.4 102.5 123.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -4.5 -19.0 6.3 42.8 Arizona -4.5 -19.0 6.3 42.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 102.4 75.8 95.1 194.3 Arizona Therapists 89.4 67.7 76.3 99.9 Physician Assistants Reimbursement Levels Compared to Therapists 24.7 94.5 Arizona 14.7 12.0 24.7 94.5						
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Arizona 19.7 11.2 26.6 66.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Versus Psychiatric Nurses Arizona Nurse Practitioners 97.0 75.7 109.1 175.6 Arizona Psychiatric Nurses 101.5 93.4 102.5 123.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -4.5 -19.0 6.3 42.8 Arizona -4.5 -19.0 6.3 42.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 102.4 75.8 95.1 194.3 Arizona Therapists 89.4 67.7 76.3 99.9 Physician Assistants Reimbursement Levels Compared to Therapists 44.7 12.0 24.7 94.5 Arizona 14.7 12.0 24.7 94.5	Arizona Medical/Surgical Specialist Physicians	110.7	96.3	128.2	242.5	
Reimbursement Levels Compared to Psychologists	Arizona Psychologists	92.4	86.6	101.3	179.2	
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Arizona Nurse Practitioners 97.0 75.7 109.1 175.6 Arizona Psychiatric Nurses 101.5 93.4 102.5 123.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Arizona -4.5 -19.0 6.3 42.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Arizona Physician Assistants 102.4 75.8 95.1 194.3 Arizona Therapists 89.4 67.7 76.3 99.9 Physician Assistants Reimbursement Levels Compared to Therapists Arizona 14.7 12.0 24.7 94.5						
Nurse Practitioners Versus Psychiatric Nurses Arizona Nurse Practitioners 97.0 75.7 109.1 175.6 Arizona Psychiatric Nurses 101.5 93.4 102.5 123.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -4.5 -19.0 6.3 42.8 Arizona -4.5 -19.0 6.3 42.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 102.4 75.8 95.1 194.3 Arizona Therapists 89.4 67.7 76.3 99.9 Physician Assistants Reimbursement Levels Compared to Therapists 89.4 67.7 76.3 99.9 Arizona 14.7 12.0 24.7 94.5	Arizona	19.7	11.2	26.6	66.3	
Arizona Nurse Practitioners 97.0 75.7 109.1 175.6 Arizona Psychiatric Nurses 101.5 93.4 102.5 123.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -4.5 -19.0 6.3 42.8 Arizona -4.5 -19.0 6.3 42.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 102.4 75.8 95.1 194.3 Arizona Physician Assistants 102.4 75.8 95.1 194.3 Physician Assistants Reimbursement Levels Compared to Therapists 89.4 67.7 76.3 99.9 Arizona 14.7 12.0 24.7 94.5	All States	28.8	17.3	44.0	38.5	
Arizona Psychiatric Nurses 101.5 93.4 102.5 123.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -4.5 -19.0 6.3 42.8 Arizona -4.5 -19.0 6.3 42.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 102.4 75.8 95.1 194.3 Arizona Therapists 89.4 67.7 76.3 99.9 Physician Assistants Reimbursement Levels Compared to Therapists 41.7 12.0 24.7 94.5	Nurse Practitioners Versus Psychiatric Nurses					
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Arizona -4.5 -19.0 6.3 42.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Arizona Physician Assistants 102.4 75.8 95.1 194.3 Arizona Therapists 89.4 67.7 76.3 99.9 Physician Assistants Reimbursement Levels Compared to Therapists 14.7 12.0 24.7 94.5	Arizona Nurse Practitioners	97.0	75.7	109.1	175.6	
Compared to Psychiatric Nurses Arizona -4.5 -19.0 6.3 42.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Arizona Physician Assistants 102.4 75.8 95.1 194.3 Arizona Therapists 89.4 67.7 76.3 99.9 Physician Assistants Reimbursement Levels Compared to Therapists 14.7 12.0 24.7 94.5	Arizona Psychiatric Nurses	101.5	93.4	102.5	123.0	
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Arizona Physician Assistants 102.4 75.8 95.1 194.3 Arizona Therapists 89.4 67.7 76.3 99.9 Physician Assistants Reimbursement Levels Compared to Therapists Compared to Therapists Arizona 14.7 12.0 24.7 94.5						
Physician Assistants Versus TherapistsArizona Physician Assistants102.475.895.1194.3Arizona Therapists89.467.776.399.9Physician Assistants Reimbursement Levels Compared to Therapists24.794.5	Arizona	-4.5	-19.0	6.3	42.8	
Arizona Physician Assistants 102.4 75.8 95.1 194.3 Arizona Therapists 89.4 67.7 76.3 99.9 Physician Assistants Reimbursement Levels Compared to Therapists Arizona 14.7 12.0 24.7 94.5	All States	7.5	-1.1	18.4	34.3	
Arizona Therapists 89.4 67.7 76.3 99.9 Physician Assistants Reimbursement Levels Compared to Therapists Arizona 14.7 12.0 24.7 94.5	Physician Assistants Versus Therapists					
Physician Assistants Reimbursement Levels Compared to Therapists Arizona 14.7 12.0 24.7 94.5	Arizona Physician Assistants	102.4	75.8	95.1	194.3	
Compared to Therapists Arizona 14.7 12.0 24.7 94.5	Arizona Therapists	89.4	67.7	76.3	99.9	
All States 29.6 33.8 59.3 101.6	Arizona	14.7	12.0	24.7	94.5	
	All States	29.6	33.8	59.3	101.6	

Appendix C-4: Arkansas Disparity Analysis, All Plans

Sample size in 2021: 42,735 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Arkansas OON Behavioral Health	9.4	13.0	12.2
Arkansas OON Medical/Surgical	1.4	3.1	2.2
Behavioral Health OON Compared to Medical/Surgical OON			
Arkansas	6.5×	4.1×	5.6×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Arkansas OON Behavioral Health	21.4	18.9	24.2
Arkansas OON Medical/Surgical	2.0	4.7	1.3
Behavioral Health OON Compared to Medical/Surgical OON			
Arkansas	10.8×	4.0×	18.4×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Arkansas OON Behavioral Health	29.6	4.6	4.0
Arkansas OON Medical/Surgical	3.1	3.3	3.5
Behavioral Health OON Compared to Medical/Surgical OON			
Arkansas	9.5×	1.4×	1.1×*
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Arkansas OON All Behavioral Health Clinicians	7.2	6.3	5.0
Arkansas OON All Medical/Surgical Clinicians	2.2	2.8	2.1
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Arkansas	3.2×	2.2×	2.4×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Arkansas OON Psychiatrists	6.9	6.7	4.4
Arkansas OON Medical/Surgical Specialist Physicians	1.8	2.0	1.2
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Arkansas	3.9×	3.4×	3.8×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Arkansas OON Psychologists	9.8	4.2	5.1
Arkansas OON Medical/Surgical Specialist Physicians	1.8	2.0	1.2
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Arkansas	5.4×	2.2×	4.4×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Arkansas OON Psychiatric Nurses	11.4	9.2	11.9
Arkansas OON Nurse Practitioners	2.0	1.1	1.4
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Arkansas	5.6×	8.5×	8.5×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Arkansas OON Therapists	6.5	6.7	5.0
Arkansas OON Physician Assistants	1.5	1.9	1.1
Therapists OON Compared to Physician Assistants OON			
Arkansas	4.4×	3.6×	4.7×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Arkansas All Medical/Surgical Clinicians	124.8	125.2	125.2
Arkansas All Behavioral Health Clinicians	117.4	122.8	130.1
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Arkansas	6.3	2.0	-3.8
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Arkansas Medical/Surgical Specialist Physicians	126.5	127.0	127.2
Arkansas Psychiatrists	104.5	109.0	114.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Arkansas	21.1	16.6	11.3
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Arkansas Medical/Surgical Specialist Physicians	126.5	127.0	127.2
Arkansas Psychologists	116.6	123.7	129.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Arkansas	8.5	2.7	-1.8
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Arkansas Nurse Practitioners	106.8	108.6	109.0
Arkansas Psychiatric Nurses	78.1	106.8	105.4
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Arkansas	36.8	1.7	3.4
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Arkansas Physician Assistants	108.6	110.9	111.2
Arkansas Therapists	121.5	125.3	133.5
Physician Assistants Reimbursement Levels Compared to Therapists			
Arkansas	-10.6	-11.5	-16.7
All States	40.6	34.5	29.6

A	verage	50th		
	0	(Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Arkansas All Medical/Surgical Clinicians	25.2	122.1	142.1	248.9
Arkansas All Behavioral Health Clinicians	30.1	112.7	113.2	148.5
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Arkansas	-3.8	8.3	25.5	67.6
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Arkansas Medical/Surgical Specialist Physicians 1.	27.2	134.2	147.9	270.4
Arkansas Psychiatrists 1	14.3	113.2	138.2	158.0
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Arkansas	11.3	18.5	7.0	71.2
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Arkansas Medical/Surgical Specialist Physicians	27.2	134.2	147.9	270.4
Arkansas Psychologists	29.5	124.1	136.6	358.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Arkansas	-1.8	8.1	8.3	67.6
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Arkansas Nurse Practitioners	09.0	84.9	109.0	153.0
Arkansas Psychiatric Nurses	05.4	89.3	107.7	123.1
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Arkansas	3.4	-4.9	1.2	24.2
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Arkansas Physician Assistants 1	11.2	90.6	109.0	152.8
·	33.5	112.7	112.7	130.2
Physician Assistants Reimbursement Levels Compared to Therapists				
Arkansas -	16.7	-19.6	-3.3	17.4
All States	29.6	33.8	59.3	101.6

Appendix C-5: California Disparity Analysis, All Plans

Sample size in 2021: 1,051,678 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
California OON Behavioral Health	13.2	12.8	11.1
California OON Medical/Surgical	1.1	0.8	1.2
Behavioral Health OON Compared to Medical/Surgical OON			
California	12.2×	16.0×	9.3×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
California OON Behavioral Health	50.0	48.9	40.3
California OON Medical/Surgical	1.8	3.3	2.4
Behavioral Health OON Compared to Medical/Surgical OON			
California	28.0×	14.7×	16.5×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
California OON Behavioral Health	41.4	35.3	31.0
California OON Medical/Surgical	11.8	6.4	2.9
Behavioral Health OON Compared to Medical/Surgical OON			
California	3.5×	5.5×	10.6×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
California OON All Behavioral Health Clinicians	30.4	32.6	34.2
California OON All Medical/Surgical Clinicians	7.5	6.3	5.9
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
California	4.1×	5.2×	5.8×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
California OON Psychiatrists	28.1	35.1	34.8
California OON Medical/Surgical Specialist Physicians	2.9	2.5	2.2
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
California	9.7×	13.8×	15.9×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
California OON Psychologists	36.6	33.3	32.8
California OON Medical/Surgical Specialist Physicians	2.9	2.5	2.2
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
California	12.7×	13.2×	15.0×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
California OON Psychiatric Nurses	6.2	8.9	3.7
California OON Nurse Practitioners	4.8	4.6	3.5
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
California	1.3×	1.9×	1.1×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
California OON Therapists	28.9	30.9	35.2
California OON Physician Assistants	3.4	7.0	6.7
Therapists OON Compared to Physician Assistants OON			
California	8.5×	4.4×	5.2×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
California All Medical/Surgical Clinicians	122.8	124.9	129.0
California All Behavioral Health Clinicians	98.0	109.0	116.7
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
California	25.3	14.6	10.5
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
California Medical/Surgical Specialist Physicians	129.5	131.8	136.5
California Psychiatrists	109.5	130.7	140.6
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
California	18.2	0.9	-2.9
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
California Medical/Surgical Specialist Physicians	129.5	131.8	136.5
California Psychologists	79.6	98.4	107.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
California	62.6	33.9	26.5
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
California Nurse Practitioners	100.3	108.3	106.6
California Psychiatric Nurses	95.6	123.4	131.8
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
California	4.9	-12.2	-19.1
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
California Physician Assistants	81.4	102.6	105.2
California Therapists	101.2	100.3	102.9
Physician Assistants Reimbursement Levels Compared to Therapists			
California	-19.6	2.3	2.3
All States	40.6	34.5	29.6

Autorage		Percentile, %			
California All Medical/Surgical Clinicians 129.0 88.0 167.8 354.6		Average		75th	95th
California All Behavioral Health Clinicians					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians California 10.5 -2.3 40.8 40.4 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists California Medical/Surgical Specialist Physicians 136.5 99.4 196.3 385.8 California Psychiatrists 140.6 120.6 167.2 300.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists California Psychiatrists 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists California Medical/Surgical Specialist Physicians 136.5 99.4 196.3 385.8 California Psychologists 107.9 96.5 111.6 282.1 Medical/Surgical Specialist Physicians Psychologists California Psychologists 107.9 96.5 111.6 282.1 Medical/Surgical Specialist Physicians 26.5 3.0 76.0 40.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses California Nurse Practitioners 106.6 83.2 121.7 208.3 California Psychiatric Nurses 131.8 107.4 130.2 186.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses California Psychiatric Nurses California Psychiatric Nurses California Psychiatric Nurses California Physician Assistants 105.2 76.7 108.8 249.8 California Therapists California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists California California 2.3 2.3 26.3 71.8	California All Medical/Surgical Clinicians	129.0	88.0	167.8	354.6
California	California All Behavioral Health Clinicians	116.7	90.2	119.1	252.5
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists California Medical/Surgical Specialist Physicians 136.5 99.4 196.3 385.8 California Psychiatrists 140.6 120.6 167.2 300.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists California 2.9 -17.6 17.4 28.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists California Medical/Surgical Specialist Physicians Versus Psychologists California Medical/Surgical Specialist Physicians 136.5 99.4 196.3 385.8 California Psychologists 107.9 96.5 111.6 282.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists California Psychologists 26.5 3.0 76.0 40.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses California Nurse Practitioners California Psychiatric Nurses 106.6 83.2 121.7 208.3 California Psychiatric Nurses 131.8 107.4 130.2 186.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses California - 19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists California Therapists 105.2 76.7 108.8 249.8 California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists California Physician Assistants Reimbursement Levels Compared to Therapists California Therapists					
Medical/Surgical Specialist Physicians Versus Psychiatrists California Medical/Surgical Specialist Physicians 136.5 99.4 196.3 385.8 California Psychiatrists 140.6 120.6 167.2 300.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists -2.9 -17.6 17.4 28.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists -2.9 -17.6 17.4 28.3 California Medical/Surgical Specialist Physicians Versus Psychologists -2.9 19.5 19.4 49.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 107.9 96.5 111.6 282.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 26.5 3.0 76.0 40.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 19.6 83.2 121.7 208.3 California Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 131.8 107.4 </td <td>California</td> <td>10.5</td> <td>-2.3</td> <td>40.8</td> <td>40.4</td>	California	10.5	-2.3	40.8	40.4
California Medical/Surgical Specialist Physicians	All States	21.7	26.6	48.0	70.4
California Psychiatrists 140.6 120.6 167.2 300.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists -2.9 -17.6 17.4 28.3 California -2.9 -17.6 17.4 28.3 Medical/Surgical Specialist Physicians Versus Psychologists California Medical/Surgical Specialist Physicians 136.5 99.4 196.3 385.8 California Psychologists 107.9 96.5 111.6 282.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists California -2.9 -17.6 17.4 28.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus Psychologists Versus Psychologists 136.5 99.4 196.3 385.8 California Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 107.9 96.5 111.6 282.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 26.5 3.0 76.0 40.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 106.6 83.2 121.7 208.3 California Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 131.8 107.4 130.2 186.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 102.9	California Medical/Surgical Specialist Physicians	136.5	99.4	196.3	385.8
Reimbursement Levels Compared to Psychiatrists	California Psychiatrists	140.6	120.6	167.2	300.7
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 136.5 99.4 196.3 385.8 California Psychologists California 26.5 3.0 76.0 40.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses California Nurse Practitioners 106.6 83.2 121.7 208.3 California Psychiatric Nurses 131.8 107.4 130.2 18.3 California -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 24.9 24.9 8 California Physician Assistants 105.2 76.7 108.8 <t< td=""><td></td><td></td><td></td><td></td><td></td></t<>					
Medical/Surgical Specialist Physicians Versus Psychologists California Medical/Surgical Specialist Physicians 136.5 99.4 196.3 385.8 California Psychologists 107.9 96.5 111.6 282.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 76.0 40.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 83.2 121.7 208.3 California Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 131.8 107.4 130.2 186.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.2 76.7 108.8 249.8 California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 2.3 2.3 26.3 71.8	California	-2.9	-17.6	17.4	28.3
Psychologists California Medical/Surgical Specialist Physicians 136.5 99.4 196.3 385.8 California Psychologists 107.9 96.5 111.6 282.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 26.5 3.0 76.0 40.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 28.8 17.3 44.0 38.5 California Nurse Practitioners 106.6 83.2 121.7 208.3 California Psychiatric Nurses 131.8 107.4 130.2 186.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.2 76.7 108.8 249.8 California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 2.3 2.3 26.3 71.8	All States	24.9	12.8	27.8	49.5
California Psychologists 107.9 96.5 111.6 282.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 26.5 3.0 76.0 40.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 106.6 83.2 121.7 208.3 California Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 131.8 107.4 130.2 186.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.2 76.7 108.8 249.8 California Physician Assistants 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 2.3 2.3 26.3 71.8					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists California 26.5 3.0 76.0 40.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 106.6 83.2 121.7 208.3 California Nurse Practitioners Nurses 131.8 107.4 130.2 186.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.2 76.7 108.8 249.8 California Physician Assistants 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 2.3 2.3 26.3 71.8	California Medical/Surgical Specialist Physicians	136.5	99.4	196.3	385.8
Reimbursement Levels Compared to Psychologists California 26.5 3.0 76.0 40.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 106.6 83.2 121.7 208.3 California Psychiatric Nurses 131.8 107.4 130.2 186.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.2 76.7 108.8 249.8 California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 2.3 2.3 26.3 71.8	California Psychologists	107.9	96.5	111.6	282.1
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 106.6 83.2 121.7 208.3 California Psychiatric Nurses 131.8 107.4 130.2 186.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.2 76.7 108.8 249.8 California Physician Assistants 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 2.3 2.3 2.3 26.3 71.8					
Nurse Practitioners Versus Psychiatric Nurses California Nurse Practitioners 106.6 83.2 121.7 208.3 California Psychiatric Nurses 131.8 107.4 130.2 186.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Compared to Psychiatric Nurses -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.2 76.7 108.8 249.8 California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 2.3 2.3 2.3 71.8	California	26.5	3.0	76.0	40.4
California Nurse Practitioners 106.6 83.2 121.7 208.3 California Psychiatric Nurses 131.8 107.4 130.2 186.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists California Physician Assistants 105.2 76.7 108.8 249.8 California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 2.3 2.3 2.3 71.8	All States	28.8	17.3	44.0	38.5
California Psychiatric Nurses 131.8 107.4 130.2 186.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists California Physician Assistants 105.2 76.7 108.8 249.8 California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 2.3 2.3 2.3 71.8	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses California -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists California Physician Assistants 105.2 76.7 108.8 249.8 California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 2.3 2.3 2.3 71.8	California Nurse Practitioners	106.6	83.2	121.7	208.3
Compared to Psychiatric Nurses California -19.1 -22.5 -6.5 11.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists California Physician Assistants 105.2 76.7 108.8 249.8 California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 2.3 2.3 26.3 71.8	California Psychiatric Nurses	131.8	107.4	130.2	186.3
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists California Physician Assistants 105.2 76.7 108.8 249.8 California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists 2.3 2.3 26.3 71.8					
Physician Assistants Versus Therapists California Physician Assistants 105.2 76.7 108.8 249.8 California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists California 2.3 2.3 2.3 71.8	California	-19.1	-22.5	-6.5	11.8
California Physician Assistants105.276.7108.8249.8California Therapists102.975.086.1145.4Physician Assistants Reimbursement Levels Compared to Therapists2.32.326.371.8	All States	7.5	-1.1	18.4	34.3
California Therapists 102.9 75.0 86.1 145.4 Physician Assistants Reimbursement Levels Compared to Therapists California 2.3 2.3 26.3 71.8	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists California 2.3 2.3 26.3 71.8	California Physician Assistants	105.2	76.7	108.8	249.8
Compared to Therapists California 2.3 2.3 26.3 71.8	California Therapists	102.9	75.0	86.1	145.4
All States 29.6 33.8 59.3 101.6	California	2.3	2.3	26.3	71.8
	All States	29.6	33.8	59.3	101.6

Appendix C-6: Colorado Disparity Analysis, All Plans

Sample size in 2021: 171,047 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Colorado OON Behavioral Health	8.9	9.8	9.6
Colorado OON Medical/Surgical	0.9	1.2	1.4
Behavioral Health OON Compared to Medical/Surgical OON			
Colorado	9.5×	8.3×	6.8×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Colorado OON Behavioral Health	4.2	31.8	45.4
Colorado OON Medical/Surgical	2.1	1.9	3.7
Behavioral Health OON Compared to Medical/Surgical OON			
Colorado	2.0×	16.6×	12.3×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Colorado OON Behavioral Health	28.9	18.3	21.6
Colorado OON Medical/Surgical	1.0	2.7	1.2
Behavioral Health OON Compared to Medical/Surgical OON			
Colorado	29.5×	6.8×	18.5×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Colorado OON All Behavioral Health Clinicians	14.2	12.8	11.8
Colorado OON All Medical/Surgical Clinicians	5.0	4.6	4.8
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Colorado	2.8×	2.8×	2.5×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Colorado OON Psychiatrists	13.8	13.4	16.0
Colorado OON Medical/Surgical Specialist Physicians	1.6	1.5	1.3
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Colorado	8.5×	8.7×	12.0×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Colorado OON Psychologists	17.5	15.9	13.4
Colorado OON Medical/Surgical Specialist Physicians	1.6	1.5	1.3
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Colorado	10.8×	10.4×	10.0×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Colorado OON Psychiatric Nurses	5.6	3.2	2.6
Colorado OON Nurse Practitioners	3.6	3.7	3.4
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Colorado	1.6×	0.9×*	0.8×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Colorado OON Therapists	13.6	12.1	10.8
Colorado OON Physician Assistants	1.0	1.0	1.0
Therapists OON Compared to Physician Assistants OON			
Colorado	14.0×	11.8×	10.6×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Colorado All Medical/Surgical Clinicians	126.5	128.3	129.2
Colorado All Behavioral Health Clinicians	84.6	92.8	99.3
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Colorado	49.5	38.2	30.1
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Colorado Medical/Surgical Specialist Physicians	129.5	132.1	134.1
Colorado Psychiatrists	90.8	99.6	102.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Colorado	42.6	32.7	30.6
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Colorado Medical/Surgical Specialist Physicians	129.5	132.1	134.1
Colorado Psychologists	79.2	86.5	92.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Colorado	63.5	52.7	45.2
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Colorado Nurse Practitioners	131.5	130.5	129.6
Colorado Psychiatric Nurses	90.5	104.9	109.1
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Colorado	45.2	24.4	18.8
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Colorado Physician Assistants	139.1	139.5	134.9
Colorado Therapists	84.1	92.7	100.1
Physician Assistants Reimbursement Levels Compared to Therapists			
Colorado	65.3	50.5	047
	05.5	50.5	34.7

Average		Percentile, %			
Colorado All Medical/Surgical Clinicians 129.2 112.1 142.0 256.5		Average		75th	95th
Colorado All Behavioral Health Clinicians 99.3 79.3 94.7 135.9					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Colorado 30.1 41.4 49.9 88.7 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Colorado Medical/Surgical Specialist Physicians 134.1 119.4 151.6 288.0 Colorado Psychiatrists 102.7 104.7 119.6 164.0 Medical/Surgical Specialist Physicians 102.7 104.7 119.6 164.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Colorado 30.6 14.0 26.8 75.6 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Colorado Medical/Surgical Specialist Physicians 134.1 119.4 151.6 288.0 Colorado Medical/Surgical Specialist Physicians 92.3 88.1 105.7 184.2 All States 28.8 17.3 44.0 38.5 Colorado Nurse Practitioners Practitioners 129.6 101.1 126.0 226.8 Colorado Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Colorado Physician Assistants Versus Therapists Colorado Physician Assistants Versus Therapists Colorado Physician Assistants Reimbursement Levels Physician Assistants Reimbursement Levels	Colorado All Medical/Surgical Clinicians	129.2	112.1	142.0	256.5
Compared to All Behavioral Health Clinicians Colorado 30.1 41.4 49.9 88.7	Colorado All Behavioral Health Clinicians	99.3	79.3	94.7	135.9
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Colorado Medical/Surgical Specialist Physicians 134.1 119.4 151.6 288.0 Colorado Psychiatrists 102.7 104.7 119.6 164.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Colorado 30.6 14.0 26.8 75.6 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Colorado Medical/Surgical Specialist Physicians 134.1 119.4 151.6 288.0 Colorado Psychologists 92.3 88.1 105.7 184.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Colorado Psychologists 92.3 88.1 105.7 184.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Colorado Psychologists 92.3 88.1 105.7 184.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Colorado Psychologists 92.3 88.1 105.7 184.2 Musce Practitioners Versus Psychiatric Nurses Colorado Nurse Practitioners 129.6 101.1 126.0 226.8 Colorado Psychiatric Nurses 109.1 101.1 105.6 124.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Colorado Respondant to Nurses Colorado Nurse Practitioners Reimbursement Levels Colorado Physician Assistants Versus Therapists Colorado Physician Assistants Reimbursement Levels Physician Assistants Reimbursement Levels					
Medical/Surgical Specialist Physicians Versus Psychiatrists	Colorado	30.1	41.4	49.9	88.7
Psychiatrists	All States	21.7	26.6	48.0	70.4
Colorado Psychiatrists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Colorado 30.6 14.0 26.8 75.6 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Psychologists 28.0 20.0 20.0 288.0 288.0 288.0 288.0 288.0 20.0 20.0 20.0 288.0 288.0 288.0 288.0 288.0 20.0 20.0 288	Colorado Medical/Surgical Specialist Physicians	134.1	119.4	151.6	288.0
Reimbursement Levels Compared to Psychiatrists	Colorado Psychiatrists	102.7	104.7	119.6	164.0
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Colorado Medical/Surgical Specialist Physicians 134.1 119.4 151.6 288.0 Colorado Psychologists 29.3 88.1 105.7 184.2 Medical/Surgical Specialist Physicians 88.1 105.7 184.2 Medical/Surgical Specialist Physicians 184.2 Medical/Surgical Specialist Physicians 184.2 48.1 105.7 184.2 Nurse Colorado 45.2 35.5 43.5 88.7 Nurse Practitioners Versus Psychiatric Nurses Colorado Psychiatric Nurses 109.1 101.1 126.0 129.6 101.1 105.6 124.4 Nurse Practitioners Reimbursement Levels Colorado 18.8 0.0 19.3					
Medical/Surgical Specialist Physicians Versus Psychologists Colorado Medical/Surgical Specialist Physicians 134.1 119.4 151.6 288.0 Colorado Psychologists 92.3 88.1 105.7 184.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 88.7 43.5 88.7 Colorado 45.2 35.5 43.5 88.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 129.6 101.1 126.0 226.8 Colorado Psychiatric Nurses 109.1 101.1 105.6 124.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 18.8 0.0 19.3 82.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 134.9 105.5 130.9 234.7 Colorado Therapists 100.1 72.3 81.8 114.8 Physician Assistants Reimbursement Levels 100.1 72.3 81.8 114.8 <td>Colorado</td> <td>30.6</td> <td>14.0</td> <td>26.8</td> <td>75.6</td>	Colorado	30.6	14.0	26.8	75.6
Psychologists Colorado Medical/Surgical Specialist Physicians 134.1 119.4 151.6 288.0	All States	24.9	12.8	27.8	49.5
Colorado Psychologists 92.3 88.1 105.7 184.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 45.2 35.5 43.5 88.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 129.6 101.1 126.0 226.8 Colorado Nurse Practitioners 129.6 101.1 105.6 124.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 109.1 101.1 105.6 124.4 Nurse Practitioners Reimbursement Levels 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 7.5 -1.1 18.4 34.3 Physician Assistants Reimbursement Levels 134.9 105.5 130.9 234.7 Colorado Therapists 100.1 72.3 81.8 114.8					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Colorado 45.2 35.5 43.5 88.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 129.6 101.1 126.0 226.8 Colorado Nurse Practitioners 129.6 101.1 105.6 124.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 109.1 101.1 105.6 124.4 Colorado 18.8 0.0 19.3 82.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 134.9 105.5 130.9 234.7 Colorado Therapists 100.1 72.3 81.8 114.8 Physician Assistants Reimbursement Levels	Colorado Medical/Surgical Specialist Physicians	134.1	119.4	151.6	288.0
Reimbursement Levels Compared to Psychologists Colorado 45.2 35.5 43.5 88.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 109.1 101.1 126.0 226.8 Colorado Nurse Practitioners Reimbursement Levels 109.1 101.1 105.6 124.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 200.0 19.3 82.2 Colorado 18.8 0.0 19.3 82.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 134.9 105.5 130.9 234.7 Colorado Therapists 100.1 72.3 81.8 114.8 Physician Assistants Reimbursement Levels	Colorado Psychologists	92.3	88.1	105.7	184.2
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 129.6 101.1 126.0 226.8 Colorado Psychiatric Nurses 109.1 101.1 105.6 124.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Colorado 18.8 0.0 19.3 82.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 134.9 105.5 130.9 234.7 Colorado Therapists 100.1 72.3 81.8 114.8 Physician Assistants Reimbursement Levels					
Nurse Practitioners Versus Psychiatric Nurses Colorado Nurse Practitioners 129.6 101.1 126.0 226.8 Colorado Psychiatric Nurses 109.1 101.1 105.6 124.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Colorado 18.8 0.0 19.3 82.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 134.9 105.5 130.9 234.7 Colorado Therapists 100.1 72.3 81.8 114.8 Physician Assistants Reimbursement Levels 100.1 72.3 81.8 114.8	Colorado	45.2	35.5	43.5	88.7
Colorado Nurse Practitioners 129.6 101.1 126.0 226.8 Colorado Psychiatric Nurses 109.1 101.1 105.6 124.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 82.2 18.8 0.0 19.3 82.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 134.9 105.5 130.9 234.7 Colorado Physician Assistants 100.1 72.3 81.8 114.8 Physician Assistants Reimbursement Levels 100.1 72.3 81.8 114.8	All States	28.8	17.3	44.0	38.5
Colorado Psychiatric Nurses 109.1 101.1 105.6 124.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 82.2 18.8 0.0 19.3 82.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 134.9 105.5 130.9 234.7 Colorado Physician Assistants 100.1 72.3 81.8 114.8 Physician Assistants Reimbursement Levels	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Colorado 18.8 0.0 19.3 82.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Colorado Physician Assistants 134.9 105.5 130.9 234.7 Colorado Therapists 100.1 72.3 81.8 114.8 Physician Assistants Reimbursement Levels	Colorado Nurse Practitioners	129.6	101.1	126.0	226.8
Compared to Psychiatric Nurses Colorado 18.8 0.0 19.3 82.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Colorado Physician Assistants 134.9 105.5 130.9 234.7 Colorado Therapists 100.1 72.3 81.8 114.8 Physician Assistants Reimbursement Levels	Colorado Psychiatric Nurses	109.1	101.1	105.6	124.4
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Colorado Physician Assistants 134.9 105.5 130.9 234.7 Colorado Therapists 100.1 72.3 81.8 114.8 Physician Assistants Reimbursement Levels					
Physician Assistants Versus TherapistsColorado Physician Assistants134.9105.5130.9234.7Colorado Therapists100.172.381.8114.8Physician Assistants Reimbursement Levels	Colorado	18.8	0.0	19.3	82.2
Colorado Physician Assistants134.9105.5130.9234.7Colorado Therapists100.172.381.8114.8Physician Assistants Reimbursement Levels	All States	7.5	-1.1	18.4	34.3
Colorado Therapists 100.1 72.3 81.8 114.8 Physician Assistants Reimbursement Levels	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels	Colorado Physician Assistants	134.9	105.5	130.9	234.7
	Colorado Therapists	100.1	72.3	81.8	114.8
	Physician Assistants Reimbursement Levels Compared to Therapists				
Colorado 34.7 45.8 59.9 104.5	Colorado	34.7	45.8	59.9	104.5
All States 29.6 33.8 59.3 101.6	All States	29.6	33.8	59.3	101.6

Appendix C-7: Connecticut Disparity Analysis, All Plans

Sample size in 2021: 58,119 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Connecticut OON Behavioral Health	8.8	9.6	11.7
Connecticut OON Medical/Surgical	0.4	0.6	0.2
Behavioral Health OON Compared to Medical/Surgical OON			
Connecticut	21.1×	16.7×	58.7×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Connecticut OON Behavioral Health	50.1	44.5	51.6
Connecticut OON Medical/Surgical	84.6	89.4	1.1
Behavioral Health OON Compared to Medical/Surgical OON			
Connecticut	0.6×	0.5×	47.5×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Connecticut OON Behavioral Health	49.7	16.9	5.2
Connecticut OON Medical/Surgical	51.1	41.1	1.9
Behavioral Health OON Compared to Medical/Surgical OON			
Connecticut	1.0×	0.4×	2.7×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Connecticut OON All Behavioral Health Clinicians	58.8	56.9	27.6
Connecticut OON All Medical/Surgical Clinicians	4.0	3.7	6.6
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Connecticut	14.7×	15.3×	4.2×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Connecticut OON Psychiatrists	70.4	68.3	33.0
Connecticut OON Medical/Surgical Specialist Physicians	1.6	2.1	2.6
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Connecticut	43.3×	33.1×	12.7×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Connecticut OON Psychologists	59.5	59.5	45.5
Connecticut OON Medical/Surgical Specialist Physicians	1.6	2.1	2.6
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Connecticut	36.6×	28.8×	17.5×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Connecticut OON Psychiatric Nurses	68.9	77.7	4.3
Connecticut OON Nurse Practitioners	3.4	3.5	1.4
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Connecticut	20.3×	22.2×	3.0×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Connecticut OON Therapists	52.7	50.2	21.6
Connecticut OON Physician Assistants	1.6	5.0	0.8
Therapists OON Compared to Physician Assistants OON			
Connecticut	33.5×	10.0×	25.6×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Connecticut All Medical/Surgical Clinicians	125.9	129.0	142.5
Connecticut All Behavioral Health Clinicians	79.5	89.6	102.1
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Connecticut	58.4	43.9	39.5
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Connecticut Medical/Surgical Specialist Physicians	129.7	133.2	147.7
Connecticut Psychiatrists	86.3	98.6	107.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Connecticut	50.2	35.1	37.1
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Connecticut Medical/Surgical Specialist Physicians	129.7	133.2	147.7
Connecticut Psychologists	78.0	89.3	106.4
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Connecticut	66.3	49.3	38.8
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Connecticut Nurse Practitioners	124.2	121.8	124.8
Connecticut Psychiatric Nurses	90.6	106.6	115.1
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Connecticut	37.2	14.3	8.4
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Connecticut Physician Assistants	129.3	131.9	130.5
Connecticut Therapists	77.4	87.0	99.1
Physician Assistants Reimbursement Levels Compared to Therapists			
Connecticut	67.1	51.6	31.7
All States	40.6	34.5	29.6

Average		Percentile, %			
Connecticut All Medical/Surgical Clinicians 142.5 122.1 165.8 300.4		Average		75th	95th
Connecticut All Behavioral Health Clinicians 102.1 79.3 97.7 159.3 159.3 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 21.7 26.6 48.0 70.4					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Connecticut 39.5 54.0 69.7 88.6 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Connecticut Psychiatrists 107.7 104.6 132.2 173.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Connecticut Psychiatrists 107.7 104.6 132.2 173.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Connecticut Sychologists Physicians Psychologists Connecticut Medical/Surgical Specialist Physicians Versus Psychologists Connecticut Medical/Surgical Specialist Physicians 147.7 128.8 181.8 335.2 Connecticut Medical/Surgical Specialist Physicians 147.7 128.8 181.8 335.2 Connecticut Psychologists 106.4 98.1 122.4 205.4 Medical/Surgical Specialist Physicians President Levels Compared to Psychologists Connecticut Psychologists 106.4 98.1 122.4 205.4 Medical/Surgical Specialist Physicians President Levels Compared to Psychologists Connecticut Nurseer Practitioners Peractitioners 124.8 105.2 128.4 204.9 Connecticut Nurse Practitioners Paractitioners Peractitioners Peractitioner	Connecticut All Medical/Surgical Clinicians	142.5	122.1	165.8	300.4
Compared to All Behavioral Health Clinicians 21.7 26.6 48.0 70.4	Connecticut All Behavioral Health Clinicians	102.1	79.3	97.7	159.3
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Connecticut Medical/Surgical Specialist Physicians 147.7 128.8 181.8 335.2 Connecticut Psychiatrists 107.7 104.6 132.2 173.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Connecticut 37.1 23.1 37.5 93.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Connecticut Medical/Surgical Specialist Physicians Versus Psychologists Connecticut Psychologists 147.7 128.8 181.8 335.2 Connecticut Psychologists 106.4 98.1 122.4 205.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Connecticut All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Connecticut Nurse Practitioners 124.8 105.2 128.4 204.9 Connecticut Psychiatric Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Connecticut Psychiatric Nurses Connecticut Psychiatric Nurses Connecticut Psychiatric Nurses Connecticut Psychiatric Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Connecticut Physician Assistants 130.5 103.9 138.1 242.8 Connecticut Physician Assistants Connecticut Physician Assistants Physician Assistants Reimbursement Levels Compared to Therapists Connecticut Therapists Connecticut Therapists Connecticut Therapists Connecticut Therapists Connecticut Therapists Connecticut Therapists					
Medical/Surgical Specialist Physicians Versus Psychiatrists Connecticut Medical/Surgical Specialist Physicians 147.7 128.8 181.8 335.2 Connecticut Psychiatrists 107.7 104.6 132.2 173.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 37.1 23.1 37.5 93.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus Psychologists 147.7 128.8 181.8 335.2 Connecticut Medical/Surgical Specialist Physicians Versus Psychologists 147.7 128.8 181.8 335.2 Connecticut Psychologists 106.4 98.1 122.4 205.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 38.8 31.4 48.5 88.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 124.8 105.2 128.4 204.9 Connecticut Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 15.1 105.5	Connecticut	39.5	54.0	69.7	88.6
Connecticut Medical/Surgical Specialist Physicians 147.7 128.8 181.8 335.2	All States	21.7	26.6	48.0	70.4
Connecticut Psychiatrists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Connecticut 37.1 23.1 37.5 93.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus Psychologists Connecticut Medical/Surgical Specialist Physicians 147.7 128.8 181.8 335.2 Connecticut Psychologists 106.4 98.1 122.4 205.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 38.8 31.4 48.5 88.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 124.8 105.2 128.4 204.9 Connecticut Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 130.5 103.9	Connecticut Medical/Surgical Specialist Physicians	147.7	128.8	181.8	335.2
Reimbursement Levels Compared to Psychiatrists 37.1 23.1 37.5 93.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Connecticut Medical/Surgical Specialist Physicians 147.7 128.8 181.8 335.2 Connecticut Psychologists 106.4 98.1 122.4 205.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Connecticut Nurse Practitioners Versus Psychiatric Nurses 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 124.8 105.2 128.4 204.9 Connecticut Nurse Practitioners Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels 28.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 130.5 103.9 138.1 242.8 Connecticut Therapists 130.5 133.9 138.1 242.8 Connecticut Therapists 130.5 130.9 138.1 242.8 Con		107.7	104.6	132.2	173.2
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 147.7 128.8 181.8 335.2 Connecticut Psychologists 106.4 98.1 122.4 205.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 88.6 122.4 205.4 Connecticut 38.8 31.4 48.5 88.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 124.8 105.2 128.4 204.9 Connecticut Nurse Practitioners 124.8 105.2 128.4 204.9 Connecticut Psychiatric Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists 7					
Medical/Surgical Specialist Physicians Versus Psychologists Connecticut Medical/Surgical Specialist Physicians 147.7 128.8 181.8 335.2 Connecticut Psychologists 106.4 98.1 122.4 205.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 88.6 122.4 205.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 124.8 105.2 128.4 204.9 Connecticut Psychiatric Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 103.9 138.1 242.8 Connecticut Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists 20.8	Connecticut	37.1	23.1	37.5	93.5
Psychologists Connecticut Medical/Surgical Specialist Physicians 147.7 128.8 181.8 335.2	All States	24.9	12.8	27.8	49.5
Connecticut Psychologists 106.4 98.1 122.4 205.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 38.8 31.4 48.5 88.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 124.8 105.2 128.4 204.9 Connecticut Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 204.9 204.9 204.9 Connecticut 8.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 130.5 103.9 138.1 242.8 Connecticut Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists 200.0 31.7 38.4 63.8 119.5					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Connecticut 38.8 31.4 48.5 88.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 28.8 105.2 128.4 204.9 Connecticut Nurse Practitioners 124.8 105.2 128.4 204.9 Connecticut Psychiatric Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.4 -0.3 17.3 63.7 Connecticut 8.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Connecticut Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists 20.0 31.7 38.4 63.8 119.5	Connecticut Medical/Surgical Specialist Physicians	147.7	128.8	181.8	335.2
Reimbursement Levels Compared to Psychologists Connecticut 38.8 31.4 48.5 88.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Connecticut Nurse Practitioners 124.8 105.2 128.4 204.9 Connecticut Psychiatric Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Connecticut Physician Assistants 130.5 103.9 138.1 242.8 Connecticut Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists Connecticut 31.7 38.4 63.8 119.5	Connecticut Psychologists	106.4	98.1	122.4	205.4
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Connecticut Nurse Practitioners 124.8 105.2 128.4 204.9 Connecticut Psychiatric Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 204.9 204.9 Connecticut 8.4 -0.5 109.5 125.2 Connecticut 8.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Connecticut Physician Assistants 130.5 103.9 138.1 242.8 Connecticut Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists 31.7 38.4 63.8 119.5					
Nurse Practitioners Versus Psychiatric Nurses Connecticut Nurse Practitioners 124.8 105.2 128.4 204.9 Connecticut Psychiatric Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Connecticut 8.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 130.5 103.9 138.1 242.8 Connecticut Physician Assistants 130.5 103.9 138.1 242.8 Physician Assistants Reimbursement Levels Compared to Therapists 31.7 38.4 63.8 119.5 Connecticut 31.7 38.4 63.8 119.5	Connecticut	38.8	31.4	48.5	88.6
Connecticut Nurse Practitioners 124.8 105.2 128.4 204.9 Connecticut Psychiatric Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 130.5 103.9 138.1 242.8 Connecticut Physician Assistants Reimbursement Levels Compared to Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists 31.7 38.4 63.8 119.5	All States	28.8	17.3	44.0	38.5
Connecticut Psychiatric Nurses 115.1 105.5 109.5 125.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 130.5 103.9 138.1 242.8 Connecticut Physician Assistants 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists 31.7 38.4 63.8 119.5	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Connecticut 8.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Connecticut Physician Assistants 130.5 103.9 138.1 242.8 Connecticut Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists 31.7 38.4 63.8 119.5	Connecticut Nurse Practitioners	124.8	105.2	128.4	204.9
Compared to Psychiatric Nurses Connecticut 8.4 -0.3 17.3 63.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Connecticut Physician Assistants 130.5 103.9 138.1 242.8 Connecticut Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists 31.7 38.4 63.8 119.5	Connecticut Psychiatric Nurses	115.1	105.5	109.5	125.2
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Connecticut Physician Assistants 130.5 103.9 138.1 242.8 Connecticut Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists Connecticut 31.7 38.4 63.8 119.5					
Physician Assistants Versus Therapists Connecticut Physician Assistants 130.5 103.9 138.1 242.8 Connecticut Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists Connecticut 31.7 38.4 63.8 119.5	Connecticut	8.4	-0.3	17.3	63.7
Connecticut Physician Assistants 130.5 103.9 138.1 242.8 Connecticut Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists Connecticut 31.7 38.4 63.8 119.5	All States	7.5	-1.1	18.4	34.3
Connecticut Therapists 99.1 75.0 84.3 110.6 Physician Assistants Reimbursement Levels Compared to Therapists Connecticut 31.7 38.4 63.8 119.5	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists Connecticut 31.7 38.4 63.8 119.5	Connecticut Physician Assistants	130.5	103.9	138.1	242.8
Compared to Therapists Connecticut 31.7 38.4 63.8 119.5	Connecticut Therapists	99.1	75.0	84.3	110.6
All States 29.6 33.8 59.3 101.6	Connecticut	31.7	38.4	63.8	119.5
	All States	29.6	33.8	59.3	101.6

Appendix C-8: Delaware Disparity Analysis, All Plans

Sample size in 2021: 58,468 covered lives

		Percent, %	
	2019	2020	2021
Acute Inpatient Facility			
Delaware OON Behavioral Health	12.9	12.0	6.3
Delaware OON Medical/Surgical	0.3	0.3	0.1
Behavioral Health OON Compared to Medical/Surgical OON			
Delaware	40.3×	41.4×	51.3×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Delaware OON Behavioral Health	46.7	38.2	n/a
Delaware OON Medical/Surgical	0.3	2.4	n/a
Behavioral Health OON Compared to Medical/Surgical OON			
Delaware	176.6×	15.7×	n/a
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Delaware OON Behavioral Health	53.1	25.5	38.2
Delaware OON Medical/Surgical	2.6	1.6	0.8
Behavioral Health OON Compared to Medical/Surgical OON			
Delaware	20.2×	16.4×	50.2×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/ Surgical Clinicians			
Delaware OON All Behavioral Health Clinicians	4.3	4.8	4.7
Delaware OON All Medical/Surgical Clinicians	0.8	0.8	0.9
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Delaware	5.1×	5.8×	5.5×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Delaware OON Psychiatrists	6.1	7.9	7.4
Delaware OON Medical/Surgical Specialist Physicians	0.5	0.5	0.4
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Delaware	12.7×	15.1×	16.5×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Delaware OON Psychologists	7.6	8.8	5.8
Delaware OON Medical/Surgical Specialist Physicians	0.5	0.5	0.4
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Delaware	15.8×	16.8×	12.9×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Delaware OON Psychiatric Nurses	0.8	0.8	5.6
Delaware OON Nurse Practitioners	1.6	1.4	1.3
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Delaware	0.5×	0.5×	4.3×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Delaware OON Therapists	3.0	3.2	3.7
Delaware OON Physician Assistants	0.9	1.5	1.0
Therapists OON Compared to Physician Assistants OON			
Delaware	3.2×	2.1×	3.6×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Delaware All Medical/Surgical Clinicians	99.9	102.2	113.7
Delaware All Behavioral Health Clinicians	85.8	91.0	108.5
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Delaware	16.5	12.3	4.9
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Delaware Medical/Surgical Specialist Physicians	104.2	106.5	119.9
Delaware Psychiatrists	78.1	83.9	99.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Delaware	33.4	26.9	20.5
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Delaware Medical/Surgical Specialist Physicians	104.2	106.5	119.9
Delaware Psychologists	98.5	104.6	113.1
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Delaware	5.8	1.7	6.0
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Delaware Nurse Practitioners	105.7	111.2	127.3
Delaware Psychiatric Nurses	75.3	94.4	104.1
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Delaware	40.3	17.9	22.3
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Delaware Physician Assistants	100.6	101.2	109.3
Delaware Therapists	82.8	88.2	109.0
Physician Assistants Reimbursement Levels Compared to Therapists			
Delaware	21.5	14.8	0.3
All States	40.6	34.5	29.6

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Delaware All Medical/Surgical Clinicians	113.7	100.0	123.9	228.1
Delaware All Behavioral Health Clinicians	108.5	88.6	101.9	133.0
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Delaware	4.9	12.9	21.5	71.4
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Delaware Medical/Surgical Specialist Physicians	119.9	105.7	140.0	239.8
Delaware Psychiatrists	99.5	97.5	111.9	167.0
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Delaware	20.5	8.4	25.1	43.6
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Delaware Medical/Surgical Specialist Physicians	119.9	105.7	140.0	239.8
Delaware Psychologists	113.1	102.0	107.4	197.0
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Delaware	6.0	3.7	30.3	71.4
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Delaware Nurse Practitioners	127.3	100.0	136.8	309.0
Delaware Psychiatric Nurses	104.1	94.2	103.1	159.7
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Delaware	22.3	6.1	32.7	93.5
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Delaware Physician Assistants	109.3	86.8	108.5	188.9
Delaware Therapists	109.0	78.2	93.1	105.6
Physician Assistants Reimbursement Levels Compared to Therapists				
Delevere				
Delaware	0.3	11.0	16.6	78.9

Appendix C-9: Florida Disparity Analysis, All Plans

Sample size in 2021: 961,333 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Florida OON Behavioral Health	13.9	14.7	11.2
Florida OON Medical/Surgical	0.8	0.8	0.5
Behavioral Health OON Compared to Medical/Surgical OON			
Florida	17.7×	18.0×	24.0×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Florida OON Behavioral Health	51.1	54.5	42.7
Florida OON Medical/Surgical	1.1	0.9	0.7
Behavioral Health OON Compared to Medical/Surgical OON			
Florida	45.6×	64.1×	58.2×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Florida OON Behavioral Health	46.4	37.5	23.2
Florida OON Medical/Surgical	2.5	1.7	1.3
Behavioral Health OON Compared to Medical/Surgical OON			
Florida	18.7×	21.8×	18.0×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Florida OON All Behavioral Health Clinicians	10.4	10.2	9.0
Florida OON All Medical/Surgical Clinicians	3.2	3.6	2.9
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Florida	3.2×	2.8×	3.1×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Florida OON Psychiatrists	7.0	7.6	6.7
Florida OON Medical/Surgical Specialist Physicians	1.2	1.4	1.0
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Florida	6.0×	5.3×	7.0×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Florida OON Psychologists	14.0	14.3	13.5
Florida OON Medical/Surgical Specialist Physicians	1.2	1.4	1.0
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Florida	11.9×	10.0×	14.0×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Florida OON Psychiatric Nurses	3.7	2.5	2.7
Florida OON Nurse Practitioners	2.9	2.5	3.0
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Florida	1.3×	1.0×*	0.9×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Florida OON Therapists	11.8	10.4	8.8
Florida OON Physician Assistants	3.4	3.2	3.4
Therapists OON Compared to Physician Assistants OON			
Florida	3.5×	3.2×	2.6×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians Florida All Medical/Surgical Clinicians Florida All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Florida All States Medical/Surgical Specialist Physicians Versus Psychiatrists Florida Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida All States Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants		Percent, %	
Florida All Medical/Surgical Clinicians Florida All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Florida All States Medical/Surgical Specialist Physicians Versus Psychiatrists Florida Medical/Surgical Specialist Physicians Florida Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida All States Medical/Surgical Specialist Physicians Versus Psychologists Florida All States Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	2019	2020	2021
Florida All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Florida All States Medical/Surgical Specialist Physicians Versus Psychiatrists Florida Medical/Surgical Specialist Physicians Florida Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida All States Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Versus Psychologists Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Florida All States Medical/Surgical Specialist Physicians Versus Psychiatrists Florida Medical/Surgical Specialist Physicians Florida Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida All States Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Versus Psychologists Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	104.7	108.4	110.7
Behavioral Health Clinicians Florida All States Medical/Surgical Specialist Physicians Versus Psychiatrists Florida Medical/Surgical Specialist Physicians Florida Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida All States Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	72.6	78.4	82.8
All States Medical/Surgical Specialist Physicians Versus Psychiatrists Florida Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida All States Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants			
Medical/Surgical Specialist Physicians Versus Psychiatrists Florida Medical/Surgical Specialist Physicians Florida Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida All States Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	44.2	38.2	33.8
Florida Medical/Surgical Specialist Physicians Florida Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida All States Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	33.3	25.7	21.7
Florida Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida All States Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida All States Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	106.9	110.9	113.5
to Psychiatrists Florida All States Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	73.6	80.1	84.9
All States Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants			
Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	45.3	38.4	33.7
Florida Medical/Surgical Specialist Physicians Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	40.8	30.1	24.9
Florida Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	106.9	110.9	113.5
to Psychologists Florida All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	75.8	81.2	87.1
All States Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants			
Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	40.9	36.5	30.2
Florida Nurse Practitioners Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	42.0	33.9	28.8
Florida Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	101.4	103.7	109.0
Nurses Florida All States Physician Assistants Versus Therapists Florida Physician Assistants	78.0	93.1	98.1
All States Physician Assistants Versus Therapists Florida Physician Assistants			
Physician Assistants Versus Therapists Florida Physician Assistants	30.0	11.4	11.1
Florida Physician Assistants	28.3	12.8	7.5
Florida Thanasista	102.6	105.7	108.1
Florida Therapists	69.5	75.2	78.6
Physician Assistants Reimbursement Levels Compared to Therapists			
Florida	47.7	40.6	37.5
All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians 110.7 94.0 128.4 236.3		Percentile, %			
Florida All Medical/Surgical Clinicians 110.7 94.0 128.4 236.3		Average		75th	95th
Florida All Behavioral Health Clinicians					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Florida 33.8 42.2 43.9 70.3 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Florida Medical/Surgical Specialist Physicians 113.5 103.3 144.1 274.2 Florida Psychiatrists 84.9 83.8 102.4 150.4 Medical/Surgical Specialist Physicians 84.9 83.8 102.4 150.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida 93.7 23.3 40.7 82.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians 113.5 103.3 144.1 274.2 Florida Psychologists 87.1 74.6 97.7 219.9 Medical/Surgical Specialist Physicians	Florida All Medical/Surgical Clinicians	110.7	94.0	128.4	236.3
Compared to Ail Behavioral Health Clinicians	Florida All Behavioral Health Clinicians	82.8	66.1	89.2	138.7
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Florida Medical/Surgical Specialist Physicians 113.5 103.3 144.1 274.2 Florida Psychiatrists 84.9 83.8 102.4 150.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida 33.7 23.3 40.7 82.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Florida Medical/Surgical Specialist Physicians Versus Psychologists Florida Psychologists 87.1 74.6 97.7 219.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida Psychologists 87.1 74.6 97.7 219.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida Psychologists 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Florida Nurse Practitioners 109.0 89.5 138.1 175.8 Florida Psychiatric Nurses 98.1 83.2 95.3 142.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida 11.1 7.5 44.9 23.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Florida Therapists 78.6 56.8 71.2 98.1 Physician Assistants Reimbursement Levels Compared to Therapists Compared to Therapists					
Medical/Surgical Specialist Physicians Versus Psychiatrists 103.3 144.1 274.2	Florida	33.8	42.2	43.9	70.3
Florida Medical/Surgical Specialist Physicians 113.5 103.3 144.1 274.2	All States	21.7	26.6	48.0	70.4
Florida Psychiatrists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Florida 33.7 23.3 40.7 82.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Psychologists Florida Medical/Surgical Specialist Physicians 87.1 74.6 97.7 219.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 87.1 74.6 97.7 219.9 Florida 30.2 38.4 47.4 70.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 89.1 83.2 95.3 142.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 98.1 83.2 95.3 142.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 11.1 7.5 44.9 23.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 108.1 82.5 107.3 198.6 Florida Physician Assistants 108.1 82.5	Florida Medical/Surgical Specialist Physicians	113.5	103.3	144.1	274.2
Reimbursement Levels Compared to Psychiatrists	Florida Psychiatrists	84.9	83.8	102.4	150.4
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians 113.5 103.3 144.1 274.2 Florida Medical/Surgical Specialist Physicians 87.1 74.6 97.7 219.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida 30.2 38.4 47.4 70.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Florida Psychiatric Nurses 98.1 83.2 95.3 142.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 98.1 83.2 95.3 142.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 15.5 14.1 7.5 44.9 23.2 <td></td> <td></td> <td></td> <td></td> <td></td>					
Medical/Surgical Specialist Physicians Versus Psychologists 113.5 103.3 144.1 274.2 Florida Psychologists 87.1 74.6 97.7 219.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 87.1 74.6 97.7 219.9 Florida 30.2 38.4 47.4 70.3 44.0 38.5 Florida 30.2 38.4 47.4 70.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 98.1 83.2 95.3 142.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 98.1 83.2 95.3 142.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 108.1 82.5 107.3 198.6 Florida Therapists 78.6 56.8 71.2 98.1 Physician Assistants Reimbursement	Florida	33.7	23.3	40.7	82.3
Psychologists	All States	24.9	12.8	27.8	49.5
Florida Psychologists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Florida 30.2 38.4 47.4 70.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 89.5 138.1 175.8 Florida Nurse Practitioners 99.1 89.5 138.1 175.8 Florida Psychiatric Nurses 98.1 83.2 95.3 142.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 11.1 7.5 44.9 23.2 Florida 11.1 7.5 44.9 23.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 108.1 82.5 107.3 198.6 Florida Therapists 78.6 56.8 71.2 98.1 Physician Assistants Reimbursement Levels Compared to Therapists 66.8 71.2 98.1	Florida Medical/Surgical Specialist Physicians	113.5	103.3	144.1	274.2
Reimbursement Levels Compared to Psychologists 30.2 38.4 47.4 70.3 44.0 38.5 44.0 38.5 44.0 38.5 44.0 38.5 44.0 38.5 44.0 38.5 44.0 38.5 44.0 38.5 44.0 38.5 44.0 38.5 44.0 38.5 44.0 38.5 44.0 38.5 44.0 38.5 44.0 38.5 44.0	Florida Psychologists	87.1	74.6	97.7	219.9
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 109.0 89.5 138.1 175.8 Florida Psychiatric Nurses 98.1 83.2 95.3 142.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Compared to Psychiatric Nurses 23.2 Florida 11.1 7.5 44.9 23.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 108.1 82.5 107.3 198.6 Florida Therapists 78.6 56.8 71.2 98.1 Physician Assistants Reimbursement Levels Compared to Therapists 78.6 56.8 71.2 98.1					
Nurse Practitioners Versus Psychiatric Nurses	Florida	30.2	38.4	47.4	70.3
Florida Nurse Practitioners 109.0 89.5 138.1 175.8 Florida Psychiatric Nurses 98.1 83.2 95.3 142.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.2 <td< td=""><td>All States</td><td>28.8</td><td>17.3</td><td>44.0</td><td>38.5</td></td<>	All States	28.8	17.3	44.0	38.5
Florida Psychiatric Nurses 98.1 83.2 95.3 142.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 11.1 7.5 44.9 23.2 Florida 11.1 7.5 44.9 23.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 108.1 82.5 107.3 198.6 Florida Physician Assistants 108.1 82.5 107.3 198.6 Florida Therapists 78.6 56.8 71.2 98.1 Physician Assistants Reimbursement Levels Compared to Therapists 78.6 56.8 71.2 98.1	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Florida 11.1 7.5 44.9 23.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 108.1 82.5 107.3 198.6 Florida Physician Assistants 108.1 82.5 107.3 198.6 Florida Therapists 78.6 56.8 71.2 98.1 Physician Assistants Reimbursement Levels Compared to Therapists	Florida Nurse Practitioners	109.0	89.5	138.1	175.8
Compared to Psychiatric Nurses Florida 11.1 7.5 44.9 23.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Florida Physician Assistants 108.1 82.5 107.3 198.6 Florida Therapists 78.6 56.8 71.2 98.1 Physician Assistants Reimbursement Levels Compared to Therapists Compared to Therapists 78.6<	Florida Psychiatric Nurses	98.1	83.2	95.3	142.7
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Florida Physician Assistants 108.1 82.5 107.3 198.6 Florida Therapists 78.6 56.8 71.2 98.1 Physician Assistants Reimbursement Levels Compared to Therapists					
Physician Assistants Versus TherapistsFlorida Physician Assistants108.182.5107.3198.6Florida Therapists78.656.871.298.1Physician Assistants Reimbursement Levels Compared to Therapists	Florida	11.1	7.5	44.9	23.2
Florida Physician Assistants 108.1 82.5 107.3 198.6 Florida Therapists 78.6 56.8 71.2 98.1 Physician Assistants Reimbursement Levels Compared to Therapists	All States	7.5	-1.1	18.4	34.3
Florida Therapists 78.6 56.8 71.2 98.1 Physician Assistants Reimbursement Levels Compared to Therapists	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists	Florida Physician Assistants	108.1	82.5	107.3	198.6
Compared to Therapists	Florida Therapists	78.6	56.8	71.2	98.1
Florida 37.5 45.2 50.7 102.3					
	Florida	37.5	45.2	50.7	102.3
All States 29.6 33.8 59.3 101.6	All States	29.6	33.8	59.3	101.6

Appendix C-10: Georgia Disparity Analysis, All Plans

Sample size in 2021: 870,186 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Georgia OON Behavioral Health	13.4	8.6	10.0
Georgia OON Medical/Surgical	1.3	0.7	0.6
Behavioral Health OON Compared to Medical/Surgical OON			
Georgia	10.0×	11.9×	16.0×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Georgia OON Behavioral Health	34.0	48.9	42.3
Georgia OON Medical/Surgical	1.5	1.8	0.4
Behavioral Health OON Compared to Medical/Surgical OON			
Georgia	22.7×	26.6×	103.8×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Georgia OON Behavioral Health	36.0	29.4	10.7
Georgia OON Medical/Surgical	6.3	2.9	1.7
Behavioral Health OON Compared to Medical/Surgical OON			
Georgia	5.7×	10.1×	6.3×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Georgia OON All Behavioral Health Clinicians	6.9	7.0	6.4
Georgia OON All Medical/Surgical Clinicians	3.4	3.1	2.9
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Georgia	2.0×	2.3×	2.2×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Georgia OON Psychiatrists	6.9	5.8	5.9
Georgia OON Medical/Surgical Specialist Physicians	1.2	1.5	1.2
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Georgia	5.7×	4.0×	4.8×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Georgia OON Psychologists	9.8	11.8	10.5
Georgia OON Medical/Surgical Specialist Physicians	1.2	1.5	1.2
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Georgia	8.1×	8.0×	8.5×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Georgia OON Psychiatric Nurses	4.8	3.4	2.0
Georgia OON Nurse Practitioners	6.3	3.6	3.0
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Georgia	0.8×	0.9×*	0.7×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Georgia OON Therapists	6.1	6.1	5.5
Georgia OON Physician Assistants	4.8	8.7	4.5
Therapists OON Compared to Physician Assistants OON			
Georgia	1.3×	0.7×	1.2×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians 133.9 139.4 141.2			Percent, %	
Georgia All Medical/Surgical Clinicians		2019	2020	2021
Georgia All Behavioral Health Clinicians	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Georgia 54.8 53.5 50.6 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists Georgia Medical/Surgical Specialist Physicians 88.6 98.4 107.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia Psychiatrists Georgia Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists Georgia Medical/Surgical Specialist Physicians Versus Psychologists Georgia Medical/Surgical Specialist Physicians Versus Psychologists Georgia Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Georgia Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Georgia Nurgical Specialist Physicians Reimbursement Levels Compared to Psychologists Georgia Nurse Practitioners Versus Psychiatric Nurses Georgia Psychiatric Nurses 109.2 114.7 118.9 Georgia Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Georgia Psychiatric Nurses 109.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists Georgia Assistants Reimbursement Levels Compared to Therapists Georgia Massistants Reimbursement Levels Compared to Therapists Georgia 60.0 74.2 55.3	Georgia All Medical/Surgical Clinicians	133.9	139.4	141.2
Georgia 54.8 53.5 50.6 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists Georgia Psychiatrists 88.6 98.4 107.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 88.6 98.4 107.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 55.3 45.4 35.4 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 44.9 44.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 92.0 114.7 118.9 Georgia Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses	Georgia All Behavioral Health Clinicians	86.5	90.8	93.8
All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists Georgia Medical/Surgical Specialist Physicians 137.6 143.1 145.1 Georgia Psychiatrists 88.6 98.4 107.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia 55.3 45.4 35.4 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists Georgia Medical/Surgical Specialist Physicians Versus Psychologists Georgia Medical/Surgical Specialist Physicians Versus Psychologists Georgia Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Georgia 48.6 44.9 44.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses Georgia Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Georgia Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Georgia Specialist Physicians Reimbursement Levels Compared to Psychiatric Nurses Georgia Psychiatric Nurses 109.2 114.7 118.9 Georgia Psychiatric Nurses 12.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Georgia Physician Assistants Versus Therapists Georgia Physician Assistants Reimbursement Levels Compared to Therapists Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists Georgia 60.0 74.2 55.3				
Medical/Surgical Specialist Physicians Versus Psychiatrists Georgia Medical/Surgical Specialist Physicians 137.6 143.1 145.1 Georgia Psychiatrists 88.6 98.4 107.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 55.3 45.4 35.4 Georgia 55.3 45.4 35.4 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 44.9 44.6 Georgia 48.6 44.9 44.6 41.9 44.6 All States 109.2 114.7 118.9 114.7 118.9 Georgia Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 </td <td>Georgia</td> <td>54.8</td> <td>53.5</td> <td>50.6</td>	Georgia	54.8	53.5	50.6
Georgia Medical/Surgical Specialist Physicians 137.6 143.1 145.1 Georgia Psychiatrists 88.6 98.4 107.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 55.3 45.4 35.4 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 137.6 143.1 145.1 Georgia Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 44.9 44.6 Georgia 48.6 44.9 44.6 44.9 44.6 All States 42.0 33.9 28.8 8 Nurse Practitioners Versus Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 50.2 17.5 8.2 All States 50.2 17.5 8.2 All States 50.2 17.5 8.2 Physician Assistants Versus Therapists 82.7 83.8 85.9	All States	33.3	25.7	21.7
Georgia Psychiatrists 88.6 98.4 107.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 55.3 45.4 35.4 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 137.6 143.1 145.1 Georgia Medical/Surgical Specialist Physicians 137.6 143.1 145.1 Georgia Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 44.9 44.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 42.0 33.9 28.8 Georgia 48.6 44.9 44.6 44.9 44.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Physician Assis	Medical/Surgical Specialist Physicians Versus Psychiatrists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia 55.3 45.4 35.4 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 137.6 143.1 145.1 Georgia Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 44.9 44.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 109.2 114.7 118.9 Georgia Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 50.2 17.5 8.2 Georgia 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists 60.0 74.2 55.3	Georgia Medical/Surgical Specialist Physicians	137.6	143.1	145.1
Georgia 55.3 45.4 35.4 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists Georgia Medical/Surgical Specialist Physicians 137.6 143.1 145.1 Georgia Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 44.9 44.6 Georgia 48.6 44.9 44.6 44.9 44.6 All States 42.0 33.9 28.8 28.8 Nurse Practitioners Versus Psychiatric Nurses 109.2 114.7 118.9 Georgia Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 12.8 7.5 Physician Assistants Versus Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists 60.0 74.2 555.3	Georgia Psychiatrists	88.6	98.4	107.2
All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 137.6 143.1 145.1 Georgia Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 44.9 44.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 30.2 114.7 118.9 Georgia Nurse Practitioners 109.2 114.7 118.9 Georgia Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 50.2 17.5 8.2 Georgia 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 145.9 133.4 Georgia Physician Assistants 132.3 145.9 133.4 Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists 60.0 74.2 55.3				
Medical/Surgical Specialist Physicians Versus Psychologists Georgia Medical/Surgical Specialist Physicians 137.6 143.1 145.1 Georgia Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 44.9 44.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 109.2 114.7 118.9 Georgia Nurse Practitioners 109.2 114.7 118.9 Georgia Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Georgia 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 145.9 133.4 Georgia Physician Assistants 132.3 145.9 133.4 Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists 60.0 74.2 55.3<	Georgia	55.3	45.4	35.4
Georgia Medical/Surgical Specialist Physicians 137.6 143.1 145.1 Georgia Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 44.9 44.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses Georgia Nurse Practitioners 109.2 114.7 118.9 Georgia Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 72.7 97.6 110.0 Georgia 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Georgia Physician Assistants 132.3 145.9 133.4 Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists Georgia 60.0 74.2 55.3	All States	40.8	30.1	24.9
Georgia Psychologists 92.6 98.7 100.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 44.9 44.6 Georgia 48.6 44.9 44.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 109.2 114.7 118.9 Georgia Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 12.8 7.5 Georgia Physician Assistants 132.3 145.9 133.4 Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists 60.0 74.2 55.3	Medical/Surgical Specialist Physicians Versus Psychologists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Georgia 48.6 44.9 44.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses Georgia Nurse Practitioners 109.2 114.7 118.9 Georgia Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Georgia 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists Georgia 60.0 74.2 55.3	Georgia Medical/Surgical Specialist Physicians	137.6	143.1	145.1
to Psychologists Georgia 48.6 44.9 44.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses Georgia Nurse Practitioners 109.2 114.7 118.9 Georgia Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 50.2 17.5 8.2 Georgia 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 132.3 145.9 133.4 Georgia Physician Assistants Reimbursement Levels Compared to Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists 60.0 74.2 55.3	Georgia Psychologists	92.6	98.7	100.4
All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses Georgia Nurse Practitioners 109.2 114.7 118.9 Georgia Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 32.3 145.9 133.4 Georgia Physician Assistants 132.3 145.9 133.4 Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists 60.0 74.2 55.3				
Nurse Practitioners Versus Psychiatric Nurses Georgia Nurse Practitioners 109.2 114.7 118.9 Georgia Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Georgia 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Georgia Physician Assistants 32.3 145.9 133.4 Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists Georgia 60.0 74.2 55.3	Georgia	48.6	44.9	44.6
Georgia Nurse Practitioners 109.2 114.7 118.9 Georgia Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 50.2 17.5 8.2 Georgia 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Georgia Physician Assistants 132.3 145.9 133.4 Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists 60.0 74.2 55.3	All States	42.0	33.9	28.8
Georgia Psychiatric Nurses 72.7 97.6 110.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Georgia 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Georgia Physician Assistants 132.3 145.9 133.4 Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists Georgia 60.0 74.2 55.3	Nurse Practitioners Versus Psychiatric Nurses			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Georgia 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Georgia Physician Assistants 132.3 145.9 133.4 Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists Georgia 60.0 74.2 55.3	Georgia Nurse Practitioners	109.2	114.7	118.9
Nurses Georgia 50.2 17.5 8.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Georgia Physician Assistants 132.3 145.9 133.4 Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists 60.0 74.2 55.3	Georgia Psychiatric Nurses	72.7	97.6	110.0
All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Georgia Physician Assistants 132.3 145.9 133.4 Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists Georgia 60.0 74.2 55.3				
Physician Assistants Versus TherapistsGeorgia Physician Assistants132.3145.9133.4Georgia Therapists82.783.885.9Physician Assistants Reimbursement Levels Compared to TherapistsGeorgia60.074.255.3	Georgia	50.2	17.5	8.2
Georgia Physician Assistants132.3145.9133.4Georgia Therapists82.783.885.9Physician Assistants Reimbursement Levels Compared to TherapistsGeorgia60.074.255.3	All States	28.3	12.8	7.5
Georgia Therapists 82.7 83.8 85.9 Physician Assistants Reimbursement Levels Compared to Therapists Georgia 60.0 74.2 55.3	Physician Assistants Versus Therapists			
Physician Assistants Reimbursement Levels Compared to Therapists Georgia 60.0 74.2 55.3	Georgia Physician Assistants	132.3	145.9	133.4
Georgia 60.0 74.2 55.3	Georgia Therapists	82.7	83.8	85.9
	Physician Assistants Reimbursement Levels Compared to Therapists			
All States 40.6 34.5 29.6	Georgia	60.0	74.2	55.3
	All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians Georgia All Medical/Surgical Clinicians 141.2 122.8 171.7 311. Georgia All Behavioral Health Clinicians 93.8 66.3 87.9 162.0 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Georgia 50.6 85.2 95.3 92.0 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Georgia Medical/Surgical Specialist Physicians 145.1 145.7 189.3 340.3 Georgia Psychiatrists 107.2 100.6 145.4 198.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia 35.4 44.9 30.2 71.4		Percentile, %			
Health Clinicians Georgia All Medical/Surgical Clinicians 141.2 122.8 171.7 311. Georgia All Behavioral Health Clinicians 93.8 66.3 87.9 162.0 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Georgia 50.6 85.2 95.3 92.0 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Georgia Medical/Surgical Specialist Physicians 145.1 145.7 189.3 340.3 Georgia Psychiatrists 107.2 100.6 145.4 198.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia 35.4 44.9 30.2 71.4	Av		75th	95th	
Georgia All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Georgia 50.6 85.2 95.3 92.6 Medical/Surgical Specialist Physicians Versus Psychiatrists Georgia Medical/Surgical Specialist Physicians Georgia Psychiatrists 145.1 145.7 189.3 340.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia 35.4 44.9 30.2 71.4	al Clinicians Versus All Behavioral				
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Georgia 50.6 85.2 95.3 92.0 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Georgia Medical/Surgical Specialist Physicians 145.1 145.7 189.3 340.3 Georgia Psychiatrists 107.2 100.6 145.4 198.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia 35.4 44.9 30.2 71.3	ical/Surgical Clinicians 14	1.2 122.8	171.7	311.1	
Compared to All Behavioral Health Clinicians Georgia 50.6 85.2 95.3 92.0 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Georgia Medical/Surgical Specialist Physicians 145.1 145.7 189.3 340.3 Georgia Psychiatrists 107.2 100.6 145.4 198.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia 35.4 44.9 30.2 71.3	avioral Health Clinicians	3.8 66.3	87.9	162.0	
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Georgia Medical/Surgical Specialist Physicians 145.1 145.7 189.3 340.3 Georgia Psychiatrists 107.2 100.6 145.4 198.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia 35.4 44.9 30.2 71.4					
Medical/Surgical Specialist Physicians Versus PsychiatristsGeorgia Medical/Surgical Specialist Physicians145.1145.7189.3340.3Georgia Psychiatrists107.2100.6145.4198.9Medical/Surgical Specialist Physicians Reimbursement Levels Compared to PsychiatristsGeorgia35.444.930.271.3	Ę	0.6 85.2	95.3	92.0	
Psychiatrists Georgia Medical/Surgical Specialist Physicians 145.1 145.7 189.3 340.3 Georgia Psychiatrists 107.2 100.6 145.4 198.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia 35.4 44.9 30.2 71.3	2	1.7 26.6	48.0	70.4	
Georgia Psychiatrists 107.2 100.6 145.4 198.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia 35.4 44.9 30.2 71.3	pecialist Physicians Versus				
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Georgia 35.4 44.9 30.2 71.	/Surgical Specialist Physicians 14	5.1 145.7	189.3	340.3	
Reimbursement Levels Compared to Psychiatrists Georgia 35.4 44.9 30.2 71.	trists 10	7.2 100.6	145.4	198.9	
All States 24.9 12.8 27.8 49.9	3	5.4 44.9	30.2	71.1	
	2	4.9 12.8	27.8	49.5	
Medical/Surgical Specialist Physicians Versus Psychologists	pecialist Physicians Versus				
Georgia Medical/Surgical Specialist Physicians 145.1 145.7 189.3 340.3	/Surgical Specialist Physicians 14	5.1 145.7	189.3	340.3	
Georgia Psychologists 100.4 78.9 96.8 298.	ogists 10	0.4 78.9	96.8	298.7	
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists					
Georgia 44.6 84.5 95.6 92.0	4	4.6 84.5	95.6	92.0	
All States 28.8 17.3 44.0 38.5	2	8.8 17.3	44.0	38.5	
Nurse Practitioners Versus Psychiatric Nurses	s Versus Psychiatric Nurses				
Georgia Nurse Practitioners 118.9 94.4 141.3 174.3	Practitioners 11	8.9 94.4	141.3	174.3	
Georgia Psychiatric Nurses 110.0 98.3 109.6 128.3	tric Nurses 11	0.0 98.3	109.6	128.3	
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses					
Georgia 8.2 -4.0 28.9 35.9		8.2 -4.0	28.9	35.9	
All States 7.5 -1.1 18.4 34.3		7.5 -1.1	18.4	34.3	
Physician Assistants Versus Therapists	nts Versus Therapists				
Georgia Physician Assistants 133.4 102.6 128.8 262.9	an Assistants 13	3.4 102.6	128.8	262.5	
<u> </u>		5.9 63.0	66.3	101.3	
Physician Assistants Reimbursement Levels Compared to Therapists					
Georgia 55.3 62.7 94.3 159.2	Ę	5.3 62.7	94.3	159.2	
All States 29.6 33.8 59.3 101.6	2	9.6 33.8	59.3	101.6	

Appendix C-11: Hawaii Disparity Analysis, All Plans

Sample size in 2021: 1,243 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Hawaii OON Behavioral Health	n/a	n/a	26.3
Hawaii OON Medical/Surgical	n/a	n/a	2.5
Behavioral Health OON Compared to Medical/Surgical OON			
Hawaii	n/a	n/a	10.6×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Hawaii OON Behavioral Health	n/a	n/a	n/a
Hawaii OON Medical/Surgical	n/a	n/a	n/a
Behavioral Health OON Compared to Medical/Surgical OON			
Hawaii	n/a	n/a	n/a
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)	-	-	-
Hawaii OON Behavioral Health	n/a	96.2	n/a
Hawaii OON Medical/Surgical	n/a	9.8	n/a
Behavioral Health OON Compared to Medical/Surgical OON	1,7,21		.,
Hawaii	n/a	9.8×	n/a
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Hawaii OON All Behavioral Health Clinicians	11.5	6.2	15.7
Hawaii OON All Medical/Surgical Clinicians	4.4	2.5	5.2
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Hawaii	2.6×	2.5×	3.0×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Hawaii OON Psychiatrists	9.0	7.8	10.4
Hawaii OON Medical/Surgical Specialist Physicians	4.1	2.0	2.2
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Hawaii	2.2×	4.0×	4.8×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Hawaii OON Psychologists	0.3	1.5	14.0
Hawaii OON Medical/Surgical Specialist Physicians	4.1	2.0	2.2
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Hawaii	0.1×	0.8×*	6.4×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Hawaii OON Psychiatric Nurses	n/a	n/a	n/a
Hawaii OON Nurse Practitioners	n/a	n/a	n/a
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Hawaii	n/a	n/a	n/a
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Hawaii OON Therapists	30.3	9.7	21.9
Hawaii OON Physician Assistants	4.1	2.1	0.3
Therapists OON Compared to Physician Assistants OON			
Hawaii	7.4×	4.7×	64.3×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{*}}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Hawaii All Medical/Surgical Clinicians	132.0	147.8	127.3
Hawaii All Behavioral Health Clinicians	105.0	99.2	96.6
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Hawaii	25.7	49.1	31.7
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Hawaii Medical/Surgical Specialist Physicians	132.3	148.1	129.8
Hawaii Psychiatrists	107.7	102.3	97.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Hawaii	22.8	44.8	32.9
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Hawaii Medical/Surgical Specialist Physicians	132.3	148.1	129.8
Hawaii Psychologists	102.0	98.2	93.1
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Hawaii	29.7	50.8	39.4
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Hawaii Nurse Practitioners	92.2	n/a	100.4
Hawaii Psychiatric Nurses	163.6	n/a	81.3
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Hawaii	-43.6	n/a	23.4
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Hawaii Physician Assistants	106.8	118.4	117.9
Hawaii Therapists	102.8	96.5	100.7
Physician Assistants Reimbursement Levels Compared to Therapists			
Hawaii	3.9	22.7	17.1
All States	40.6	34.5	29.6

n/a = Data not available.

Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians 127.3 98.1 142.3 348.0 148		Percentile, %			
Hawaii All Medical/Surgical Clinicians		Average		75th	95th
Hawaii All Behavioral Health Clinicians 96.6 81.1 96.2 166.0					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Hawaii 31.7 20.9 47.9 109.7 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Hawaii Psychiatrists Hawaii Psychiatrists Hawaii Psychiatrists 97.7 89.1 106.4 166.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Hawaii 32.9 19.9 44.0 89.0 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Hawaii Psychologists Hawaii Psychologists 93.1 87.8 87.8 185.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Hawaii Psychologists 93.1 87.8 87.8 185.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Hawaii Psychologists 93.1 87.8 87.8 185.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Hawaii Nurse Practitioners 100.4 79.1 116.2 159.0 Hawaii Psychiatric Nurses Hawaii Psychiatric Nurses Hawaii Psychiatric Nurses All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Hawaii Therapists	Hawaii All Medical/Surgical Clinicians	127.3	98.1	142.3	348.0
Compared to All Behavioral Health Clinicians	Hawaii All Behavioral Health Clinicians	96.6	81.1	96.2	166.0
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists Hawaii Medical/Surgical Specialist Physicians 129.8 106.8 153.3 313.7 Hawaii Psychiatrists 97.7 89.1 106.4 166.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 89.0 44.0 89.0 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 87.8 49.5 Hawaii Medical/Surgical Specialist Physicians Physicians Reimbursement Levels Compared to Psychologists 129.8 106.8 153.3 313.7 Hawaii Psychologists 93.1 87.8 87.8 185.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 87.8 17.3 44.0 38.5 Hawaii 39.4 21.6 74.5 109.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.3 69.4 69.4 89.7 Hawaii Psychiatric Nurses 81.3 69.4 69.4 <	Hawaii	31.7	20.9	47.9	109.7
Hawaii Medical/Surgical Specialist Physicians 129.8 106.8 153.3 313.7 Hawaii Psychiatrists 97.7 89.1 106.4 166.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 32.9 19.9 44.0 89.0 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 49.5 Hawaii Medical/Surgical Specialist Physicians Versus Psychologists 93.1 87.8 87.8 185.9 Medical/Surgical Specialist Physicians 129.8 106.8 153.3 313.7 Hawaii Psychologists 93.1 87.8 87.8 185.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 39.4 21.6 74.5 109.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 41.3 69.4 69.4 89.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 81.3 69.4 69.4 89.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 41.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels 17.1 17.7 18.4 34.3 Physician Assistants 17.1 17.7 18.8 98.5	All States	21.7	26.6	48.0	70.4
Hawaii Psychiatrists 97.7 89.1 106.4 166.0					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Hawaii 32.9 19.9 44.0 89.0 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Psychologists 129.8 106.8 153.3 313.7 Hawaii Psychologists 93.1 87.8 87.8 185.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 4 21.6 74.5 109.7 All States 39.4 21.6 74.5 109.7 All States 100.4 79.1 116.2 159.0 Hawaii Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 41.1 18.4 39.7 Hawaii 23.4 14.0 67.3 77.	Hawaii Medical/Surgical Specialist Physicians	129.8	106.8	153.3	313.7
Reimbursement Levels Compared to Psychiatrists	Hawaii Psychiatrists	97.7	89.1	106.4	166.0
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 129.8 106.8 153.3 313.7 Hawaii Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 93.1 87.8 87.8 185.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 39.4 21.6 74.5 109.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.3 69.4 69.4 89.7 Hawaii Psychiatric Nurses 81.3 69.4 69.4 89.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.4 14.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 117.9 87.4 125.0 218.8 Hawaii Physician Assistants Reimbursement Levels Compared to Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 17.1 27.7 58.8 98.5					
Medical/Surgical Specialist Physicians Versus Psychologists Hawaii Medical/Surgical Specialist Physicians 129.8 106.8 153.3 313.7 Hawaii Psychologists 93.1 87.8 87.8 185.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 39.4 21.6 74.5 109.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.3 69.4 69.4 89.7 Hawaii Psychiatric Nurses 81.3 69.4 69.4 89.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 81.3 69.4 69.4 89.7 Hawaii 23.4 14.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 17.1 27.7 </td <td>Hawaii</td> <td>32.9</td> <td>19.9</td> <td>44.0</td> <td>89.0</td>	Hawaii	32.9	19.9	44.0	89.0
Hawaii Medical/Surgical Specialist Physicians 129.8 106.8 153.3 313.7 Hawaii Psychologists 93.1 87.8 87.8 185.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Hawaii 39.4 21.6 74.5 109.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Hawaii Nurse Practitioners 100.4 79.1 116.2 159.0 Hawaii Psychiatric Nurses 81.3 69.4 69.4 89.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Hawaii 23.4 14.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Hawaii Therapists 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists Hawaii Therapists 17.1 27.7 58.8 98.5	All States	24.9	12.8	27.8	49.5
Hawaii Psychologists 93.1 87.8 87.8 185.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 39.4 21.6 74.5 109.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 100.4 79.1 116.2 159.0 Hawaii Psychiatric Nurses 81.3 69.4 69.4 89.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 81.3 69.4 69.4 89.7 Hawaii 23.4 14.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 17.1 27.7 58.8 98.5 Hawaii 17.1 27.7 58.8 98.5					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Hawaii 39.4 21.6 74.5 109.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Hawaii Nurse Practitioners 100.4 79.1 116.2 159.0 Hawaii Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Hawaii 23.4 14.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Hawaii Therapists 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists Hawaii 17.1 27.7 58.8 98.5	Hawaii Medical/Surgical Specialist Physicians	129.8	106.8	153.3	313.7
Reimbursement Levels Compared to Psychologists 39.4 21.6 74.5 109.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Hawaii Nurse Practitioners 100.4 79.1 116.2 159.0 Hawaii Psychiatric Nurses 81.3 69.4 69.4 89.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Hawaii 23.4 14.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Hawaii Physician Assistants 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists Compared to Therapists 17.1 27.7 58.8 98.5		93.1	87.8	87.8	185.9
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Hawaii Nurse Practitioners 100.4 79.1 116.2 159.0 Hawaii Psychiatric Nurses 81.3 69.4 69.4 89.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.4 14.0 67.3 77.2 Hawaii 23.4 14.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Hawaii Physician Assistants 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 17.1 27.7 58.8 98.5					
Nurse Practitioners Versus Psychiatric Nurses Hawaii Nurse Practitioners 100.4 79.1 116.2 159.0 Hawaii Psychiatric Nurses 81.3 69.4 69.4 89.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.4 14.0 67.3 77.2 Hawaii 23.4 14.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 17.1 27.7 58.8 98.5	Hawaii	39.4	21.6	74.5	109.7
Hawaii Nurse Practitioners 100.4 79.1 116.2 159.0 Hawaii Psychiatric Nurses 81.3 69.4 69.4 89.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.4 14.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 17.1 27.7 58.8 98.5	All States	28.8	17.3	44.0	38.5
Hawaii Psychiatric Nurses 81.3 69.4 69.4 89.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.4 14.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Hawaii Physician Assistants 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 17.1 27.7 58.8 98.5	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Hawaii 23.4 14.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Hawaii Physician Assistants 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 17.1 27.7 58.8 98.5	Hawaii Nurse Practitioners	100.4	79.1	116.2	159.0
Compared to Psychiatric Nurses Hawaii 23.4 14.0 67.3 77.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Hawaii Physician Assistants 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 17.1 27.7 58.8 98.5	Hawaii Psychiatric Nurses	81.3	69.4	69.4	89.7
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Hawaii Physician Assistants 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 17.1 27.7 58.8 98.5					
Physician Assistants Versus TherapistsHawaii Physician Assistants117.987.4125.0218.8Hawaii Therapists100.768.578.7110.2Physician Assistants Reimbursement Levels Compared to Therapists17.127.758.898.5	Hawaii	23.4	14.0	67.3	77.2
Hawaii Physician Assistants 117.9 87.4 125.0 218.8 Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists 17.1 27.7 58.8 98.5	All States	7.5	-1.1	18.4	34.3
Hawaii Therapists 100.7 68.5 78.7 110.2 Physician Assistants Reimbursement Levels Compared to Therapists Hawaii 17.1 27.7 58.8 98.5	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists Hawaii 17.1 27.7 58.8 98.5	Hawaii Physician Assistants	117.9	87.4	125.0	218.8
Compared to Therapists Hawaii 17.1 27.7 58.8 98.5	Hawaii Therapists	100.7	68.5	78.7	110.2
All States 29.6 33.8 59.3 101.6	Hawaii	17.1	27.7	58.8	98.5
	All States	29.6	33.8	59.3	101.6

Appendix C-12: Idaho Disparity Analysis, All Plans

Sample size in 2021: 231 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Idaho OON Behavioral Health	10.8	5.7	n/a
Idaho OON Medical/Surgical	1.0	0.7	n/a
Behavioral Health OON Compared to Medical/Surgical OON			
Idaho	11.3×	7.6×	n/a
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Idaho OON Behavioral Health	54.5	55.9	27.9
Idaho OON Medical/Surgical	1.9	0.2	1.3
Behavioral Health OON Compared to Medical/Surgical OON			
Idaho	28.1×	366.1×	21.0×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Idaho OON Behavioral Health	41.0	12.8	n/a
Idaho OON Medical/Surgical	8.3	5.4	n/a
Behavioral Health OON Compared to Medical/Surgical OON			
Idaho	4.9×	2.4×	n/a
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Idaho OON All Behavioral Health Clinicians	12.4	7.3	8.0
Idaho OON All Medical/Surgical Clinicians	2.8	2.2	1.1
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Idaho	4.4×	3.3×	0.1×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Idaho OON Psychiatrists	7.7	9.6	n/a
Idaho OON Medical/Surgical Specialist Physicians	8.0	8.0	n/a
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
ldaho	9.2×	12.3×	n/a
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Idaho OON Psychologists	14.1	12.6	n/a
Idaho OON Medical/Surgical Specialist Physicians	0.8	0.8	n/a
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
ldaho	16.9×	16.1×	n/a
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Idaho OON Psychiatric Nurses	2.2	13.5	n/a
Idaho OON Nurse Practitioners	1.2	1.7	n/a
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
ldaho	1.8×*	8.2×	n/a
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Idaho OON Therapists	13.1	6.1	n/a
Idaho OON Physician Assistants	0.8	0.5	n/a
Therapists OON Compared to Physician Assistants OON			
ldaho	16.9×	13.3×	n/a
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{*}}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Idaho All Medical/Surgical Clinicians	159.6	162.3	125.1
Idaho All Behavioral Health Clinicians	102.2	105.0	105.9
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Idaho	56.2	54.6	18.1
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Idaho Medical/Surgical Specialist Physicians	162.6	163.7	130.7
Idaho Psychiatrists	129.4	141.4	154.6
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Idaho	25.6	15.8	-15.4*
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Idaho Medical/Surgical Specialist Physicians	162.6	163.7	130.7
Idaho Psychologists	110.4	106.9	66.6
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Idaho	47.3	53.1	96.4
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Idaho Nurse Practitioners	171.5	173.8	n/a
Idaho Psychiatric Nurses	146.5	155.3	n/a
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Idaho	17.1	11.9	n/a
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Idaho Physician Assistants	177.6	181.7	153.0
Idaho Therapists	93.5	99.4	105.2
Physician Assistants Reimbursement Levels Compared to Therapists			
Idaho	90.0	82.9	45.4
All States	40.6	34.5	29.6

^{*} Reimbursement levels are not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test.

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Idaho All Medical/Surgical Clinicians	125.1	115.7	130.3	201.2
Idaho All Behavioral Health Clinicians	105.9	68.4	103.0	104.3
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Idaho	18.1	69.2	26.5	92.9
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Idaho Medical/Surgical Specialist Physicians	130.7	130.9	158.1	248.7
Idaho Psychiatrists	154.6	123.8	208.3	208.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Idaho	-15.4*	5.7	-24.1	19.4
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Idaho Medical/Surgical Specialist Physicians	130.7	130.9	158.1	248.7
Idaho Psychologists	66.6	66.6	66.6	66.6
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Idaho	96.4	96.6	137.5	92.9
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Idaho Nurse Practitioners	n/a	n/a	n/a	n/a
Idaho Psychiatric Nurses	n/a	n/a	n/a	n/a
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Idaho	n/a	n/a	n/a	n/a
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Idaho Physician Assistants	153.0	123.5	178.5	189.7
Idaho Therapists	105.2	68.4	103.0	104.3
Physician Assistants Reimbursement Levels Compared to Therapists				
Idaho	45.4	80.6	73.3	81.8
All States	29.6	33.8	59.3	101.6

^{*} Reimbursement levels are not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test.

Appendix C-13: Illinois Disparity Analysis, All Plans

Sample size in 2021: 349,077 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Illinois OON Behavioral Health	5.4	6.7	6.2
Illinois OON Medical/Surgical	0.7	2.1	1.4
Behavioral Health OON Compared to Medical/Surgical OON			
Illinois	7.7×	3.3×	4.5×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Illinois OON Behavioral Health	15.9	30.1	47.7
Illinois OON Medical/Surgical	0.8	1.4	2.4
Behavioral Health OON Compared to Medical/Surgical OON			
Illinois	19.5×	20.8×	20.0×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Illinois OON Behavioral Health	14.2	8.2	7.0
Illinois OON Medical/Surgical	3.0	1.8	2.4
Behavioral Health OON Compared to Medical/Surgical OON			
Illinois	4.7×	4.6×	2.9×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Illinois OON All Behavioral Health Clinicians	7.2	5.4	4.4
Illinois OON All Medical/Surgical Clinicians	2.6	2.7	2.3
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Illinois	2.8×	2.0×	1.9×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Illinois OON Psychiatrists	7.5	6.2	6.0
Illinois OON Medical/Surgical Specialist Physicians	1.5	1.8	1.4
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Illinois	5.0×	3.4×	4.3×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Illinois OON Psychologists	6.8	6.8	5.9
Illinois OON Medical/Surgical Specialist Physicians	1.5	1.8	1.4
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Illinois	4.5×	3.8×	4.2×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Illinois OON Psychiatric Nurses	2.9	3.4	0.9
Illinois OON Nurse Practitioners	1.1	1.1	1.0
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Illinois	2.5×	3.1×	1.0×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Illinois OON Therapists	7.4	4.6	3.5
Illinois OON Physician Assistants	0.9	0.8	0.5
Therapists OON Compared to Physician Assistants OON			
Illinois	7.9×	5.6×	6.5×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians Illinois All Medical/Surgical Clinicians Illinois All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Illinois All States All States 33.3 25.7 Medical/Surgical Specialist Physicians Versus Psychiatrists Illinois Psychiatrists Illinois Psychiatrists Illinois Psychiatrists Illinois All States All States All States All States Illinois All States All State			Percent, %	
Illinois All Medical/Surgical Clinicians		2019	2020	2021
Illinois All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Illinois All States 33.3 25.7 Medical/Surgical Specialist Physicians Versus Psychiatrists Illinois Medical/Surgical Specialist Physicians Psychiatrists Illinois Psychiatrists Illinois Psychiatrists Illinois All States All States All States All States Illinois Psychiatrists Illinois Psychiatrists Illinois All States All States All States Illinois Psychologists Illinois Psychologists Illinois Psychologists Illinois Psychologists Illinois Psychologists Illinois Psychologists Illinois All States All States All States All States Illinois All States All States Illinois All States Illinois Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois Psychiatric Nurses Illinois Psychiatric Nurses Illinois All States	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Illinois	Illinois All Medical/Surgical Clinicians	123.4	126.5	132.0
Behavioral Health Clinicians Illinois 23.4 20.2 All States 33.3 25.7 Medical/Surgical Specialist Physicians Versus Psychiatrists Illinois Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Illinois All States 40.8 30.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Illinois 32.1 28.9 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists Illinois Medical/Surgical Specialist Physicians Versus Psychologists Illinois Psychologists 103.0 103.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Illinois 22.3 24.6 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Illinois Nurse Practitioners Illinois Nurse Practitioners Illinois Psychiatric Nurses 91.5 98.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 22.2 21.8 All States 28.3 12.8 Physician Assistants Versus Therapists Illinois Physician Assistants Illinois Physician Assistants Illinois Physician Assistants Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1	Illinois All Behavioral Health Clinicians	100.0	105.2	109.0
All States 33.3 25.7				
Medical/Surgical Specialist Physicians Versus Psychiatrists Illinois Medical/Surgical Specialist Physicians 125.9 128.9 Illinois Psychiatrists 95.3 100.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 32.1 28.9 Illinois 32.1 28.9 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists 125.9 128.9 Illinois Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 103.0 103.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 22.3 24.6 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses 117.3 119.9 Illinois Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 91.5 98.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.2 21.8 All States 28.2 21.8 Physician Assistants Versus Therapists 119.1 120.7 Illinois Therapists 100.1 107.7 Phys	Illinois	23.4	20.2	21.0
Illinois Medical/Surgical Specialist Physicians 125.9 128.9 Illinois Psychiatrists 95.3 100.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 32.1 28.9 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists 125.9 128.9 Illinois Medical/Surgical Specialist Physicians 125.9 128.9 Illinois Psychologists 103.0 103.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 1103.0 103.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 42.0 33.9 Murse Practitioners Versus Psychiatric Nurses 117.3 119.9 Illinois Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 91.5 98.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 28.2 21.8 All States 28.3 12.8 Physician Assistants Versus Therapists 119.1 120.7 Illinois Therapists 119.1 120.7 Physician Assistants Reimbursement Levels Compared to Therapists 119.0 12.1 111.0 110.0 11.0	All States	33.3	25.7	21.7
Illinois Psychiatrists 95.3 100.0	Medical/Surgical Specialist Physicians Versus Psychiatrists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Illinois	Illinois Medical/Surgical Specialist Physicians	125.9	128.9	134.9
Illinois 32.1 28.9 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists Illinois Medical/Surgical Specialist Physicians 125.9 128.9 Illinois Psychologists 103.0 103.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Illinois 22.3 24.6 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Illinois Nurse Practitioners 117.3 119.9 Illinois Psychiatric Nurses 91.5 98.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 28.2 21.8 All States 28.3 12.8 Physician Assistants Versus Therapists Illinois Therapists 119.1 120.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1 Illinois 19.0 12.1	Illinois Psychiatrists	95.3	100.0	107.5
All States				
Medical/Surgical Specialist Physicians Versus PsychologistsIllinois Medical/Surgical Specialist Physicians125.9128.9Illinois Psychologists103.0103.4Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists22.324.6Illinois22.324.6All States42.033.9Nurse Practitioners Versus Psychiatric Nurses117.3119.9Illinois Nurse Practitioners117.3119.9Illinois Psychiatric Nurses91.598.4Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses28.221.8Illinois28.221.8All States28.312.8Physician Assistants Versus Therapists119.1120.7Illinois Therapists100.1107.7Physician Assistants Reimbursement Levels Compared to Therapists119.012.1Illinois19.012.1	Illinois	32.1	28.9	25.6
Illinois Medical/Surgical Specialist Physicians Illinois Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Illinois Illinois Illinois 22.3 24.6 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Illinois Nurse Practitioners 117.3 119.9 Illinois Psychiatric Nurses 91.5 98.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 28.2 21.8 All States 28.3 12.8 Physician Assistants Versus Therapists Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1	All States	40.8	30.1	24.9
Illinois Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Illinois All States Practitioners Versus Psychiatric Nurses Illinois All States Physician Assistants Versus Therapists Illinois Therapists Illinois Therapists Illinois 103.0 103.4 103.0 103.4 103.0 103.4 14.6 12.3 24.6 42.0 33.9 119.9 119.9 119.9 119.9 12.1	Medical/Surgical Specialist Physicians Versus Psychologists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Illinois 22.3 24.6 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Illinois Nurse Practitioners 117.3 119.9 Illinois Psychiatric Nurses 91.5 98.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 28.2 21.8 All States 28.3 12.8 Physician Assistants Versus Therapists Illinois Physician Assistants 119.1 120.7 Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1	Illinois Medical/Surgical Specialist Physicians	125.9	128.9	134.9
to Psychologists Illinois 22.3 24.6 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Illinois Nurse Practitioners 117.3 119.9 Illinois Psychiatric Nurses 91.5 98.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 28.2 21.8 All States 28.3 12.8 Physician Assistants Versus Therapists Illinois Physician Assistants 119.1 120.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1	Illinois Psychologists	103.0	103.4	106.6
All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Illinois Nurse Practitioners 117.3 119.9 Illinois Psychiatric Nurses 91.5 98.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 28.2 21.8 All States 28.3 12.8 Physician Assistants Versus Therapists Illinois Physician Assistants 119.1 120.7 Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1				
Nurse Practitioners Versus Psychiatric Nurses Illinois Nurse Practitioners 117.3 119.9 Illinois Psychiatric Nurses 91.5 98.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 28.2 21.8 All States 28.3 12.8 Physician Assistants Versus Therapists Illinois Physician Assistants 119.1 120.7 Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1	Illinois	22.3	24.6	26.6
Illinois Nurse Practitioners Illinois Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 28.2 21.8 All States 28.3 12.8 Physician Assistants Versus Therapists Illinois Physician Assistants 119.1 120.7 Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1	All States	42.0	33.9	28.8
Illinois Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois All States Physician Assistants Versus Therapists Illinois Physician Assistants 119.1 120.7 Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1	Nurse Practitioners Versus Psychiatric Nurses			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 28.2 21.8 All States 28.3 12.8 Physician Assistants Versus Therapists Illinois Physician Assistants 119.1 120.7 Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1	Illinois Nurse Practitioners	117.3	119.9	125.6
Nurses Illinois 28.2 21.8 All States 28.3 12.8 Physician Assistants Versus Therapists Illinois Physician Assistants 119.1 120.7 Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1	Illinois Psychiatric Nurses	91.5	98.4	104.2
All States 28.3 12.8 Physician Assistants Versus Therapists Illinois Physician Assistants 119.1 120.7 Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1				
Physician Assistants Versus TherapistsIllinois Physician Assistants119.1120.7Illinois Therapists100.1107.7Physician Assistants Reimbursement Levels Compared to TherapistsIllinois19.012.1	Illinois	28.2	21.8	20.6
Illinois Physician Assistants 119.1 120.7 Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1	All States	28.3	12.8	7.5
Illinois Therapists 100.1 107.7 Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1	Physician Assistants Versus Therapists			
Physician Assistants Reimbursement Levels Compared to Therapists Illinois 19.0 12.1	Illinois Physician Assistants	119.1	120.7	127.0
Illinois 19.0 12.1	Illinois Therapists	100.1	107.7	110.5
	Physician Assistants Reimbursement Levels Compared to Therapists			
All States 40.6 34.5	Illinois	19.0	12.1	14.9
	All States	40.6	34.5	29.6

Average		Percentile, %			
Health Clinicians		Average		75th	95th
Illinois All Behavioral Health Clinicians 109.0 84.5 98.9 130.0					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Illinois	Illinois All Medical/Surgical Clinicians	132.0	108.7	151.4	285.5
Compared to All Behavioral Health Clinicians	Illinois All Behavioral Health Clinicians	109.0	84.5	98.9	130.0
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists Illinois Medical/Surgical Specialist Physicians 134.9 129.2 168.4 304.5 Illinois Psychiatrists 107.5 100.7 121.6 169.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 25.6 28.2 38.4 80.1 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 106.6 97.1 104.7 154.3 Illinois Psychologists 106.6 97.1 104.7 154.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 106.6 97.1 104.7 154.3 Illinois 26.6 33.1 60.8 119.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 104.2 89.1 97.8 139.8 Illinois 20.6	Illinois	21.0	28.7	53.0	119.6
Psychiatrists Illinois Medical/Surgical Specialist Physicians 134.9 129.2 168.4 304.5 Illinois Psychiatrists 107.5 100.7 121.6 169.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 25.6 28.2 38.4 80.1 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Illinois Medical/Surgical Specialist Physicians 134.9 129.2 168.4 304.5 Illinois Psychologists 106.6 97.1 104.7 154.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Illinois 26.6 33.1 60.8 119.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 20.6 6.3 30.6 55.4 Illinois 20.6 6.3 20.6 6.3 20.6	All States	21.7	26.6	48.0	70.4
Illinois Psychiatrists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Illinois 25.6 28.2 38.4 80.1 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Illinois Medical/Surgical Specialist Physicians 134.9 129.2 168.4 304.5 Illinois Psychologists 106.6 97.1 104.7 154.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 26.6 33.1 60.8 119.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 125.6 94.7 127.7 217.3 Illinois Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 104.2 89.1 97.8 139.8 Illinois 20.6 6.3 30.6 55.4	Illinois Medical/Surgical Specialist Physicians	134.9	129.2	168.4	304.5
Reimbursement Levels Compared to Psychiatrists 25.6 28.2 38.4 80.1 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Illinois Medical/Surgical Specialist Physicians 134.9 129.2 168.4 304.5 Illinois Psychologists 106.6 97.1 104.7 154.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Illinois 26.6 33.1 60.8 119.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Illinois Nurse Practitioners 125.6 94.7 127.7 217.3 Illinois Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 20.6 6.3 30.6 55.4 Illinois 20.6 6.3 30.6 55.4	Illinois Psychiatrists	107.5	100.7	121.6	169.1
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Psychologists 134.9 129.2 168.4 304.5 Illinois Psychologists 106.6 97.1 104.7 154.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 26.6 33.1 60.8 119.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 125.6 94.7 127.7 217.3 Illinois Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.6 6.3 30.6 55.4					
Medical/Surgical Specialist Physicians Versus Psychologists Illinois Medical/Surgical Specialist Physicians 134.9 129.2 168.4 304.5 Illinois Psychologists 106.6 97.1 104.7 154.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 106.6 33.1 60.8 119.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 125.6 94.7 127.7 217.3 Illinois Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.6 6.3 30.6 55.4	Illinois	25.6	28.2	38.4	80.1
Illinois Medical/Surgical Specialist Physicians 134.9 129.2 168.4 304.5 Illinois Psychologists 106.6 97.1 104.7 154.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Illinois 26.6 33.1 60.8 119.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Illinois Nurse Practitioners 125.6 94.7 127.7 217.3 Illinois Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 20.6 6.3 30.6 55.4	All States	24.9	12.8	27.8	49.5
Illinois Psychologists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Illinois 26.6 33.1 60.8 119.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 125.6 94.7 127.7 217.3 Illinois Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.6 6.3 30.6 55.4	Illinois Medical/Surgical Specialist Physicians	134.9	129.2	168.4	304.5
Reimbursement Levels Compared to Psychologists 26.6 33.1 60.8 119.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Illinois Nurse Practitioners 125.6 94.7 127.7 217.3 Illinois Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.6 6.3 30.6 55.4	Illinois Psychologists	106.6	97.1	104.7	154.3
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 125.6 94.7 127.7 217.3 Illinois Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.6 6.3 30.6 55.4					
Nurse Practitioners Versus Psychiatric Nurses Illinois Nurse Practitioners 125.6 94.7 127.7 217.3 Illinois Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 20.6 6.3 30.6 55.4	Illinois	26.6	33.1	60.8	119.6
Illinois Nurse Practitioners 125.6 94.7 127.7 217.3 Illinois Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.6 6.3 30.6 55.4	All States	28.8	17.3	44.0	38.5
Illinois Psychiatric Nurses 104.2 89.1 97.8 139.8 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Illinois 20.6 6.3 30.6 55.4	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses ### 100	Illinois Nurse Practitioners	125.6	94.7	127.7	217.3
Compared to Psychiatric Nurses 20.6 6.3 30.6 55.4	Illinois Psychiatric Nurses	104.2	89.1	97.8	139.8
75 44 040	Illinois	20.6	6.3	30.6	55.4
All States 7.5 -1.1 18.4 34.3	All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists	Physician Assistants Versus Therapists				
Illinois Physician Assistants 127.0 97.8 120.7 225.1	Illinois Physician Assistants	127.0	97.8	120.7	225.1
Illinois Therapists 110.5 79.9 90.5 103.8	Illinois Therapists	110.5	79.9	90.5	103.8
Physician Assistants Reimbursement Levels Compared to Therapists					
Illinois 14.9 22.4 33.4 116.9	Illinois	14.9	22.4	33.4	116.9
All States 29.6 33.8 59.3 101.6	All States	29.6	33.8	59.3	101.6

Appendix C-14: Indiana Disparity Analysis, All Plans

Sample size in 2021: 231,243 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Indiana OON Behavioral Health	8.6	10.2	12.6
Indiana OON Medical/Surgical	0.6	0.9	0.9
Behavioral Health OON Compared to Medical/Surgical OON			
Indiana	13.8×	10.8×	14.8×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Indiana OON Behavioral Health	52.1	48.6	13.3
Indiana OON Medical/Surgical	7.9	1.3	19.5
Behavioral Health OON Compared to Medical/Surgical OON			
Indiana	6.6×	36.0×	0.7×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Indiana OON Behavioral Health	38.7	21.7	10.4
Indiana OON Medical/Surgical	3.8	3.0	1.3
Behavioral Health OON Compared to Medical/Surgical OON			
Indiana	10.3×	7.2×	8.0×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Indiana OON All Behavioral Health Clinicians	6.8	4.7	4.5
Indiana OON All Medical/Surgical Clinicians	1.6	1.6	1.3
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Indiana	4.3×	3.0×	3.6×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Indiana OON Psychiatrists	11.9	10.0	9.7
Indiana OON Medical/Surgical Specialist Physicians	1.2	0.9	0.8
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Indiana	10.3×	10.9×	11.6×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Indiana OON Psychologists	6.7	5.1	5.9
Indiana OON Medical/Surgical Specialist Physicians	1.2	0.9	0.8
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Indiana	5.8×	5.5×	7.1×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Indiana OON Psychiatric Nurses	3.2	0.2	3.4
Indiana OON Nurse Practitioners	0.9	0.7	0.7
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Indiana	3.7×	0.3×	4.5×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Indiana OON Therapists	5.6	3.6	3.2
Indiana OON Physician Assistants	0.9	1.3	0.5
Therapist OON Compared to Physician Assistants OON			
Indiana	6.4×	2.7×	6.1×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Indiana All Medical/Surgical Clinicians	107.6	107.7	109.6
Indiana All Behavioral Health Clinicians	90.4	92.5	97.2
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Indiana	19.0	16.5	12.7
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Indiana Medical/Surgical Specialist Physicians	112.0	112.9	115.2
Indiana Psychiatrists	85.2	85.3	92.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Indiana	31.4	32.5	24.5
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Indiana Medical/Surgical Specialist Physicians	112.0	112.9	115.2
Indiana Psychologists	91.4	93.3	97.1
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Indiana	22.5	21.0	18.7
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Indiana Nurse Practitioners	95.8	96.0	97.7
Indiana Psychiatric Nurses	109.6	102.5	89.8
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Indiana	-12.6	-6.3	8.7
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Indiana Physician Assistants	101.0	101.0	103.2
Indiana Therapists	91.0	93.6	98.1
Physician Assistants Reimbursement Levels Compared to Therapists			
Indiana	11.0	8.0	5.3
All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians 109.6 94.2 125.2 231.0 Indiana All Medical/Surgical Clinicians 87.2 76.8 88.5 118.1 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 12.7 22.7 41.4 95.6 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists 115.2 107.6 140.7 259.4 Indiana Medical/Surgical Specialist Physicians 115.2 107.6 140.7 259.4 Indiana Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 92.5 88.6 110.6 140.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 115.2 107.6 140.7 259.4 Indiana Psychologists 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 115.2 107.6 140.7 259.4 Indiana Medical/Surgical Specialist Physicians Versus Psychologists 115.2 107.6 140.7 259.4 Indiana Medical/Surgical Specialist Physicians 115.2 107.6 140.7 259.4 Indiana Medical/Surgical Specialist Physicians 115.2 107.6 140.7 259.4 Indiana Psychologists 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians 18.7 21.3 41.1 95.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 18.7 21.3 41.1 95.6 Indiana Nurse Practitioners 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 18.7 9.5 1.3 25.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 98.1 71.0 79.5 99.0 Physician Assistants Versus Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 98.1 71.0 79.5 99.0 Indiana Physician Assistants Reimbursement Levels Compared to Therapists 98.1 71.0 79.5 99.0 Indiana Physician Assistants Reimbursement Lev		Percentile, %				
Indiana All Medical/Surgical Clinicians 109.6 94.2 125.2 231.0 Indiana All Behavioral Health Clinicians 97.2 76.8 88.5 118.1 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Indiana 12.7 22.7 41.4 95.6 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists 92.5 88.6 110.6 140.7 259.4 Indiana Medical/Surgical Specialist Physicians 92.5 88.6 110.6 140.9 Medical/Surgical Specialist Physicians 24.5 21.4 27.3 84.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus 89.8 73.1 99.7 172.0 Medical/Surgical Specialist Physicians 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians 18.7 21.3 41.1 95.6 All States 28.8 17.3 44.0 38.5 Medical/Surgical Specialist Physicians 18.7 21.3 41.1 95.6 All States 28.8 17.3 44.0 38.5 Medical/Surgical Specialist Physicians 89.8 73.1 94.0 128.2 Indiana Nurse Practitioners Versus Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 89.8 73.1 94.0 128.2 Indiana Physician Assistants Versus Therapists 99.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 98.1 71.0 79.5 99.0 Physician Assistants R		Average		75th	95th	
Indiana All Behavioral Health Clinicians 97.2 76.8 88.5 118.1						
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Indiana 12.7 22.7 41.4 95.6 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Indiana Medical/Surgical Specialist Physicians 115.2 107.6 140.7 259.4 Indiana Psychiatrists 92.5 88.6 110.6 140.9 Medical/Surgical Specialist Physicians Proposition 12.8 24.5 21.4 27.3 84.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Psychiatrists Indiana 24.5 21.4 27.3 84.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Indiana Medical/Surgical Specialist Physicians 115.2 107.6 140.7 259.4 Indiana Psychologists 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians Psychologists Indiana Psychologists 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Indiana Nurse Practitioners 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Indiana Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Indiana 8.7 9.5 1.3 25.3 All States 7.5 1.1 18.4 34.3 Physician Assistants Versus Therapists Indiana Physician Assistants 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists Indiana 5.3 19.9 27.4 65.6	Indiana All Medical/Surgical Clinicians	109.6	94.2	125.2	231.0	
Compared to Ail Behavioral Health Clinicians 12.7 22.7 41.4 95.6 Ail States 21.7 26.6 48.0 70.4	Indiana All Behavioral Health Clinicians	97.2	76.8	88.5	118.1	
All States						
Medical/Surgical Specialist Physicians Versus Psychiatrists Indiana Medical/Surgical Specialist Physicians 115.2 107.6 140.7 259.4 Indiana Psychiatrists 92.5 88.6 110.6 140.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 24.5 21.4 27.3 84.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 88.7 99.7 172.0 Indiana Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 18.7 21.3 41.1 95.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 89.8 73.1 94.0 128.2 Indiana Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 89.8 73.1 94.0 128.2 Indiana Psychiatric Nurses 89.8 73.1 94.0 128.2	Indiana	12.7	22.7	41.4	95.6	
Indiana Medical/Surgical Specialist Physicians 115.2 107.6 140.7 259.4 Indiana Psychiatrists 92.5 88.6 110.6 140.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Indiana 24.5 21.4 27.3 84.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Indiana Medical/Surgical Specialist Physicians Versus Psychologists Indiana Psychologists 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians 115.2 107.6 140.7 259.4 Indiana Psychologists 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Indiana 18.7 21.3 41.1 95.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Indiana Nurse Practitioners 97.7 80.1 95.2 160.6 Indiana Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels 28.8 7.5 1.1 18.4 34.3 Physician Assistants Versus Therapists Indiana Physician Assistants 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels 28.8 27.8 27.4 65.6 Indiana Reimbursement Reimbursement Levels 28.8 28.8 27.8 27.8 Indiana Physician Assistants Reimbursement Levels 28.8	All States	21.7	26.6	48.0	70.4	
Indiana Psychiatrists 92.5 88.6 110.6 140.9						
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Indiana 24.5 21.4 27.3 84.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Psychologists 115.2 107.6 140.7 259.4 Indiana Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 18.7 21.3 41.1 95.6 Indiana 18.7 21.3 41.1 95.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 97.7 80.1 95.2 160.6 Indiana Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.7 9.5 1.3 25.3 All States 7.5 -1.1 18.4 34.3 Phys	Indiana Medical/Surgical Specialist Physicians	115.2	107.6	140.7	259.4	
Reimbursement Levels Compared to Psychiatrists Indiana	Indiana Psychiatrists	92.5	88.6	110.6	140.9	
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians 115.2 107.6 140.7 259.4 Indiana Medical/Surgical Specialist Physicians 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians 88.7 99.7 172.0 Medical/Surgical Specialist Physicians 172.0 Medical/Surgical Specialist Physicians 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians 172.0 172.0 172.0 Medical/Surgical Specialist Physicians 182.0 <td colspa<="" td=""><td></td><td></td><td></td><td></td><td></td></td>	<td></td> <td></td> <td></td> <td></td> <td></td>					
Medical/Surgical Specialist Physicians Versus Psychologists 115.2 107.6 140.7 259.4 Indiana Medical/Surgical Specialist Physicians 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 41.1 95.6 Indiana 18.7 21.3 41.1 95.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 97.7 80.1 95.2 160.6 Indiana Nurse Practitioners Reimbursement Levels 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 89.8 73.1 94.0 128.2 Indiana 8.7 9.5 1.3 25.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement	Indiana	24.5	21.4	27.3	84.2	
Indiana Medical/Surgical Specialist Physicians 115.2 107.6 140.7 259.4 Indiana Psychologists 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Indiana 18.7 21.3 41.1 95.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Indiana Nurse Practitioners 97.7 80.1 95.2 160.6 Indiana Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.7 9.5 1.3 25.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 10.3 19.9 27.4 65.6 Indiana 5.3 19.9 27.4 65.6	All States	24.9	12.8	27.8	49.5	
Indiana Psychologists 97.1 88.7 99.7 172.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 18.7 21.3 41.1 95.6 Indiana 18.7 21.3 44.1 95.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 97.7 80.1 95.2 160.6 Indiana Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 89.8 73.1 94.0 128.2 Indiana 8.7 9.5 1.3 25.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 8.7 9.5 1.3 25.3 Indiana Physician Assistants 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 19.9 27.4 65.6 Indiana 5.3 19.9 27.4 65.6 <td></td> <td></td> <td></td> <td></td> <td></td>						
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Indiana 18.7 21.3 41.1 95.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 89.8 17.3 95.2 160.6 Indiana Nurse Practitioners 97.7 80.1 95.2 160.6 Indiana Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.7 9.5 1.3 25.3 Indiana 8.7 9.5 1.3 25.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 5.3 19.9 27.4 65.6	Indiana Medical/Surgical Specialist Physicians	115.2	107.6	140.7	259.4	
Reimbursement Levels Compared to Psychologists Indiana	Indiana Psychologists	97.1	88.7	99.7	172.0	
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 97.7 80.1 95.2 160.6 Indiana Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.7 9.5 1.3 25.3 Indiana 8.7 9.5 1.3 25.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 5.3 19.9 27.4 65.6 Indiana 5.3 19.9 27.4 65.6						
Nurse Practitioners Versus Psychiatric Nurses 97.7 80.1 95.2 160.6 Indiana Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Compared to Psychiatric Nurses 8.7 9.5 1.3 25.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 5.3 19.9 27.4 65.6	Indiana	18.7	21.3	41.1	95.6	
Indiana Nurse Practitioners 97.7 80.1 95.2 160.6 Indiana Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.7 9.5 1.3 25.3 Indiana 8.7 9.5 1.3 25.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 5.3 19.9 27.4 65.6	All States	28.8	17.3	44.0	38.5	
Indiana Psychiatric Nurses 89.8 73.1 94.0 128.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.7 9.5 1.3 25.3 Indiana 8.7 9.5 1.3 25.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 5.3 19.9 27.4 65.6	Nurse Practitioners Versus Psychiatric Nurses					
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Indiana 8.7 9.5 1.3 25.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 5.3 19.9 27.4 65.6	Indiana Nurse Practitioners	97.7	80.1	95.2	160.6	
Compared to Psychiatric Nurses Indiana 8.7 9.5 1.3 25.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Indiana Physician Assistants 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 5.3 19.9 27.4 65.6	Indiana Psychiatric Nurses	89.8	73.1	94.0	128.2	
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Indiana Physician Assistants 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 5.3 19.9 27.4 65.6						
Physician Assistants Versus TherapistsIndiana Physician Assistants103.285.1101.3164.0Indiana Therapists98.171.079.599.0Physician Assistants Reimbursement Levels Compared to Therapists5.319.927.465.6	Indiana	8.7	9.5	1.3	25.3	
Indiana Physician Assistants 103.2 85.1 101.3 164.0 Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists 5.3 19.9 27.4 65.6	All States	7.5	-1.1	18.4	34.3	
Indiana Therapists 98.1 71.0 79.5 99.0 Physician Assistants Reimbursement Levels Compared to Therapists Indiana 5.3 19.9 27.4 65.6	Physician Assistants Versus Therapists					
Physician Assistants Reimbursement Levels Compared to Therapists Indiana 5.3 19.9 27.4 65.6	Indiana Physician Assistants	103.2	85.1	101.3	164.0	
Compared to Therapists Indiana 5.3 19.9 27.4 65.6	·	98.1	71.0	79.5	99.0	
All States 29.6 33.8 59.3 101.6	Indiana	5.3	19.9	27.4	65.6	
	All States	29.6	33.8	59.3	101.6	

Appendix C-15: Iowa Disparity Analysis, All Plans

Sample size in 2021: 120,790 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Iowa OON Behavioral Health	3.7	22.3	26.7
Iowa OON Medical/Surgical	1.5	32.8	35.0
Behavioral Health OON Compared to Medical/Surgical OON			
lowa	2.5×	0.7×	0.8×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Iowa OON Behavioral Health	17.2	8.3	35.7
Iowa OON Medical/Surgical	0.7	13.3	1.8
Behavioral Health OON Compared to Medical/Surgical OON			
lowa	26.2×	0.6×	20.3×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Iowa OON Behavioral Health	14.0	14.8	19.6
Iowa OON Medical/Surgical	3.2	36.9	39.0
Behavioral Health OON Compared to Medical/Surgical OON			
lowa	4.4×	0.4×	0.5×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Iowa OON All Behavioral Health Clinicians	7.9	42.2	54.5
Iowa OON All Medical/Surgical Clinicians	2.4	35.1	41.4
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
lowa	3.3×	1.2×	1.3×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Iowa OON Psychiatrists	6.4	39.6	49.8
Iowa OON Medical/Surgical Specialist Physicians	1.8	34.9	34.8
Psychiatrist OON Compared to Medical/Surgical OON			
lowa	3.5×	1.1×	1.4×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Iowa OON Psychologists	4.4	38.9	65.5
Iowa OON Medical/Surgical Specialist Physicians	1.8	34.9	34.8
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
lowa	2.4×	1.1×	1.9×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Iowa OON Psychiatric Nurses	5.3	16.2	14.2
Iowa OON Nurse Practitioners	1.8	8.4	10.7
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
lowa	2.9×	1.9×	1.3×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Iowa OON Therapists	9.1	43.5	52.5
Iowa OON Physician Assistants	2.2	14.5	21.5
Therapists OON Compared to Physician Assistants OON			
lowa	4.2×	3.0×	2.4×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians 154.7 157.4 160.9			Percent, %	
Iowa All Medical/Surgical Clinicians 154.7 157.4 160.9 Iowa All Behavioral Health Clinicians 120.1 129.5 136.4 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 28.8 21.5 18.0 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 166.2 170.8 174.9 Iowa Psychiatrists 125.7 130.7 139.9 Iowa Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 125.7 130.7 139.9 Iowa Psychiatrists 125.7 130.7 139.9 Iowa 166.2 170.8 174.9 Iowa Psychologists 160.0 180.0 Iowa I		2019	2020	2021
Iowa All Behavioral Health Clinicians 120.1 129.5 136.4	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 18.0	Iowa All Medical/Surgical Clinicians	154.7	157.4	160.9
Behavioral Health Clinicians 10wa 28.8 21.5 18.0 All States 33.3 25.7 21.7	Iowa All Behavioral Health Clinicians	120.1	129.5	136.4
All States 33.3 25.7 21.7				
Medical/Surgical Specialist Physicians Versus Psychiatrists Iowa Medical/Surgical Specialist Physicians 166.2 170.8 174.9 Iowa Psychiatrists 125.7 130.7 139.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 20.0 25.0 Iowa 32.2 30.7 25.0 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 166.2 170.8 174.9 Iowa Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 115.6 128.2 133.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 43.8 33.2 30.8 Iowa 43.8 33.2 30.8 30.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 149.2 151.1 155.6 Iowa Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Iowa	lowa	28.8	21.5	18.0
Iowa Medical/Surgical Specialist Physicians 166.2 170.8 174.9 Iowa Psychiatrists 125.7 130.7 139.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Iowa 32.2 30.7 25.0 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists Iowa Medical/Surgical Specialist Physicians Versus Psychologists Iowa Psychologists 116.6 128.2 133.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Iowa 43.8 33.2 30.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses Iowa Nurse Practitioners 149.2 151.1 155.6 Iowa Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Iowa 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 156.3 154.6 160.0 Iowa Physician Assistants Reimbursement Levels Compared to Therapists Iowa 19.3 17.3 Iowa 19.5 19.5 Iowa 1	All States	33.3	25.7	21.7
Iowa Psychiatrists	Medical/Surgical Specialist Physicians Versus Psychiatrists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Iowa 32.2 30.7 25.0 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 166.2 170.8 174.9 Iowa Medical/Surgical Specialist Physicians 166.2 170.8 174.9 Iowa Psychologists 115.6 128.2 133.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 43.8 33.2 30.8 Iowa 43.8 33.2 30.8 30.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 149.2 151.1 155.6 Iowa Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 156.3 154.6 160.0 Iowa Physician Assistants Reimbursement	Iowa Medical/Surgical Specialist Physicians	166.2	170.8	174.9
to Psychiatrists Iowa 32.2 30.7 25.0 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 166.2 170.8 174.9 Iowa Psychologists 115.6 128.2 133.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 43.8 33.2 30.8 Iowa 43.8 33.2 30.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 149.2 151.1 155.6 Iowa Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 121.3 130.8 141.6 Iowa 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 156.3 154.6 160.0 Iowa Physician Assistants Reimbursement Levels Compared to Therapists 119.7 129.6 136.4	Iowa Psychiatrists	125.7	130.7	139.9
All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 166.2 170.8 174.9 lowa Psychologists 115.6 128.2 133.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 115.6 128.2 133.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 43.8 33.2 30.8 Iowa 43.8 33.2 30.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 156.3 154.6 160.0 Iowa Physician Assistants Reimbursement Levels Compared to Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists 100.0 100.0 100.0 100.0 100.0 1	Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Medical/Surgical Specialist Physicians Versus Psychologists Iowa Medical/Surgical Specialist Physicians 166.2 170.8 174.9 Iowa Psychologists 115.6 128.2 133.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 43.8 33.2 30.8 Iowa 43.8 33.2 30.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 149.2 151.1 155.6 Iowa Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 156.3 154.6 160.0 Iowa Physician Assistants Reimbursement Levels Compared to Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists 100.0 19.3 17.3	lowa	32.2	30.7	25.0
Iowa Medical/Surgical Specialist Physicians 166.2 170.8 174.9 Iowa Psychologists 115.6 128.2 133.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 33.2 30.8 Iowa 43.8 33.2 30.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 149.2 151.1 155.6 Iowa Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 156.3 154.6 160.0 Iowa Physician Assistants 156.3 154.6 160.0 Iowa Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists Iowa 30.6 19.3 17.3	All States	40.8	30.1	24.9
Iowa Psychologists 115.6 128.2 133.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 33.2 30.8 Iowa 43.8 33.2 30.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 149.2 151.1 155.6 Iowa Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 154.6 160.0 Iowa Physician Assistants 156.3 154.6 160.0 Iowa Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists 30.6 19.3 17.3	Medical/Surgical Specialist Physicians Versus Psychologists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Iowa	Iowa Medical/Surgical Specialist Physicians	166.2	170.8	174.9
to Psychologists Iowa 43.8 33.2 30.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 149.2 151.1 155.6 Iowa Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 156.3 154.6 160.0 Iowa Physician Assistants 156.3 154.6 160.0 Physician Assistants Reimbursement Levels Compared to Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists 30.6 19.3 17.3	lowa Psychologists	115.6	128.2	133.7
All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 149.2 151.1 155.6 Iowa Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 156.3 154.6 160.0 Iowa Physician Assistants 156.3 154.6 160.0 Iowa Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists 30.6 19.3 17.3				
Nurse Practitioners Versus Psychiatric Nurses Iowa Nurse Practitioners 149.2 151.1 155.6 Iowa Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Iowa Physician Assistants 156.3 154.6 160.0 Iowa Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists 30.6 19.3 17.3	lowa	43.8	33.2	30.8
Iowa Nurse Practitioners 149.2 151.1 155.6 Iowa Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Iowa Physician Assistants 156.3 154.6 160.0 Iowa Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists Iowa 30.6 19.3 17.3	All States	42.0	33.9	28.8
Iowa Psychiatric Nurses 121.3 130.8 141.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Iowa Physician Assistants 156.3 154.6 160.0 Iowa Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists Iowa 30.6 19.3 17.3	Nurse Practitioners Versus Psychiatric Nurses			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Iowa 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 156.3 154.6 160.0 Iowa Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists 10wa 30.6 19.3 17.3 Iowa Therapists 17.3 17.3 Iowa Therapists 17.3 17.3 Iowa Therapists 17.3 17.3 Iowa Therapists 19.3 Iowa Therapis	Iowa Nurse Practitioners	149.2	151.1	155.6
Nurses 23.0 15.5 9.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Iowa Physician Assistants 156.3 154.6 160.0 Iowa Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists 30.6 19.3 17.3	Iowa Psychiatric Nurses	121.3	130.8	141.6
All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Iowa Physician Assistants 156.3 154.6 160.0 Iowa Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists Iowa 30.6 19.3 17.3				
Physician Assistants Versus TherapistsIowa Physician Assistants156.3154.6160.0Iowa Therapists119.7129.6136.4Physician Assistants Reimbursement Levels Compared to TherapistsIowa30.619.317.3	lowa	23.0	15.5	9.9
Iowa Physician Assistants156.3154.6160.0Iowa Therapists119.7129.6136.4Physician Assistants Reimbursement Levels Compared to TherapistsIowa30.619.317.3	All States	28.3	12.8	7.5
lowa Therapists 119.7 129.6 136.4 Physician Assistants Reimbursement Levels Compared to Therapists lowa 30.6 19.3 17.3	Physician Assistants Versus Therapists			
Physician Assistants Reimbursement Levels Compared to Therapists Iowa 30.6 19.3 17.3	Iowa Physician Assistants	156.3	154.6	160.0
lowa 30.6 19.3 17.3	Iowa Therapists	119.7	129.6	136.4
	Physician Assistants Reimbursement Levels Compared to Therapists			
All States 40.6 34.5 29.6	lowa	30.6	19.3	17.3
	All States	40.6	34.5	29.6

Autorage		Percentile, %			
Iowa All Medical/Surgical Clinicians 160.9 135.6 176.2 275.3 Iowa All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Iowa 18.0 28.4 48.8 51.2 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Iowa Psychiatrists 139.9 176.3 223.8 375.3 Iowa Psychiatrists 139.9 138.4 163.9 200.4 Medical/Surgical Specialist Physicians 174.9 176.3 223.8 375.3 Iowa Psychiatrists 139.9 138.4 163.9 200.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Iowa Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Iowa 25.0 27.4 36.6 87.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Iowa Medical/Surgical Specialist Physicians 174.9 176.3 223.8 375.3 Iowa Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians 174.9 176.3 223.8 375.3 Iowa Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Iowa Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians 174.9 176.3 223.8 375.3 Iowa Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians 174.9 176.3 223.8 375.3 Iowa Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians 174.9 176.3 223.8 375.3 Iowa Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians 184.9 176.3 223.8 375.3 Iowa Psychologists 184.0 184.0 184.0 184.0 I		Average		75th	95th
Iowa All Behavioral Health Clinicians 136.4 105.6 118.4 182.1					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 18.0 28.4 48.8 51.2 All States 21.7 26.6 48.0 70.4	Iowa All Medical/Surgical Clinicians	160.9	135.6	176.2	275.3
Compared to Ail Behavioral Health Clinicians 18.0 28.4 48.8 51.2	Iowa All Behavioral Health Clinicians	136.4	105.6	118.4	182.1
All States					
Medical/Surgical Specialist Physicians 174.9 176.3 223.8 375.3 Iowa Medical/Surgical Specialist Physicians 139.9 138.4 163.9 200.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Iowa 25.0 27.4 36.6 87.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians 174.9 176.3 223.8 375.3 Iowa Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians 174.9 176.3 223.8 375.3 Iowa Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians 174.9 176.3 223.8 375.3 Iowa Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians 28.8 17.3 44.0 38.5 Iowa 30.8 57.9 78.4 51.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 155.6 120.7 151.5 235.3 Iowa Psychiatric Nurses 141.6 109.2 163.0 224.0 Nurse Practitioners Reimbursement Levels 28.8 17.3 17.1 18.4 34.3 Physician Assistants Versus Therapists 160.0 123.8 160.3 225.3 Iowa Physician Assistants 160.0 123.8 160.3 225.3 Iowa Physician Assistants Reimbursement Levels 28.8 17.3 17.3 50.9 88.8 Iowa 17.3 17.3 50.9 88.8	lowa	18.0	28.4	48.8	51.2
Down Medical/Surgical Specialist Physicians 174.9 176.3 223.8 375.3 Iowa Psychiatrists 139.9 138.4 163.9 200.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Iowa 25.0 27.4 36.6 87.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Iowa Medical/Surgical Specialist Physicians Versus Psychologists Iowa Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Iowa 30.8 57.9 78.4 51.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Iowa Nurse Practitioners 155.6 120.7 151.5 235.3 Iowa Psychiatric Nurses 141.6 109.2 163.0 224.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Iowa 9.9 10.5 -7.1 5.1 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Iowa Physician Assistants Reimbursement Levels Compared to Psychiatric Reimbursement Levels Compared to Psychiatris Reimbursement Levels Compared to Therapists Iowa Physician Assistants Reimbursement Levels Compared to Therapists Iowa Proposition Assistants Reimbursement Levels Compared to Therapists Iowa Physician Assistants Reimbursement Levels Iowa Physician Assistants Physician Physician Assistants Iowa	All States	21.7	26.6	48.0	70.4
Iowa Psychiatrists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists	Iowa Medical/Surgical Specialist Physicians	174.9	176.3	223.8	375.3
Reimbursement Levels Compared to Psychiatrists 10wa 25.0 27.4 36.6 87.3 All States 24.9 12.8 27.8 49.5	Iowa Psychiatrists	139.9	138.4	163.9	200.4
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 174.9 176.3 223.8 375.3 Iowa Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 30.8 57.9 78.4 51.2 Iowa 30.8 57.9 78.4 51.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 155.6 120.7 151.5 235.3 Iowa Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 141.6 109.2 163.0 224.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 9.9 10.5 -7.1 5.1 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 160.0 123.8 160.3 225.3 Iowa Physician Assistants Reimbursement Levels Compared to Therapists 136.4 105.5 106.2 119.3 Physician Ass					
Medical/Surgical Specialist Physicians Versus Psychologists lowa Medical/Surgical Specialist Physicians 174.9 176.3 223.8 375.3 lowa Psychologists 133.7 111.6 125.5 344.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 30.8 57.9 78.4 51.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 155.6 120.7 151.5 235.3 lowa Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 141.6 109.2 163.0 224.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 9.9 10.5 -7.1 5.1 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 160.0 123.8 160.3 225.3 lowa Physician Assistants Reimbursement Levels Compared to Therapists 136.4 105.5 106.2 119.3 Physician Assistants Reimbursement Levels Compared to Therapists 17.3 17.3 50.9<	lowa	25.0	27.4	36.6	87.3
Down 174.9 176.3 223.8 375.3	All States	24.9	12.8	27.8	49.5
Iowa Psychologists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Iowa 30.8 57.9 78.4 51.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 155.6 120.7 151.5 235.3 Iowa Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 141.6 109.2 163.0 224.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 7.5 -7.1 5.1 Iowa 9.9 10.5 -7.1 5.1 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 160.0 123.8 160.3 225.3 Iowa Therapists 136.4 105.5 106.2 119.3 Physician Assistants Reimbursement Levels Compared to Therapists 17.3 17.3 50.9 88.8	Iowa Medical/Surgical Specialist Physicians	174.9	176.3	223.8	375.3
Reimbursement Levels Compared to Psychologists 10wa 30.8 57.9 78.4 51.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Iowa Nurse Practitioners 155.6 120.7 151.5 235.3 Iowa Psychiatric Nurses 141.6 109.2 163.0 224.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Iowa 9.9 10.5 -7.1 5.1 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Iowa Physician Assistants 160.0 123.8 160.3 225.3 Iowa Therapists 136.4 105.5 106.2 119.3 Physician Assistants Reimbursement Levels Compared to Therapists Iowa 17.3 17.3 50.9 88.8	Iowa Psychologists	133.7	111.6	125.5	344.1
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Iowa Nurse Practitioners 155.6 120.7 151.5 235.3 Iowa Psychiatric Nurses 141.6 109.2 163.0 224.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 25.1 25.1 25.1 Iowa 9.9 10.5 -7.1 5.1 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Iowa Physician Assistants 160.0 123.8 160.3 225.3 Iowa Therapists 136.4 105.5 106.2 119.3 Physician Assistants Reimbursement Levels Compared to Therapists 17.3 17.3 50.9 88.8					
Nurse Practitioners Versus Psychiatric Nurses Iowa Nurse Practitioners 155.6 120.7 151.5 235.3 Iowa Psychiatric Nurses 141.6 109.2 163.0 224.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 29.9 10.5 -7.1 5.1 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 160.0 123.8 160.3 225.3 Iowa Physician Assistants Reimbursement Levels Compared to Therapists 136.4 105.5 106.2 119.3 Iowa 17.3 17.3 50.9 88.8	lowa	30.8	57.9	78.4	51.2
Iowa Nurse Practitioners 155.6 120.7 151.5 235.3 Iowa Psychiatric Nurses 141.6 109.2 163.0 224.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 200.0 100.0	All States	28.8	17.3	44.0	38.5
Iowa Psychiatric Nurses 141.6 109.2 163.0 224.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 9.9 10.5 -7.1 5.1 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 160.0 123.8 160.3 225.3 Iowa Physician Assistants 136.4 105.5 106.2 119.3 Physician Assistants Reimbursement Levels Compared to Therapists 17.3 17.3 50.9 88.8	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Iowa 9.9 10.5 -7.1 5.1 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 160.0 123.8 160.3 225.3 Iowa Physician Assistants 136.4 105.5 106.2 119.3 Physician Assistants Reimbursement Levels Compared to Therapists 17.3 17.3 50.9 88.8	Iowa Nurse Practitioners	155.6	120.7	151.5	235.3
Compared to Psychiatric Nurses lowa 9.9 10.5 -7.1 5.1 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists lowa Physician Assistants 160.0 123.8 160.3 225.3 lowa Therapists 136.4 105.5 106.2 119.3 Physician Assistants Reimbursement Levels Compared to Therapists 17.3 17.3 50.9 88.8	Iowa Psychiatric Nurses	141.6	109.2	163.0	224.0
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Iowa Physician Assistants 160.0 123.8 160.3 225.3 Iowa Therapists 136.4 105.5 106.2 119.3 Physician Assistants Reimbursement Levels Compared to Therapists 17.3 17.3 50.9 88.8					
Physician Assistants Versus TherapistsIowa Physician Assistants160.0123.8160.3225.3Iowa Therapists136.4105.5106.2119.3Physician Assistants Reimbursement Levels Compared to TherapistsIowa17.317.350.988.8	lowa	9.9	10.5	-7.1	5.1
Iowa Physician Assistants 160.0 123.8 160.3 225.3 Iowa Therapists 136.4 105.5 106.2 119.3 Physician Assistants Reimbursement Levels Compared to Therapists 17.3 17.3 50.9 88.8	All States	7.5	-1.1	18.4	34.3
lowa Therapists 136.4 105.5 106.2 119.3 Physician Assistants Reimbursement Levels Compared to Therapists lowa 17.3 17.3 50.9 88.8	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists Iowa 17.3 17.3 50.9 88.8	Iowa Physician Assistants	160.0	123.8	160.3	225.3
Compared to Therapists 17.3 17.3 50.9 88.8	·	136.4	105.5	106.2	119.3
All States 29.6 33.8 59.3 101.6	lowa	17.3	17.3	50.9	88.8
	All States	29.6	33.8	59.3	101.6

Appendix C-16: Kansas Disparity Analysis, All Plans

Sample size in 2021: 128,361 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Kansas OON Behavioral Health	8.3	10.4	7.8
Kansas OON Medical/Surgical	1.0	1.3	0.8
Behavioral Health OON Compared to Medical/Surgical OON			
Kansas	8.1×	8.0×	9.4×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Kansas OON Behavioral Health	46.4	49.1	25.5
Kansas OON Medical/Surgical	2.4	2.4	2.2
Behavioral Health OON Compared to Medical/Surgical OON			
Kansas	19.7×	20.8×	11.6×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Kansas OON Behavioral Health	30.3	30.6	19.1
Kansas OON Medical/Surgical	3.3	3.8	4.7
Behavioral Health OON Compared to Medical/Surgical OON			
Kansas	9.3×	8.1×	4.0×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Kansas OON All Behavioral Health Clinicians	11.9	9.6	8.4
Kansas OON All Medical/Surgical Clinicians	3.0	3.1	2.6
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Kansas	4.0×	3.1×	3.3×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Kansas OON Psychiatrists	6.0	4.7	4.2
Kansas OON Medical/Surgical Specialist Physicians	2.1	2.1	1.6
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Kansas	2.8×	2.3×	2.6×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Kansas OON Psychologists	11.2	9.1	7.6
Kansas OON Medical/Surgical Specialist Physicians	2.1	2.1	1.6
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Kansas	5.3×	4.4×	4.7×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Kansas OON Psychiatric Nurses	6.2	3.6	4.0
Kansas OON Nurse Practitioners	3.2	2.7	2.5
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Kansas	2.0×	1.3×*	1.6×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Kansas OON Therapists	14.4	11.3	9.9
Kansas OON Physician Assistants	2.2	2.1	2.3
Therapists OON Compared to Physician Assistant OON			
Kansas	6.5×	5.4×	4.3×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Kansas All Medical/Surgical Clinicians	113.4	117.8	118.1
Kansas All Behavioral Health Clinicians	89.0	98.5	106.2
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Kansas	27.4	19.6	11.2
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Kansas Medical/Surgical Specialist Physicians	117.7	122.3	123.0
Kansas Psychiatrists	85.3	94.0	101.0
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Kansas	37.9	30.2	21.8
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Kansas Medical/Surgical Specialist Physicians	117.7	122.3	123.0
Kansas Psychologists	83.8	92.0	98.4
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Kansas	40.5	32.9	25.0
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Kansas Nurse Practitioners	102.3	108.9	110.2
Kansas Psychiatric Nurses	83.8	95.8	105.8
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Kansas	22.1	13.6	4.2
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Kansas Physician Assistants	112.0	117.2	116.9
Kansas Therapists	93.3	103.0	110.7
Physician Assistants Reimbursement Levels Compared to Therapists			
Kansas	20.1	13.8	5.5

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians		Percentile, %			
Health Clinicians		Average		75th	95th
Kansas All Behavioral Health Clinicians 106.2 91.0 102.5 127.2					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Kansas All States All States All States All States Cansas Medical/Surgical Specialist Physicians Versus Psychiatrists Kansas Medical/Surgical Specialist Physicians Kansas Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Kansas All States All States All States Cansas All States All State	Kansas All Medical/Surgical Clinicians	118.1	104.0	137.1	231.3
Compared to All Behavioral Health Clinicians Kansas 11.2 14.2 33.7 81.9 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Kansas Medical/Surgical Specialist Physicians 123.0 116.3 155.9 277.7 Kansas Psychiatrists 101.0 99.4 113.7 141.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Kansas 21.8 17.0 37.2 96.7 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Kansas Medical/Surgical Specialist Physicians Versus Psychologists Kansas Psychologists 98.4 97.6 112.2 144.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Kansas 25.0 19.2 38.9 81.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Kansas Nurse Practitioners 110.2 91.8 121.5 182.8 Kansas Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Kansas 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9	Kansas All Behavioral Health Clinicians	106.2	91.0	102.5	127.2
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Kansas Medical/Surgical Specialist Physicians 123.0 116.3 155.9 277.7 Kansas Psychiatrists 101.0 99.4 113.7 141.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Kansas 21.8 17.0 37.2 96.7 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Kansas Medical/Surgical Specialist Physicians Versus Psychologists Kansas Medical/Surgical Specialist Physicians 98.4 97.6 112.2 144.0 Medical/Surgical Specialist Physicians Psychologists 98.4 97.6 112.2 144.0 Medical/Surgical Specialist Physicians Psychologists Kansas Psychologists 98.4 97.6 112.2 144.0 Medical/Surgical Specialist Physicians Psychologists Physicians Psychologists 98.4 97.6 112.2 144.0 Medical/Surgical Specialist Physicians Psychologists Physicians Psychiatric Nurses Practitioners Versus Psychiatric Nurses Practitioners Psychiatric Nurses Practitioners Pseimbursement Levels Compared to Psychiatric Nurses Practitioners Reimbursement Levels Compared to Psychiatric Nurses Propertioners Pseimbursement Levels Physician Psychiatric Nurses Physician Assistants Versus Therapists Physician Assistants Versus Therapists Physician Psychologists Physician					
Medical/Surgical Specialist Physicians Versus Psychiatrists Kansas Medical/Surgical Specialist Physicians 123.0 116.3 155.9 277.7 Kansas Psychiatrists 101.0 99.4 113.7 141.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 21.8 17.0 37.2 96.7 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 24.9 12.8 27.8 49.5 Kansas Medical/Surgical Specialist Physicians Versus Psychologists 123.0 116.3 155.9 277.7 Kansas Psychologists 98.4 97.6 112.2 144.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 25.0 19.2 38.9 81.9 All States 25.0 19.2 38.9 81.9 All States 25.0 19.2 38.9 81.9 Nurse Practitioners Versus Psychiatric Nurses 110.2 91.8 121.5 182.8 Kansas Phychiatric Nurses 105.8 95.	Kansas	11.2	14.2	33.7	81.9
Name	All States	21.7	26.6	48.0	70.4
Kansas Psychiatrists 101.0 99.4 113.7 141.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 21.8 17.0 37.2 96.7 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus Psychologists 22.0 116.3 155.9 277.7 Kansas Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 98.4 97.6 112.2 144.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 25.0 19.2 38.9 81.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 110.2 91.8 121.5 182.8 Kansas Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Th					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Kansas 21.8 17.0 37.2 96.7 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Wedical/Surgical Specialist Physicians Versus Psychologists Kansas Psychologists 98.4 97.6 112.2 144.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 25.0 19.2 38.9 81.9 Kansas 25.0 19.2 38.9 81.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 110.2 91.8 121.5 182.8 Kansas Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 116.9 93.2 117.1 195.5 Kansas Therapists 110.7	Kansas Medical/Surgical Specialist Physicians	123.0	116.3	155.9	277.7
Reimbursement Levels Compared to Psychiatrists Xansas 21.8 17.0 37.2 96.7	Kansas Psychiatrists	101.0	99.4	113.7	141.1
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 123.0 116.3 155.9 277.7 Kansas Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 98.4 97.6 112.2 144.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 25.0 19.2 38.9 81.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 102.2 91.8 121.5 182.8 Kansas Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 4.2 -4.3 13.1 54.2 Kansas 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9					
Medical/Surgical Specialist Physicians Versus Psychologists Kansas Medical/Surgical Specialist Physicians 123.0 116.3 155.9 277.7 Kansas Psychologists 98.4 97.6 112.2 144.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 81.9 112.2 38.9 81.9 Kansas 25.0 19.2 38.9 81.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 110.2 91.8 121.5 182.8 Kansas Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 4.2 -4.3 13.1 54.2 Kansas 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9	Kansas	21.8	17.0	37.2	96.7
Psychologists Kansas Medical/Surgical Specialist Physicians 123.0 116.3 155.9 277.7 Kansas Psychologists 98.4 97.6 112.2 144.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 25.0 19.2 38.9 81.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 110.2 91.8 121.5 182.8 Kansas Nurse Practitioners 110.2 91.8 121.5 182.8 Kansas Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 4.2 -4.3 13.1 54.2 Kansas 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9	All States	24.9	12.8	27.8	49.5
Kansas Psychologists 98.4 97.6 112.2 144.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 25.0 19.2 38.9 81.9 Kansas 25.0 19.2 38.9 81.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Kansas Nurse Practitioners 110.2 91.8 121.5 182.8 Kansas Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 4.2 -4.3 13.1 54.2 Kansas 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Kansas Physician Assistants 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Kansas 25.0 19.2 38.9 81.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 8.5 10.2 91.8 121.5 182.8 Kansas Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 6.2 4.2 -4.3 13.1 54.2 Kansas 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9	Kansas Medical/Surgical Specialist Physicians	123.0	116.3	155.9	277.7
Reimbursement Levels Compared to Psychologists Kansas 25.0 19.2 38.9 81.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Kansas Nurse Practitioners 110.2 91.8 121.5 182.8 Kansas Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 4.2 -4.3 13.1 54.2 Kansas 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9	Kansas Psychologists	98.4	97.6	112.2	144.0
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 110.2 91.8 121.5 182.8 Kansas Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Compared to Psychiatric Nurses 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9					
Nurse Practitioners Versus Psychiatric Nurses Kansas Nurse Practitioners 110.2 91.8 121.5 182.8 Kansas Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 2 4.2 -4.3 13.1 54.2 Kansas 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9	Kansas	25.0	19.2	38.9	81.9
Kansas Nurse Practitioners 110.2 91.8 121.5 182.8 Kansas Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 4.2 -4.3 13.1 54.2 Kansas 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9	All States	28.8	17.3	44.0	38.5
Kansas Psychiatric Nurses 105.8 95.9 107.5 118.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 4.2 -4.3 13.1 54.2 Kansas 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Kansas Physician Assistants 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Kansas 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Kansas Physician Assistants 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9	Kansas Nurse Practitioners	110.2	91.8	121.5	182.8
Compared to Psychiatric Nurses Kansas 4.2 -4.3 13.1 54.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Kansas Physician Assistants 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9	Kansas Psychiatric Nurses	105.8	95.9	107.5	118.6
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Kansas Physician Assistants 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9					
Physician Assistants Versus TherapistsKansas Physician Assistants116.993.2117.1195.5Kansas Therapists110.780.9100.5111.9	Kansas	4.2	-4.3	13.1	54.2
Kansas Physician Assistants 116.9 93.2 117.1 195.5 Kansas Therapists 110.7 80.9 100.5 111.9	All States	7.5	-1.1	18.4	34.3
Kansas Therapists 110.7 80.9 100.5 111.9	Physician Assistants Versus Therapists				
	Kansas Physician Assistants	116.9	93.2	117.1	195.5
	Kansas Therapists	110.7	80.9	100.5	111.9
Physician Assistants Reimbursement Levels Compared to Therapists					
Kansas 5.5 15.3 16.5 74.8	Kansas	5.5	15.3	16.5	74.8
All States 29.6 33.8 59.3 101.6	All States	29.6	33.8	59.3	101.6

Appendix C-17: Kentucky Disparity Analysis, All Plans

Sample size in 2021: 185,558 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Kentucky OON Behavioral Health	2.5	4.0	4.0
Kentucky OON Medical/Surgical	0.4	0.6	0.2
Behavioral Health OON Compared to Medical/Surgical OON			
Kentucky	6.7×	7.1×	17.2×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Kentucky OON Behavioral Health	13.0	18.4	15.9
Kentucky OON Medical/Surgical	4.2	0.3	0.2
Behavioral Health OON Compared to Medical/Surgical OON			
Kentucky	3.1×	59.6×	85.6×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Kentucky OON Behavioral Health	10.5	4.0	4.9
Kentucky OON Medical/Surgical	5.3	5.2	2.5
Behavioral Health OON Compared to Medical/Surgical OON			
Kentucky	2.0×	0.8×	2.0×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Kentucky OON All Behavioral Health Clinicians	3.1	2.9	2.7
Kentucky OON All Medical/Surgical Clinicians	0.6	0.7	0.5
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Kentucky	4.8×	4.1×	4.9×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Kentucky OON Psychiatrists	7.6	5.7	6.6
Kentucky OON Medical/Surgical Specialist Physicians	0.4	0.4	0.2
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Kentucky	17.6×	12.8×	30.6×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Kentucky OON Psychologists	2.9	3.9	3.4
Kentucky OON Medical/Surgical Specialist Physicians	0.4	0.4	0.2
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Kentucky	6.7×	8.8×	15.7×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Kentucky OON Psychiatric Nurses	1.6	2.3	0.4
Kentucky OON Nurse Practitioners	0.5	0.6	0.4
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Kentucky	3.2×	4.0×	1.0×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Kentucky OON Therapists	2.3	2.2	1.9
Kentucky OON Physician Assistants	0.3	0.2	0.2
Therapists OON Compared to Physician Assistants OON			
Kentucky	6.9×	9.6×	11.5×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Kentucky All Medical/Surgical Clinicians	105.0	105.7	110.7
Kentucky All Behavioral Health Clinicians	79.1	80.2	85.1
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Kentucky	32.8	31.8	30.1
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Kentucky Medical/Surgical Specialist Physicians	111.3	113.1	118.2
Kentucky Psychiatrists	80.1	83.0	90.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Kentucky	39.0	36.2	30.6
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Kentucky Medical/Surgical Specialist Physicians	111.3	113.1	118.2
Kentucky Psychologists	85.2	86.9	90.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Kentucky	30.6	30.1	30.0
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Kentucky Nurse Practitioners	94.3	94.5	103.7
Kentucky Psychiatric Nurses	71.1	80.8	74.2
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Kentucky	32.7	17.0	39.7
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Kentucky Physician Assistants	97.9	97.6	104.4
Kentucky Therapists	77.2	78.2	82.8
Physician Assistants Reimbursement Levels Compared to Therapists			
Kentucky	26.8	24.8	26.1
All States	40.6	34.5	29.6

Autorage		Percentile, %			
Health Clinicians		Average		75th	95th
Kentucky All Behavioral Health Clinicians 85.1 60.4 76.6 115.5					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Kentucky 30.1 54.5 60.4 101.1 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Kentucky Medical/Surgical Specialist Physicians 118.2 104.5 141.5 307.3 Kentucky Psychiatrists 90.5 82.2 109.0 155.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Kentucky Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Kentucky 30.6 27.2 29.8 97.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Kentucky Medical/Surgical Specialist Physicians Versus Psychologists 90.9 69.6 95.1 353.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Kentucky Psychologists 90.9 69.6 95.1 353.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Kentucky All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Kentucky Nurse Practitioners 103.7 90.3 108.6 172.6 Kentucky Psychiatric Nurses 74.2 63.0 78.6 97.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Kentucky 9 39.7 43.5 38.2 78.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Kentucky Physician Assistants Kentucky Therapists 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists Kentucky Therapists	Kentucky All Medical/Surgical Clinicians	110.7	93.4	122.9	232.3
Compared to All Behavioral Health Clinicians Kentucky 30.1 54.5 60.4 101.1	Kentucky All Behavioral Health Clinicians	85.1	60.4	76.6	115.5
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists Kentucky Medical/Surgical Specialist Physicians 118.2 104.5 141.5 307.3 Kentucky Psychiatrists 90.5 82.2 109.0 155.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 82.2 109.0 155.7 Kentucky 30.6 27.2 29.8 97.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 82.8 141.5 307.3 Kentucky Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 90.9 69.6 95.1 353.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 141.5 307.3 Kentucky Psychologists Psychologists 90.9 69.6 95.1 353.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 17.3 44.0 36.5 Nurse Practitioners Versus Psychiatric Nurses 103.7 90.3 108.6 172.6 Kentucky Psychiatri	Kentucky	30.1	54.5	60.4	101.1
Number Psychiatrists Sentucky Medical/Surgical Specialist Physicians Sentucky Psychiatrists Sentucky Psychiatrists Sentucky Septialist Physicians Sentucky Septialist Physicians Sentucky Septialist Physicians Sentucky Sentucky	All States	21.7	26.6	48.0	70.4
Kentucky Psychiatrists 90.5 82.2 109.0 155.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 30.6 27.2 29.8 97.3 Kentucky 30.6 27.2 29.8 97.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 90.9 69.6 95.1 307.3 Kentucky Psychologists 90.9 69.6 95.1 353.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 8 8 75.1 101.1 48.7 101.1 48.7 101.1 48.7 101.1 48.7 101.1 48.7 101.1 48.8 17.3 44.0 38.5 85.5 Nurse Practitioners Versus Psychiatric Nurses 74.2 63.0 78.6 97.0 97.0 90.3 108.6 172.6 78.0 78.0 78.0					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Kentucky 30.6 27.2 29.8 97.3 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus Psychologists Kentucky Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 118.2 104.5 141.5 307.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 90.9 69.6 95.1 353.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatric Nurses 28.8 17.3 48.7 101.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 74.2 63.0 78.6 97.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 74.2 63.0 78.6 97.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 82.8 56.3 67.4 94.4 <td>Kentucky Medical/Surgical Specialist Physicians</td> <td>118.2</td> <td>104.5</td> <td>141.5</td> <td>307.3</td>	Kentucky Medical/Surgical Specialist Physicians	118.2	104.5	141.5	307.3
Reimbursement Levels Compared to Psychiatrists Scattering	Kentucky Psychiatrists	90.5	82.2	109.0	155.7
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 118.2 104.5 141.5 307.3 Kentucky Psychologists 90.9 69.6 95.1 353.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 30.0 50.1 48.7 101.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Kentucky Nurse Practitioners 103.7 90.3 108.6 172.6 Kentucky Psychiatric Nurses 74.2 63.0 78.6 97.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 39.7 43.5 38.2 78.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Kentucky Physician Assistants 104.4 90.3 103.6 164.4 Kentucky Therapists 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists					
Medical/Surgical Specialist Physicians Versus Psychologists Kentucky Medical/Surgical Specialist Physicians Kentucky Psychologists 90.9 69.6 95.1 353.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 10.0 50.1 48.7 101.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 8 103.7 90.3 108.6 172.6 Kentucky Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 74.2 63.0 78.6 97.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8 75.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists 82.8 56.3 67.4 94.4	Kentucky	30.6	27.2	29.8	97.3
Nurse Practitioners Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nurse Practitioners Reimbursement Levels Nurse Practitioners Reimbursement Levels Nurse Practitioners Nurses Nurse Practitioners Nurses Nurse Practitioners Reimbursement Levels Nurse Practitioners Nurses Nurse Pr	All States	24.9	12.8	27.8	49.5
Kentucky Psychologists 90.9 69.6 95.1 353.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 30.0 50.1 48.7 101.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 8 103.7 90.3 108.6 172.6 Kentucky Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 74.2 63.0 78.6 97.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 75.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 104.4 90.3 103.6 164.4 Kentucky Therapists 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists 26.1 60.4 53.6 74.2					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Kentucky 30.0 50.1 48.7 101.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Kentucky Nurse Practitioners 103.7 90.3 108.6 172.6 Kentucky Psychiatric Nurses 74.2 63.0 78.6 97.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.0 78.6 97.0 Kentucky 39.7 43.5 38.2 78.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists 26.1 60.4 53.6 74.2	Kentucky Medical/Surgical Specialist Physicians	118.2	104.5	141.5	307.3
Reimbursement Levels Compared to Psychologists Kentucky 30.0 50.1 48.7 101.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 103.7 90.3 108.6 172.6 Kentucky Psychiatric Nurses 74.2 63.0 78.6 97.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 74.2 63.0 78.6 97.0 Kentucky 39.7 43.5 38.2 78.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 104.4 90.3 103.6 164.4 Kentucky Physician Assistants 104.4 90.3 103.6 164.4 Physician Assistants Reimbursement Levels Compared to Therapists 82.8 56.3 67.4 94.4 Kentucky 10 60.4 53.6 74.2 60.4 60.4 50.6 74.2	Kentucky Psychologists	90.9	69.6	95.1	353.9
All States 28.8 17.3 44.0 38.5					
Nurse Practitioners Versus Psychiatric Nurses Kentucky Nurse Practitioners 103.7 90.3 108.6 172.6 Kentucky Psychiatric Nurses 74.2 63.0 78.6 97.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.1 80.0 78.0 97.0 Kentucky 39.7 43.5 38.2 78.0 78.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 104.4 90.3 103.6 164.4 Kentucky Physician Assistants 104.4 90.3 103.6 164.4 Physician Assistants Reimbursement Levels 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels 26.1 60.4 53.6 74.2	Kentucky	30.0	50.1	48.7	101.1
Kentucky Nurse Practitioners 103.7 90.3 108.6 172.6 Kentucky Psychiatric Nurses 74.2 63.0 78.6 97.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 39.7 43.5 38.2 78.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 104.4 90.3 103.6 164.4 Kentucky Physician Assistants 104.4 90.3 103.6 164.4 Kentucky Therapists 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists 26.1 60.4 53.6 74.2	All States	28.8	17.3	44.0	38.5
Kentucky Psychiatric Nurses 74.2 63.0 78.6 97.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 39.7 43.5 38.2 78.0 Kentucky 39.7 43.5 38.2 78.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 104.4 90.3 103.6 164.4 Kentucky Physician Assistants 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists 26.1 60.4 53.6 74.2	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 39.7 43.5 38.2 78.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Kentucky Physician Assistants 104.4 90.3 103.6 164.4 Kentucky Therapists 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists 26.1 60.4 53.6 74.2	Kentucky Nurse Practitioners	103.7	90.3	108.6	172.6
Compared to Psychiatric Nurses Kentucky 39.7 43.5 38.2 78.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Kentucky Physician Assistants 104.4 90.3 103.6 164.4 Kentucky Therapists 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists 26.1 60.4 53.6 74.2	Kentucky Psychiatric Nurses	74.2	63.0	78.6	97.0
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Kentucky Physician Assistants 104.4 90.3 103.6 164.4 Kentucky Therapists 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists 26.1 60.4 53.6 74.2					
Physician Assistants Versus TherapistsKentucky Physician Assistants104.490.3103.6164.4Kentucky Therapists82.856.367.494.4Physician Assistants Reimbursement Levels Compared to Therapists26.160.453.674.2	Kentucky	39.7	43.5	38.2	78.0
Kentucky Physician Assistants 104.4 90.3 103.6 164.4 Kentucky Therapists 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists 26.1 60.4 53.6 74.2	All States	7.5	-1.1	18.4	34.3
Kentucky Therapists 82.8 56.3 67.4 94.4 Physician Assistants Reimbursement Levels Compared to Therapists Kentucky 26.1 60.4 53.6 74.2	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists Kentucky 26.1 60.4 53.6 74.2	Kentucky Physician Assistants	104.4	90.3	103.6	164.4
Compared to Therapists Kentucky 26.1 60.4 53.6 74.2	Kentucky Therapists	82.8	56.3	67.4	94.4
All States 29.6 33.8 59.3 101.6	Kentucky	26.1	60.4	53.6	74.2
	All States	29.6	33.8	59.3	101.6

Appendix C-18: Louisiana Disparity Analysis, All Plans

Sample size in 2021: 118,264 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Louisiana OON Behavioral Health	7.9	7.0	4.7
Louisiana OON Medical/Surgical	0.7	0.9	1.0
Behavioral Health OON Compared to Medical/Surgical OON			
Louisiana	11.4×	7.7×	4.8×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Louisiana OON Behavioral Health	24.0	25.5	58.1
Louisiana OON Medical/Surgical	0.3	0.5	2.6
Behavioral Health OON Compared to Medical/Surgical OON			
Louisiana	81.4×	52.8×	22.2×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Louisiana OON Behavioral Health	8.4	2.3	0.7
Louisiana OON Medical/Surgical	5.5	1.8	0.3
Behavioral Health OON Compared to Medical/Surgical OON			
Louisiana	1.5×	1.3×	2.1×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Louisiana OON All Behavioral Health Clinicians	7.7	6.7	6.0
Louisiana OON All Medical/Surgical Clinicians	1.4	1.3	1.2
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Louisiana	5.4×	5.1×	4.8×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Louisiana OON Psychiatrists	12.2	9.3	10.9
Louisiana OON Medical/Surgical Specialist Physicians	0.9	0.9	0.7
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Louisiana	13.2×	10.9×	16.6×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Louisiana OON Psychologists	8.7	6.7	7.3
Louisiana OON Medical/Surgical Specialist Physicians	0.9	0.9	0.7
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Louisiana	9.4×	7.9×	11.1×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Louisiana OON Psychiatric Nurses	4.2	10.0	6.8
Louisiana OON Nurse Practitioners	5.4	2.9	2.3
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Louisiana	0.8×*	3.4×	3.0×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Louisiana OON Therapists	5.8	6.0	4.5
Louisiana OON Physician Assistants	2.2	1.7	1.9
Therapists OON Compared to Physician Assistants OON			
Louisiana	2.6×	3.4×	2.3×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Louisiana All Medical/Surgical Clinicians	110.8	111.1	111.8
Louisiana All Behavioral Health Clinicians	88.6	91.0	93.1
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Louisiana	25.1	22.0	20.2
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Louisiana Medical/Surgical Specialist Physicians	111.5	111.7	112.6
Louisiana Psychiatrists	88.9	89.0	88.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Louisiana	25.5	25.5	26.7
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Louisiana Medical/Surgical Specialist Physicians	111.5	111.7	112.6
Louisiana Psychologists	92.1	99.0	104.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Louisiana	21.1	12.8	8.2
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Louisiana Nurse Practitioners	94.6	95.7	99.8
Louisiana Psychiatric Nurses	77.0	91.5	100.5
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Louisiana	22.8	4.6	-0.8
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Louisiana Physician Assistants	103.1	102.6	109.7
Louisiana Therapists	87.2	88.9	90.9
Physician Assistants Reimbursement Levels Compared to Therapists			
Louisiana	18.3	15.5	20.7
All States	40.6	34.5	29.6

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Louisiana All Medical/Surgical Clinicians	111.8	99.4	130.1	231.1
Louisiana All Behavioral Health Clinicians	93.1	68.1	82.0	124.8
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Louisiana	20.2	46.0	58.7	85.1
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Louisiana Medical/Surgical Specialist Physicians	112.6	105.1	137.3	232.7
Louisiana Psychiatrists	88.9	81.7	98.8	171.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Louisiana	26.7	28.7	38.9	35.3
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Louisiana Medical/Surgical Specialist Physicians	112.6	105.1	137.3	232.7
Louisiana Psychologists	104.2	102.5	104.4	203.1
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Louisiana	8.2	2.6	31.5	85.1
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Louisiana Nurse Practitioners	99.8	80.4	108.7	164.0
Louisiana Psychiatric Nurses	100.5	80.5	94.4	123.7
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Louisiana	-0.8	-0.1	15.1	32.6
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Louisiana Physician Assistants	109.7	87.0	113.3	166.0
Louisiana Therapists	90.9	68.1	68.1	87.1
Physician Assistants Reimbursement Levels Compared to Therapists				
Louisiana	20.7	27.8	66.4	90.7
All States	29.6	33.8	59.3	101.6

Appendix C-19: Maine Disparity Analysis, All Plans

Sample size in 2021: 39,286 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Maine OON Behavioral Health	7.4	5.2	8.7
Maine OON Medical/Surgical	0.2	0.3	0.4
Behavioral Health OON Compared to Medical/Surgical OON			
Maine	35.8×	15.1×	20.3×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Maine OON Behavioral Health	46.7	42.6	23.4
Maine OON Medical/Surgical	15.6	62.5	0.4
Behavioral Health OON Compared to Medical/Surgical OON			
Maine	3.0×	0.7×	52.8×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Maine OON Behavioral Health	16.6	8.7	18.6
Maine OON Medical/Surgical	0.05	0.2	0.6
Behavioral Health OON Compared to Medical/Surgical OON			
Maine	339.2×	38.9×	33.4×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Maine OON All Behavioral Health Clinicians	6.7	6.9	9.2
Maine OON All Medical/Surgical Clinicians	0.9	0.9	0.9
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Maine	7.6×	7.6×	10.7×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Maine OON Psychiatrists	6.6	7.8	5.3
Maine OON Medical/Surgical Specialist Physicians	0.7	0.6	0.6
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Maine	9.5×	14.0×	8.4×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Maine OON Psychologists	10.2	8.3	13.3
Maine OON Medical/Surgical Specialist Physicians	0.7	0.6	0.6
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Maine	14.7×	14.9×	21.0×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Maine OON Psychiatric Nurses	6.3	1.7	9.9
Maine OON Nurse Practitioners	0.7	1.0	1.0
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Maine	9.0×	1.7×*	10.1×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Maine OON Therapists	6.1	6.7	8.9
Maine OON Physician Assistants	0.7	1.3	1.5
Therapists OON Compared to Physician Assistants OON			
Maine	9.0×	5.1×	6.0×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

^{*} Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Maine All Medical/Surgical Clinicians	131.8	139.2	147.6
Maine All Behavioral Health Clinicians	83.4	93.3	99.9
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Maine	58.1	49.2	47.7
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Maine Medical/Surgical Specialist Physicians	136.4	145.8	157.5
Maine Psychiatrists	103.0	112.6	119.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Maine	32.4	29.5	31.5
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Maine Medical/Surgical Specialist Physicians	136.4	145.8	157.5
Maine Psychologists	88.4	96.7	108.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Maine	54.4	50.9	45.4
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Maine Nurse Practitioners	126.1	130.5	138.8
Maine Psychiatric Nurses	106.9	122.9	113.3
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Maine	17.9	6.2	22.5
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Maine Physician Assistants	137.7	165.8	152.0
Maine Therapists	78.2	89.5	95.2
Physician Assistants Reimbursement Levels Compared to Therapists			
Maine	76.2	85.2	59.7
All States	40.6	34.5	29.6

All differences tested in this table were statistically significant. All differences tested in this table were statistically significant.

Autorage		Percentile, %			
Health Clinicians Maine All Medical/Surgical Clinicians 147.6 122.9 167.8 265.5 Maine All Behavioral Health Clinicians 99.9 75.0 89.0 156.7 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 47.7 63.8 88.5 69.5 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists 157.5 159.2 192.9 318.1 Maine Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 119.7 107.1 137.3 244.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 48.6 40.5 30.2 Maline Medical/Surgical Specialist Physicians Versus Psychologists 157.5 159.2 192.9 318.1 Maine Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 108.3 100.1 115.9 226.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 45.4 59.1 66.4 69.5 All States 28.8 <td< th=""><th></th><th>Average</th><th></th><th>75th</th><th>95th</th></td<>		Average		75th	95th
Maine All Behavioral Health Clinicians 99.9 75.0 89.0 156.7 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 47.7 63.8 88.5 69.5 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists 8.85 69.5 Maine Medical/Surgical Specialist Physicians Psychiatrists 157.5 159.2 192.9 318.1 Maine Psychiatrists 119.7 107.1 137.3 244.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 31.5 48.6 40.5 30.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 157.5 159.2 192.9 318.1 Maine Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 108.3 100.1 115.9 226.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatric Nurses 45.4 59.1 66.4 69.5 All States 28.8 17.3					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians	Maine All Medical/Surgical Clinicians	147.6	122.9	167.8	265.5
Maine 47.7 63.8 88.5 69.5 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists 157.5 159.2 192.9 318.1 Maine Psychiatrists 119.7 107.1 137.3 244.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 48.6 40.5 30.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 157.5 159.2 192.9 318.1 Maine Medical/Surgical Specialist Physicians Psychologists 157.5 159.2 192.9 318.1 Maine Psychologists 108.3 100.1 115.9 226.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 45.4 59.1 66.4 69.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses </td <td>Maine All Behavioral Health Clinicians</td> <td>99.9</td> <td>75.0</td> <td>89.0</td> <td>156.7</td>	Maine All Behavioral Health Clinicians	99.9	75.0	89.0	156.7
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists Maine Medical/Surgical Specialist Physicians 157.5 159.2 192.9 318.1 Maine Psychiatrists 119.7 107.1 137.3 244.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 31.5 48.6 40.5 30.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Psychologists 157.5 159.2 192.9 318.1 Maine Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 100.1 115.9 226.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 45.4 59.1 66.4 69.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 138.8 113.7 143.5 196.4 Maine Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 7.5 <td< td=""><td>Maine</td><td>47.7</td><td>63.8</td><td>88.5</td><td>69.5</td></td<>	Maine	47.7	63.8	88.5	69.5
Psychiatrists Maine Medical/Surgical Specialist Physicians 157.5 159.2 192.9 318.1 Maine Psychiatrists 119.7 107.1 137.3 244.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 31.5 48.6 40.5 30.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Psychologists 157.5 159.2 192.9 318.1 Maine Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 108.3 100.1 115.9 226.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 45.4 59.1 66.4 69.5 Maline 45.4 59.1 66.4 69.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 138.8 113.7 143.5 196.4 Maine Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses	All States	21.7	26.6	48.0	70.4
Maine Psychiatrists 119.7 107.1 137.3 244.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 31.5 48.6 40.5 30.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 157.5 159.2 192.9 318.1 Maine Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 108.3 100.1 115.9 226.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 45.4 59.1 66.4 69.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 138.8 113.7 143.5 196.4 Maine Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 152.0 124.2 160.0 276.9 Maine Therapi					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Maine 31.5 48.6 40.5 30.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus Psychologists Maine Medical/Surgical Specialist Physicians 157.5 159.2 192.9 318.1 Maine Psychologists 108.3 100.1 115.9 226.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 45.4 59.1 66.4 69.5 Maine 45.4 59.1 66.4 69.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 138.8 113.7 143.5 196.4 Maine Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists	Maine Medical/Surgical Specialist Physicians	157.5	159.2	192.9	318.1
Reimbursement Levels Compared to Psychiatrists Maine 31.5 48.6 40.5 30.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists	Maine Psychiatrists	119.7	107.1	137.3	244.4
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Maine Psychologists 108.3 100.1 115.9 226.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 100.1 115.9 226.6 Maine 45.4 59.1 66.4 69.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 138.8 113.7 143.5 196.4 Maine Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 33.3 30.4 12.8 Maine 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 152.0 124.2 160.0 276.9 Maine Therapists 95.2 70.9 79.0 127.0 Physician Assistants Reimbursement Levels Compared to Therapists					
Medical/Surgical Specialist Physicians Versus Psychologists Maine Medical/Surgical Specialist Physicians 157.5 159.2 192.9 318.1 Maine Psychologists 108.3 100.1 115.9 226.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 45.4 59.1 66.4 69.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 138.8 113.7 143.5 196.4 Maine Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 33.3 30.4 12.8 Maine 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 95.2 70.9 79.0 127.0 Physician Assistants Reimbursement Levels Compared to Therapists 59.7 75.2 102.5 118.1	Maine	31.5	48.6	40.5	30.2
Psychologists Maine Medical/Surgical Specialist Physicians 157.5 159.2 192.9 318.1 Maine Psychologists 108.3 100.1 115.9 226.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 45.4 59.1 66.4 69.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 138.8 113.7 143.5 196.4 Maine Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 152.0 124.2 160.0 276.9 Maine Therapists 95.2 70.9 79.0 127.0 Physician Assistants Reimbursement Levels Compared to Therapists 59.7 75.2 102.5 118.1	All States	24.9	12.8	27.8	49.5
Maine Psychologists 108.3 100.1 115.9 226.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 45.4 59.1 66.4 69.5 Maine 45.4 59.1 66.4 69.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Maine Nurse Practitioners 138.8 113.7 143.5 196.4 Maine Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 33.3 30.4 12.8 Maine 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Maine Physician Assistants 152.0 124.2 160.0 276.9 Maine Therapists 95.2 70.9 79.0 127.0 Physician Assistants Reimbursement Levels Compared to Therapists 59.7 75.2 102.5 118.1					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maine 45.4 59.1 66.4 69.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 138.8 113.7 143.5 196.4 Maine Nurse Practitioners 138.8 113.7 143.5 196.4 Maine Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 33.3 30.4 12.8 Maine 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Maine Physician Assistants Reimbursement Levels Compared to Therapists 95.2 70.9 79.0 127.0 Physician Assistants Reimbursement Levels Compared to Therapists 59.7 75.2 102.5 118.1	Maine Medical/Surgical Specialist Physicians	157.5	159.2	192.9	318.1
Reimbursement Levels Compared to Psychologists Maine 45.4 59.1 66.4 69.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Maine Nurse Practitioners 138.8 113.7 143.5 196.4 Maine Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 33.3 30.4 12.8 Maine 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Maine Physician Assistants 152.0 124.2 160.0 276.9 Physician Assistants Reimbursement Levels Compared to Therapists 59.7 75.2 102.5 118.1	Maine Psychologists	108.3	100.1	115.9	226.6
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 138.8 113.7 143.5 196.4 Maine Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 33.3 30.4 12.8 Maine 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Maine Physician Assistants 152.0 124.2 160.0 276.9 Physician Assistants Reimbursement Levels Compared to Therapists 95.2 70.9 79.0 127.0 Maine 59.7 75.2 102.5 118.1					
Nurse Practitioners Versus Psychiatric Nurses Maine Nurse Practitioners 138.8 113.7 143.5 196.4 Maine Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 152.0 124.2 160.0 276.9 Maine Physician Assistants 152.0 124.2 160.0 276.9 Physician Assistants Reimbursement Levels Compared to Therapists 59.7 75.2 102.5 118.1 Maine 59.7 75.2 102.5 118.1	Maine	45.4	59.1	66.4	69.5
Maine Nurse Practitioners 138.8 113.7 143.5 196.4 Maine Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 152.0 124.2 160.0 276.9 Maine Physician Assistants 152.0 124.2 160.0 276.9 Physician Assistants Reimbursement Levels Compared to Therapists 95.2 70.9 79.0 127.0 Maine 59.7 75.2 102.5 118.1	All States	28.8	17.3	44.0	38.5
Maine Psychiatric Nurses 113.3 85.3 110.0 174.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 152.0 124.2 160.0 276.9 Maine Physician Assistants 95.2 70.9 79.0 127.0 Physician Assistants Reimbursement Levels Compared to Therapists 59.7 75.2 102.5 118.1	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maine 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 152.0 124.2 160.0 276.9 Maine Therapists 95.2 70.9 79.0 127.0 Physician Assistants Reimbursement Levels Compared to Therapists 59.7 75.2 102.5 118.1	Maine Nurse Practitioners	138.8	113.7	143.5	196.4
Compared to Psychiatric Nurses Maine 22.5 33.3 30.4 12.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Maine Physician Assistants 152.0 124.2 160.0 276.9 Maine Therapists 95.2 70.9 79.0 127.0 Physician Assistants Reimbursement Levels Compared to Therapists 59.7 75.2 102.5 118.1	Maine Psychiatric Nurses	113.3	85.3	110.0	174.2
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Maine Physician Assistants 152.0 124.2 160.0 276.9 Maine Therapists 95.2 70.9 79.0 127.0 Physician Assistants Reimbursement Levels Compared to Therapists Maine 59.7 75.2 102.5 118.1					
Physician Assistants Versus TherapistsMaine Physician Assistants152.0124.2160.0276.9Maine Therapists95.270.979.0127.0Physician Assistants Reimbursement Levels Compared to Therapists59.775.2102.5118.1	Maine	22.5	33.3	30.4	12.8
Maine Physician Assistants 152.0 124.2 160.0 276.9 Maine Therapists 95.2 70.9 79.0 127.0 Physician Assistants Reimbursement Levels Compared to Therapists Maine 59.7 75.2 102.5 118.1	All States	7.5	-1.1	18.4	34.3
Maine Therapists 95.2 70.9 79.0 127.0 Physician Assistants Reimbursement Levels Compared to Therapists Maine 59.7 75.2 102.5 118.1	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists Maine 59.7 75.2 102.5 118.1	Maine Physician Assistants	152.0	124.2	160.0	276.9
Maine 59.7 75.2 102.5 118.1	Maine Therapists	95.2	70.9	79.0	127.0
All States 29.6 33.8 59.3 101.6	Maine	59.7	75.2	102.5	118.1
	All States	29.6	33.8	59.3	101.6

Appendix C-20: Maryland Disparity Analysis, All Plans

Sample size in 2021: 194,550 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Maryland OON Behavioral Health	7.9	5.7	6.7
Maryland OON Medical/Surgical	0.5	0.5	0.3
Behavioral Health OON Compared to Medical/Surgical OON			
Maryland	14.7×	12.4×	20.8×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Maryland OON Behavioral Health	40.5	29.8	66.2
Maryland OON Medical/Surgical	2.8	2.8	0.7
Behavioral Health OON Compared to Medical/Surgical OON			
Maryland	14.6×	10.6×	96.5×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Maryland OON Behavioral Health	29.8	22.1	17.7
Maryland OON Medical/Surgical	8.6	7.3	5.7
Behavioral Health OON Compared to Medical/Surgical OON			
Maryland	3.5×	3.0×	3.1×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Maryland OON All Behavioral Health Clinicians	17.2	16.3	16.3
Maryland OON All Medical/Surgical Clinicians	2.2	2.0	1.9
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Maryland	7.9×	8.1×	8.7×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Maryland OON Psychiatrists	16.5	16.4	17.3
Maryland OON Medical/Surgical Specialist Physicians	1.3	1.1	0.8
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Maryland	12.7×	15.4×	21.1×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Maryland OON Psychologists	29.3	29.2	29.9
Maryland OON Medical/Surgical Specialist Physicians	1.3	1.1	0.8
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Maryland	22.5×	27.5×	36.4×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Maryland OON Psychiatric Nurses	6.1	6.0	2.5
Maryland OON Nurse Practitioners	1.0	1.1	0.8
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Maryland	6.3×	5.7×	3.2×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Maryland OON Therapists	14.1	13.1	13.4
Maryland OON Physician Assistants	0.5	0.6	1.2
Therapists OON Compared to Physician Assistants OON			
Maryland	27.7×	21.7×	11.1×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

Maryland All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Maryland 34.6 All States 33.3 Medical/Surgical Specialist Physicians Versus Psychiatrists Maryland Medical/Surgical Specialist Physicians Maryland Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Maryland 34.2 All States Medical/Surgical Specialist Physicians Versus Psychologists Maryland 34.2 All States Medical/Surgical Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians Maryland Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland 31.6 All States Maryland 31.6 All States Maryland Nurse Practitioners Maryland Nurse Practitioners Maryland Psychiatric Nurses Maryland 34.9 All States Maryland 34.9 All States	rcent, %	
Maryland All Medical/Surgical Clinicians Maryland All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Maryland 34.6 All States 33.3 Medical/Surgical Specialist Physicians Versus Psychiatrists Maryland Medical/Surgical Specialist Physicians Maryland Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Maryland 34.2 All States Maryland 34.2 All States Maryland Medical/Surgical Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians Maryland Psychologists Maryland Psychologists Maryland Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland 31.6 All States Maryland 31.6 All States Maryland Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland Psychiatric Nurses Maryland Psychiatric Nurses Maryland Specialist Reimbursement Levels Compared to Psychiatric Nurses Maryland Psychiatric Nurses Maryland 34.9 All States	2020	2021
Maryland All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Maryland All States 33.3 Medical/Surgical Specialist Physicians Versus Psychiatrists Maryland Medical/Surgical Specialist Physicians Maryland Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Maryland All States Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Maryland All States Medical/Surgical Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians Maryland Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland 31.6 All States Maryland 31.6 All States Maryland Nurse Practitioners Maryland Nurse Practitioners Maryland Psychiatric Nurses Maryland Psychiatric Nurses Maryland All States Maryland 34.9 All States 28.3		
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Maryland 34.6 All States 33.3 Medical/Surgical Specialist Physicians Versus Psychiatrists Maryland Medical/Surgical Specialist Physicians 110.7 Maryland Psychiatrists 82.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Maryland 34.2 All States 40.8 Medical/Surgical Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians Versus Psychologists Maryland Psychologists Physicians Reimbursement Levels Compared to Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland 31.6 All States 42.0 Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners 107.1 Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3	109.7	112.0
Behavioral Health Clinicians Maryland 34.6 All States 33.3 Medical/Surgical Specialist Physicians Versus Psychiatrists Maryland Medical/Surgical Specialist Physicians 110.7 Maryland Psychiatrists 82.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Maryland 34.2 All States 40.8 Medical/Surgical Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians Versus Psychologists Maryland Psychologists 84.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland 31.6 All States 42.0 Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners 107.1 Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3	84.5	90.7
All States 33.3 Medical/Surgical Specialist Physicians Versus Psychiatrists Maryland Psychiatrists 82.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Maryland 34.2 All States 40.8 Medical/Surgical Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians 110.7 Maryland Psychologists 84.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland 31.6 All States 42.0 Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners 107.1 Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3		
Medical/Surgical Specialist Physicians Versus PsychiatristsMaryland Medical/Surgical Specialist Physicians110.7Maryland Psychiatrists82.5Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists34.2Maryland34.2All States40.8Medical/Surgical Specialist Physicians Versus Psychologists110.7Maryland Medical/Surgical Specialist Physicians110.7Maryland Psychologists84.1Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists31.6Maryland31.6All States42.0Nurse Practitioners Versus Psychiatric Nurses107.1Maryland Nurse Practitioners107.1Maryland Psychiatric Nurses79.4Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses79.4Maryland34.9All States28.3	29.9	23.4
Maryland Medical/Surgical Specialist Physicians Maryland Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Maryland All States Maryland Medical/Surgical Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians Maryland Psychologists Maryland Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland 31.6 All States Maryland Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners Maryland Psychiatric Nurses Maryland Psychiatric Nurses Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States	25.7	21.7
Maryland Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Maryland All States Maryland Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians Maryland Psychologists Maryland Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland All States Maryland All States Maryland Nurse Practitioners Versus Psychiatric Nurses Maryland Psychiatric Nurses Maryland Psychiatric Nurses Maryland Psychiatric Nurses Total Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3		
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Maryland 34.2 All States 40.8 Medical/Surgical Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians 110.7 Maryland Psychologists 84.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland 31.6 All States 42.0 Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners 107.1 Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3	115.2	119.2
to Psychiatrists Maryland 34.2 All States 40.8 Medical/Surgical Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians 110.7 Maryland Psychologists 84.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland 31.6 All States 42.0 Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners 107.1 Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland States 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3	89.7	96.2
All States 40.8 Medical/Surgical Specialist Physicians Versus Psychologists Maryland Medical/Surgical Specialist Physicians 110.7 Maryland Psychologists 84.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland 31.6 All States 42.0 Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners 107.1 Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3		
Medical/Surgical Specialist Physicians Versus PsychologistsMaryland Medical/Surgical Specialist Physicians110.7Maryland Psychologists84.1Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists31.6Maryland31.6All States42.0Nurse Practitioners Versus Psychiatric Nurses107.1Maryland Nurse Practitioners107.1Maryland Psychiatric Nurses79.4Nurse Practitioners Reimbursement Levels Compared to Psychiatric NursesMaryland34.9All States28.3	28.4	23.9
Maryland Medical/Surgical Specialist Physicians Maryland Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland All States Maryland Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland Maryland All States Maryland 34.9 All States	30.1	24.9
Maryland Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland All States Maryland Versus Psychiatric Nurses Maryland Nurse Practitioners Maryland Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland Maryland All States Maryland 34.9 All States		
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Maryland 31.6 All States 42.0 Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners 107.1 Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3	115.2	119.2
to Psychologists Maryland 31.6 All States 42.0 Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners 107.1 Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3	88.9	97.0
All States 42.0 Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners 107.1 Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3		
Nurse Practitioners Versus Psychiatric Nurses Maryland Nurse Practitioners 107.1 Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3	29.5	22.8
Maryland Nurse Practitioners 107.1 Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3	33.9	28.8
Maryland Psychiatric Nurses 79.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3		
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Maryland 34.9 All States 28.3	111.0	113.8
Nurses 34.9 Maryland 34.9 All States 28.3	86.7	95.0
All States 28.3		
	28.1	19.8
	12.8	7.5
Physician Assistants Versus Therapists		
Maryland Physician Assistants 118.7	123.1	130.1
Maryland Therapists 73.5	81.1	86.6
Physician Assistants Reimbursement Levels Compared to Therapists		
Maryland 61.4	51.9	50.2
All States 40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians Maryland All Medical/Surgical Clinicians 112.0 90.8 130.0 22 Maryland All Behavioral Health Clinicians 90.7 71.9 90.0 14 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Maryland 23.4 26.3 44.5 5 All States 21.7 26.6 48.0 7	3.7 1.3 8.3 0.4
Health CliniciansMaryland All Medical/Surgical Clinicians112.090.8130.022Maryland All Behavioral Health Clinicians90.771.990.014All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians23.426.344.55Maryland23.426.344.55All States21.726.648.07	8.3 0.4
Maryland All Behavioral Health Clinicians 90.7 71.9 90.0 14 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Maryland 23.4 26.3 44.5 5 All States 21.7 26.6 48.0 7	8.3 0.4
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Maryland 23.4 26.3 44.5 5 All States 21.7 26.6 48.0 7	8.3 0.4
Compared to All Behavioral Health Clinicians Maryland 23.4 26.3 44.5 5 All States 21.7 26.6 48.0 7	0.4
All States 21.7 26.6 48.0 7	0.4
	3.8
Medical/Surgical Specialist Physicians Versus Psychiatrists	3.8
Maryland Medical/Surgical Specialist Physicians 119.2 109.1 145.3 24	
Maryland Psychiatrists 96.2 90.5 118.9 17	2.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists	
Maryland 23.9 20.5 22.2 4	1.2
All States 24.9 12.8 27.8 4	9.5
Medical/Surgical Specialist Physicians Versus Psychologists	
Maryland Medical/Surgical Specialist Physicians 119.2 109.1 145.3 24	3.8
Maryland Psychologists 97.0 94.4 110.3 18	4.4
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists	
Maryland 22.8 15.5 31.8 5	8.3
All States 28.8 17.3 44.0 3	8.5
Nurse Practitioners Versus Psychiatric Nurses	
Maryland Nurse Practitioners 113.8 92.1 134.7 18	7.9
Maryland Psychiatric Nurses 95.0 85.0 96.0 12	0.9
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses	
Maryland 19.8 8.4 40.2 5	5.4
All States 7.5 -1.1 18.4 3	4.3
Physician Assistants Versus Therapists	
Maryland Physician Assistants 130.1 102.2 141.4 20	9.3
·	0.9
Physician Assistants Reimbursement Levels Compared to Therapists	
Maryland 50.2 60.8 84.3 10	7.5
All States 29.6 33.8 59.3 10	16

Appendix C-21: Massachusetts Disparity Analysis, All Plans

Sample size in 2021: 250,239 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Massachusetts OON Behavioral Health	7.6	9.7	9.5
Massachusetts OON Medical/Surgical	0.3	0.3	0.3
Behavioral Health OON Compared to Medical/Surgical OON			
Massachusetts	26.5×	31.6×	34.9×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Massachusetts OON Behavioral Health	35.2	56.9	24.2
Massachusetts OON Medical/Surgical	0.2	0.5	2.5
Behavioral Health OON Compared to Medical/Surgical OON			
Massachusetts	225.0×	107.2×	9.6×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Massachusetts OON Behavioral Health	13.2	14.0	29.2
Massachusetts OON Medical/Surgical	3.0	2.5	3.5
Behavioral Health OON Compared to Medical/Surgical OON			
Massachusetts	4.4×	5.7×	8.3×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Massachusetts OON All Behavioral Health Clinicians	13.7	11.3	14.4
Massachusetts OON All Medical/Surgical Clinicians	1.8	1.2	1.0
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Massachusetts	7.6×	9.1×	14.1×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Massachusetts OON Psychiatrists	17.6	17.0	22.8
Massachusetts OON Medical/Surgical Specialist Physicians	0.7	0.8	0.5
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Massachusetts	26.0×	21.1×	42.1×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Massachusetts OON Psychologists	15.4	13.8	21.1
Massachusetts OON Medical/Surgical Specialist Physicians	0.7	0.8	0.5
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Massachusetts	22.8×	17.0×	39.0×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Massachusetts OON Psychiatric Nurses	18.8	7.4	5.4
Massachusetts OON Nurse Practitioners	1.6	0.9	0.9
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Massachusetts	11.6×	8.2×	6.0×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Massachusetts OON Therapists	10.9	8.0	9.4
Massachusetts OON Physician Assistants	1.0	0.7	0.4
Therapists OON Compared to Physician Assistants OON			
Massachusetts	11.5×	11.0×	24.7×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Massachusetts All Medical/Surgical Clinicians	160.0	165.6	170.5
Massachusetts All Behavioral Health Clinicians	102.6	114.8	117.8
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Massachusetts	55.9	44.7	44.8
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Massachusetts Medical/Surgical Specialist Physicians	173.7	181.2	189.5
Massachusetts Psychiatrists	112.7	125.4	136.4
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Massachusetts	54.0	44.5	38.9
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Massachusetts Medical/Surgical Specialist Physicians	173.7	181.2	189.5
Massachusetts Psychologists	108.4	122.6	123.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Massachusetts	60.2	47.8	53.1
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Massachusetts Nurse Practitioners	139.3	145.1	147.5
Massachusetts Psychiatric Nurses	92.0	113.4	118.9
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Massachusetts	51.3	27.9	24.0
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Massachusetts Physician Assistants	137.2	144.1	164.9
Massachusetts Therapists	94.5	105.5	109.8
Physician Assistants Reimbursement Levels Compared to Therapists			
Massachusetts	45.3	36.6	50.2
All States	40.6	34.5	29.6

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Massachusetts All Medical/Surgical Clinicians	170.5	147.8	197.8	323.9
Massachusetts All Behavioral Health Clinicians	117.8	88.6	103.7	189.5
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Massachusetts	44.8	66.9	90.7	71.0
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Massachusetts Medical/Surgical Specialist Physicians	189.5	178.2	222.0	427.2
Massachusetts Psychiatrists	136.4	116.4	156.2	236.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			.00	200
Massachusetts	38.9	53.1	42.2	80.4
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Massachusetts Medical/Surgical Specialist Physicians	189.5	178.2	222.0	427.2
Massachusetts Psychologists	123.7	102.7	119.6	229.0
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Massachusetts	53.1	73.6	85.6	71.0
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Massachusetts Nurse Practitioners	147.5	118.9	153.8	216.6
Massachusetts Psychiatric Nurses	118.9	101.1	114.1	151.0
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Massachusetts	24.0	17.6	34.8	43.5
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Massachusetts Physician Assistants	164.9	144.1	169.9	255.6
Massachusetts Therapists	109.8	77.9	88.6	118.3
Physician Assistants Reimbursement Levels Compared to Therapists				
Massachusetts	50.2	85.1	91.8	115.9
All States	29.6	33.8	59.3	101.6

Appendix C-22: Michigan Disparity Analysis, All Plans

Sample size in 2021: 88,725 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Michigan OON Behavioral Health	4.2	4.6	4.9
Michigan OON Medical/Surgical	1.2	1.9	3.2
Behavioral Health OON Compared to Medical/Surgical OON			
Michigan	3.3×	2.4×	1.5×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Michigan OON Behavioral Health	10.5	9.5	8.7
Michigan OON Medical/Surgical	5.4	8.7	3.1
Behavioral Health OON Compared to Medical/Surgical OON			
Michigan	1.9×	1.1×	2.8×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Michigan OON Behavioral Health	12.6	12.3	11.7
Michigan OON Medical/Surgical	7.7	12.0	11.4
Behavioral Health OON Compared to Medical/Surgical OON			
Michigan	1.6×	1.0×*	1.0×*
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Michigan OON All Behavioral Health Clinicians	5.0	4.9	2.6
Michigan OON All Medical/Surgical Clinicians	1.2	1.4	1.5
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Michigan	4.3×	3.6×	1.7×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Michigan OON Psychiatrists	7.6	6.9	2.7
Michigan OON Medical/Surgical Specialist Physicians	0.8	1.0	1.2
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Michigan	9.5×	7.0×	2.3×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Michigan OON Psychologists	6.2	6.3	3.4
Michigan OON Medical/Surgical Specialist Physicians	8.0	1.0	1.2
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Michigan	7.8×	6.4×	2.8×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Michigan OON Psychiatric Nurses	1.4	1.8	1.2
Michigan OON Nurse Practitioners	1.0	1.6	1.2
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Michigan	1.3×*	1.1×*	1.0×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Michigan OON Therapists	3.3	3.5	2.2
Michigan OON Physician Assistants	0.4	0.3	0.7
Therapists OON Compared to Physician Assistants OON			
Michigan	7.8×	11.0×	3.4×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Michigan All Medical/Surgical Clinicians	113.1	114.8	116.2
Michigan All Behavioral Health Clinicians	93.3	97.5	104.3
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Michigan	21.3	17.7	11.4
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Michigan Medical/Surgical Specialist Physicians	114.4	116.6	120.7
Michigan Psychiatrists	84.9	89.7	95.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Michigan	34.8	30.0	26.8
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Michigan Medical/Surgical Specialist Physicians	114.4	116.6	120.7
Michigan Psychologists	93.9	96.2	102.8
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Michigan	21.8	21.2	17.4
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Michigan Nurse Practitioners	99.9	101.9	104.7
Michigan Psychiatric Nurses	81.4	87.3	81.3
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Michigan	22.8	16.8	28.7
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Michigan Physician Assistants	100.7	101.8	106.0
Michigan Therapists	95.9	101.1	107.2
Physician Assistants Reimbursement Levels Compared to Therapists			
Michigan	5.0	0.8	-1.1
All States	40.6	34.5	29.6

Autorage		Percentile, %			
Michigan All Medical/Surgical Clinicians 116.2 102.8 142.4 222.8 Michigan All Behavioral Health Clinicians 104.3 86.3 96.0 125.8 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 104.3 86.3 96.0 125.8 Michigan 11.4 19.1 48.4 77.1 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists 95.2 92.6 113.0 151.2 Michigan Psychiatrists 26.8 23.6 33.2 46.0 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychiatric Nurses 100.8 101.7 115.4 152.3 Michigan Psychologists 102.8 101.7		Average		75th	95th
Michigan All Behavioral Health Clinicians 104.3 86.3 96.0 125.8 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Image: Compared to All Behavioral Health Clinicians Image: Compared to All Behavioral Health Clinicians Inchigan 11.4 19.1 48.4 77.1 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Wichigan Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 120.7 114.5 150.5 220.8 Michigan Psychologists 26.8 23.6 33.2 46.0 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 102.8 101.7 115.4 152.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 102.8 101.7 115.4 152.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 104.7 12.6 30.4 77.1 All States 28.8 17.3 44.0 38.5 Nurs	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Michigan 11.4 19.1 48.4 77.1 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Michigan Medical/Surgical Specialist Physicians Michigan Psychiatrists Michigan Psychiatrists Michigan Psychiatrists Michigan Psychiatrists Michigan Psychiatrists Michigan 26.8 23.6 33.2 46.0 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Michigan All States 120.7 114.5 150.5 220.8 Michigan Psychologists Michigan All States 17.4 12.6 30.4 77.1 All States 17.4 12.6 30.4 77.1 All States 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Michigan Psychiatric Nurses Michigan Michigan 28.7 16.3 43.4 63.5 All States 7.5 1.1 18.4 34.3 Physician Assistants Versus Therapists Michigan Physician Assistants 106.0 85.2 106.2 157.0 Physician Assistants Reimbursement Levels Compared to Therapists Michigan Therapists Michigan Therapists Michigan 10.1 10.3 14.6 49.5	Michigan All Medical/Surgical Clinicians	116.2	102.8	142.4	222.8
Michigan 11.4 19.1 48.4 77.1 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus 8.0 120.7 114.5 150.5 220.8 Michigan Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 95.2 92.6 113.0 151.2 Michigan 26.8 23.6 33.2 46.0 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus 120.7 114.5 150.5 220.8 Michigan Medical/Surgical Specialist Physicians Psychologists 120.7 114.5 150.5 220.8 Michigan Psychologists 102.8 101.7 115.4 152.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.4 12.6 30.4 77.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nu	Michigan All Behavioral Health Clinicians	104.3	86.3	96.0	125.8
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists Michigan Medical/Surgical Specialist Physicians Michigan Psychiatrists 120.7 114.5 150.5 220.8 Michigan Psychiatrists 95.2 92.6 113.0 151.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 33.2 46.0 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 120.7 114.5 150.5 220.8 Michigan Psychologists 102.8 101.7 115.4 152.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 101.7 115.4 152.3 Michigan Psychologists Physicians Reimbursement Levels Compared to Psychologists 17.4 12.6 30.4 77.1 All States Practitioners Versus Psychiatric Nurses 104.7 85.3 105.2 157.0 Michigan Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 81.3 73.4 73.4 96.1 Michigan Psychiatric Nurses 81.3 73.4 73.4 96.1 <td>Michigan</td> <td>11.4</td> <td>19.1</td> <td>48.4</td> <td>77.1</td>	Michigan	11.4	19.1	48.4	77.1
Psychiatrists Michigan Medical/Surgical Specialist Physicians 120.7 114.5 150.5 220.8 Michigan Psychiatrists 95.2 92.6 113.0 151.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 8 23.6 33.2 46.0 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 101.7 114.5 150.5 220.8 Michigan Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 102.8 101.7 115.4 152.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 102.8 101.7 115.4 152.3 Michigan Psychologists 102.8 101.7 115.4 152.3 Michigan Psychologists 102.8 101.7 115.4 152.3 Michigan Psychologists 104.7 12.6 30.4 77.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.3 73.4	All States	21.7	26.6	48.0	70.4
Michigan Psychiatrists 95.2 92.6 113.0 151.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 26.8 23.6 33.2 46.0 Michigan 26.8 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 120.7 114.5 150.5 220.8 Michigan Medical/Surgical Specialist Physicians Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 102.8 101.7 115.4 152.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.4 12.6 30.4 77.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.3 73.4 73.4 96.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 81.3 73.4 73.4 96.1 Michigan Psychiatric Nurses 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.0<					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Michigan 26.8 23.6 33.2 46.0 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus Versus </td <td>Michigan Medical/Surgical Specialist Physicians</td> <td>120.7</td> <td>114.5</td> <td>150.5</td> <td>220.8</td>	Michigan Medical/Surgical Specialist Physicians	120.7	114.5	150.5	220.8
Reimbursement Levels Compared to Psychiatrists Michigan 26.8 23.6 33.2 46.0 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Nuchigan Medical/Surgical Specialist Physicians Psychologists Michigan Psychologists 102.8 101.7 115.4 152.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 102.8 101.7 115.4 152.3 Michigan 17.4 12.6 30.4 77.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.3 73.4 73.4 96.1 Michigan Psychiatric Nurses 81.3 73.4 73.4 96.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.7 16.3 43.4 63.5 Michigan 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.0	Michigan Psychiatrists	95.2	92.6	113.0	151.2
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians 120.7 114.5 150.5 220.8 Michigan Psychologists 102.8 101.7 115.4 152.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.4 12.6 30.4 77.1 Michigan 17.4 12.6 30.4 77.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Michigan Nurse Practitioners 104.7 85.3 105.2 157.0 Michigan Psychiatric Nurses 81.3 73.4 73.4 96.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Michigan Physician Assistants 106.0 85.2 106.2 157.0 Michigan Physician Assistants Reimbursement Levels Compared to Therapists <					
Medical/Surgical Specialist Physicians Versus Psychologists Michigan Psychologists 102.8 101.7 115.4 152.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.4 12.6 30.4 77.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Michigan Nurse Practitioners 104.7 85.3 105.2 157.0 Michigan Psychiatric Nurses 81.3 73.4 73.4 96.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.0 85.2 106.2 157.0 Michigan Physician Assistants Reimbursement Levels Compared to Therapists 107.2 77.2 92.7 105.0 Physician Assistants Reimbursement Levels Compared to Therapists 107.2 77.2 92.7 105.0	Michigan	26.8	23.6	33.2	46.0
Psychologists Michigan Medical/Surgical Specialist Physicians 120.7 114.5 150.5 220.8 Michigan Psychologists 102.8 101.7 115.4 152.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.4 12.6 30.4 77.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 81.3 73.4 73.4 96.1 Michigan Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 81.3 73.4 73.4 96.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.0 85.2 106.2 157.0 Michigan Therapists 107.2 77.2 92.7 105.0 Physician Assistants Reimbursement Levels Compared to Therapists -1.1 10.3 14.6 49.5	All States	24.9	12.8	27.8	49.5
Michigan Psychologists 102.8 101.7 115.4 152.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.4 12.6 30.4 77.1 Michigan 17.4 12.6 30.4 77.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 104.7 85.3 105.2 157.0 Michigan Psychiatric Nurses 81.3 73.4 73.4 96.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 81.3 73.4 73.4 96.1 Michigan 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.0 85.2 106.2 157.0 Michigan Therapists 107.2 77.2 92.7 105.0 Physician Assistants Reimbursement Levels Compared to Therapists 49.5 Michigan -1.1 10.3 14.6 49.5					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Michigan 17.4 12.6 30.4 77.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 104.7 85.3 105.2 157.0 Michigan Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 81.3 73.4 73.4 96.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.0 85.2 106.2 157.0 Michigan Physician Assistants 107.2 77.2 92.7 105.0 Physician Assistants Reimbursement Levels Compared to Therapists -1.1 10.3 14.6 49.5 Michigan -1.1 10.3 14.6 49.5	Michigan Medical/Surgical Specialist Physicians	120.7	114.5	150.5	220.8
Reimbursement Levels Compared to Psychologists Michigan 17.4 12.6 30.4 77.1 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Michigan Nurse Practitioners 104.7 85.3 105.2 157.0 Michigan Psychiatric Nurses 81.3 73.4 73.4 96.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.7 16.3 43.4 63.5 Michigan 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Michigan Physician Assistants 106.0 85.2 106.2 157.0 Michigan Assistants Reimbursement Levels Compared to Therapists 107.2 77.2 92.7 105.0 Michigan -1.1 10.3 14.6 49.5	Michigan Psychologists	102.8	101.7	115.4	152.3
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Michigan Nurse Practitioners 104.7 85.3 105.2 157.0 Michigan Psychiatric Nurses 81.3 73.4 73.4 96.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.0 85.2 106.2 157.0 Michigan Physician Assistants 106.0 85.2 106.2 157.0 Physician Assistants Reimbursement Levels Compared to Therapists 107.2 77.2 92.7 105.0 Michigan -1.1 10.3 14.6 49.5					
Nurse Practitioners Versus Psychiatric Nurses Michigan Nurse Practitioners 104.7 85.3 105.2 157.0 Michigan Psychiatric Nurses 81.3 73.4 73.4 96.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.7 16.3 43.4 63.5 Michigan 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.0 85.2 106.2 157.0 Michigan Physician Assistants 107.2 77.2 92.7 105.0 Physician Assistants Reimbursement Levels Compared to Therapists -1.1 10.3 14.6 49.5 Michigan -1.1 10.3 14.6 49.5	Michigan	17.4	12.6	30.4	77.1
Michigan Nurse Practitioners 104.7 85.3 105.2 157.0 Michigan Psychiatric Nurses 81.3 73.4 73.4 96.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.7 16.3 43.4 63.5 Michigan 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Michigan Physician Assistants 106.0 85.2 106.2 157.0 Michigan Therapists 107.2 77.2 92.7 105.0 Physician Assistants Reimbursement Levels Compared to Therapists -1.1 10.3 14.6 49.5 Michigan -1.1 10.3 14.6 49.5	All States	28.8	17.3	44.0	38.5
Michigan Psychiatric Nurses 81.3 73.4 73.4 96.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.7 16.3 43.4 63.5 Michigan 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Michigan Physician Assistants 106.0 85.2 106.2 157.0 Michigan Therapists 107.2 77.2 92.7 105.0 Physician Assistants Reimbursement Levels Compared to Therapists -1.1 10.3 14.6 49.5	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Michigan 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Michigan Physician Assistants 106.0 85.2 106.2 157.0 Michigan Therapists 107.2 77.2 92.7 105.0 Physician Assistants Reimbursement Levels Compared to Therapists Michigan -1.1 10.3 14.6 49.5	Michigan Nurse Practitioners	104.7	85.3	105.2	157.0
Compared to Psychiatric Nurses Michigan 28.7 16.3 43.4 63.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Michigan Physician Assistants 106.0 85.2 106.2 157.0 Michigan Therapists 107.2 77.2 92.7 105.0 Physician Assistants Reimbursement Levels Compared to Therapists -1.1 10.3 14.6 49.5	Michigan Psychiatric Nurses	81.3	73.4	73.4	96.1
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Michigan Physician Assistants 106.0 85.2 106.2 157.0 Michigan Therapists 107.2 77.2 92.7 105.0 Physician Assistants Reimbursement Levels Compared to Therapists Michigan -1.1 10.3 14.6 49.5					
Physician Assistants Versus TherapistsMichigan Physician Assistants106.085.2106.2157.0Michigan Therapists107.277.292.7105.0Physician Assistants Reimbursement Levels Compared to Therapists-1.110.314.649.5	Michigan	28.7	16.3	43.4	63.5
Michigan Physician Assistants106.085.2106.2157.0Michigan Therapists107.277.292.7105.0Physician Assistants Reimbursement Levels Compared to TherapistsMichigan-1.110.314.649.5	All States	7.5	-1.1	18.4	34.3
Michigan Therapists 107.2 77.2 92.7 105.0 Physician Assistants Reimbursement Levels Compared to Therapists Michigan -1.1 10.3 14.6 49.5	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists Michigan -1.1 10.3 14.6 49.5	Michigan Physician Assistants	106.0	85.2	106.2	157.0
Compared to Therapists Michigan -1.1 10.3 14.6 49.5		107.2	77.2	92.7	105.0
All States 29.6 33.8 59.3 101.6	Michigan	-1.1	10.3	14.6	49.5
	All States	29.6	33.8	59.3	101.6

Appendix C-23: Minnesota Disparity Analysis, All Plans

Sample size in 2021: 187,575 covered lives

Acute Inpatient Facility Minnesota OON Behavioral Health 7.0 5.7 4.6			Percent, %	
Minnesota OON Behavioral Health 7.0 5.7 4.6 Minnesota OON Medical/Surgical 0.6 2.4 1.2 Behavioral Health OON Compared to Medical/Surgical OON 12.2× 2.4× 3.7× All States 7.1× 6.0× 6.2× Parity Would Be 1.0× 1.0× 1.0× Subacute Inpatient Facility Minnesota OON Behavioral Health 16.1 7.9 n/a Minnesota OON Medical/Surgical 0.6 2.2 n/a Minnesota OON Medical/Surgical 0.6 2.2 n/a Minnesota OON Medical/Surgical 0.6 2.2 n/a Minnesota ON Medical/Surgical 0.6 2.2 n/a Minnesota Minnesota 28.5× 3.5× n/a All States 9.9× 7.9× 19.9× Parity Would Be 1.0× 1.0× 1.0× Minnesota OON Behavioral Health Clinicans 5.6× 7.7× 17.0× Behavioral Health OON Compared to Medical/Surgical OON 1.0× 1.0× 1.0× Minnesota ON All Beha		2019	2020	2021
Minnesota OON Medical/Surgical 0.6 2.4 1.2	Acute Inpatient Facility			
Behavioral Health OON Compared to Medical/Surgical OON Minnesota 12.2× 2.4× 3.7× All States 7.1 × 6.0× 6.2× Parity Would Be 1.0× 1.0× 1.0× 1.0× 1.0× 1.0× Subacute Inpatient Facility Minnesota OON Behavioral Health 16.1 7.9 n/a Minnesota OON Medical/Surgical 0.6 2.2 n/a Minnesota OON Medical/Surgical 0.6 2.5 n/a Minnesota 28.5× 3.5× n/a All States 9.9× 7.9× 19.9× Parity Would Be 1.0×	Minnesota OON Behavioral Health	7.0	5.7	4.6
Minnesota 12.2× 2.4× 3.7× All States 7.1× 6.0× 6.2× Parity Would Be 1.0× 1.0× 1.0× Subacute Inpatient Facility Minnesota OON Behavioral Health 16.1 7.9 n/a Minnesota OON Medical/Surgical 0.6 2.2 n/a Behavioral Health OON Compared to Medical/Surgical OON Minnesota 28.5× 3.5× n/a All States 9.9× 7.9× 19.9× Parity Would Be 1.0× 1.0× 1.0× Outpatient Facility (Non-Emergency Room) Minnesota OON Behavioral Health 9.6 8.4 9.3 Minnesota OON Behavioral Health 9.6 8.4 9.3 Minnesota OON Medical/Surgical 1.7 1.1 0.5 Behavioral Health OON Compared to Medical/Surgical OON Minnesota 3.5× 1.7× 17.0× All States 3.5× 1.7× 17.0× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Minnesota OON All Medical/Surgical Clinicians 8.8 5.4 4.3 Minnesota 3.6× 1.5× 1.5× All States 3.9× 3.9× 3.5× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians 1.0× 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians 1.0× 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians 1.0× 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians 1.0× 0.9 0.7 Psychiatrists 0ON Compared to Medical/Surgical Specialist Physicians 1.0× 0.9× Minnesota 0.0× 0.0× 0.0× Minn	Minnesota OON Medical/Surgical	0.6	2.4	1.2
All States	Behavioral Health OON Compared to Medical/Surgical OON			
Parity Would Be	Minnesota	12.2×	2.4×	3.7×
Minnesota OON Behavioral Health	All States	7.1×	6.0×	6.2×
Minnesota OON Behavioral Health 16.1 7.9 n/a Minnesota OON Medical/Surgical 0.6 2.2 n/a Behavioral Health OON Compared to Medical/Surgical OON 28.5× 3.5× n/a Minnesota 28.5× 3.5× n/a All States 9.9× 7.9× 19.9× Parity Would Be 1.0× 1.0× 1.0× Outpatient Facility (Non-Emergency Room) 3.6 8.4 9.3 Minnesota OON Behavioral Health 9.6 8.4 9.3 Minnesota OON Medical/Surgical 1.7 1.1 0.5 Behavioral Health OON Compared to Medical/Surgical OON 5.6× 7.7× 17.0× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians 8.8 5.4 4.3 Minnesota OON All Behavioral Health Clinicians OON Compared to All Medical/Surgical Surgical S	Parity Would Be	1.0×	1.0×	1.0×
Minnesota OON Medical/Surgical 0.6 2.2 n/a Behavioral Health OON Compared to Medical/Surgical OON 28.5× 3.5× n/a All States 9.9× 7.9× 19.9× Parity Would Be 1.0× 1.0× 1.0× Outpatient Facility (Non-Emergency Room) Minnesota OON Behavioral Health 9.6 8.4 9.3 Minnesota OON Medical/Surgical 1.7 1.1 0.5 Behavioral Health OON Compared to Medical/Surgical OON 5.6× 7.7× 17.0× All States 3.5× 1.7× 1.5× All States 3.5× 1.7× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians 8.8 5.4 4.3 Minnesota OON All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians OON 3.6× 1.5× 1.5× All States 3.9× 3.9× 3.9× 3.5× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians <td>Subacute Inpatient Facility</td> <td></td> <td></td> <td></td>	Subacute Inpatient Facility			
Behavioral Health OON Compared to Medical/Surgical OON	Minnesota OON Behavioral Health	16.1	7.9	n/a
Behavioral Health OON Compared to Medical/Surgical OON Minnesota 28.5× 3.5× n/a All States 9.9× 7.9× 19.9× 19.9× 1.0×	Minnesota OON Medical/Surgical	0.6	2.2	n/a
Minnesota 28.5× 3.5× n/a All States 9.9× 7.9× 19.9× Parity Would Be 1.0× 1.0× Outpatient Facility (Non-Emergency Room) Minnesota OON Behavioral Health 9.6 8.4 9.3 Minnesota OON Medical/Surgical 1.7 1.1 0.5 Behavioral Health OON Compared to Medical/Surgical OON	<u> </u>			
Parity Would Be	·	28.5×	3.5×	n/a
Outpatient Facility (Non-Emergency Room) Minnesota OON Behavioral Health 9.6 8.4 9.3 Minnesota OON Medical/Surgical 1.7 1.1 0.5 Behavioral Health OON Compared to Medical/Surgical OON 5.6× 7.7× 17.0× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Offfice Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Minnesota OON All Behavioral Health Clinicians 8.8 5.4 4.3 Minnesota OON All Medical/Surgical Clinicians 2.5 3.6 3.0 Minnesota OON All Medical/Surgical Clinicians 3.6× 1.5× 1.5× All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 3.6× 1.5× 1.5× All States 3.9× 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians 1.0 0.9 0.7 Minnesota OON Medical/Surgical Specialist Physicians OON 1.0 <t< td=""><td>All States</td><td>9.9×</td><td>7.9×</td><td>19.9×</td></t<>	All States	9.9×	7.9×	19.9×
Minnesota OON Behavioral Health 9.6 8.4 9.3 Minnesota OON Medical/Surgical 1.7 1.1 0.5 Behavioral Health OON Compared to Medical/Surgical OON 5.6× 7.7× 17.0× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Minnesota OON All Behavioral Health Clinicians 8.8 5.4 4.3 Minnesota OON All Medical/Surgical Clinicians 2.5 3.6 3.0 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 3.6× 1.5× 1.5× All States 3.9× 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Physicians 1.0 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON 1.0 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON 1.0	Parity Would Be	1.0×	1.0×	1.0×
Minnesota OON Behavioral Health 9.6 8.4 9.3 Minnesota OON Medical/Surgical 1.7 1.1 0.5 Behavioral Health OON Compared to Medical/Surgical OON 5.6× 7.7× 17.0× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Minnesota OON All Behavioral Health Clinicians 8.8 5.4 4.3 Minnesota OON All Medical/Surgical Clinicians 2.5 3.6 3.0 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 3.6× 1.5× 1.5× All States 3.9× 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Physicians 1.0 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON 1.0 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON 1.0	Outpatient Facility (Non-Emergency Room)			
Minnesota OON Medical/Surgical 1.7 1.1 0.5 Behavioral Health OON Compared to Medical/Surgical OON 5.6× 7.7× 17.0× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Minnesota OON All Behavioral Health Clinicians 8.8 5.4 4.3 Minnesota OON All Medical/Surgical Clinicians 2.5 3.6 3.0 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 3.6× 1.5× 1.5× All States 3.9× 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Minnesota OON Psychiatrists 12.3 7.4 7.2 Minnesota OON Medical/Surgical Specialist Physicians OON 1.0 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON 1.0 0.9 0.7 Minnesota 12.9× 8.4× <td></td> <td>9.6</td> <td>8.4</td> <td>9.3</td>		9.6	8.4	9.3
Behavioral Health OON Compared to Medical/Surgical OON				
Minnesota 5.6× 7.7× 17.0× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Minnesota OON All Behavioral Health Clinicians 8.8 5.4 4.3 Minnesota OON All Medical/Surgical Clinicians 2.5 3.6 3.0 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 3.6× 1.5× 1.5× All States 3.9× 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Minnesota OON Psychiatrists 12.3 7.4 7.2 Minnesota OON Compared to Medical/Surgical Specialist Physicians OON 1.0 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON 1.0 8.4× 9.6× All States 9.0× 8.7× 8.9×	<u> </u>			
Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Minnesota OON All Behavioral Health Clinicians 8.8 5.4 4.3 Minnesota OON All Medical/Surgical Clinicians 2.5 3.6 3.0 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 3.6× 1.5× 1.5× Minnesota 3.6× 1.5× 1.5× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians 12.3 7.4 7.2 Minnesota OON Psychiatrists 12.3 7.4 7.2 Minnesota OON Compared to Medical/Surgical Specialist Physicians OON 1.0 0.9 0.7 Minnesota 12.9× 8.4× 9.6× All States 9.0× 8.7× 8.9×		5.6×	7.7×	17.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical CliniciansMinnesota OON All Behavioral Health Clinicians8.85.44.3Minnesota OON All Medical/Surgical Clinicians2.53.63.0All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON3.6×1.5×1.5×Minnesota3.6×1.5×1.5×All States3.9×3.9×3.5×Parity Would Be1.0×1.0×1.0×Office Visits - Psychiatrists Versus Medical/Surgical Specialist PhysiciansMinnesota OON Psychiatrists12.37.47.2Minnesota OON Medical/Surgical Specialist Physicians1.00.90.7Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON1.00.90.7Minnesota12.9×8.4×9.6×All States9.0×8.7×8.9×	All States	3.5×	1.7×	1.5×
Medical/Surgical Clinicians Minnesota OON All Behavioral Health Clinicians 8.8 5.4 4.3 Minnesota OON All Medical/Surgical Clinicians 2.5 3.6 3.0 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 3.6× 1.5× 1.5× Minnesota 3.9× 3.9× 3.5× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Minnesota OON Psychiatrists 12.3 7.4 7.2 Minnesota OON Medical/Surgical Specialist Physicians OON 1.0 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON 1.0 8.4× 9.6× Minnesota 12.9× 8.4× 9.6× All States 9.0× 8.7× 8.9×	Parity Would Be	1.0×	1.0×	1.0×
Minnesota OON All Medical/Surgical Clinicians 2.5 3.6 3.0 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 3.6× 1.5× 1.5× Minnesota 3.9× 3.9× 3.9× 3.5× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Minnesota OON Psychiatrists 12.3 7.4 7.2 Minnesota OON Medical/Surgical Specialist Physicians OON 1.0 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON 12.9× 8.4× 9.6× Minnesota 12.9× 8.4× 9.6× All States 9.0× 8.7× 8.9×				
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Minnesota 3.6× 1.5× 1.5× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Minnesota OON Psychiatrists 12.3 7.4 7.2 Minnesota OON Medical/Surgical Specialist Physicians 1.0 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON Minnesota 12.9× 8.4× 9.6× All States 9.0× 8.7× 8.9×	Minnesota OON All Behavioral Health Clinicians	8.8	5.4	4.3
Clinicians OON Minnesota 3.6× 1.5× 1.5× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Minnesota OON Psychiatrists 12.3 7.4 7.2 Minnesota OON Medical/Surgical Specialist Physicians 1.0 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON Minnesota 12.9× 8.4× 9.6× All States 9.0× 8.7× 8.9×	Minnesota OON All Medical/Surgical Clinicians	2.5	3.6	3.0
All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Minnesota OON Psychiatrists 12.3 7.4 7.2 Minnesota OON Medical/Surgical Specialist Physicians 1.0 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON Minnesota 12.9× 8.4× 9.6× All States 9.0× 8.7× 8.9×				
Parity Would Be 1.0× 1	Minnesota	3.6×	1.5×	1.5×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians 12.3 7.4 7.2 Minnesota OON Psychiatrists 1.0 0.9 0.7 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON 12.9× 8.4× 9.6× Minnesota 12.9× 8.4× 9.6× All States 9.0× 8.7× 8.9×	All States	3.9×	3.9×	3.5×
PhysiciansMinnesota OON Psychiatrists12.37.47.2Minnesota OON Medical/Surgical Specialist Physicians1.00.90.7Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OONMinnesota12.9×8.4×9.6×All States9.0×8.7×8.9×	Parity Would Be	1.0×	1.0×	1.0×
Minnesota OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON Minnesota All States 1.0 0.9 0.7 12.9× 8.4× 9.6× 9.0× 8.7× 8.9×				
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON Minnesota 12.9× 8.4× 9.6× All States 9.0× 8.7× 8.9×	Minnesota OON Psychiatrists	12.3	7.4	7.2
Minnesota 12.9× 8.4× 9.6× All States 9.0× 8.7× 8.9×	Minnesota OON Medical/Surgical Specialist Physicians	1.0	0.9	0.7
All States 9.0× 8.7× 8.9×				
	Minnesota	12.9×	8.4×	9.6×
Parity Would Be 1.0× 1.0× 1.0×	All States	9.0×	8.7×	8.9×
	Parity Would Be	1.0×	1.0×	1.0×

		Percent, %	
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Minnesota OON Psychologists	11.7	6.9	6.4
Minnesota OON Medical/Surgical Specialist Physicians	1.0	0.9	0.7
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Minnesota	12.3×	7.9×	8.6×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Minnesota OON Psychiatric Nurses	1.0	2.4	1.0
Minnesota OON Nurse Practitioners	1.2	1.6	1.0
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Minnesota	0.9×*	1.5×*	1.0×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Minnesota OON Therapists	6.9	4.5	3.1
Minnesota OON Physician Assistants	0.6	3.7	2.6
Therapists OON Compared to Physician Assistants OON			
Minnesota	11.6×	1.2×	1.2×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Minnesota All Medical/Surgical Clinicians	209.7	205.5	207.0
Minnesota All Behavioral Health Clinicians	112.6	112.6	107.2
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Minnesota	86.3	82.5	93.1
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Minnesota Medical/Surgical Specialist Physicians	222.6	219.5	222.8
Minnesota Psychiatrists	143.2	146.2	134.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Minnesota	55.4	50.2	65.2
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Minnesota Medical/Surgical Specialist Physicians	222.6	219.5	222.8
Minnesota Psychologists	108.0	104.6	99.4
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Minnesota	106.1	109.9	124.1
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Minnesota Nurse Practitioners	198.1	185.9	182.1
Minnesota Psychiatric Nurses	90.4	166.6	171.8
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Minnesota	119.2	11.6	6.0
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Minnesota Physician Assistants	208.1	193.2	198.1
Minnesota Therapists	110.0	112.4	106.5
Physician Assistants Reimbursement Levels Compared to Therapists			
Minnesota	89.1	71.8	86.0
All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians Minnesota All Medical/Surgical Clinicians Minnesota All Behavioral Health Clinicians All Medical/Surgical Clinicians 107.2 90.7 107.9 211. All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Minnesota 93.1 100.3 127.4 96. All States 21.7 26.6 48.0 70. Medical/Surgical Specialist Physicians Versus Psychiatrists Minnesota Medical/Surgical Specialist Physicians 222.8 221.0 271.2 507.	
Health CliniciansMinnesota All Medical/Surgical Clinicians207.0181.7245.4416.Minnesota All Behavioral Health Clinicians107.290.7107.9211.All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians93.1100.3127.496.Minnesota93.1100.3127.496.All States21.726.648.070.Medical/Surgical Specialist Physicians Versus Psychiatrists	5th
Minnesota All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Minnesota 93.1 100.3 127.4 96. All States 21.7 26.6 48.0 70. Medical/Surgical Specialist Physicians Versus Psychiatrists	
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Minnesota 93.1 100.3 127.4 96. All States 21.7 26.6 48.0 70. Medical/Surgical Specialist Physicians Versus Psychiatrists	.3
Compared to All Behavioral Health Clinicians Minnesota 93.1 100.3 127.4 96. All States 21.7 26.6 48.0 70. Medical/Surgical Specialist Physicians Versus Psychiatrists	.4
All States 21.7 26.6 48.0 70. Medical/Surgical Specialist Physicians Versus Psychiatrists	
Medical/Surgical Specialist Physicians Versus Psychiatrists	.9
Psychiatrists	.4
Minnesota Medical/Surgical Specialist Physicians 222 8 221 0 271 2 507	
	.5
Minnesota Psychiatrists 134.9 127.5 173.5 288.	.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists	
Minnesota 65.2 73.3 56.3 75.	.7
All States 24.9 12.8 27.8 49.	.5
Medical/Surgical Specialist Physicians Versus Psychologists	
Minnesota Medical/Surgical Specialist Physicians 222.8 221.0 271.2 507.	.5
Minnesota Psychologists 99.4 96.8 120.9 244.	.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists	
Minnesota 124.1 128.3 124.4 96.	.9
All States 28.8 17.3 44.0 38.	.5
Nurse Practitioners Versus Psychiatric Nurses	
Minnesota Nurse Practitioners 182.1 147.6 202.1 300.	.3
Minnesota Psychiatric Nurses 171.8 145.0 191.1 197.	.9
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses	
Minnesota 6.0 1.8 5.8 51.	.8
All States 7.5 -1.1 18.4 34.	.3
Physician Assistants Versus Therapists	
Minnesota Physician Assistants 198.1 185.9 224.9 306.	.8
Minnesota Therapists 106.5 89.8 102.4 145.	.7
Physician Assistants Reimbursement Levels Compared to Therapists	
Minnesota 86.0 106.9 119.5 110.	.6
All States 29.6 33.8 59.3 101.	.6

Appendix C-24: Mississippi Disparity Analysis, All Plans

Sample size in 2021: 63,171 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Mississippi OON Behavioral Health	12.3	9.8	8.6
Mississippi OON Medical/Surgical	1.2	1.3	1.1
Behavioral Health OON Compared to Medical/Surgical OON			
Mississippi	9.8×	7.3×	7.7×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Mississippi OON Behavioral Health	59.9	28.0	41.3
Mississippi OON Medical/Surgical	0.3	2.6	1.2
Behavioral Health OON Compared to Medical/Surgical OON			
Mississippi	184.3×	10.6×	34.6×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Mississippi OON Behavioral Health	34.4	23.3	17.5
Mississippi OON Medical/Surgical	15.2	1.3	1.4
Behavioral Health OON Compared to Medical/Surgical OON			
Mississippi	2.3×	17.3×	12.7×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Mississippi OON All Behavioral Health Clinicians	8.1	5.5	2.3
Mississippi OON All Medical/Surgical Clinicians	2.0	1.3	1.2
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Mississippi	4.1×	4.2×	1.9×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Mississippi OON Psychiatrists	10.8	7.1	4.6
Mississippi OON Medical/Surgical Specialist Physicians	1.1	1.1	1.1
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Mississippi	9.6×	6.3×	4.4×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

		Percent, %	
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Mississippi OON Psychologists	4.5	3.5	1.1
Mississippi OON Medical/Surgical Specialist Physicians	1.1	1.1	1.1
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Mississippi	4.0×	3.1×	1.0×*
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Mississippi OON Psychiatric Nurses	10.8	2.2	4.1
Mississippi OON Nurse Practitioners	1.2	0.8	8.0
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Mississippi	8.7×	2.7×*	5.1×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Mississippi OON Therapists	8.3	5.5	1.9
Mississippi OON Physician Assistants	1.1	0.8	0.5
Therapists OON Compared to Physician Assistants OON			
Mississippi	7.2×	6.9×	4.2×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Mississippi All Medical/Surgical Clinicians	122.5	123.2	124.3
Mississippi All Behavioral Health Clinicians	114.3	125.7	132.5
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Mississippi	7.2	-1.9	-6.2
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Mississippi Medical/Surgical Specialist Physicians	120.9	121.2	122.2
Mississippi Psychiatrists	89.6	92.0	96.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Mississippi	34.9	31.7	26.3
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Mississippi Medical/Surgical Specialist Physicians	120.9	121.2	122.2
Mississippi Psychologists	103.6	117.4	122.6
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Mississippi	16.7	3.2	-0.3
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Mississippi Nurse Practitioners	114.2	116.3	118.0
Mississippi Psychiatric Nurses	90.2	101.5	100.5
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Mississippi	26.5	14.6	17.5
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Mississippi Physician Assistants	125.5	130.9	124.2
Mississippi Therapists	130.2	139.0	143.6
Physician Assistants Reimbursement Levels Compared to Therapists			
Mississippi	-3.6	-5.8	-13.5
All States	40.6	34.5	29.6

		Perce	ntile, %	
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Mississippi All Medical/Surgical Clinicians	124.3	109.9	160.5	287.3
Mississippi All Behavioral Health Clinicians	132.5	118.5	129.6	152.9
All Behavioral Health Clinicians Reimbursement Levels Compared to All Medical/Surgical Clinicians				
Mississippi	-6.2	-7.2	23.9	88.0
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Mississippi Medical/Surgical Specialist Physicians	122.2	120.8	173.6	298.9
Mississippi Psychiatrists	96.7	95.7	117.4	159.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Mississippi	26.3	26.3	47.8	86.9
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Mississippi Medical/Surgical Specialist Physicians	122.2	120.8	173.6	298.9
Mississippi Psychologists	122.6	127.6	129.6	382.4
Psychologist Reimbursement Levels Compared to Medical/Surgical Specialist Physicians				
Mississippi	-0.3	-5.3	34.0	88.0
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Mississippi Nurse Practitioners	118.0	95.9	112.1	247.6
Mississippi Psychiatric Nurses	100.5	85.8	95.7	119.7
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Mississippi	17.5	11.8	17.2	106.8
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Mississippi Physician Assistants	124.2	95.9	146.0	247.6
Mississippi Therapists	143.6	127.6	129.6	148.0
Physician Assistants Reimbursement Levels Compared to Therapists				
Mississippi	-13.5	-24.8	12.7	67.3

Appendix C-25: Missouri Disparity Analysis, All Plans

Sample size in 2021: 293,914 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Missouri OON Behavioral Health	7.8	8.3	7.9
Missouri OON Medical/Surgical	0.7	1.4	0.7
Behavioral Health OON Compared to Medical/Surgical OON			
Missouri	11.1×	6.0×	11.9×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Missouri OON Behavioral Health	31.5	37.4	39.3
Missouri OON Medical/Surgical	1.8	3.6	8.0
Behavioral Health OON Compared to Medical/Surgical OON			
Missouri	18.0×	10.3×	51.1×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Missouri OON Behavioral Health	14.0	9.7	10.2
Missouri OON Medical/Surgical	2.5	1.7	1.3
Behavioral Health OON Compared to Medical/Surgical OON			
Missouri	5.7×	5.6×	7.5×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Missouri OON All Behavioral Health Clinicians	10.9	9.6	6.9
Missouri OON All Medical/Surgical Clinicians	2.3	2.4	2.1
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Missouri	4.8×	4.1×	3.3×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Missouri OON Psychiatrists	7.2	7.7	3.7
Missouri OON Medical/Surgical Specialist Physicians	1.5	1.9	1.4
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Missouri	4.8×	4.1×	2.7×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

		Percent, %	
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Missouri OON Psychologists	12.9	11.8	8.8
Missouri OON Medical/Surgical Specialist Physicians	1.5	1.9	1.4
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Missouri	8.7×	6.3×	6.4×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Missouri OON Psychiatric Nurses	3.7	4.8	4.3
Missouri OON Nurse Practitioners	3.0	3.1	2.1
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Missouri	1.2×*	1.6×	2.1×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Missouri OON Therapists	12.2	9.8	7.7
Missouri OON Physician Assistants	2.7	3.3	2.9
Therapists OON Compared to Physician Assistants OON			
Missouri	4.6×	3.0×	2.6×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Missouri All Medical/Surgical Clinicians	105.6	106.9	108.5
Missouri All Behavioral Health Clinicians	75.2	83.3	87.6
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Missouri	40.4	28.3	23.8
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Missouri Medical/Surgical Specialist Physicians	110.8	112.8	114.7
Missouri Psychiatrists	78.1	87.3	89.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Missouri	41.9	29.3	28.1
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Missouri Medical/Surgical Specialist Physicians	110.8	112.8	114.7
Missouri Psychologists	75.8	82.1	86.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Missouri	46.2	37.5	32.6
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Missouri Nurse Practitioners	103.6	103.8	104.6
Missouri Psychiatric Nurses	78.8	93.6	95.7
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Missouri	31.5	10.9	9.3
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Missouri Physician Assistants	107.5	109.9	109.3
Missouri Therapists	73.0	81.6	87.1
Physician Assistants Reimbursement Levels Compared to Therapists			
Missouri	47.3	34.6	25.6
All States	40.6	34.5	29.6

Average			Perce	ntile, %	
Health Clinicians Missouri All Medical/Surgical Clinicians 108.5 93.1 120.6 224.4 Missouri All Behavioral Health Clinicians 87.6 69.2 84.5 123.7 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 23.8 34.4 42.8 81.3 Missouri 23.8 34.4 42.8 81.3 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus 89.5 86.1 105.0 143.0 Missouri Psychiatrists 89.5 86.1 105.0 143.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 89.5 86.1 105.0 143.0 Medical/Surgical Specialist Physicians Versus Psychologists 89.5 86.1 105.0 143.0 Medical/Surgical Specialist Physicians Versus Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Missouri Psychi		Average		75th	95th
Missouri All Behavioral Health Clinicians 87.6 69.2 84.5 123.7 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 23.8 34.4 42.8 81.3 Missouri 23.8 34.4 42.8 81.3 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists 89.5 86.1 105.0 143.0 Missouri Psychiatrists 89.5 86.1 105.0 143.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 28.1 27.2 37.4 89.5 Medical/Surgical Specialist Physicians Versus Psychologists 24.9 12.8 27.8 49.5 Missouri Medical/Surgical Specialist Physicians Versus Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Missouri 32.6 38.5 44.3 81.3 All States 28.8 17.3 44.0 38.					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Missouri 23.8 34.4 42.8 81.3 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Missouri Medical/Surgical Specialist Physicians 89.5 86.1 105.0 143.0 Missouri 28.1 27.2 37.4 89.5 Missouri 28.1 27.2 37.4 89.5 Medical/Surgical Specialist Physicians 99.1 12.8 27.8 49.5 Medical/Surgical Specialist Physicians 99.5 99.0 100.0 170.9 Medical/Surgical Specialist Physicians 98.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians 98.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians 98.5 14.3 81.3 All States 98.6 38.5 44.3 81.3 All States 109.6 85.0 112.8 175.3 Missouri Nurse Practitioners Versus Psychiatric Nurses Missouri Nurse Practitioners 89.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels 99.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels 99.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels	Missouri All Medical/Surgical Clinicians	108.5	93.1	120.6	224.4
Missouri 23.8 34.4 42.8 81.3 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Missouri Medical/Surgical Specialist Physicians 114.7 109.4 144.3 271.0 Missouri Psychiatrists 89.5 86.1 105.0 143.0 Medical/Surgical Specialist Physicians 28.1 27.2 37.4 89.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 86.5 79.0 100.0 170.9 Missouri Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Missouri Psychiatric Nurses 28.8 17.3 44.0	Missouri All Behavioral Health Clinicians	87.6	69.2	84.5	123.7
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists Missouri Medical/Surgical Specialist Physicians 114.7 109.4 144.3 271.0 Missouri Psychiatrists 89.5 86.1 105.0 143.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 28.1 27.2 37.4 89.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatric Nurses 32.6 38.5 44.3 81.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Peractitioners 104.6 85.0 112.8 175.3 Missouri Psychiatric Nurses 95.7 82.0 96.3 145.1	Missouri	23.8	34.4	42.8	81.3
Psychiatrists Missouri Medical/Surgical Specialist Physicians Neimbursement Levels Compared to Psychiatrists 114.7 109.4 144.3 271.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 28.1 27.2 37.4 89.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 86.5 79.0 100.0 170.9 Missouri Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Missouri Psychiatric Nurgea 32.6 38.5 44.3 81.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 95.7 82.0 96.3 145.1 All States 7.5 -1.1 18.4 34.3 <t< td=""><td>All States</td><td>21.7</td><td>26.6</td><td>48.0</td><td>70.4</td></t<>	All States	21.7	26.6	48.0	70.4
Missouri Psychiatrists 89.5 86.1 105.0 143.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 28.1 27.2 37.4 89.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Psychologists 114.7 109.4 144.3 271.0 Missouri Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatric Nurses 32.6 38.5 44.3 81.3 Missouri Nurse Practitioners Versus Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels 9.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 3					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Missouri 28.1 27.2 37.4 89.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 86.5 79.0 100.0 170.9 Missouri Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Missouri 32.6 38.5 44.3 81.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 9.3 3.7 17.2 20.8 All States 7.5 <t< td=""><td>Missouri Medical/Surgical Specialist Physicians</td><td>114.7</td><td>109.4</td><td>144.3</td><td>271.0</td></t<>	Missouri Medical/Surgical Specialist Physicians	114.7	109.4	144.3	271.0
Reimbursement Levels Compared to Psychiatrists Missouri 28.1 27.2 37.4 89.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Psychologists 86.5 79.0 100.0 170.9 Missouri Psychologists Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Missouri 32.6 38.5 44.3 81.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 99.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 <th< td=""><td>Missouri Psychiatrists</td><td>89.5</td><td>86.1</td><td>105.0</td><td>143.0</td></th<>	Missouri Psychiatrists	89.5	86.1	105.0	143.0
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Missouri Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 32.6 38.5 44.3 81.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 85.0 112.8 175.3 Missouri Nurse Practitioners 104.6 85.0 112.8 175.3 Missouri Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 9.3 3.7 17.2 20.8 Missouri 9.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels					
Medical/Surgical Specialist Physicians Versus Psychologists Missouri Medical/Surgical Specialist Physicians 114.7 109.4 144.3 271.0 Missouri Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Missouri 32.6 38.5 44.3 81.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 99.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels	Missouri	28.1	27.2	37.4	89.5
Psychologists Missouri Medical/Surgical Specialist Physicians 114.7 109.4 144.3 271.0 Missouri Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 79.0 100.0 170.9 Missouri 32.6 38.5 44.3 81.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 104.6 85.0 112.8 175.3 Missouri Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels 20.8 20.8 20.8 20.8 Missouri 9.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels	All States	24.9	12.8	27.8	49.5
Missouri Psychologists 86.5 79.0 100.0 170.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 32.6 38.5 44.3 81.3 Missouri 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 85.0 112.8 175.3 Missouri Nurse Practitioners 104.6 85.0 112.8 175.3 Missouri Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Missouri 9.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Missouri 32.6 38.5 44.3 81.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 85.0 112.8 175.3 Missouri Nurse Practitioners 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 9.3 3.7 17.2 20.8 Missouri 9.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels	Missouri Medical/Surgical Specialist Physicians	114.7	109.4	144.3	271.0
Reimbursement Levels Compared to Psychologists Missouri 32.6 38.5 44.3 81.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 85.0 112.8 175.3 Missouri Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 9.3 3.7 17.2 20.8 Missouri 9.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels	Missouri Psychologists	86.5	79.0	100.0	170.9
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 104.6 85.0 112.8 175.3 Missouri Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.8 20.8 Missouri 9.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 109.3 89.2 114.7 170.6 Missouri Physician Assistants 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels 87.1 61.8 72.8 95.7					
Nurse Practitioners Versus Psychiatric Nurses Missouri Nurse Practitioners 104.6 85.0 112.8 175.3 Missouri Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.8 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels	Missouri	32.6	38.5	44.3	81.3
Missouri Nurse Practitioners 104.6 85.0 112.8 175.3 Missouri Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.8 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels	All States	28.8	17.3	44.0	38.5
Missouri Psychiatric Nurses 95.7 82.0 96.3 145.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 9.3 3.7 17.2 20.8 Missouri 9.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 109.3 89.2 114.7 170.6 Missouri Physician Assistants 109.3 89.2 114.7 170.6 Physician Assistants Reimbursement Levels 87.1 61.8 72.8 95.7	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Missouri 9.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels	Missouri Nurse Practitioners	104.6	85.0	112.8	175.3
Compared to Psychiatric Nurses Missouri 9.3 3.7 17.2 20.8 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Missouri Physician Assistants 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels	Missouri Psychiatric Nurses	95.7	82.0	96.3	145.1
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Missouri Physician Assistants 109.3 89.2 114.7 170.6 Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels					
Physician Assistants Versus TherapistsMissouri Physician Assistants109.389.2114.7170.6Missouri Therapists87.161.872.895.7Physician Assistants Reimbursement Levels	Missouri	9.3	3.7	17.2	20.8
Missouri Physician Assistants109.389.2114.7170.6Missouri Therapists87.161.872.895.7Physician Assistants Reimbursement Levels	All States	7.5	-1.1	18.4	34.3
Missouri Therapists 87.1 61.8 72.8 95.7 Physician Assistants Reimbursement Levels	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels	Missouri Physician Assistants	109.3	89.2	114.7	170.6
	Missouri Therapists	87.1	61.8	72.8	95.7
	Physician Assistants Reimbursement Levels Compared to Therapists				
Missouri 25.6 44.4 57.5 78.3	Missouri	25.6	44.4	57.5	78.3
All States 29.6 33.8 59.3 101.6	All States	29.6	33.8	59.3	101.6

Appendix C-26: Montana Disparity Analysis, All Plans

Sample size in 2021: 9,993 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Montana OON Behavioral Health	0.8	0.7	11.3
Montana OON Medical/Surgical	1.1	1.0	1.2
Behavioral Health OON Compared to Medical/Surgical OON			
Montana	0.7×*	0.7×*	9.5×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Montana OON Behavioral Health	1.1	7.7	15.6
Montana OON Medical/Surgical	0.7	15.7	1.9
Behavioral Health OON Compared to Medical/Surgical OON			
Montana	1.4×*	0.5×	8.2×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Montana OON Behavioral Health	43.1	56.6	58.8
Montana OON Medical/Surgical	8.7	6.0	2.3
Behavioral Health OON Compared to Medical/Surgical OON			
Montana	4.9×	9.4×	25.1×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Montana OON All Behavioral Health Clinicians	16.3	5.5	6.7
Montana OON All Medical/Surgical Clinicians	2.8	2.7	2.8
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Montana	5.8×	2.0×	2.4×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Montana OON Psychiatrists	17.4	9.6	8.4
Montana OON Medical/Surgical Specialist Physicians	1.4	1.0	1.5
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Montana	12.6×	9.9×	5.5×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

		Percent, %		
	2019	2020	2021	
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians				
Montana OON Psychologists	9.5	2.8	4.2	
Montana OON Medical/Surgical Specialist Physicians	1.4	1.0	1.5	
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON				
Montana	6.9×	2.9×	2.8×	
All States	10.9×	9.4×	10.6×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Psychiatric Nurses Versus Nurse Practitioners				
Montana OON Psychiatric Nurses	58.3	n/a	n/a	
Montana OON Nurse Practitioners	1.2	n/a	n/a	
Psychiatric Nurses OON Compared to Nurse Practitioners OON				
Montana	47.8×	n/a	n/a	
All States	5.2×	5.4×	1.7×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Therapists Versus Physician Assistants				
Montana OON Therapists	17.2	5.4	7.0	
Montana OON Physician Assistants	1.6	1.8	1.7	
Therapists OON Compared to Physician Assistants OON				
Montana	10.5×	3.0×	4.2×	
All States	5.5×	4.7×	4.1×	
Parity Would Be	1.0×	1.0×	1.0×	

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

Montana All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			Percent, %	
Montana All Medical/Surgical Clinicians 153.2 155.3 158.8 Montana All Behavioral Health Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 28.1 26.6 22.9 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 151.5 155.0 157.9 Montana Redical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 129.2 130.1 158.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 17.2 19.1 -0.2* Montana 17.2 19.1 -0.2* All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 151.5 155.0 157.9 Montana Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 155.0 157.9 157.9 Montana 21.8 26.3 25.1 26.3 25.1 All		2019	2020	2021
Montana All Behavioral Health Clinicians 119.6 122.6 129.2 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 28.1 26.6 22.9 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 151.5 155.0 157.9 Montana Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 129.2 130.1 158.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 151.5 155.0 157.9 Montana Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 124.4 122.7 126.3 Montana Psychologists 124.4 122.7 126.3 Montana 21.8 26.3 25.1 All States 42.0 33.9 <td>All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians</td> <td></td> <td></td> <td></td>	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 28.1 26.6 22.9 Montana 28.1 26.6 22.9 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 151.5 155.0 157.9 Montana Medical/Surgical Specialist Physicians 129.2 130.1 158.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 40.8 30.1 24.9 Montana 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 151.5 155.0 157.9 Montana 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 21.8 26.3 25.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 100.4 129.5 126.6 Montana Austral Psychiatric Nurses 100.4 129.5 126.6 Montana Physician Assistants Versus Therapists 148.8 149.1 151.5 Montana Therapists 148.8 149.1 151.5 Montana Physician Assistants Reimbursement Levels Compared to Therapists 148.8 149.1 151.5 Montana Austral Reimbursement Levels Compared to Therapists 148.8 149.1 151.5 Montana Austral Reimbursement Levels Compared to Therapists 148.8 149.1 151.5 Montana Austral Reimbursement Levels Compared to Therapists 148.8 149.1 151.5 Montana Austral Reimbursement Levels Compared to Therapists 148.8 149.1 151.5 Montana Austral Reimbursement Levels Compared to Therap	Montana All Medical/Surgical Clinicians	153.2	155.3	158.8
Montana 28.1 26.6 22.9 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 5.0 157.9 Montana Medical/Surgical Specialist Physicians 151.5 155.0 157.9 Montana Psychiatrists 129.2 130.1 158.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 40.8 30.1 24.9 Montana 17.2 19.1 -0.2* All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 151.5 155.0 157.9 Montana Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 124.4 122.7 126.3 Montana Psychologists 21.8 26.3 25.1 Montana 21.8 26.3 25.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Psychiatric Nurses 155.1 156.2 24.1 <td>Montana All Behavioral Health Clinicians</td> <td>119.6</td> <td>122.6</td> <td>129.2</td>	Montana All Behavioral Health Clinicians	119.6	122.6	129.2
All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 151.5 155.0 157.9 Montana Psychiatrists 129.2 130.1 158.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 17.2 19.1 -0.2° All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 151.5 155.0 157.9 Montana Medical/Surgical Specialist Physicians Versus Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 21.8 26.3 25.1 Montana 21.8 26.3 25.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses Montana Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 <th></th> <th></th> <th></th> <th></th>				
Medical/Surgical Specialist Physicians Versus Psychiatrists Montana Medical/Surgical Specialist Physicians 151.5 155.0 157.9 Montana Psychiatrists 129.2 130.1 158.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 17.2 19.1 -0.2* Montana 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 40.8 30.1 24.9 Montana Medical/Surgical Specialist Physicians Versus Psychologists 151.5 155.0 157.9 Montana Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 21.8 26.3 25.1 Montana Psychologists 21.8 26.3 25.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.	Montana	28.1	26.6	22.9
Montana Medical/Surgical Specialist Physicians 151.5 155.0 157.9 Montana Psychiatrists 129.2 130.1 158.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 17.2 19.1 -0.2* Montana 17.2 19.1 -0.2* All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 151.5 155.0 157.9 Montana Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 21.8 26.3 25.1 Montana Psychologists 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Montana 54.5 20.6	All States	33.3	25.7	21.7
Montana Psychiatrists 129.2 130.1 158.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 17.2 19.1 -0.2° Montana 17.2 19.1 -0.2° All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 151.5 155.0 157.9 Montana Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 21.8 26.3 25.1 Montana 21.8 26.3 25.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Physician Assistants Versus Therapists 48.8 149.1 151.5 Montana Physician Assistants 148.8 149.1 151.5 Montana Assistants Reimbur	Medical/Surgical Specialist Physicians Versus Psychiatrists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Montana 17.2 19.1 -0.2* All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 151.5 155.0 157.9 Montana Medical/Surgical Specialist Physicians 124.4 122.7 126.3 Montana Psychologists 124.4 122.7 126.3 Montana 21.8 26.3 25.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Montana 54.5 20.6 24.1 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 148.8 149.1 151.5 Montana Physician Assistants Reimbursement Levels Compared to Therapists 17.5 12.6 22.4 <td>Montana Medical/Surgical Specialist Physicians</td> <td>151.5</td> <td>155.0</td> <td>157.9</td>	Montana Medical/Surgical Specialist Physicians	151.5	155.0	157.9
Montana 17.2 19.1 -0.2* All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 151.5 155.0 157.9 Montana Medical/Surgical Specialist Physicians 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 21.8 26.3 25.1 Montana 21.8 26.3 25.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Nurse Practitioners 155.1 156.2 157.1 Montana Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Montana 54.5 20.6 24.1 24.1 24.1 24.1 24.1 25.1 25.1 25.1 25.1 25.2 25.2 25.2	Montana Psychiatrists	129.2	130.1	158.2
All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 151.5 155.0 157.9 Montana Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 21.8 26.3 25.1 Montana 21.8 26.3 25.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 54.5 20.6 24.1 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 148.8 149.1 151.5 Montana Physician Assistants 148.8 149.1 151.5 Montana Assistants Reimbursement Levels Compared to Therapists 117.3 121.9 126.8 Montana Assistants Reimbursement Levels Compared to Therapists 149.4	Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Medical/Surgical Specialist Physicians Versus Psychologists Montana Medical/Surgical Specialist Physicians 151.5 155.0 157.9 Montana Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 21.8 26.3 25.1 Montana 21.8 26.3 25.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Nurse Practitioners 155.1 156.2 157.1 Montana Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Montana 54.5 20.6 24.1 24.1 24.1 24.1 24.1 24.1 24.1 24.1 24.1 24.1 24.1 25.5 25.5 25.5 25.1 25.1 25.1 25.1 25.1 25.1 25.1 25.1 25.1 25.1 25.1 25.1	Montana	17.2	19.1	-0.2*
Montana Medical/Surgical Specialist Physicians 151.5 155.0 157.9 Montana Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 21.8 26.3 25.1 Montana 21.8 26.3 25.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Nurse Practitioners 155.1 156.2 157.1 Montane Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Montana 54.5 20.6 24.1 24.1 24.1 24.1 24.1 24.1 24.1 24.1 24.1 24.1 24.1 24.1 24.1 24.1 26.8<	All States	40.8	30.1	24.9
Montana Psychologists 124.4 122.7 126.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 21.8 26.3 25.1 Montana 21.8 26.3 25.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Montana 54.5 20.6 24.1 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 148.8 149.1 151.5 Montana Physician Assistants 148.8 149.1 151.5 Montana Assistants Reimbursement Levels Compared to Therapists 26.8 22.4 19.4	Medical/Surgical Specialist Physicians Versus Psychologists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to PsychologistsMontana21.826.325.1All States42.033.928.8Nurse Practitioners Versus Psychiatric NursesMontana Nurse Practitioners155.1156.2157.1Montana Psychiatric Nurses100.4129.5126.6Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses44.520.624.1All States28.312.87.5Physician Assistants Versus TherapistsMontana Physician Assistants148.8149.1151.5Montana Therapists117.3121.9126.8Physician Assistants Reimbursement Levels Compared to Therapists26.822.419.4Montana26.822.419.4	Montana Medical/Surgical Specialist Physicians	151.5	155.0	157.9
to Psychologists Montana 21.8 26.3 25.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Nurse Practitioners 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 54.5 20.6 24.1 Montana 54.5 20.6 24.1 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 148.8 149.1 151.5 Montana Physician Assistants 148.8 149.1 151.5 Physician Assistants Reimbursement Levels Compared to Therapists 117.3 121.9 126.8 Montana 26.8 22.4 19.4	Montana Psychologists	124.4	122.7	126.3
All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 155.1 156.2 157.1 Montana Nurse Practitioners 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.6 24.1 Montana 54.5 20.6 24.1 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 148.8 149.1 151.5 Montana Physician Assistants 148.8 149.1 151.5 Montana Therapists 117.3 121.9 126.8 Physician Assistants Reimbursement Levels Compared to Therapists Montana 26.8 22.4 19.4				
Nurse Practitioners Versus Psychiatric NursesMontana Nurse Practitioners155.1156.2157.1Montana Psychiatric Nurses100.4129.5126.6Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses54.520.624.1All States28.312.87.5Physician Assistants Versus TherapistsMontana Physician Assistants148.8149.1151.5Montana Therapists117.3121.9126.8Physician Assistants Reimbursement Levels Compared to TherapistsMontana26.822.419.4	Montana	21.8	26.3	25.1
Montana Nurse Practitioners 155.1 156.2 157.1 Montana Psychiatric Nurses 100.4 129.5 126.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.6 24.1 Montana 54.5 20.6 24.1 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Montana Physician Assistants 148.8 149.1 151.5 Montana Therapists 117.3 121.9 126.8 Physician Assistants Reimbursement Levels Compared to Therapists Montana 26.8 22.4 19.4	All States	42.0	33.9	28.8
Montana Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Montana 54.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Montana Physician Assistants 148.8 149.1 151.5 Montana Therapists 117.3 121.9 126.8 Physician Assistants Reimbursement Levels Compared to Therapists Montana 26.8 22.4 19.4	Nurse Practitioners Versus Psychiatric Nurses			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Montana 54.5 20.6 24.1 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Montana Physician Assistants 148.8 149.1 151.5 Montana Therapists 117.3 121.9 126.8 Physician Assistants Reimbursement Levels Compared to Therapists Montana 26.8 22.4 19.4	Montana Nurse Practitioners	155.1	156.2	157.1
Nurses Montana 54.5 20.6 24.1 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Montana Physician Assistants 148.8 149.1 151.5 Montana Therapists 117.3 121.9 126.8 Physician Assistants Reimbursement Levels Compared to Therapists 26.8 22.4 19.4	Montana Psychiatric Nurses	100.4	129.5	126.6
All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Montana Physician Assistants 148.8 149.1 151.5 Montana Therapists 117.3 121.9 126.8 Physician Assistants Reimbursement Levels Compared to Therapists Montana 26.8 22.4 19.4	· · · · · · · · · · · · · · · · · · ·			
Physician Assistants Versus TherapistsMontana Physician Assistants148.8149.1151.5Montana Therapists117.3121.9126.8Physician Assistants Reimbursement Levels Compared to TherapistsMontana26.822.419.4	Montana	54.5	20.6	24.1
Montana Physician Assistants148.8149.1151.5Montana Therapists117.3121.9126.8Physician Assistants Reimbursement Levels Compared to TherapistsMontana26.822.419.4	All States	28.3	12.8	7.5
Montana Therapists 117.3 121.9 126.8 Physician Assistants Reimbursement Levels Compared to Therapists Montana 26.8 22.4 19.4	Physician Assistants Versus Therapists			
Physician Assistants Reimbursement Levels Compared to Therapists Montana 26.8 22.4 19.4	Montana Physician Assistants	148.8	149.1	151.5
Montana 26.8 22.4 19.4	Montana Therapists	117.3	121.9	126.8
	Physician Assistants Reimbursement Levels Compared to Therapists			
All States 40.6 34.5 29.6	Montana	26.8	22.4	19.4
	All States	40.6	34.5	29.6

^{*} Reimbursement levels are not statistically different between medical/surgical and behavioral health at a p < .05.

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Montana All Medical/Surgical Clinicians	158.8	140.9	162.9	307.5
Montana All Behavioral Health Clinicians	129.2	97.5	108.3	162.2
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Montana	22.9	44.5	50.4	89.6
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Montana Medical/Surgical Specialist Physicians	157.9	155.5	165.2	322.9
Montana Psychiatrists	158.2	144.4	177.7	334.8
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Montana	-0.2*	7.7	-7.0	-3.6
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Montana Medical/Surgical Specialist Physicians	157.9	155.5	165.2	322.9
Montana Psychologists	126.3	118.1	134.7	250.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Montana	25.1	31.6	22.7	89.6
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Montana Nurse Practitioners	157.1	128.3	148.7	202.2
Montana Psychiatric Nurses	126.6	93.1	113.8	165.8
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Montana	24.1	37.8	30.6	21.9
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Montana Physician Assistants	151.5	116.3	140.0	198.0
Montana Therapists	126.8	97.5	97.5	110.4
Physician Assistants Reimbursement Levels Compared to Therapists				
Montana	19.4	19.3	43.5	79.3
All States	29.6	33.8	59.3	101.6

^{*} Reimbursement levels are not statistically different between medical/surgical and behavioral health at a p < .05.

Appendix C-27: Nebraska Disparity Analysis, All Plans

Sample size in 2021: 48,707 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Nebraska OON Behavioral Health	6.4	11.8	9.7
Nebraska OON Medical/Surgical	0.9	5.1	1.9
Behavioral Health OON Compared to Medical/Surgical OON			
Nebraska	6.8×	2.3×	5.1×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Nebraska OON Behavioral Health	33.6	52.7	45.0
Nebraska OON Medical/Surgical	3.5	5.6	1.7
Behavioral Health OON Compared to Medical/Surgical OON			
Nebraska	9.6×	9.5×	25.9×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Nebraska OON Behavioral Health	32.9	21.0	17.8
Nebraska OON Medical/Surgical	0.7	1.7	1.8
Behavioral Health OON Compared to Medical/Surgical OON			
Nebraska	45.5×	12.6×	10.0×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Nebraska OON All Behavioral Health Clinicians	9.3	7.0	4.4
Nebraska OON All Medical/Surgical Clinicians	1.6	4.9	2.5
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Nebraska	5.9×	1.4×	1.8×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Nebraska OON Psychiatrists	6.2	5.9	3.4
Nebraska OON Medical/Surgical Specialist Physicians	1.1	4.0	1.6
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Nebraska	5.7×	1.5×	2.2×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

		Percent, %		
	2019	2020	2021	
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians				
Nebraska OON Psychologists	7.8	3.7	2.2	
Nebraska OON Medical/Surgical Specialist Physicians	1.1	4.0	1.6	
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON				
Nebraska	7.2×	0.9×*	1.4×	
All States	10.9×	9.4×	10.6×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Psychiatric Nurses Versus Nurse Practitioners				
Nebraska OON Psychiatric Nurses	6.5	1.6	1.9	
Nebraska OON Nurse Practitioners	1.7	1.6	1.5	
Psychiatric Nurses OON Compared to Nurse Practitioners OON				
Nebraska	3.9×	1.0×*	1.3×*	
All States	5.2×	5.4×	1.7×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Therapists Versus Physician Assistants				
Nebraska OON Therapists	10.9	8.3	5.2	
Nebraska OON Physician Assistants	1.3	1.1	0.5	
Therapists OON Compared to Physician Assistants OON				
Nebraska	8.2×	7.9×	10.6×	
All States	5.5×	4.7×	4.1×	
Parity Would Be	1.0×	1.0×	1.0×	

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Nebraska All Medical/Surgical Clinicians	167.4	172.4	177.6
Nebraska All Behavioral Health Clinicians	125.6	130.7	136.5
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Nebraska	33.3	31.9	30.1
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Nebraska Medical/Surgical Specialist Physicians	172.0	179.7	187.0
Nebraska Psychiatrists	140.0	149.6	163.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Nebraska	22.9	20.1	14.1
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Nebraska Medical/Surgical Specialist Physicians	172.0	179.7	187.0
Nebraska Psychologists	129.7	131.1	139.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Nebraska	32.5	37.1	33.8
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Nebraska Nurse Practitioners	170.3	172.0	175.7
Nebraska Psychiatric Nurses	115.7	155.1	165.3
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Nebraska	47.1	10.9	6.3
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Nebraska Physician Assistants	171.0	177.3	184.6
Nebraska Therapists	119.1	125.5	129.7
Physician Assistants Reimbursement Levels Compared to Therapists			
Nebraska	43.5	41.3	42.3
All States	40.6	34.5	29.6

Autorage		Percentile, %			
Nebraska All Medical/Surgical Clinicians 177.6 154.7 191.8 311.3		Average		75th	95th
Nebraska All Behavioral Health Clinicians 136.5 106.1 128.1 200.2					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 30.1 45.7 49.7 55.5 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists 187.0 183.7 212.1 313.7 Nebraska Medical/Surgical Specialist Physicians 187.0 183.7 212.1 313.7 Nebraska Psychiatrists 163.9 179.2 189.0 239.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 187.0 183.7 212.1 313.7 Medical/Surgical Specialist Physicians Versus Psychologists 187.0 183.7 212.1 313.7 Nebraska Medical/Surgical Specialist Physicians 187.0 183.7 212.1 313.7 Nebraska Psychologists 139.7 131.9 170.4 223.1 Medical/Surgical Specialist Physicians 187.0 183.7 212.1 313.7 Nebraska Psychologists 33.8 39.2 24.5 55.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 175.7 152.5 177.4 229.9 Nebraska Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels 26.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 184.6 155.7 180.8 238.9 Nebraska Therapists 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels 26.0 27.1 27.1 27.1 Nebraska Therapists 129.7 102.4 110.7 131.9 Nebraska Nebraska Therapists 129.7 102.4 110.7 131.9 Nebraska Therapists 129.7 102.4 10.7 131.9 Nebraska Therapists 129.7 102.4 10.7 10.7 10.7 Nebraska	Nebraska All Medical/Surgical Clinicians	177.6	154.7	191.8	311.3
Nebraska	Nebraska All Behavioral Health Clinicians	136.5	106.1	128.1	200.2
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists Nebraska Medical/Surgical Specialist Physicians 187.0 183.7 212.1 313.7 Nebraska Psychiatrists 163.9 179.2 189.0 239.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 14.1 2.5 12.2 31.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 187.0 183.7 212.1 313.7 180.7 180.4 223.1 223.1 224.1 313.7 180.4 223.1 223.1 224.5 55.5 28.8 180.7 131.9 170.4 223.1 223.1 224.5 55.5 All States 33.8 39.2 24.5 55.5 All States 28.8 17.3 44.0 38.5 38.5 38.5 Nurse Practitioners Versus Psychiatric Nurses 165.3 110.4 212.3 224.0 229.9 </td <td>Nebraska</td> <td>30.1</td> <td>45.7</td> <td>49.7</td> <td>55.5</td>	Nebraska	30.1	45.7	49.7	55.5
Nebraska Medical/Surgical Specialist Physicians 187.0 183.7 212.1 313.7 Nebraska Psychiatrists 163.9 179.2 189.0 239.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nebraska 14.1 2.5 12.2 31.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Nebraska Medical/Surgical Specialist Physicians Versus Psychologists Nebraska Psychologists 139.7 131.9 170.4 223.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nebraska Psychologists 139.7 131.9 170.4 223.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nebraska 33.8 39.2 24.5 55.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Nebraska Nurse Practitioners 175.7 152.5 177.4 229.9 Nebraska Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels 26.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 184.6 155.7 180.8 238.9 Nebraska Therapists 184.6 155.7 180.8 238.9 Nebraska Therapists 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels 26.0 27.0	All States	21.7	26.6	48.0	70.4
Nebraska Psychiatrists 163.9 179.2 189.0 239.0					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nebraska 14.1 2.5 12.2 31.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 27.8 49.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 183.7 212.1 313.7 Nebraska Psychologists Physicians Reimbursement Levels Compared to Psychologists 139.7 131.9 170.4 223.1 Nebraska Nurse Practitioners Versus Psychiatric Nurses 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 175.7 152.5 177.4 229.9 Nebraska Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 184.6 155.7 180.8 238.9 Nebr	Nebraska Medical/Surgical Specialist Physicians	187.0	183.7	212.1	313.7
Nebraska	Nebraska Psychiatrists	163.9	179.2	189.0	239.0
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Nebraska Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 139.7 131.9 170.4 223.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 33.8 39.2 24.5 55.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Nebraska Nurse Practitioners 175.7 152.5 177.4 229.9 Nebraska Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 6.3 38.2 -16.4 -6.2 All States 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Nebraska Physician Assistants 184.6 155.7 180.8 238.9 Nebraska Therapists 129.7 102.4 110.7 131.9					
Medical/Surgical Specialist Physicians Versus Psychologists Nebraska Medical/Surgical Specialist Physicians 187.0 183.7 212.1 313.7 Nebraska Psychologists 139.7 131.9 170.4 223.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 33.8 39.2 24.5 55.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 175.7 152.5 177.4 229.9 Nebraska Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 184.6 155.7 180.8 238.9 Nebraska Physician Assistants Reimbursement Levels Compared to Therapists 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels Compared to Therapists 42.3 52.1	Nebraska	14.1	2.5	12.2	31.2
Nebraska Medical/Surgical Specialist Physicians 187.0 183.7 212.1 313.7 Nebraska Psychologists 139.7 131.9 170.4 223.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nebraska 33.8 39.2 24.5 55.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Nebraska Nurse Practitioners 175.7 152.5 177.4 229.9 Nebraska Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nebraska 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 184.6 155.7 180.8 238.9 Nebraska Therapists 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels Compared to Therapists Nebraska 42.3 52.1 63.3 81.1	All States	24.9	12.8	27.8	49.5
Nebraska Psychologists 139.7 131.9 170.4 223.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 33.8 39.2 24.5 55.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 175.7 152.5 177.4 229.9 Nebraska Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 184.6 155.7 180.8 238.9 Nebraska Therapists 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels Compared to Therapists 42.3 52.1 63.3 81.1 Nebraska 42.3 52.1 63.3 81.1					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nebraska 33.8 39.2 24.5 55.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Nurse Practitioners Psychiatric Nurses Nebraska Psychiatric Nurses 175.7 152.5 177.4 229.9 Nebraska Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 184.6 155.7 180.8 238.9 Nebraska Therapists 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels Compared to Therapists 42.3 52.1 63.3 81.1	Nebraska Medical/Surgical Specialist Physicians	187.0	183.7	212.1	313.7
Reimbursement Levels Compared to Psychologists Nebraska 33.8 39.2 24.5 55.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 175.7 152.5 177.4 229.9 Nebraska Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 6.3 38.2 -16.4 -6.2 Nebraska 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 184.6 155.7 180.8 238.9 Nebraska Therapists 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels Compared to Therapists 42.3 52.1 63.3 81.1	Nebraska Psychologists	139.7	131.9	170.4	223.1
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Nebraska Nurse Practitioners 175.7 152.5 177.4 229.9 Nebraska Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nebraska 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Nebraska Physician Assistants 184.6 155.7 180.8 238.9 Nebraska Therapists 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels Compared to Therapists Nebraska 42.3 52.1 63.3 81.1					
Nurse Practitioners Versus Psychiatric Nurses Nebraska Nurse Practitioners 175.7 152.5 177.4 229.9 Nebraska Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 184.6 155.7 180.8 238.9 Nebraska Physician Assistants 184.6 155.7 180.8 238.9 Physician Assistants Reimbursement Levels Compared to Therapists 42.3 52.1 63.3 81.1	Nebraska	33.8	39.2	24.5	55.5
Nebraska Nurse Practitioners 175.7 152.5 177.4 229.9 Nebraska Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 184.6 155.7 180.8 238.9 Nebraska Physician Assistants 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels Compared to Therapists 42.3 52.1 63.3 81.1	All States	28.8	17.3	44.0	38.5
Nebraska Psychiatric Nurses 165.3 110.4 212.3 245.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 184.6 155.7 180.8 238.9 Nebraska Physician Assistants 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels Compared to Therapists 42.3 52.1 63.3 81.1	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Nebraska Physician Assistants 184.6 155.7 180.8 238.9 Nebraska Therapists 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels Compared to Therapists 42.3 52.1 63.3 81.1	Nebraska Nurse Practitioners	175.7	152.5	177.4	229.9
Compared to Psychiatric Nurses Nebraska 6.3 38.2 -16.4 -6.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Nebraska Physician Assistants 184.6 155.7 180.8 238.9 Nebraska Therapists 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels Compared to Therapists 42.3 52.1 63.3 81.1	Nebraska Psychiatric Nurses	165.3	110.4	212.3	245.0
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Nebraska Physician Assistants 184.6 155.7 180.8 238.9 Nebraska Therapists 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels Compared to Therapists 42.3 52.1 63.3 81.1					
Physician Assistants Versus TherapistsNebraska Physician Assistants184.6155.7180.8238.9Nebraska Therapists129.7102.4110.7131.9Physician Assistants Reimbursement Levels Compared to TherapistsCompared to TherapistsNebraska42.352.163.381.1	Nebraska	6.3	38.2	-16.4	-6.2
Nebraska Physician Assistants184.6155.7180.8238.9Nebraska Therapists129.7102.4110.7131.9Physician Assistants Reimbursement Levels Compared to TherapistsCompared to Therapists42.352.163.381.1	All States	7.5	-1.1	18.4	34.3
Nebraska Therapists 129.7 102.4 110.7 131.9 Physician Assistants Reimbursement Levels Compared to Therapists Nebraska 42.3 52.1 63.3 81.1	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists Nebraska 42.3 52.1 63.3 81.1	Nebraska Physician Assistants	184.6	155.7	180.8	238.9
Compared to Therapists Nebraska 42.3 52.1 63.3 81.1	Nebraska Therapists	129.7	102.4	110.7	131.9
All States 29.6 33.8 59.3 101.6	Nebraska	42.3	52.1	63.3	81.1
	All States	29.6	33.8	59.3	101.6

Appendix C-28: Nevada Disparity Analysis, All Plans

Sample size in 2021: 58,197 covered lives

Nevada OON Behavioral Health		Percent, %		
Nevada OON Behavioral Health		2019	2020	2021
Nevada OON Medical/Surgical 1.2 1.0 0.8	Acute Inpatient Facility			
Behavioral Health OON Compared to Medical/Surgical OON Nevada	Nevada OON Behavioral Health	13.6	14.1	16.0
Nevada	Nevada OON Medical/Surgical	1.2	1.0	0.8
All States 7.1× 6.0× 6.2× Parity Would Be 1.0× 1.0× 1.0× 1.0× Subacute Inpatient Facility Nevada OON Behavioral Health 61.0 57.1 58.8 Nevada OON Medical/Surgical 0.3 10.0 2.7 Behavioral Health OON Compared to Medical/Surgical OON Nevada 0ON Behavioral Health 00N Compared to Medical/Surgical OON Parity Would Be 9.9× 7.9× 19.9× 19.9× 10.0× 1.0× 1.0× 1.0× 1.0× 1.0× 1.0× 1.	Behavioral Health OON Compared to Medical/Surgical OON			
Parity Would Be	Nevada	11.3×	13.7×	20.7×
Nevada OON Behavioral Health	All States	7.1×	6.0×	6.2×
Nevada OON Behavioral Health	Parity Would Be	1.0×	1.0×	1.0×
Nevada OON Medical/Surgical 0.3 10.0 2.7	Subacute Inpatient Facility			
Behavioral Health OON Compared to Medical/Surgical OON Nevada 226.7x 5.7x 21.4x	Nevada OON Behavioral Health	61.0	57.1	58.8
Nevada 226.7× 5.7× 21.4× All States 9.9× 7.9× 19.9× Parity Would Be 1.0× 1.0× 1.0× Outpatient Facility (Non-Emergency Room) Nevada OON Behavioral Health 61.8 31.0 34.5 Nevada OON Medical/Surgical 16.2 11.0 11.6 Behavioral Health OON Compared to Medical/Surgical OON 3.8× 2.8× 3.0× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Offfice Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians 11.0 10.4 8.8 Nevada OON All Behavioral Health Clinicians 11.0 10.4 8.8 Nevada OON All Medical/Surgical Clinicians 6.0 5.8 5.2 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 1.0× 1.7× All States 3.9× 3.9× 3.9× 3.9× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0×	Nevada OON Medical/Surgical	0.3	10.0	2.7
All States				
Parity Would Be 1.0× 1.0× 1.0× Outpatient Facility (Non-Emergency Room) Nevada OON Behavioral Health 61.8 31.0 34.5 Nevada OON Medical/Surgical 16.2 11.0 11.6 Behavioral Health OON Compared to Medical/Surgical OON 3.8× 2.8× 3.0× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians 11.0 10.4 8.8 Nevada OON All Behavioral Health Clinicians 6.0 5.8 5.2 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 1.8× 1.8× 1.8× Nevada 1.8× 1.8× 1.7× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians 6.1 7.5 5.0 Nevada OON Medical/Surgical Specialist Physicians 4.9 5.6 4.3 <	Nevada	226.7×	5.7×	21.4×
Outpatient Facility (Non-Emergency Room) Nevada OON Behavioral Health 61.8 31.0 34.5 Nevada OON Medical/Surgical 16.2 11.0 11.6 Behavioral Health OON Compared to Medical/Surgical OON 3.8× 2.8× 3.0× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Nevada OON All Behavioral Health Clinicians 11.0 10.4 8.8 Nevada OON All Medical/Surgical Clinicians 6.0 5.8 5.2 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 1.8× 1.8× 1.7× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Nevada OON Medical/Surgical Specialist Physicians 4.9 5.6 4.3 Psychiatrist OON Compared to Medical/Surgical OON 6.1 7.5 5.0	All States	9.9×	7.9×	19.9×
Nevada OON Behavioral Health 61.8 31.0 34.5 Nevada OON Medical/Surgical 16.2 11.0 11.6 Behavioral Health OON Compared to Medical/Surgical OON 3.8× 2.8× 3.0× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians 11.0 10.4 8.8 Nevada OON All Medical/Surgical Clinicians 6.0 5.8 5.2 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 1.8× 1.8× 1.7× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians 6.1 7.5 5.0 Nevada OON Medical/Surgical Specialist Physicians 4.9 5.6 4.3 Psychiatrist OON Compared to Medical/Surgical OON	Parity Would Be	1.0×	1.0×	1.0×
Nevada OON Medical/Surgical 16.2 11.0 11.6	Outpatient Facility (Non-Emergency Room)			
Behavioral Health OON Compared to Medical/Surgical OON	Nevada OON Behavioral Health	61.8	31.0	34.5
Nevada 3.8× 2.8× 3.0× All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Nevada OON All Behavioral Health Clinicians 11.0 10.4 8.8 Nevada OON All Medical/Surgical Clinicians 6.0 5.8 5.2 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 1.8× 1.8× 1.7× All States 3.9× 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians 6.1 7.5 5.0 Nevada OON Medical/Surgical Specialist Physicians 4.9 5.6 4.3 Psychiatrist OON Compared to Medical/Surgical OON 4.9 5.6 4.3	Nevada OON Medical/Surgical	16.2	11.0	11.6
All States 3.5× 1.7× 1.5× Parity Would Be 1.0× 1.0× 1.0× 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Nevada OON All Behavioral Health Clinicians 6.0 5.8 5.2 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Nevada 1.8× 1.8× 1.7× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Nevada OON Psychiatrists Specialist Physicians 4.9 5.6 4.3 Psychiatrist OON Compared to Medical/Surgical OON	Behavioral Health OON Compared to Medical/Surgical OON			
Parity Would Be 1.0× 1	Nevada	3.8×	2.8×	3.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical CliniciansNevada OON All Behavioral Health Clinicians11.010.48.8Nevada OON All Medical/Surgical Clinicians6.05.85.2All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON1.8×1.8×1.8×Nevada1.8×1.8×1.7×All States3.9×3.9×3.5×Parity Would Be1.0×1.0×1.0×Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians6.17.55.0Nevada OON Psychiatrists6.17.55.0Nevada OON Medical/Surgical Specialist Physicians4.95.64.3Psychiatrist OON Compared to Medical/Surgical OON	All States	3.5×	1.7×	1.5×
Medical/Surgical CliniciansNevada OON All Behavioral Health Clinicians11.010.48.8Nevada OON All Medical/Surgical Clinicians6.05.85.2All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON1.8×1.8×1.7×Nevada1.8×1.8×1.7×All States3.9×3.9×3.5×Parity Would Be1.0×1.0×1.0×Office Visits - Psychiatrists Versus Medical/Surgical Specialist PhysiciansNevada OON Psychiatrists6.17.55.0Nevada OON Medical/Surgical Specialist Physicians4.95.64.3Psychiatrist OON Compared to Medical/Surgical OON	Parity Would Be	1.0×	1.0×	1.0×
Nevada OON All Medical/Surgical Clinicians All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Nevada 1.8× 1.8× 1.7× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Nevada OON Psychiatrists Nevada OON Medical/Surgical Specialist Physicians Nevada OON Medical/Surgical Specialist Physicians 4.9 5.6 4.3 Psychiatrist OON Compared to Medical/Surgical OON				
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Nevada 1.8× 1.8× 1.7× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Nevada OON Psychiatrists 6.1 7.5 5.0 Nevada OON Medical/Surgical Specialist Physicians 4.9 5.6 4.3 Psychiatrist OON Compared to Medical/Surgical OON	Nevada OON All Behavioral Health Clinicians	11.0	10.4	8.8
Clinicians OON Nevada 1.8× 1.8× 1.7× All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians 6.1 7.5 5.0 Nevada OON Psychiatrists 6.1 7.5 5.0 Nevada OON Medical/Surgical Specialist Physicians 4.9 5.6 4.3 Psychiatrist OON Compared to Medical/Surgical OON 5.6 4.3	Nevada OON All Medical/Surgical Clinicians	6.0	5.8	5.2
All States 3.9× 3.9× 3.5× Parity Would Be 1.0× 1.0× 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Nevada OON Psychiatrists 6.1 7.5 5.0 Nevada OON Medical/Surgical Specialist Physicians 4.9 5.6 4.3 Psychiatrist OON Compared to Medical/Surgical OON 4.9 </td <td></td> <td></td> <td></td> <td></td>				
Parity Would Be 1.0× 1	Nevada	1.8×	1.8×	1.7×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Nevada OON Psychiatrists 6.1 7.5 5.0 Nevada OON Medical/Surgical Specialist Physicians 4.9 5.6 4.3 Psychiatrist OON Compared to Medical/Surgical OON	All States	3.9×	3.9×	3.5×
Physicians Nevada OON Psychiatrists 6.1 7.5 5.0 Nevada OON Medical/Surgical Specialist Physicians 4.9 5.6 4.3 Psychiatrist OON Compared to Medical/Surgical OON	Parity Would Be	1.0×	1.0×	1.0×
Nevada OON Medical/Surgical Specialist Physicians 4.9 5.6 4.3 Psychiatrist OON Compared to Medical/Surgical OON				
Psychiatrist OON Compared to Medical/Surgical OON	Nevada OON Psychiatrists	6.1	7.5	5.0
	Nevada OON Medical/Surgical Specialist Physicians	4.9	5.6	4.3
Nevada 1,2× 1.3× 1.1×	Psychiatrist OON Compared to Medical/Surgical OON			
	Nevada	1.2×	1.3×	1.1×
All States 9.0× 8.7× 8.9×	All States	9.0×	8.7×	8.9×
Parity Would Be 1.0× 1.0× 1.0×	Parity Would Be	1.0×	1.0×	1.0×

		Percent, %		
	2019	2020	2021	
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians				
Nevada OON Psychologists	9.9	8.9	10.3	
Nevada OON Medical/Surgical Specialist Physicians	4.9	5.6	4.3	
Psychologist OON Compared to Medical/Surgical OON				
Nevada	2.0×	1.6×	2.4×	
All States	10.9×	9.4×	10.6×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Psychiatric Nurses Versus Nurse Practitioners				
Nevada OON Psychiatric Nurses	2.6	7.1	9.1	
Nevada OON Nurse Practitioners	6.1	6.6	5.6	
Psychiatric Nurses OON Compared to Nurse Practitioners OON				
Nevada	0.4×	1.1×*	1.6×	
All States	5.2×	5.4×	1.7×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Therapists Versus Physician Assistants				
Nevada OON Therapists	14.5	12.4	10.0	
Nevada OON Physician Assistants	8.6	7.6	5.9	
Therapists OON Compared to Physician Assistants OON				
Nevada	1.7×	1.6×	1.7×	
All States	5.5×	4.7×	4.1×	
Parity Would Be	1.0×	1.0×	1.0×	

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

Nevada All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Nevada 17.7 13.0 All States 33.3 25.7 Medical/Surgical Specialist Physicians Versus Psychiatrists Nevada Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nevada Psychiatrists 81.9 89.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nevada All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians Versus Psychologists Nevada Psychologists 99.0 101.2 Nevada Psychologists 99.0 101.2 Nevada Psychologists 99.0 101.2 Nevada Psychologists 42.7 18.4 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners 99.0 100.4 Nevada Psychiatric Nurses 103.0 109.9 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada 9.9.7 -8.6 All States 28.3 12.8 Physician Assistants Versus Therapists			Percent, %	
Nevada All Medical/Surgical Clinicians 97.6 100.0		2019	2020	2021
Nevada All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Nevada 17.7 13.0 All States 33.3 25.7 Medical/Surgical Specialist Physicians Versus Psychiatrists Nevada Medical/Surgical Specialist Physicians 99.0 101.2 Nevada Psychiatrists 81.9 89.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nevada Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nevada Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nevada 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians Versus Psychologists Nevada Psychologists 79.4 85.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada Psychologists 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners Neimbursement Levels Compared to Psychiatric Nurses Nevada Psychiatric Nurses 103.0 109.9 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada Psychiatric Nurses 28.3 12.8 Physician Assistants Versus Therapists Nevada Therapists 98.8 103.9 Nevada Therapists 83.9 88.6 Physician Assistants Reimbursement Levels Compared to Therapists Nevada Nevada Therapists 83.9 88.6	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Nevada 17.7 13.0 All States 33.3 25.7 Medical/Surgical Specialist Physicians Versus Psychiatrists Nevada Medical/Surgical Specialist Physicians 99.0 101.2 Nevada Psychiatrists 81.9 89.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nevada Psychiatrists Nevada 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians Versus Psychologists Nevada Psychologists 79.4 85.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada Psychologists 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada Nurse Reimbursement Levels Compared to Psychiatric Nurses Nevada — 9.7 8.6 All States 28.3 12.8 Physician Assistants Versus Therapists Nevada Physician Assistants Seimbursement Levels Compared to Therapists Nevada Assistants Reimbursement Levels Compared to Therapists Nevada Assistants Reimbursement Levels Compared to Therapists Nevada Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	Nevada All Medical/Surgical Clinicians	97.6	100.0	105.4
Nevada	Nevada All Behavioral Health Clinicians	83.0	88.5	98.8
All States 33.3 25.7				
Medical/Surgical Specialist Physicians Versus Psychiatrists 99.0 101.2 Nevada Medical/Surgical Specialist Physicians 81.9 89.1 Mevada Psychiatrists 81.9 89.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 20.9 13.5 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists 99.0 101.2 Nevada Medical/Surgical Specialist Physicians Physicians 99.0 101.2 Nevada Psychologists 79.4 85.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 24.7 18.4 Nevada 24.7 18.4 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses 93.0 100.4 100.4 100.4 Nevada Psychiatric Nurses 103.0 109.9 100.4 100.0 109.9 Nevada Psychiatric Nurses 28.3 12.8 12.8 12.8 Physician Assistants Versus Therapists 83.9 88.6 103.9 Nevada Physician Assistants Reimbursement Levels Compared to Therapists	Nevada	17.7	13.0	6.7
Nevada Medical/Surgical Specialist Physicians 99.0 101.2 Nevada Psychiatrists 81.9 89.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 20.9 13.5 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists 99.0 101.2 Nevada Medical/Surgical Specialist Physicians Seimbursement Levels Compared to Psychologists 79.4 85.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 42.0 33.9 Nevada 24.7 18.4 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses 93.0 100.4	All States	33.3	25.7	21.7
Nevada Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nevada 20.9 13.5 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians 99.0 101.2 Nevada Psychologists 79.4 85.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada Psychologists 42.0 33.9 Nevada Nevada Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada Psychiatric Nurses 103.0 109.9 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada Psychiatric Nurses 28.3 12.8 Physician Assistants Versus Therapists Nevada Physician Assistants 88.6 Physician Assistants Reimbursement Levels Compared to Therapists Nevada Nevada Psychiatric Reimbursement Levels Compared to Therapists Nevada Therapists 83.9 88.6	Medical/Surgical Specialist Physicians Versus Psychiatrists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nevada 20.9 13.5 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians 99.0 101.2 Nevada Psychologists 79.4 85.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners 93.0 100.4 Nevada Psychiatric Nurses 103.0 109.9 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada - 9.7 - 8.6 All States 28.3 12.8 Physician Assistants Versus Therapists Nevada Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	Nevada Medical/Surgical Specialist Physicians	99.0	101.2	106.9
Nevada 20.9 13.5 All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians 99.0 101.2 Nevada Psychologists 79.4 85.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada 24.7 18.4 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners 93.0 100.4 Nevada Psychiatric Nurses 103.0 109.9 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada -9.7 -8.6 All States 28.3 12.8 Physician Assistants Versus Therapists 98.8 103.9 Nevada Therapists 98.8 103.9 Nevada Therapists 83.9 88.6 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3 Nevada 17.7 17.3 Nevada 17.7 17.3 Nevada 17.7 17.3	Nevada Psychiatrists	81.9	89.1	97.2
All States 40.8 30.1 Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians 99.0 101.2 Nevada Psychologists 79.4 85.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 24.7 18.4 Nevada 24.7 18.4 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners 93.0 100.4 100.4 Nevada Psychiatric Nurses 103.0 109.9 109.9 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 Nevada -9.7 -8.6 28.3 12.8 Physician Assistants Versus Therapists Nevada Physician Assistants 98.8 103.9 Nevada Therapists 83.9 88.6 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3				
Medical/Surgical Specialist Physicians Versus PsychologistsNevada Medical/Surgical Specialist Physicians99.0101.2Nevada Psychologists79.485.4Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists24.718.4Nevada24.718.4All States42.033.9Nurse Practitioners Versus Psychiatric Nurses93.0100.4Nevada Nurse Practitioners93.0100.4Nevada Psychiatric Nurses103.0109.9Nurse Practitioners Reimbursement Levels Compared to Psychiatric NursesNevada-9.7-8.6All States28.312.8Physician Assistants Versus Therapists98.8103.9Nevada Physician Assistants98.8103.9Nevada Therapists83.988.6Physician Assistants Reimbursement Levels Compared to Therapists17.717.3	Nevada	20.9	13.5	9.9
Nevada Medical/Surgical Specialist Physicians Nevada Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada All States Nevada Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners Nevada Psychiatric Nurses Nevada Psychiatric Nurses Nevada Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada Nevada Physician Assistants Versus Therapists Nevada Physician Assistants Nevada Therapists Physician Assistants Reimbursement Levels Compared to Therapists Nevada Nevada Therapists Nevada Therapists Nevada 17.7 17.3	All States	40.8	30.1	24.9
Nevada Psychologists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada Nevada All States Nevada Nurse Practitioners Versus Psychiatric Nurses Nevada Psychiatric Nurses Nevada Psychiatric Nurses Nevada Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada Nevada -9.7 -8.6 All States Physician Assistants Versus Therapists Nevada Physician Assistants Nevada Therapists Physician Assistants Reimbursement Levels Compared to Therapists Nevada Nevada 17.7 17.3	Medical/Surgical Specialist Physicians Versus Psychologists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada 24.7 18.4 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners 93.0 100.4 Nevada Psychiatric Nurses 103.0 109.9 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada - 9.7 -8.6 All States 28.3 12.8 Physician Assistants Versus Therapists Nevada Physician Assistants 98.8 103.9 Nevada Therapists 98.8 103.9 Nevada Therapists 83.9 88.6 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	Nevada Medical/Surgical Specialist Physicians	99.0	101.2	106.9
Nevada 24.7 18.4 All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners 93.0 100.4 Nevada Psychiatric Nurses 103.0 109.9 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada 19.7 -8.6 All States 28.3 12.8 Physician Assistants Versus Therapists Nevada Physician Assistants 98.8 103.9 Nevada Therapists 98.8 103.9 Nevada Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	, ,	79.4	85.4	97.5
All States 42.0 33.9 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners 93.0 100.4 Nevada Psychiatric Nurses 103.0 109.9 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada -9.7 -8.6 All States 28.3 12.8 Physician Assistants Versus Therapists Nevada Physician Assistants 98.8 103.9 Nevada Therapists 83.9 88.6 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3				
Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners Nevada Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada Nevada -9.7 -8.6 All States Physician Assistants Versus Therapists Nevada Physician Assistants Nevada Therapists Physician Assistants Reimbursement Levels Compared to Therapists Nevada Nevada 17.7 17.3	Nevada	24.7	18.4	9.7
Nevada Nurse Practitioners 93.0 100.4 Nevada Psychiatric Nurses 103.0 109.9 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada -9.7 -8.6 All States 28.3 12.8 Physician Assistants Versus Therapists Nevada Physician Assistants 98.8 103.9 Nevada Therapists 83.9 88.6 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	All States	42.0	33.9	28.8
Nevada Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada -9.7 -8.6 All States 28.3 12.8 Physician Assistants Versus Therapists Nevada Physician Assistants 98.8 103.9 Nevada Therapists 83.9 88.6 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	Nurse Practitioners Versus Psychiatric Nurses			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada -9.7 -8.6 All States 28.3 12.8 Physician Assistants Versus Therapists Nevada Physician Assistants 98.8 103.9 Nevada Therapists 83.9 88.6 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	Nevada Nurse Practitioners	93.0	100.4	103.9
Nurses 19.7 -8.6 All States 28.3 12.8 Physician Assistants Versus Therapists Nevada Physician Assistants 98.8 103.9 Nevada Therapists 83.9 88.6 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	Nevada Psychiatric Nurses	103.0	109.9	114.7
All States 28.3 12.8 Physician Assistants Versus Therapists Nevada Physician Assistants 98.8 103.9 Nevada Therapists 83.9 88.6 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	· · · · · · · · · · · · · · · · · · ·			
Physician Assistants Versus Therapists Nevada Physician Assistants Nevada Therapists Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	Nevada	-9.7	-8.6	-9.4
Nevada Physician Assistants Nevada Therapists Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	All States	28.3	12.8	7.5
Nevada Therapists 83.9 88.6 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	Physician Assistants Versus Therapists			
Physician Assistants Reimbursement Levels Compared to Therapists Nevada 17.7 17.3	Nevada Physician Assistants	98.8	103.9	113.0
Nevada 17.7 17.3	Nevada Therapists	83.9	88.6	99.0
	Physician Assistants Reimbursement Levels Compared to Therapists			
All States 40.6 34.5	Nevada	17.7	17.3	14.1
	All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians 105.4 89.9 119.6 225.0		Percentile, %			
Nevada All Medical/Surgical Clinicians 105.4 89.9 119.6 225.0		Average		75th	95th
Nevada All Behavioral Health Clinicians 98.8 78.1 95.9 129.5					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Nevada 6.7 15.1 24.7 73.7 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Nevada Medical/Surgical Specialist Physicians 106.9 100.0 129.0 239.1 Nevada Psychiatrists 97.2 97.1 111.7 153.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nevada 9.9 3.0 15.6 55.8 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians Versus Psychologists Nevada Psychologists 97.5 92.1 104.1 177.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada Psychologists 97.8 6 24.0 73.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners 103.9 87.5 134.7 168.2 Nevada Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada -9.4 -5.7 29.4 -9.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Nevada Physician Assistants Nevada Physician Assistants Nevada Physician Assistants Reimbursement Levels Compared to Therapists Nevada Therapists Nevada Therapists Nevada Physician Assistants Reimbursement Levels Compared to Therapists Nevada Therapists Nevada Therapists Nevada Physician Assistants Reimbursement Levels Compared to Therapists Nevada Therapists	Nevada All Medical/Surgical Clinicians	105.4	89.9	119.6	225.0
Nevada	Nevada All Behavioral Health Clinicians	98.8	78.1	95.9	129.5
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Nevada Medical/Surgical Specialist Physicians 106.9 100.0 129.0 239.1 Nevada Psychiatrists 97.2 97.1 111.7 153.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nevada 9.9 3.0 15.6 55.8 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians 97.5 92.1 104.1 177.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada Psychologists 97.5 92.1 104.1 177.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada Psychiatric Nurses 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners 103.9 87.5 134.7 168.2 Nevada Psychiatric Nurses 114.7 92.8 104.1 186.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 114.7 92.8 104.1 186.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 113.0 88.5 119.1 180.0 Nevada Physician Assistants Versus Therapists Nevada Physician Assistants 113.0 88.5 119.1 180.0 Nevada Physician Assistants Nersus Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 14.1 17.8 43.7 73.0					
Medical/Surgical Specialist Physicians Versus Psychiatrists Nevada Medical/Surgical Specialist Physicians 106.9 100.0 129.0 239.1 Nevada Psychiatrists 97.2 97.1 111.7 153.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 9.9 3.0 15.6 55.8 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 97.5 92.1 104.1 177.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 97.5 92.1 104.1 177.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatric Nurses 8 17.3 44.0 38.5 Nevada 9.7 8.6 24.0 73.7 All States 28.8 17.3 44.0 38.5 Nevada Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 114.7 92.8 104.1 186.6	Nevada	6.7	15.1	24.7	73.7
Nevada Medical/Surgical Specialist Physicians 106.9 100.0 129.0 239.1	All States	21.7	26.6	48.0	70.4
Nevada Psychiatrists 97.2 97.1 111.7 153.4					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Nevada 9.9 3.0 15.6 55.8 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus	Nevada Medical/Surgical Specialist Physicians	106.9	100.0	129.0	239.1
Nevada 9.9 3.0 15.6 55.8	Nevada Psychiatrists	97.2	97.1	111.7	153.4
Medical/Surgical Specialist Physicians Versus					
Medical/Surgical Specialist Physicians Versus Psychologists Nevada Medical/Surgical Specialist Physicians 106.9 100.0 129.0 239.1 Nevada Psychologists 97.5 92.1 104.1 177.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 9.7 8.6 24.0 73.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 103.9 87.5 134.7 168.2 Nevada Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 114.7 92.8 104.1 186.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -9.4 -5.7 29.4 -9.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 113.0 88.5 119.1 180.0 Nevada Physician Assistants Reimbursement Levels Compared to Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists 14.1 17.8 43.7<	Nevada	9.9	3.0	15.6	55.8
Nevada Medical/Surgical Specialist Physicians 106.9 100.0 129.0 239.1 Nevada Psychologists 97.5 92.1 104.1 177.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada 9.7 8.6 24.0 73.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners 103.9 87.5 134.7 168.2 Nevada Psychiatric Nurses 114.7 92.8 104.1 186.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada -9.4 -5.7 29.4 -9.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Nevada Physician Assistants 113.0 88.5 119.1 180.0 Nevada Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 14.1 17.8 43.7 73.0	All States	24.9	12.8	27.8	49.5
Nevada Psychologists 97.5 92.1 104.1 177.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8.6 24.0 73.7 Nevada 9.7 8.6 24.0 73.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 103.9 87.5 134.7 168.2 Nevada Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 114.7 92.8 104.1 186.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -9.4 -5.7 29.4 -9.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 113.0 88.5 119.1 180.0 Nevada Physician Assistants 113.0 88.5 119.1 180.0 Nevada Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists 24.1 17.8 43.7 73.0					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Nevada 9.7 8.6 24.0 73.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 103.9 87.5 134.7 168.2 Nevada Nurse Practitioners 103.9 87.5 134.7 168.2 Nevada Psychiatric Nurses 114.7 92.8 104.1 186.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -9.4 -5.7 29.4 -9.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 113.0 88.5 119.1 180.0 Nevada Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists 14.1 17.8 43.7 73.0	Nevada Medical/Surgical Specialist Physicians	106.9	100.0	129.0	239.1
Reimbursement Levels Compared to Psychologists Nevada 9.7 8.6 24.0 73.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 103.9 87.5 134.7 168.2 Nevada Psychiatric Nurses 114.7 92.8 104.1 186.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -9.4 -5.7 29.4 -9.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 113.0 88.5 119.1 180.0 Nevada Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists 14.1 17.8 43.7 73.0	Nevada Psychologists	97.5	92.1	104.1	177.8
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners 103.9 87.5 134.7 168.2 Nevada Psychiatric Nurses 114.7 92.8 104.1 186.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada -9.4 -5.7 29.4 -9.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Nevada Physician Assistants 113.0 88.5 119.1 180.0 Nevada Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 14.1 17.8 43.7 73.0					
Nurse Practitioners Versus Psychiatric Nurses Nevada Nurse Practitioners 103.9 87.5 134.7 168.2 Nevada Psychiatric Nurses 114.7 92.8 104.1 186.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -9.4 -5.7 29.4 -9.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 113.0 88.5 119.1 180.0 Nevada Physician Assistants 19.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists 14.1 17.8 43.7 73.0	Nevada	9.7	8.6	24.0	73.7
Nevada Nurse Practitioners 103.9 87.5 134.7 168.2 Nevada Psychiatric Nurses 114.7 92.8 104.1 186.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -9.4 -5.7 29.4 -9.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 113.0 88.5 119.1 180.0 Nevada Physician Assistants 113.0 88.5 119.1 180.0 Nevada Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists 14.1 17.8 43.7 73.0	All States	28.8	17.3	44.0	38.5
Nevada Psychiatric Nurses 114.7 92.8 104.1 186.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses -9.4 -5.7 29.4 -9.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Nevada Physician Assistants 113.0 88.5 119.1 180.0 Nevada Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists 14.1 17.8 43.7 73.0	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nevada -9.4 -5.7 29.4 -9.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Nevada Physician Assistants 113.0 88.5 119.1 180.0 Nevada Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists 14.1 17.8 43.7 73.0	Nevada Nurse Practitioners	103.9	87.5	134.7	168.2
Compared to Psychiatric Nurses Nevada -9.4 -5.7 29.4 -9.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Nevada Physician Assistants 113.0 88.5 119.1 180.0 Nevada Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists 14.1 17.8 43.7 73.0	Nevada Psychiatric Nurses	114.7	92.8	104.1	186.6
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Nevada Physician Assistants 113.0 88.5 119.1 180.0 Nevada Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists 14.1 17.8 43.7 73.0					
Physician Assistants Versus TherapistsNevada Physician Assistants113.088.5119.1180.0Nevada Therapists99.075.282.9104.1Physician Assistants Reimbursement Levels Compared to Therapists14.117.843.773.0	Nevada	-9.4	-5.7	29.4	-9.9
Nevada Physician Assistants113.088.5119.1180.0Nevada Therapists99.075.282.9104.1Physician Assistants Reimbursement Levels Compared to Therapists14.117.843.773.0	All States	7.5	-1.1	18.4	34.3
Nevada Therapists 99.0 75.2 82.9 104.1 Physician Assistants Reimbursement Levels Compared to Therapists Nevada 14.1 17.8 43.7 73.0	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists Nevada 14.1 17.8 43.7 73.0	Nevada Physician Assistants	113.0	88.5	119.1	180.0
Compared to Therapists Nevada 14.1 17.8 43.7 73.0	Nevada Therapists	99.0	75.2	82.9	104.1
All States 29.6 33.8 59.3 101.6	Nevada	14.1	17.8	43.7	73.0
	All States	29.6	33.8	59.3	101.6

Appendix C-29: New Hampshire Disparity Analysis, All Plans

Sample size in 2021: 30,168 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
New Hampshire OON Behavioral Health	13.7	13.7	13.6
New Hampshire OON Medical/Surgical	0.4	0.9	0.4
Behavioral Health OON Compared to Medical/Surgical OON			
New Hampshire	31.1×	15.5×	31.6×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
New Hampshire OON Behavioral Health	74.9	65.2	52.5
New Hampshire OON Medical/Surgical	9.8	2.4	0.7
Behavioral Health OON Compared to Medical/Surgical OON			
New Hampshire	7.7×	27.1×	73.8×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
New Hampshire OON Behavioral Health	42.5	48.7	40.2
New Hampshire OON Medical/Surgical	1.5	2.6	1.9
Behavioral Health OON Compared to Medical/Surgical OON		-	-
New Hampshire	27.4×	19.1×	20.7×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
New Hampshire OON All Behavioral Health Clinicians	6.6	5.7	8.9
New Hampshire OON All Medical/Surgical Clinicians	1.7	2.0	1.9
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
New Hampshire	3.9×	2.8×	4.7×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
New Hampshire OON Psychiatrists	6.5	9.2	11.3
New Hampshire OON Medical/Surgical Specialist Physicians	0.8	1.2	1.1
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
New Hampshire	8.3×	7.5×	10.6×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
New Hampshire OON Psychologists	4.9	5.1	8.7
New Hampshire OON Medical/Surgical Specialist Physicians	0.8	1.2	1.1
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
New Hampshire	6.2×	4.1×	8.2×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
New Hampshire OON Psychiatric Nurses	8.0	7.1	24.6
New Hampshire OON Nurse Practitioners	1.5	1.1	1.2
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
New Hampshire	5.3×	6.3×	20.0×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
New Hampshire OON Therapists	7.1	5.1	7.9
New Hampshire OON Physician Assistants	1.5	0.8	0.2
Therapists OON Compared to Physician Assistants OON			
New Hampshire	4.9×	6.6×	41.3×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
New Hampshire All Medical/Surgical Clinicians	152.4	156.0	159.5
New Hampshire All Behavioral Health Clinicians	96.8	103.4	106.2
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
New Hampshire	57.5	50.9	50.2
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
New Hampshire Medical/Surgical Specialist Physicians	161.5	166.0	171.5
New Hampshire Psychiatrists	108.9	119.2	119.1
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
New Hampshire	48.3	39.3	44.0
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
New Hampshire Medical/Surgical Specialist Physicians	161.5	166.0	171.5
New Hampshire Psychologists	96.8	103.2	109.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
New Hampshire	66.7	60.9	57.1
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
New Hampshire Nurse Practitioners	159.8	159.6	161.5
New Hampshire Psychiatric Nurses	136.1	167.1	117.2
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
New Hampshire	17.5	-4.5	37.8
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
New Hampshire Physician Assistants	194.9	180.9	186.2
New Hampshire Therapists	90.8	97.1	102.0
Physician Assistants Reimbursement Levels Compared to Therapists			
New Hampshire	114.5	86.4	82.5
All States	40.6	34.5	29.6

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
New Hampshire All Medical/Surgical Clinicians	159.5	130.8	185.8	296.6
New Hampshire All Behavioral Health Clinicians	106.2	82.5	102.2	160.1
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
New Hampshire	50.2	58.5	81.8	85.2
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
New Hampshire Medical/Surgical Specialist Physicians	171.5	159.8	213.4	361.5
New Hampshire Psychiatrists	119.1	114.7	140.5	201.8
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
New Hampshire	44.0	39.4	51.8	79.1
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
New Hampshire Medical/Surgical Specialist Physicians	171.5	159.8	213.4	361.5
New Hampshire Psychologists	109.2	104.3	122.3	189.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
New Hampshire	57.1	53.2	74.5	85.2
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
New Hampshire Nurse Practitioners	161.5	126.5	162.5	254.6
New Hampshire Psychiatric Nurses	117.2	96.7	118.0	151.3
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
New Hampshire	37.8	30.8	37.8	68.2
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
New Hampshire Physician Assistants	186.2	160.8	188.2	294.9
New Hampshire Therapists	102.0	79.0	86.5	109.7
Physician Assistant Reimbursement Levels Compared to Therapists				
New Hampshire	82.5	103.5	117.5	168.8
All States	29.6	33.8	59.3	101.6

Appendix C-30: New Jersey Disparity Analysis, All Plans

Sample size in 2021: 429,973 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
New Jersey OON Behavioral Health	17.7	16.4	13.3
New Jersey OON Medical/Surgical	0.7	0.7	0.6
Behavioral Health OON Compared to Medical/Surgical OON			
New Jersey	25.6×	24.8×	23.4×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
New Jersey OON Behavioral Health	69.5	60.9	41.6
New Jersey OON Medical/Surgical	0.8	0.7	2.6
Behavioral Health OON Compared to Medical/Surgical OON			
New Jersey	92.1×	92.5×	16.0×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
New Jersey OON Behavioral Health	43.2	41.0	36.9
New Jersey OON Medical/Surgical	8.8	12.4	15.4
Behavioral Health OON Compared to Medical/Surgical OON			
New Jersey	4.9×	3.3×	2.4×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
New Jersey OON All Behavioral Health Clinicians	35.7	32.0	31.0
New Jersey OON All Medical/Surgical Clinicians	17.8	15.5	15.6
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
New Jersey	2.0×	2.1×	2.0×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
New Jersey OON Psychiatrists	33.5	30.0	28.3
New Jersey OON Medical/Surgical Specialist Physicians	4.4	4.3	4.5
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
New Jersey	7.6×	7.0×	6.3×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
New Jersey OON Psychologists	43.5	40.9	40.9
New Jersey OON Medical/Surgical Specialist Physicians	4.4	4.3	4.5
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
New Jersey	9.8×	9.6×	9.2×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
New Jersey OON Psychiatric Nurses	13.2	11.1	8.5
New Jersey OON Nurse Practitioners	4.0	4.3	4.5
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
New Jersey	3.3×	2.6×	1.9×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
New Jersey OON Therapists	34.3	30.1	28.8
New Jersey OON Physician Assistants	5.0	4.3	3.4
Therapists OON Compared to Physician Assistants OON			
New Jersey	6.8×	7.0×	8.4×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians		Percent, %		
New Jersey All Medical/Surgical Clinicians 104.6 110.3 115.3 New Jersey All Behavioral Health Clinicians 83.2 94.8 105.1 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians New Jersey 25.8 16.4 9.7 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists New Jersey Medical/Surgical Specialist Physicians 109.4 115.6 121.4 New Jersey Psychiatrists 84.2 98.4 108.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New Jersey Psychiatrists 40.8 30.1 24.9 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists New Jersey Medical/Surgical Specialist Physicians Versus Psychologists New Jersey Medical/Surgical Specialist Physicians 109.4 115.6 121.4 New Jersey Medical/Surgical Specialist Physicians 109.4 115.6 121.4 New Jersey Medical/Surgical Specialist Physicians 109.4 115.6 121.4 New Jersey Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New Jersey 31.9 23.1 14.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses New Jersey Nurse Practitioners 101.6 110.1 117.1 New Jersey Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New Jersey Physician Resistants Versus Therapists New Jersey Physician Assistants Versus Therapists New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists New Jersey Herapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists New Jersey Therapists 12.6 5.8 0.4		2019	2020	2021
New Jersey All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians New Jersey 25.8 16.4 9.7	New Jersey All Medical/Surgical Clinicians	104.6	110.3	115.3
New Jersey	New Jersey All Behavioral Health Clinicians	83.2	94.8	105.1
All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists New Jersey Medical/Surgical Specialist Physicians 109.4 115.6 121.4 New Jersey Psychiatrists 84.2 98.4 108.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New Jersey 29.9 17.5 11.9 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists New Jersey Medical/Surgical Specialist Physicians Versus Psychologists New Jersey Psychologists 82.9 93.9 105.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New Jersey Psychologists 82.9 93.9 105.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New Jersey 31.9 23.1 14.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses New Jersey Nurse Practitioners New Jersey Nurse Practitioners New Jersey Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New Jersey 36.8 21.7 8.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New Jersey Physician Assistants New Jersey Physician Assistants New Jersey Therapists 93.9 99.4 104.0 New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists New Jersey Therapists 83.4 94.0 103.5				
Medical/Surgical Specialist Physicians Versus Psychiatrists New Jersey Medical/Surgical Specialist Physicians 109.4 115.6 121.4 New Jersey Psychiatrists 84.2 98.4 108.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 29.9 17.5 11.9 New Jersey 29.9 17.5 11.9 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 8.29 93.9 105.7 Mew Jersey Medical/Surgical Specialist Physicians Versus Psychologists 82.9 93.9 105.7 Mew Jersey Psychologists 82.9 93.9 105.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 82.9 93.9 105.7 Mew Jersey 31.9 23.1 14.8 14.8 14.0 14.8 All States 42.0 33.9 28.8 14.0 10.1 117.1 117.1 117.1 117.1 117.1 117.1 117.1 117.1 117.1 117.1 117.1	New Jersey	25.8	16.4	9.7
New Jersey Medical/Surgical Specialist Physicians 109.4 115.6 121.4 New Jersey Psychiatrists 84.2 98.4 108.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New Jersey 29.9 17.5 11.9 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists New Jersey Medical/Surgical Specialist Physicians Versus Psychologists New Jersey Psychologists 82.9 93.9 105.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New Jersey 31.9 23.1 14.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 101.6 110.1 117.1 New Jersey Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Physician Assistants Versus Therapists 93.9 99.4 104.0 New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists New Jersey Therapists 83.4 94.0 103.5 New Jersey Second Secon	All States	33.3	25.7	21.7
New Jersey Psychiatrists 84.2 98.4 108.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 29.9 17.5 11.9 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists New Jersey Medical/Surgical Specialist Physicians 109.4 115.6 121.4 New Jersey Psychologists 82.9 93.9 105.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 109.4 115.6 121.4 New Jersey 31.9 23.1 14.8 All States 42.0 33.9 28.8 New Jersey Psychiatric Nurses 74.3 90.4 107.7 New Jersey 36.8 21.7 8.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New Je	Medical/Surgical Specialist Physicians Versus Psychiatrists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New Jersey 29.9 17.5 11.9 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 109.4 115.6 121.4 New Jersey Medical/Surgical Specialist Physicians 109.4 115.6 121.4 New Jersey Psychologists 82.9 93.9 105.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 23.1 14.8 New Jersey 31.9 23.1 14.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 74.3 90.4 107.7 New Jersey Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 74.3 90.4 107.7 New Jersey 36.8 21.7 8.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 93.9 99.4 104.0	New Jersey Medical/Surgical Specialist Physicians	109.4	115.6	121.4
New Jersey 29.9 17.5 11.9 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists New Jersey Medical/Surgical Specialist Physicians 109.4 115.6 121.4 New Jersey Psychologists 82.9 93.9 105.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New Jersey 31.9 23.1 14.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses New Jersey Nurse Practitioners 101.6 110.1 117.1 New Jersey Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New Jersey 36.8 21.7 8.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 93.9 99.4 104.0 New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists New Jersey 12.6 5.8 0.4	New Jersey Psychiatrists	84.2	98.4	108.5
All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists New Jersey Psychologists 82.9 93.9 105.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 31.9 23.1 14.8 New Jersey 31.9 23.1 14.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 101.6 110.1 117.1 New Jersey Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 36.8 21.7 8.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 93.9 99.4 104.0 New Jersey Physician Assistants 93.9 99.4 104.0 New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists 12.6 5.8 0.4	Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Medical/Surgical Specialist Physicians Versus Psychologists New Jersey Medical/Surgical Specialist Physicians 109.4 115.6 121.4 New Jersey Psychologists 82.9 93.9 105.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 31.9 23.1 14.8 New Jersey 31.9 23.1 14.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 101.6 110.1 117.1 New Jersey Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 36.8 21.7 8.8 New Jersey 36.8 21.7 8.8 3.8 4.5 7.5 Physician Assistants Versus Therapists 93.9 99.4 104.0 103.5 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists 12.6 5.8 0.4	New Jersey	29.9	17.5	11.9
New Jersey Medical/Surgical Specialist Physicians 109.4 115.6 121.4 New Jersey Psychologists 82.9 93.9 105.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 31.9 23.1 14.8 New Jersey 31.9 23.1 14.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 101.6 110.1 117.1 New Jersey Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.8 21.7 8.8 New Jersey 36.8 21.7 8.8 8.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 93.9 99.4 104.0 New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists 12.6 5.8 0.4	All States	40.8	30.1	24.9
New Jersey Psychologists 82.9 93.9 105.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 31.9 23.1 14.8 New Jersey 31.9 23.1 14.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 101.6 110.1 117.1 New Jersey Nurse Practitioners 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 86.8 21.7 8.8 8.8 All States 28.3 12.8 7.5 7.5 Physician Assistants Versus Therapists 93.9 99.4 104.0 New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists New Jersey 12.6 5.8 0.4	Medical/Surgical Specialist Physicians Versus Psychologists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New Jersey 31.9 23.1 14.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses New Jersey Nurse Practitioners 101.6 110.1 117.1 New Jersey Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New Jersey 36.8 21.7 8.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New Jersey Physician Assistants 93.9 99.4 104.0 New Jersey Therapists 93.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists New Jersey 12.6 5.8 0.4	New Jersey Medical/Surgical Specialist Physicians	109.4	115.6	121.4
to Psychologists New Jersey 31.9 23.1 14.8 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses New Jersey Nurse Practitioners 101.6 110.1 117.1 New Jersey Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.8 21.7 8.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New Jersey Physician Assistants 93.9 99.4 104.0 New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists 8.8 0.4	New Jersey Psychologists	82.9	93.9	105.7
All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses New Jersey Nurse Practitioners 101.6 110.1 117.1 New Jersey Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.8 21.7 8.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 93.9 99.4 104.0 New Jersey Physician Assistants 93.9 99.4 104.0 New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists 12.6 5.8 0.4				
Nurse Practitioners Versus Psychiatric NursesNew Jersey Nurse Practitioners101.6110.1117.1New Jersey Psychiatric Nurses74.390.4107.7Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses8.8New Jersey36.821.78.8All States28.312.87.5Physician Assistants Versus TherapistsNew Jersey Physician Assistants93.999.4104.0New Jersey Therapists83.494.0103.5Physician Assistants Reimbursement Levels Compared to TherapistsNew Jersey12.65.80.4	New Jersey	31.9	23.1	14.8
New Jersey Nurse Practitioners 101.6 110.1 117.1 New Jersey Psychiatric Nurses 74.3 90.4 107.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.8 21.7 8.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 93.9 99.4 104.0 New Jersey Physician Assistants 93.9 99.4 104.0 New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists 12.6 5.8 0.4	All States	42.0	33.9	28.8
New Jersey Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New Jersey All States New Jersey Physician Assistants Versus Therapists New Jersey Physician Assistants New Jersey Therapists Physician Assistants Reimbursement Levels Compared to Therapists New Jersey 12.6 5.8 0.4	Nurse Practitioners Versus Psychiatric Nurses			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New Jersey	New Jersey Nurse Practitioners	101.6	110.1	117.1
Nurses 36.8 21.7 8.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New Jersey Physician Assistants 93.9 99.4 104.0 New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists New Jersey 12.6 5.8 0.4	New Jersey Psychiatric Nurses	74.3	90.4	107.7
All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New Jersey Physician Assistants 93.9 99.4 104.0 New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists New Jersey 12.6 5.8 0.4	· · · · · · · · · · · · · · · · · · ·			
Physician Assistants Versus TherapistsNew Jersey Physician Assistants93.999.4104.0New Jersey Therapists83.494.0103.5Physician Assistants Reimbursement Levels Compared to TherapistsNew Jersey12.65.80.4	New Jersey	36.8	21.7	8.8
New Jersey Physician Assistants93.999.4104.0New Jersey Therapists83.494.0103.5Physician Assistants Reimbursement Levels Compared to TherapistsNew Jersey12.65.80.4	All States	28.3	12.8	7.5
New Jersey Therapists 83.4 94.0 103.5 Physician Assistants Reimbursement Levels Compared to Therapists New Jersey 12.6 5.8 0.4	Physician Assistants Versus Therapists			
Physician Assistants Reimbursement Levels Compared to Therapists New Jersey 12.6 5.8 0.4	New Jersey Physician Assistants	93.9	99.4	104.0
New Jersey 12.6 5.8 0.4	New Jersey Therapists	83.4	94.0	103.5
	Physician Assistants Reimbursement Levels Compared to Therapists			
All States 40.6 34.5 29.6	New Jersey	12.6	5.8	0.4
	All States	40.6	34.5	29.6

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
New Jersey All Medical/Surgical Clinicians	115.3	98.8	136.5	236.6
New Jersey All Behavioral Health Clinicians	105.1	82.9	103.3	158.4
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
New Jersey	9.7	19.2	32.1	49.4
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
New Jersey Medical/Surgical Specialist Physicians	121.4	113.6	151.2	272.9
New Jersey Psychiatrists	108.5	110.3	128.2	188.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
New Jersey	11.9	3.0	17.9	44.8
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
New Jersey Medical/Surgical Specialist Physicians	121.4	113.6	151.2	272.9
New Jersey Psychologists	105.7	99.9	118.9	195.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
New Jersey	14.8	13.7	27.1	49.4
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
New Jersey Nurse Practitioners	117.1	105.0	121.3	163.2
New Jersey Psychiatric Nurses	107.7	95.4	103.6	140.1
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
New Jersey	8.8	10.1	17.1	16.5
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
New Jersey Physician Assistants	104.0	86.3	114.5	170.0
New Jersey Therapists	103.5	78.7	85.1	124.9
Physician Assistant Reimbursement Levels Compared to Therapist				
New Jersey	0.4	9.7	34.5	36.1

Appendix C-31: New Mexico Disparity Analysis, All Plans

Sample size in 2021: 32,651 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
New Mexico OON Behavioral Health	29.0	13.4	10.7
New Mexico OON Medical/Surgical	12.6	3.4	2.0
Behavioral Health OON Compared to Medical/Surgical OON			
New Mexico	2.3×	4.0×	5.4×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
New Mexico OON Behavioral Health	43.3	47.2	42.1
New Mexico OON Medical/Surgical	3.5	9.4	8.2
Behavioral Health OON Compared to Medical/Surgical OON			
New Mexico	12.4×	5.0×	5.2×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
New Mexico OON Behavioral Health	33.4	18.6	27.9
New Mexico OON Medical/Surgical	7.9	2.4	4.1
Behavioral Health OON Compared to Medical/Surgical OON			
New Mexico	4.3×	7.7×	6.8×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
New Mexico OON All Behavioral Health Clinicians	27.3	21.9	18.1
New Mexico OON All Medical/Surgical Clinicians	12.1	5.1	2.6
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
New Mexico	2.3×	4.3×	6.8×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
New Mexico OON Psychiatrists	30.8	28.1	27.8
New Mexico OON Medical/Surgical Specialist Physicians	12.2	6.0	2.5
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
New Mexico	2.5×	4.7×	11.1×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %			
	2019	2020	2021	
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians				
New Mexico OON Psychologists	17.1	20.4	18.1	
New Mexico OON Medical/Surgical Specialist Physicians	12.2	6.0	2.5	
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON				
New Mexico	1.4×	3.4×	7.2×	
All States	10.9×	9.4×	10.6×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Psychiatric Nurses Versus Nurse Practitioners				
New Mexico OON Psychiatric Nurses	72.3	5.5	1.4	
New Mexico OON Nurse Practitioners	7.5	2.6	2.3	
Psychiatric Nurses OON Compared to Nurse Practitioners OON				
New Mexico	9.7×	2.1×*	0.6×*	
All States	5.2×	5.4×	1.7×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Therapists Versus Physician Assistants				
New Mexico OON Therapists	28.2	21.3	17.1	
New Mexico OON Physician Assistants	8.5	2.4	1.4	
Therapists OON Compared to Physician Assistants OON				
New Mexico	3.3×	8.9×	11.8×	
All States	5.5×	4.7×	4.1×	
Parity Would Be	1.0×	1.0×	1.0×	

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			Percent, %	
New Mexico All Medical/Surgical Clinicians 133.9 137.5 137.3		2019	2020	2021
New Mexico All Behavioral Health Clinicians 90.8 97.4 103.1	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians New Mexico	New Mexico All Medical/Surgical Clinicians	133.9	137.5	137.3
New Mexico 47.5 41.2 33.1 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists New Mexico Medical/Surgical Specialist Physicians 133.6 140.0 138.6 New Mexico Psychiatrists 99.0 101.6 113.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 34.9 37.7 22.0 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 83.7 90.3 93.3 New Mexico Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 80.7 90.3 93.3 New Mexico Psychiatric Nurses 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 94.2 94.3 98.2 111.2 Nurse Practititioners Reimbursement Levels Compared	New Mexico All Behavioral Health Clinicians	90.8	97.4	103.1
All States 33.3 25.7 21.7				
Medical/Surgical Specialist Physicians Versus Psychiatrists New Mexico Medical/Surgical Specialist Physicians 133.6 140.0 138.6 New Mexico Psychiatrists 99.0 101.6 113.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 34.9 37.7 22.0 New Mexico 34.9 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 83.0 140.0 138.6 New Mexico Medical/Surgical Specialist Physicians Versus Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 42.0 33.9 28.8 New Mexico 59.5 55.0 48.6 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 126.6 125.9 128.8 New Mexico Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 94.3 98.2 111.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3	New Mexico	47.5	41.2	33.1
New Mexico Medical/Surgical Specialist Physicians 133.6 140.0 138.6 New Mexico Psychiatrists 99.0 101.6 113.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 34.9 37.7 22.0 New Mexico 34.9 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 59.5 55.0 48.6 New Mexico 59.5 55.0 48.6 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 126.6 125.9 128.8 New Mexico Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 94.3 98.2 111.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Physician Assistants Versus Therapists	All States	33.3	25.7	21.7
New Mexico Psychiatrists 99.0 101.6 113.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 34.9 37.7 22.0 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 133.6 140.0 138.6 New Mexico Medical/Surgical Specialist Physicians 133.6 140.0 138.6 New Mexico Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 126.6 125.9 128.8 New Mexico 59.5 55.0 48.6 48.8 All States 42.0 33.9 28.8 New Mexico Nurse Practitioners 126.6 125.9 128.8 New Mexico Psychiatric Nurses 94.3 98.2 111.2 New Mexico Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Physician Assistants Versus Therapists <t< td=""><td>Medical/Surgical Specialist Physicians Versus Psychiatrists</td><td></td><td></td><td></td></t<>	Medical/Surgical Specialist Physicians Versus Psychiatrists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New Mexico 34.9 37.7 22.0 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 133.6 140.0 138.6 New Mexico Medical/Surgical Specialist Physicians Physicians 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 59.5 55.0 48.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 94.3 98.2 111.2 New Mexico Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 94.3 98.2 111.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Physician Assistants Versus Therapists 135.9 137.9 146.4 New Mexico Physician Assistants 135.9 137.9 146.4 New Mexico Therapists 91.7	New Mexico Medical/Surgical Specialist Physicians	133.6	140.0	138.6
New Mexico 34.9 37.7 22.0 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists New Mexico Medical/Surgical Specialist Physicians 133.6 140.0 138.6 New Mexico Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 59.5 55.0 48.6 New Mexico 59.5 55.0 48.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 126.6 125.9 128.8 New Mexico Nurse Practitioners 94.3 98.2 111.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 94.3 98.2 111.2 New Mexico 34.3 28.2 15.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 135.9 137.9 146.4 New Mexico Therapists 91.7 98.5 104.2 Physician Assistants Reimbu	New Mexico Psychiatrists	99.0	101.6	113.7
All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 133.6 140.0 138.6 New Mexico Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.7 90.3 93.3 New Mexico 59.5 55.0 48.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 New Mexico Nurse Practitioners 126.6 125.9 128.8 New Mexico Psychiatric Nurses 94.3 98.2 111.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 94.3 98.2 111.2 New Mexico 34.3 28.2 15.8 15.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 135.9 137.9 146.4 New Mexico Therapists 91.7 98.5 104.2 Physician Assistants Reimbursement Levels Compared to Therapists 48.2 40.0 40.4				
Medical/Surgical Specialist Physicians Versus Psychologists New Mexico Medical/Surgical Specialist Physicians 133.6 140.0 138.6 New Mexico Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 59.5 55.0 48.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 New Mexico Nurse Practitioners 126.6 125.9 128.8 New Mexico Psychiatric Nurses 94.3 98.2 111.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 34.3 28.2 15.8 New Mexico 34.3 28.2 15.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 135.9 137.9 146.4 New Mexico Therapists 91.7 98.5 104.2 Physician Assistants Reimbursement Levels Compared to Therapists 48.2 40.0 40.4	New Mexico	34.9	37.7	22.0
New Mexico Medical/Surgical Specialist Physicians 133.6 140.0 138.6 New Mexico Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 59.5 55.0 48.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 New Mexico Nurse Practitioners Versus Psychiatric Nurses 94.3 98.2 111.2 New Mexico Psychiatric Nurses 94.3 98.2 111.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 34.3 28.2 15.8 New Mexico 34.3 28.2 15.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 12.8 7.5 New Mexico Physician Assistants 135.9 137.9 146.4 New Mexico Therapists 91.7 98.5 104.2 Physician Assistants Reimbursement Levels Compared to Therapists New Mexico 48.2 40.0 40.4	All States	40.8	30.1	24.9
New Mexico Psychologists 83.7 90.3 93.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Secondary of the part of the pa	Medical/Surgical Specialist Physicians Versus Psychologists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to PsychologistsNew Mexico59.555.048.6All States42.033.928.8Nurse Practitioners Versus Psychiatric NursesNew Mexico Nurse Practitioners126.6125.9128.8New Mexico Psychiatric Nurses94.398.2111.2Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses34.328.215.8New Mexico34.328.215.8All States28.312.87.5Physician Assistants Versus TherapistsNew Mexico Physician Assistants135.9137.9146.4New Mexico Therapists91.798.5104.2Physician Assistants Reimbursement Levels Compared to Therapists48.240.040.4	New Mexico Medical/Surgical Specialist Physicians	133.6	140.0	138.6
to Psychologists New Mexico 59.5 55.0 48.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 126.6 125.9 128.8 New Mexico Psychiatric Nurses 94.3 98.2 111.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 34.3 28.2 15.8 New Mexico 34.3 28.2 15.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 135.9 137.9 146.4 New Mexico Physician Assistants 91.7 98.5 104.2 Physician Assistants Reimbursement Levels Compared to Therapists 48.2 40.0 40.4	New Mexico Psychologists	83.7	90.3	93.3
All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 126.6 125.9 128.8 New Mexico Psychiatric Nurses 94.3 98.2 111.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.2 15.8 New Mexico 34.3 28.2 15.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 135.9 137.9 146.4 New Mexico Physician Assistants 135.9 137.9 146.4 New Mexico Therapists 91.7 98.5 104.2 Physician Assistants Reimbursement Levels Compared to Therapists 48.2 40.0 40.4				
Nurse Practitioners Versus Psychiatric Nurses New Mexico Nurse Practitioners New Mexico Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Nurses New Mexico All States New Mexico Physician Assistants Versus Therapists New Mexico Physician Assistants New Mexico Therapists New Mexico 48.2 40.0 40.4	New Mexico	59.5	55.0	48.6
New Mexico Nurse Practitioners 126.6 125.9 128.8 New Mexico Psychiatric Nurses 94.3 98.2 111.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 34.3 28.2 15.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 135.9 137.9 146.4 New Mexico Physician Assistants 91.7 98.5 104.2 Physician Assistants Reimbursement Levels Compared to Therapists 48.2 40.0 40.4	All States	42.0	33.9	28.8
New Mexico Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New Mexico All States New Mexico Physician Assistants Versus Therapists New Mexico Physician Assistants New Mexico Physician Assistants New Mexico Therapists Physician Assistants Reimbursement Levels Compared to Therapists New Mexico New Mexico 135.9 137.9 146.4 New Mexico Therapists 91.7 98.5 104.2 Physician Assistants Reimbursement Levels Compared to Therapists New Mexico 48.2 40.0 40.4	Nurse Practitioners Versus Psychiatric Nurses			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New Mexico 34.3 28.2 15.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New Mexico Physician Assistants 135.9 137.9 146.4 New Mexico Therapists 91.7 98.5 104.2 Physician Assistants Reimbursement Levels Compared to Therapists New Mexico 48.2 40.0 40.4	New Mexico Nurse Practitioners	126.6	125.9	128.8
Nurses New Mexico 34.3 28.2 15.8 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New Mexico Physician Assistants 135.9 137.9 146.4 New Mexico Therapists 91.7 98.5 104.2 Physician Assistants Reimbursement Levels Compared to Therapists 48.2 40.0 40.4	New Mexico Psychiatric Nurses	94.3	98.2	111.2
All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New Mexico Physician Assistants 135.9 137.9 146.4 New Mexico Therapists 91.7 98.5 104.2 Physician Assistants Reimbursement Levels Compared to Therapists New Mexico 48.2 40.0 40.4	· · · · · · · · · · · · · · · · · · ·			
Physician Assistants Versus TherapistsNew Mexico Physician Assistants135.9137.9146.4New Mexico Therapists91.798.5104.2Physician Assistants Reimbursement Levels Compared to TherapistsNew Mexico48.240.040.4	New Mexico	34.3	28.2	15.8
New Mexico Physician Assistants135.9137.9146.4New Mexico Therapists91.798.5104.2Physician Assistants Reimbursement Levels Compared to TherapistsNew Mexico48.240.040.4	All States	28.3	12.8	7.5
New Mexico Therapists 91.7 98.5 104.2 Physician Assistants Reimbursement Levels Compared to Therapists New Mexico 48.2 40.0 40.4	Physician Assistants Versus Therapists			
Physician Assistants Reimbursement Levels Compared to Therapists New Mexico 48.2 40.0 40.4	New Mexico Physician Assistants	135.9	137.9	146.4
New Mexico 48.2 40.0 40.4	New Mexico Therapists	91.7	98.5	104.2
1011	Physician Assistants Reimbursement Levels Compared to Therapists			
All States 40.6 34.5 29.6	New Mexico	48.2	40.0	40.4
	All States	40.6	34.5	29.6

Autorage		Percentile, %			
New Mexico All Medical/Surgical Clinicians 137.3 122.2 158.4 298.1		Average		75th	95th
New Mexico All Behavioral Health Clinicians 103.1 78.3 89.8 148.1					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 33.1 56.1 76.4 101.4 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists New Mexico Medical/Surgical Specialist Physicians 138.6 136.4 168.0 303.6 New Mexico Psychiatrists 113.7 108.4 130.5 189.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New Mexico 22.0 25.8 28.7 60.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists New Mexico Medical/Surgical Specialist Physicians 138.6 136.4 168.0 303.6 New Mexico Psychologists 93.3 82.8 99.2 168.3 Medical/Surgical Specialist Physicians 138.6 136.4 168.0 303.6 New Mexico Psychologists 93.3 82.8 99.2 168.3 Medical/Surgical Specialist Physicians 28.8 17.3 44.0 38.5 New Mexico Psychologists 28.8 17.3 44.0 38.5 New Mexico Nurse Practitioners 128.8 102.3 137.5 180.7 New Mexico Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels 28.8 4.3 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.4 118.6 148.4 242.2 New Mexico Physician Assistants 146.4 118.6 148.6 148.6 Physician Assistants Reimbursement Levels 146.4 146.4 146.4 146.8 Physician Assistants Reimbursement Levels 146.4 146.4 146.8	New Mexico All Medical/Surgical Clinicians	137.3	122.2	158.4	298.1
New Mexico 33.1 56.1 76.4 101.4	New Mexico All Behavioral Health Clinicians	103.1	78.3	89.8	148.1
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists New Mexico Psychiatrists 113.7 108.4 130.5 189.4 Medical/Surgical Specialist Physicians 113.7 108.4 130.5 189.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New Mexico 22.0 25.8 28.7 60.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists New Mexico Medical/Surgical Specialist Physicians 138.6 136.4 168.0 303.6 New Mexico Psychologists 93.3 82.8 99.2 168.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New Mexico Psychologists 93.3 82.8 99.2 168.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New Mexico All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses New Mexico Nurse Practitioners 128.8 102.3 137.5 180.7 New Mexico Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New Mexico Psychiatric Nurses New Mexico Psychiatric Nurses New Mexico Physician Assistants 146.4 118.6 148.4 242.2 New Mexico Physician Assistants 146.4 118.6 148.4 242.2 New Mexico Physician Assistants 146.4 118.6 148.4 242.2 New Mexico Physician Assistants Reimbursement Levels Compared to Therapists New Mexico Therapists					
Medical/Surgical Specialist Physicians Versus Psychiatrists New Mexico Medical/Surgical Specialist Physicians 138.6 136.4 168.0 303.6 New Mexico Psychiatrists 113.7 108.4 130.5 189.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 22.0 25.8 28.7 60.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 136.4 168.0 303.6 New Mexico Psychologists 93.3 82.8 99.2 168.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 99.2 168.3 New Mexico 48.6 64.7 69.4 101.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 128.8 102.3 137.5 180.7 New Mexico Nurse Practitioners Reimbursement Levels Compared to Psychia	New Mexico	33.1	56.1	76.4	101.4
New Mexico Medical/Surgical Specialist Physicians 138.6 136.4 168.0 303.6 New Mexico Psychiatrists 113.7 108.4 130.5 189.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New Mexico 22.0 25.8 28.7 60.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists New Mexico Medical/Surgical Specialist Physicians 138.6 136.4 168.0 303.6 New Mexico Psychologists 93.3 82.8 99.2 168.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New Mexico Psychologists 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses New Mexico Nurse Practitioners 128.8 102.3 137.5 180.7 New Mexico Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New Mexico Psychiatric Nurses 15.8 4.3 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.4 118.6 148.4 242.2 New Mexico Physician Assistants Reimbursement Levels Compared to Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists 104.4 61.8 71.5 91.1 New Mexico Physician Assistants Reimbursement Levels Compared to Therapists 104.4 61.8 71.5 91.1 New Mexico Physician Assistants Reimbursement Levels Compared to Therapists 104.4 61.8 71.5 91.1 New Mexico Physician Assistants Reimbursement Levels Compared to Therapists 104.4 61.8 71.5 91.1 New Mexico Physician Assistants Reimbursement Levels Compared to Therapists 104.4 61.8 71.5 91.1 New Mexico Physician Assistants Reimbursement Levels 104.4 104.4 104.4 104.4 104.4 104.4 104.4 104.4 104.4 104.4 104.4 104.4 104.4 104.4 104.4 104.4 104.	All States	21.7	26.6	48.0	70.4
New Mexico Psychiatrists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New Mexico 22.0 25.8 28.7 60.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 99.2 168.0 303.6 New Mexico Medical/Surgical Specialist Physicians New Mexico Psychologists 93.3 82.8 99.2 168.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 64.7 69.4 101.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 128.8 102.3 137.5 180.7 New Mexico Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 15.8 4.3 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.4 118.6 148.4 242.2 New Mexico	New Mexico Medical/Surgical Specialist Physicians	138.6	136.4	168.0	303.6
New Mexico 22.0 25.8 28.7 60.2	New Mexico Psychiatrists	113.7	108.4	130.5	189.4
All States					
Medical/Surgical Specialist Physicians Versus Psychologists New Mexico Psychologists 93.3 82.8 99.2 168.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 64.7 69.4 101.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses New Mexico Nurse Practitioners 128.8 102.3 137.5 180.7 New Mexico Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 111.2 98.0 109.0 155.7 New Mexico 15.8 4.3 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.4 118.6 148.4 242.2 New Mexico Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists 104.4 61.8 71.5 91.1	New Mexico	22.0	25.8	28.7	60.2
New Mexico Medical/Surgical Specialist Physicians 138.6 136.4 168.0 303.6 New Mexico Psychologists 93.3 82.8 99.2 168.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New Mexico 48.6 64.7 69.4 101.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses New Mexico Nurse Practitioners 128.8 102.3 137.5 180.7 New Mexico Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New Mexico 15.8 4.3 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists New Mexico Physician Assistants 146.4 118.6 148.4 242.2 New Mexico Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists New Mexico Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists New Mexico Therapist	All States	24.9	12.8	27.8	49.5
New Mexico Psychologists 93.3 82.8 99.2 168.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 48.6 64.7 69.4 101.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 128.8 102.3 137.5 180.7 New Mexico Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 7.5 -1.1 18.4 34.3 New Mexico 15.8 4.3 26.1 16.0 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.4 118.6 148.4 242.2 New Mexico Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists 104.4 61.8 71.5 91.1					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New Mexico 48.6 64.7 69.4 101.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 128.8 102.3 137.5 180.7 New Mexico Nurse Practitioners 128.8 102.3 137.5 180.7 New Mexico Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.8 102.3 137.5 180.7 New Mexico 15.8 4.3 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.4 118.6 148.4 242.2 New Mexico Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists 40.4 61.8 71.5 91.1	New Mexico Medical/Surgical Specialist Physicians	138.6	136.4	168.0	303.6
Reimbursement Levels Compared to Psychologists New Mexico 48.6 64.7 69.4 101.4 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 128.8 102.3 137.5 180.7 New Mexico Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 15.8 4.3 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.4 118.6 148.4 242.2 New Mexico Physician Assistants 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists 40.4 61.8 71.5 91.1	New Mexico Psychologists	93.3	82.8	99.2	168.3
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 128.8 102.3 137.5 180.7 New Mexico Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Compared to Psychiatric Nurses 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.4 118.6 148.4 242.2 New Mexico Physician Assistants 146.4 118.6 148.4 242.2 Physician Assistants Reimbursement Levels Compared to Therapists 104.2 73.3 86.5 126.8 New Mexico 40.4 61.8 71.5 91.1					
Nurse Practitioners Versus Psychiatric Nurses New Mexico Nurse Practitioners 128.8 102.3 137.5 180.7 New Mexico Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 26.1 16.0 New Mexico 15.8 4.3 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.4 118.6 148.4 242.2 New Mexico Physician Assistants 146.4 118.6 148.4 242.2 Physician Assistants Reimbursement Levels Compared to Therapists 104.2 73.3 86.5 126.8 New Mexico 40.4 61.8 71.5 91.1	New Mexico	48.6	64.7	69.4	101.4
New Mexico Nurse Practitioners 128.8 102.3 137.5 180.7 New Mexico Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.4 118.6 148.4 242.2 New Mexico Physician Assistants 146.4 118.6 148.4 242.2 New Mexico Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists 40.4 61.8 71.5 91.1	All States	28.8	17.3	44.0	38.5
New Mexico Psychiatric Nurses 111.2 98.0 109.0 155.7 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 15.8 4.3 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.4 118.6 148.4 242.2 New Mexico Physician Assistants 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists 40.4 61.8 71.5 91.1 New Mexico 40.4 61.8 71.5 91.1	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New Mexico 15.8 4.3 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists New Mexico Physician Assistants 146.4 118.6 148.4 242.2 New Mexico Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists 40.4 61.8 71.5 91.1	New Mexico Nurse Practitioners	128.8	102.3	137.5	180.7
Compared to Psychiatric Nurses New Mexico 15.8 4.3 26.1 16.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists New Mexico Physician Assistants 146.4 118.6 148.4 242.2 New Mexico Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists 40.4 61.8 71.5 91.1	New Mexico Psychiatric Nurses	111.2	98.0	109.0	155.7
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists New Mexico Physician Assistants 146.4 118.6 148.4 242.2 New Mexico Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists 40.4 61.8 71.5 91.1					
Physician Assistants Versus TherapistsNew Mexico Physician Assistants146.4118.6148.4242.2New Mexico Therapists104.273.386.5126.8Physician Assistants Reimbursement Levels Compared to TherapistsCompared to TherapistsNew Mexico40.461.871.591.1	New Mexico	15.8	4.3	26.1	16.0
New Mexico Physician Assistants 146.4 118.6 148.4 242.2 New Mexico Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists Compared to Therapists 40.4 61.8 71.5 91.1	All States	7.5	-1.1	18.4	34.3
New Mexico Therapists 104.2 73.3 86.5 126.8 Physician Assistants Reimbursement Levels Compared to Therapists New Mexico 40.4 61.8 71.5 91.1	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists New Mexico 40.4 61.8 71.5 91.1	New Mexico Physician Assistants	146.4	118.6	148.4	242.2
Compared to Therapists New Mexico 40.4 61.8 71.5 91.1	New Mexico Therapists	104.2	73.3	86.5	126.8
All States 29.6 33.8 59.3 101.6	New Mexico	40.4	61.8	71.5	91.1
	All States	29.6	33.8	59.3	101.6

Appendix C-32: New York Disparity Analysis, All Plans

Sample size in 2021: 491,906 covered lives

		Percent, %		
	2019	2020	2021	
Acute Inpatient Facility				
New York OON Behavioral Health	10.9	9.8	8.0	
New York OON Medical/Surgical	0.9	1.3	0.8	
Behavioral Health OON Compared to Medical/Surgical OON				
New York	12.5×	7.8×	9.6×	
All States	7.1×	6.0×	6.2×	
Parity Would Be	1.0×	1.0×	1.0×	
Subacute Inpatient Facility				
New York OON Behavioral Health	46.9	42.2	45.8	
New York OON Medical/Surgical	7.5	17.6	2.9	
Behavioral Health OON Compared to Medical/Surgical OON				
New York	6.2×	2.4×	15.9×	
All States	9.9×	7.9×	19.9×	
Parity Would Be	1.0×	1.0×	1.0×	
Outpatient Facility (Non-Emergency Room)				
New York OON Behavioral Health	15.4	13.5	19.8	
New York OON Medical/Surgical	9.1	45.6	60.7	
Behavioral Health OON Compared to Medical/Surgical OON				
New York	1.7×	0.3×	0.3×	
All States	3.5×	1.7×	1.5×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians				
New York OON All Behavioral Health Clinicians	37.7	29.5	29.3	
New York OON All Medical/Surgical Clinicians	14.4	9.2	9.3	
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON				
New York	2.6×	3.2×	3.1×	
All States	3.9×	3.9×	3.5×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians				
New York OON Psychiatrists	40.6	33.0	31.5	
New York OON Medical/Surgical Specialist Physicians	4.7	3.4	3.5	
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON				
New York	8.7×	9.6×	9.1×	
All States	9.0×	8.7×	8.9×	
Parity Would Be	1.0×	1.0×	1.0×	

		Percent, %	
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
New York OON Psychologists	44.0	34.8	35.9
New York OON Medical/Surgical Specialist Physicians	4.7	3.4	3.5
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
New York	9.4×	10.1×	10.3×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
New York OON Psychiatric Nurses	8.5	4.8	4.0
New York OON Nurse Practitioners	4.1	4.0	4.0
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
New York	2.1×	1.2×	1.0×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
New York OON Therapists	33.9	26.7	26.5
New York OON Physician Assistants	3.0	2.8	2.4
Therapists OON Compared to Physician Assistant OON			
New York	11.3×	9.7×	11.2×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

New York All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians New York All Medical/Surgical Clinicians New York All Behavioral Health Clinicians New York New York Nedical/Surgical Specialist Physicians Versus Psychiatrists New York Nedical/Surgical Specialist Physicians New York New York Nedical/Surgical Specialist Physicians New York New York Nedical/Surgical Specialist Physicians New York New York New York New York New York New York Nedical/Surgical Specialist Physicians New York New York Nedical/Surgical Specialist Physicians New York New Yor			Percent, %	
New York All Medical/Surgical Clinicians 118.0 121.7 129.8		2019	2020	2021
New York All Behavioral Health Clinicians	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians New York 38.1 21.6 14.4	New York All Medical/Surgical Clinicians	118.0	121.7	129.8
New York 38.1 21.6 14.4 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists Vork Medical/Surgical Specialist Physicians 122.3 126.3 135.5 New York Psychiatrists 87.3 102.4 118.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 40.1 23.4 13.9 New York 40.1 23.4 13.9 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 122.3 126.3 135.5 New York Medical/Surgical Specialist Physicians Versus Psychologists 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.2 99.3 118.2 New York Psychologists 47.0 27.2 14.6 All States 47.0 27.2 14.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 77.8 97.4 113.2	New York All Behavioral Health Clinicians	85.5	100.1	113.5
All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 122.3 126.3 135.5 New York Psychiatrists 87.3 102.4 118.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New York 40.1 23.4 13.9 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists New York Psychologists 122.3 126.3 136.3 135.5 New York Psychologists 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.2 99.3 118.2 New York 44.0 27.2 14.6 All States 47.0 27.2 14.6 All States 112.0 117.3 126.0 New York				
Medical/Surgical Specialist Physicians Versus Psychiatrists New York Medical/Surgical Specialist Physicians 122.3 126.3 135.5 New York Psychiatrists 87.3 102.4 118.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 40.1 23.4 13.9 New York 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 47.0 27.2 14.6 All States 42.0 33.9 28.8 New York 47.0 27.2 14.6 All States 112.0 117.3 126.0 New York Nurse Practitioners Versus Psychiatric Nurses 77.8 97.4 113.2 New York Psychiatric Nurses 77.8 97.4 113.2 New Y	New York	38.1	21.6	14.4
New York Medical/Surgical Specialist Physicians 122.3 126.3 135.5 New York Psychiatrists 87.3 102.4 118.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 40.1 23.4 13.9 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 40.8 30.1 24.9 New York Medical/Surgical Specialist Physicians Versus Psychologists 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 47.0 27.2 14.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 77.8 97.4 113.2 New York Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 77.8 97.4 113.2 New York 43.9 20.4 11.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 86.5 </td <td>All States</td> <td>33.3</td> <td>25.7</td> <td>21.7</td>	All States	33.3	25.7	21.7
New York Psychiatrists 102.4 118.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New York 40.1 23.4 13.9 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists New York Medical/Surgical Specialist Physicians 122.3 126.3 135.5 New York Psychologists 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 47.0 27.2 14.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 77.8 97.4 113.2 New York Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 77.8 97.4 113.2 New York 43.9 20.4 11.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New York Physician Assistants 111.8 113.2<	Medical/Surgical Specialist Physicians Versus Psychiatrists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New York 40.1 23.4 13.9 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 122.3 126.3 135.5 New York Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 47.0 27.2 14.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 New York Nurse Practitioners Nurses 77.8 97.4 113.2 New York Sychiatric Nurses 77.8 97.4 113.2 New York Psychiatric Nurses 77.8 97.4 113.2 New York 43.9 20.4 11.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 86.5 99.7 108.2 Physician Assistants Reimbursement Levels Compared to Therapists 79.7 </td <td>New York Medical/Surgical Specialist Physicians</td> <td>122.3</td> <td>126.3</td> <td>135.5</td>	New York Medical/Surgical Specialist Physicians	122.3	126.3	135.5
New York	New York Psychiatrists	87.3	102.4	118.9
All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 122.3 126.3 135.5 New York Medical/Surgical Specialist Physicians 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.2 99.3 118.2 New York 47.0 27.2 14.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 New York Nurse Practitioners Practitioners 112.0 117.3 126.0 New York Psychiatric Nurses 77.8 97.4 113.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 77.8 97.4 113.2 New York 43.9 20.4 11.3 11.3 11.3 11.3 11.3 11.3 11.3 11.3 11.3 11.3 11.3 11.3 12.0 12.0 12.0 12.0 12.0 12.0 12.0 12.0 12.0 12.0 12.0 12.0 12.0 12.0 12.0 12.0 12.0 12.0 <td></td> <td></td> <td></td> <td></td>				
Medical/Surgical Specialist Physicians Versus Psychologists New York Medical/Surgical Specialist Physicians 122.3 126.3 135.5 New York Psychologists 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 47.0 27.2 14.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 112.0 117.3 126.0 New York Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 77.8 97.4 113.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 12.8 7.5 Physician Assistants Versus Therapists 86.5 99.7 108.2 Physician Assistants Reimbursement Levels Compared to Therapists 86.5 99.7 108.2 New York 13.5 15.5 15.5	New York	40.1	23.4	13.9
New York Medical/Surgical Specialist Physicians 122.3 126.3 135.5 New York Psychologists 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 27.2 14.6 New York 47.0 27.2 14.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 112.0 117.3 126.0 New York Nurse Practitioners 77.8 97.4 113.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 77.8 97.4 113.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 New York 43.9 20.4 11.3 11.3 11.3 11.3 11.3 11.3 11.3 11.3 12.5 11.3 11.3 12.5 11.3 12.5 11.3 12.5 10.8 11.3 12.5 10.8 11.3 12.5 12.5 12.5 12.5 12.5 12.5 12.5 12.5 12.5 12.5 12.5 12.5 12.5 12.5 12.5 1	All States	40.8	30.1	24.9
New York Psychologists 83.2 99.3 118.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 47.0 27.2 14.6 New York 47.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 112.0 117.3 126.0 New York Psychiatric Nurses 77.8 97.4 113.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 43.9 20.4 11.3 New York 43.9 20.4 11.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 12.8 7.5 New York Physician Assistants 111.8 113.2 125.0 New York Therapists 86.5 99.7 108.2 Physician Assistants Reimbursement Levels Compared to Therapists 29.2 13.5 15.5	Medical/Surgical Specialist Physicians Versus Psychologists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New York 47.0 27.2 14.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses New York Nurse Practitioners 112.0 117.3 126.0 New York Psychiatric Nurses 77.8 97.4 113.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New York 43.9 20.4 11.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New York Physician Assistants 111.8 113.2 125.0 New York Therapists 86.5 99.7 108.2 Physician Assistants Reimbursement Levels Compared to Therapists New York York 13.5 15.5	New York Medical/Surgical Specialist Physicians	122.3	126.3	135.5
to Psychologists New York 47.0 27.2 14.6 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 112.0 117.3 126.0 New York Nurse Practitioners 77.8 97.4 113.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 80.2 11.3 11.3 New York 43.9 20.4 11.3 11.3 11.3 11.3 11.3 11.3 11.3 11.3 11.3 11.3 11.3 11.3 11.3 125.0 108.2 11.3 11.3 125.0 108.2 11.3	New York Psychologists	83.2	99.3	118.2
All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 112.0 117.3 126.0 New York Psychiatric Nurses 77.8 97.4 113.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 80.2 11.3 New York 43.9 20.4 11.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 111.8 113.2 125.0 New York Physician Assistants 111.8 113.2 125.0 New York Therapists 86.5 99.7 108.2 Physician Assistants Reimbursement Levels Compared to Therapists 29.2 13.5 15.5				
Nurse Practitioners Versus Psychiatric Nurses New York Nurse Practitioners 112.0 117.3 126.0 New York Psychiatric Nurses 77.8 97.4 113.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 43.9 20.4 11.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New York Physician Assistants 111.8 113.2 125.0 New York Therapists 86.5 99.7 108.2 Physician Assistants Reimbursement Levels Compared to Therapists 29.2 13.5 15.5	New York	47.0	27.2	14.6
New York Nurse Practitioners 112.0 117.3 126.0 New York Psychiatric Nurses 77.8 97.4 113.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.4 11.3 New York 43.9 20.4 11.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 111.8 113.2 125.0 New York Physician Assistants 111.8 113.2 125.0 New York Therapists 86.5 99.7 108.2 Physician Assistants Reimbursement Levels Compared to Therapists 29.2 13.5 15.5	All States	42.0	33.9	28.8
New York Psychiatric Nurses 77.8 97.4 113.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 43.9 20.4 11.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New York Physician Assistants 111.8 113.2 125.0 New York Therapists 86.5 99.7 108.2 Physician Assistants Reimbursement Levels Compared to Therapists New York 29.2 13.5 15.5	Nurse Practitioners Versus Psychiatric Nurses			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New York	New York Nurse Practitioners	112.0	117.3	126.0
Nurses 43.9 20.4 11.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New York Physician Assistants 111.8 113.2 125.0 New York Therapists 86.5 99.7 108.2 Physician Assistants Reimbursement Levels Compared to Therapists 29.2 13.5 15.5	New York Psychiatric Nurses	77.8	97.4	113.2
All States 28.3 12.8 7.5 Physician Assistants Versus Therapists New York Physician Assistants 111.8 113.2 125.0 New York Therapists 86.5 99.7 108.2 Physician Assistants Reimbursement Levels Compared to Therapists New York 29.2 13.5 15.5	· · · · · · · · · · · · · · · · · · ·			
Physician Assistants Versus TherapistsNew York Physician Assistants111.8113.2125.0New York Therapists86.599.7108.2Physician Assistants Reimbursement Levels Compared to TherapistsNew York29.213.515.5	New York	43.9	20.4	11.3
New York Physician Assistants111.8113.2125.0New York Therapists86.599.7108.2Physician Assistants Reimbursement Levels Compared to TherapistsNew York29.213.515.5	All States	28.3	12.8	7.5
New York Therapists 86.5 99.7 108.2 Physician Assistants Reimbursement Levels Compared to Therapists New York 29.2 13.5 15.5	Physician Assistants Versus Therapists			
Physician Assistants Reimbursement Levels Compared to Therapists New York 29.2 13.5 15.5	New York Physician Assistants	111.8	113.2	125.0
New York 29.2 13.5 15.5	New York Therapists	86.5	99.7	108.2
1000 1000	Physician Assistants Reimbursement Levels Compared to Therapists			
All States 40.6 34.5 29.6	New York	29.2	13.5	15.5
	All States	40.6	34.5	29.6

Autorage		Percentile, %			
New York All Behavioral Health Clinicians 129.8 107.7 153.0 284.1		Average		75th	95th
New York All Behavioral Health Clinicians 113.5 90.3 118.2 188.3					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians	New York All Medical/Surgical Clinicians	129.8	107.7	153.0	284.1
New York 14.4 19.3 29.4 50.9	New York All Behavioral Health Clinicians	113.5	90.3	118.2	188.3
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists New York Medical/Surgical Specialist Physicians 135.5 122.0 168.3 310.7 New York Psychiatrists 118.9 116.8 149.4 197.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New York New York 13.9 4.5 12.6 57.6 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists New York Medical/Surgical Specialist Physicians 135.5 122.0 168.3 310.7 New York Psychologists 118.2 105.1 132.5 226.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New York Psychologists 14.6 16.1 27.0 50.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses New York Nurse Practitioners 126.0 106.3 138.8 217.7 New York Nurse Practitioners 213.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New York 11.3 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists New York Physician Assistants 125.0 98.3 135.7 211.9 New York Physician Assistants 125.0 98.3 135.7 211.9 New York Physician Assistants 126.0 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists New York Therapists New York Therapists New York Therapists					
Medical/Surgical Specialist Physicians Versus Psychiatrists New York Medical/Surgical Specialist Physicians 135.5 122.0 168.3 310.7 New York Psychiatrists 118.9 116.8 149.4 197.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 57.6 4.5 12.6 57.6 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8.8 27.0 168.3 310.7 New York Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 118.2 105.1 132.5 226.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 14.6 16.1 27.0 50.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 126.0 106.3 138.8 217.7 New York Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 113.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 113.2 <	New York	14.4	19.3	29.4	50.9
New York Medical/Surgical Specialist Physicians 135.5 122.0 168.3 310.7	All States	21.7	26.6	48.0	70.4
New York Psychiatrists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists New York 13.9 4.5 12.6 57.6 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Psychologists 135.5 122.0 168.3 310.7 New York Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 118.2 105.1 132.5 226.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 14.6 16.1 27.0 50.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 126.0 106.3 138.8 217.7 New York Psychiatric Nurses 113.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 113.2 98.7 112.0 133.4 New York 11.3 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus T	New York Medical/Surgical Specialist Physicians	135.5	122.0	168.3	310.7
New York	New York Psychiatrists	118.9	116.8	149.4	197.1
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists New York Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 118.2 105.1 132.5 226.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 14.6 16.1 27.0 50.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses New York Nurse Practitioners 126.0 106.3 138.8 217.7 New York Psychiatric Nurses 113.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 113.2 98.7 112.0 133.4 New York 11.3 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists New York Physician Assistants 125.0 98.3 135.7 211.9 New York Therapists 108.2 78.3 90.3 122.3 <td< td=""><td></td><td></td><td></td><td></td><td></td></td<>					
Medical/Surgical Specialist Physicians Versus Psychologists New York Medical/Surgical Specialist Physicians New York Psychologists 118.2 105.1 132.5 226.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 14.6 16.1 27.0 50.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 126.0 106.3 138.8 217.7 New York Psychiatric Nurses 113.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 113.2 98.7 112.0 133.4 New York 11.3 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 125.0 98.3 135.7 211.9 New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists 25.5 50.2 73.2	New York	13.9	4.5	12.6	57.6
New York Medical/Surgical Specialist Physicians 135.5 122.0 168.3 310.7 New York Psychologists 118.2 105.1 132.5 226.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New York 14.6 16.1 27.0 50.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses New York Nurse Practitioners 126.0 106.3 138.8 217.7 New York Psychiatric Nurses 113.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New York 11.3 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists New York Physician Assistants 125.0 98.3 135.7 211.9 New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists New York Therapists 15.5 25.5 50.2 73.2 New York Pork 15.5 25.5 50.2 73.2 New York York 15.5 25.5 50.2 73.2	All States	24.9	12.8	27.8	49.5
New York Psychologists 118.2 105.1 132.5 226.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 14.6 16.1 27.0 50.9 New York 14.6 16.1 27.0 50.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 126.0 106.3 138.8 217.7 New York Psychiatric Nurses 113.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 7.7 23.9 63.2 New York 11.3 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists New York Physician Assistants 125.0 98.3 135.7 211.9 New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists 15.5 25.5 50.2 73.2					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists New York 14.6 16.1 27.0 50.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 126.0 106.3 138.8 217.7 New York Nurse Practitioners 113.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 7.7 23.9 63.2 New York 11.3 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 125.0 98.3 135.7 211.9 New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists 15.5 25.5 50.2 73.2	New York Medical/Surgical Specialist Physicians	135.5	122.0	168.3	310.7
Reimbursement Levels Compared to Psychologists New York 14.6 16.1 27.0 50.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 126.0 106.3 138.8 217.7 New York Psychiatric Nurses 113.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 7.7 23.9 63.2 New York 11.3 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 125.0 98.3 135.7 211.9 New York Physician Assistants Reimbursement Levels Compared to Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists 15.5 25.5 50.2 73.2	New York Psychologists	118.2	105.1	132.5	226.0
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 126.0 106.3 138.8 217.7 New York Psychiatric Nurses 113.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Compared to Psychiatric Nurses 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 125.0 98.3 135.7 211.9 New York Physician Assistants 125.0 98.3 135.7 211.9 Physician Assistants Reimbursement Levels Compared to Therapists 108.2 78.3 90.3 122.3 New York 15.5 25.5 50.2 73.2					
Nurse Practitioners Versus Psychiatric Nurses New York Nurse Practitioners 126.0 106.3 138.8 217.7 New York Psychiatric Nurses 113.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Compared to Psychiatric Nurses 23.9 63.2 New York 11.3 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 125.0 98.3 135.7 211.9 New York Physician Assistants 125.0 98.3 135.7 211.9 New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists 15.5 25.5 50.2 73.2	New York	14.6	16.1	27.0	50.9
New York Nurse Practitioners 126.0 106.3 138.8 217.7 New York Psychiatric Nurses 113.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.9 63.2 New York 11.3 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 125.0 98.3 135.7 211.9 New York Physician Assistants 125.0 98.3 135.7 211.9 New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists 15.5 25.5 50.2 73.2 New York 15.5 25.5 50.2 73.2	All States	28.8	17.3	44.0	38.5
New York Psychiatric Nurses 113.2 98.7 112.0 133.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 11.3 7.7 23.9 63.2 New York 11.3 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists New York Physician Assistants 125.0 98.3 135.7 211.9 New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists 15.5 25.5 50.2 73.2	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses New York 11.3 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists New York Physician Assistants 125.0 98.3 135.7 211.9 New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists 15.5 25.5 50.2 73.2	New York Nurse Practitioners	126.0	106.3	138.8	217.7
Compared to Psychiatric Nurses New York 11.3 7.7 23.9 63.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists New York Physician Assistants 125.0 98.3 135.7 211.9 New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists 15.5 25.5 50.2 73.2	New York Psychiatric Nurses	113.2	98.7	112.0	133.4
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists New York Physician Assistants 125.0 98.3 135.7 211.9 New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists Compared to Therapists New York 15.5 25.5 50.2 73.2					
Physician Assistants Versus TherapistsNew York Physician Assistants125.098.3135.7211.9New York Therapists108.278.390.3122.3Physician Assistants Reimbursement Levels Compared to TherapistsCompared to TherapistsNew York15.525.550.273.2	New York	11.3	7.7	23.9	63.2
New York Physician Assistants 125.0 98.3 135.7 211.9 New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists 25.5 50.2 73.2	All States	7.5	-1.1	18.4	34.3
New York Therapists 108.2 78.3 90.3 122.3 Physician Assistants Reimbursement Levels Compared to Therapists New York 15.5 25.5 50.2 73.2	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists New York 15.5 25.5 50.2 73.2	New York Physician Assistants	125.0	98.3	135.7	211.9
Compared to Therapists 15.5 25.5 50.2 73.2		108.2	78.3	90.3	122.3
All States 29.6 33.8 59.3 101.6	New York	15.5	25.5	50.2	73.2
	All States	29.6	33.8	59.3	101.6

Appendix C-33: North Carolina Disparity Analysis, All Plans

Sample size in 2021: 387,960 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
North Carolina OON Behavioral Health	12.3	11.8	12.3
North Carolina OON Medical/Surgical	0.9	1.7	0.7
Behavioral Health OON Compared to Medical/Surgical OON			
North Carolina	13.3×	7.0×	17.7×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
North Carolina OON Behavioral Health	42.6	48.6	n/a
North Carolina OON Medical/Surgical	1.1	5.8	n/a
Behavioral Health OON Compared to Medical/Surgical OON			
North Carolina	39.3×	8.4×	n/a
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
North Carolina OON Behavioral Health	21.7	20.4	19.1
North Carolina OON Medical/Surgical	6.4	5.8	3.6
Behavioral Health OON Compared to Medical/Surgical OON			
North Carolina	3.4×	3.5×	5.2×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
North Carolina OON All Behavioral Health Clinicians	12.4	9.6	8.5
North Carolina OON All Medical/Surgical Clinicians	2.2	2.2	1.5
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
North Carolina	5.7×	4.3×	5.6×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
North Carolina OON Psychiatrists	12.0	9.1	7.9
North Carolina OON Medical/Surgical Specialist Physicians	1.2	1.3	0.7
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
North Carolina	9.9×	6.8×	10.9×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %			
	2019	2020	2021	
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians				
North Carolina OON Psychologists	16.6	15.7	17.6	
North Carolina OON Medical/Surgical Specialist Physicians	1.2	1.3	0.7	
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON				
North Carolina	13.6×	11.8×	24.3×	
All States	10.9×	9.4×	10.6×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Psychiatric Nurses Versus Nurse Practitioners				
North Carolina OON Psychiatric Nurses	4.9	8.4	8.4	
North Carolina OON Nurse Practitioners	1.8	3.0	1.7	
Psychiatric Nurses OON Compared to Nurse Practitioners OON				
North Carolina	2.8×	2.8×	5.0×	
All States	5.2×	5.4×	1.7×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Therapists Versus Physician Assistants				
North Carolina OON Therapists	10.9	8.2	6.6	
North Carolina OON Physician Assistants	1.8	1.9	0.7	
Therapists OON Compared to Physician Assistants OON				
North Carolina	6.1×	4.3×	9.2×	
All States	5.5×	4.7×	4.1×	
Parity Would Be	1.0×	1.0×	1.0×	

n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
North Carolina All Medical/Surgical Clinicians	144.1	148.8	152.3
North Carolina All Behavioral Health Clinicians	87.0	95.2	99.0
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
North Carolina	65.6	56.2	53.9
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
North Carolina Medical/Surgical Specialist Physicians	150.7	156.1	160.9
North Carolina Psychiatrists	91.1	97.8	107.1
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
North Carolina	65.4	59.6	50.2
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
North Carolina Medical/Surgical Specialist Physicians	150.7	156.1	160.9
North Carolina Psychologists	90.6	97.4	100.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
North Carolina	66.3	60.3	60.6
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
North Carolina Nurse Practitioners	136.4	139.1	145.0
North Carolina Psychiatric Nurses	95.0	103.8	96.6
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
North Carolina	43.5	34.0	50.2
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
North Carolina Physician Assistants	142.4	143.2	146.2
North Carolina Therapists	83.3	93.6	96.1
Physician Assistants Reimbursement Levels Compared to Therapists			
North Carolina	71.0	53.1	52.2
All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			Perce	ntile, %	
North Carolina All Medical/Surgical Clinicians 152.3 128.8 181.5 307.9		Average		75th	95th
North Carolina All Behavioral Health Clinicians 99.0 73.1 91.3 169.5					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 53.9 76.0 98.8 81.6 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists 107.1 92.5 134.4 220.2 Medical/Surgical Specialist Physicians 160.9 153.5 200.5 334.3 North Carolina Medical/Surgical Specialist Physicians 107.1 92.5 134.4 220.2 Medical/Surgical Specialist Physicians 107.1 92.5 134.4 220.2 Medical/Surgical Specialist Physicians 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 100.2 91.3 102.8 231.5 Medical/Surgical Specialist Physicians 160.9 153.5 200.5 334.3 North Carolina Medical/Surgical Specialist Physicians 160.9 153.5 200.5 334.3 North Carolina Psychologists 100.2 91.3 102.8 231.5 Medical/Surgical Specialist Physicians 28.8 17.3 40.0 38.5 Medical/Surgical Specialist Physicians 28.8 17.3 44.0 38.5 North Carolina Nurse Practitioners 145.0 112.3 154.1 231.3 North Carolina Nurse Practitioners 145.0 112.3 154.1 231.3 North Carolina Psychiatric Nurses 96.6 78.4 94.1 143.2 Nurse Practitioners Reimbursement Levels 20.2 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.2 121.6 155.4 249.2 North Carolina Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels 20.2 77.3 102.0 146.0 North Carolina Seistants Reimbursement Levels 20.2 77.3 102.0 146.0 North Carolina Seistants Reimbursement Levels 20.2 77.3 102.0 146.0 North Carolina Seistants Reimbursement Levels 20.2 77.3 102.0 146.0 North Carolina Seistants Reimbursement Levels 20.2 77.3 102.0 146.0 North Carolina Seistants Reimbursement Leve	North Carolina All Medical/Surgical Clinicians	152.3	128.8	181.5	307.9
North Carolina 53.9 76.0 98.8 81.6	North Carolina All Behavioral Health Clinicians	99.0	73.1	91.3	169.5
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists North Carolina Medical/Surgical Specialist Physicians North Carolina Psychiatrists 160.9 153.5 200.5 334.3 North Carolina Psychiatrists 107.1 92.5 134.4 220.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 50.2 66.0 49.2 51.9 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 24.9 153.5 200.5 334.3 North Carolina Medical/Surgical Specialist Physicians Psychologists 160.9 153.5 200.5 334.3 North Carolina Psychologists 100.2 91.3 102.8 231.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 17.3 44.0 38.5 North Carolina 60.6 68.2 95.1 81.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 96.6 78.4 94.1 143.2	North Carolina	53.9	76.0	98.8	81.6
North Carolina Medical/Surgical Specialist Physicians 160.9 153.5 200.5 334.3 North Carolina Psychiatrists 107.1 92.5 134.4 220.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists North Carolina 50.2 66.0 49.2 51.9 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists North Carolina Medical/Surgical Specialist Physicians 160.9 153.5 200.5 334.3 North Carolina Psychologists 100.2 91.3 102.8 231.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists North Carolina Psychologists 100.2 91.3 102.8 231.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists North Carolina Psychologists 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses North Carolina Nurse Practitioners 145.0 112.3 154.1 231.3 North Carolina Psychiatric Nurses 96.6 78.4 94.1 143.2 Nurse Practitioners Reimbursement Levels 26.0 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.2 121.6 155.4 249.2 North Carolina Physician Assistants 146.2 121.6 155.4 249.2 North Carolina Reimbursement Levels 26.0 68.6 77.0 101.3 Physician Assistants Reimbursement Levels 27.7 102.0 146.0 North Carolina Reimbursement Lev	All States	21.7	26.6	48.0	70.4
North Carolina Psychiatrists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists North Carolina 50.2 66.0 49.2 51.9 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus Psychologists Versus Psychologists 334.3 North Carolina Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 100.2 91.3 102.8 231.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 60.6 68.2 95.1 81.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 96.6 78.4 94.1 143.2 North Carolina Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 96.6 78.4 94.1 143.2 North Carolina 50.2 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists North Carolina Physician Assistants 146.2 121.6 155.4	North Carolina Medical/Surgical Specialist Physicians	160.9	153.5	200.5	334.3
North Carolina 50.2 66.0 49.2 51.9 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists North Carolina Medical/Surgical Specialist Physicians 160.9 153.5 200.5 334.3 North Carolina Psychologists 100.2 91.3 102.8 231.5 Medical/Surgical Specialist Physicians 160.9 153.5 200.5 334.3 North Carolina Psychologists 100.2 91.3 102.8 231.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists North Carolina 60.6 68.2 95.1 81.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 145.0 112.3 154.1 231.3 North Carolina Nurse Practitioners 145.0 112.3 154.1 231.3 North Carolina Psychiatric Nurses 96.6 78.4 94.1 143.2 Nurse Practitioners Reimbursement Levels 200.5 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.2 121.6 155.4 249.2 North Carolina Physician Assistants 146.2 121.6 155.4 249.2 North Carolina Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels 200.5 200.5 200.5 Compared to Therapists 200.5 200.5 200.5 North Carolina Assistants Reimbursement Levels 200.5 200.5 Compared to Therapists 200.5 200.5 North Carolina 200.5 North Carolina 200.5 200.5 North Carolina 200.5 North Carolina 200.5 North Carolina 200.5 North Car	North Carolina Psychiatrists	107.1	92.5	134.4	220.2
Medical/Surgical Specialist Physicians Versus					
Medical/Surgical Specialist Physicians Versus Psychologists North Carolina Medical/Surgical Specialist Physicians 160.9 153.5 200.5 334.3 North Carolina Psychologists 100.2 91.3 102.8 231.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 100.2 95.1 81.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 8 112.3 154.1 231.3 North Carolina Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 96.6 78.4 94.1 143.2 North Carolina 50.2 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels Compared to Therapists 96.1 68.6 77.0 101.3 North Carolina 52.2 77.3 102.0 146.0	North Carolina	50.2	66.0	49.2	51.9
North Carolina Medical/Surgical Specialist Physicians 160.9 153.5 200.5 334.3 North Carolina Psychologists 100.2 91.3 102.8 231.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists North Carolina 60.6 68.2 95.1 81.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses North Carolina Nurse Practitioners 145.0 112.3 154.1 231.3 North Carolina Psychiatric Nurses 96.6 78.4 94.1 143.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses North Carolina 50.2 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.2 121.6 155.4 249.2 North Carolina Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels Compared to Therapists 146.0 152.2 77.3 102.0 146.0 North Carolina 52.2 77.3 102.0 146.0	All States	24.9	12.8	27.8	49.5
North Carolina Psychologists 100.2 91.3 102.8 231.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 8 95.1 81.6 North Carolina 60.6 68.2 95.1 81.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 145.0 112.3 154.1 231.3 North Carolina Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 96.6 78.4 94.1 143.2 North Carolina Physician Reimbursement Levels Compared to Psychiatric Nurses 50.2 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.2 121.6 155.4 249.2 North Carolina Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels Compared to Therapists 52.2 77.3 102.0 146.0					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists North Carolina 60.6 68.2 95.1 81.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 8.0 112.3 154.1 231.3 North Carolina Nurse Practitioners 96.6 78.4 94.1 143.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.6 78.4 94.1 143.2 North Carolina 50.2 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.2 121.6 155.4 249.2 North Carolina Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels Compared to Therapists 52.2 77.3 102.0 146.0	North Carolina Medical/Surgical Specialist Physicians	160.9	153.5	200.5	334.3
North Carolina 60.6 68.2 95.1 81.6	North Carolina Psychologists	100.2	91.3	102.8	231.5
All States 28.8 17.3 44.0 38.5					
Nurse Practitioners Versus Psychiatric Nurses North Carolina Nurse Practitioners 145.0 112.3 154.1 231.3 North Carolina Psychiatric Nurses 96.6 78.4 94.1 143.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 50.2 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.2 121.6 155.4 249.2 North Carolina Physician Assistants 146.2 121.6 155.4 249.2 North Carolina Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels Compared to Therapists 52.2 77.3 102.0 146.0	North Carolina	60.6	68.2	95.1	81.6
North Carolina Nurse Practitioners 145.0 112.3 154.1 231.3 North Carolina Psychiatric Nurses 96.6 78.4 94.1 143.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 50.2 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.2 121.6 155.4 249.2 North Carolina Physician Assistants 146.2 121.6 155.4 249.2 North Carolina Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels Compared to Therapists 52.2 77.3 102.0 146.0	All States	28.8	17.3	44.0	38.5
North Carolina Psychiatric Nurses 96.6 78.4 94.1 143.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 50.2 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 146.2 121.6 155.4 249.2 North Carolina Physician Assistants 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels Compared to Therapists 52.2 77.3 102.0 146.0	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses North Carolina 50.2 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists North Carolina Physician Assistants 146.2 121.6 155.4 249.2 North Carolina Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels Compared to Therapists 52.2 77.3 102.0 146.0	North Carolina Nurse Practitioners	145.0	112.3	154.1	231.3
Compared to Psychiatric Nurses North Carolina 50.2 43.2 63.9 61.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists North Carolina Physician Assistants 146.2 121.6 155.4 249.2 North Carolina Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels Compared to Therapists 52.2 77.3 102.0 146.0	North Carolina Psychiatric Nurses	96.6	78.4	94.1	143.2
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists North Carolina Physician Assistants 146.2 121.6 155.4 249.2 North Carolina Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels Compared to Therapists 52.2 77.3 102.0 146.0					
Physician Assistants Versus Therapists North Carolina Physician Assistants 146.2 North Carolina Therapists 96.1 Physician Assistants Reimbursement Levels Compared to Therapists North Carolina 52.2 77.3 102.0 146.0	North Carolina	50.2	43.2	63.9	61.5
North Carolina Physician Assistants 146.2 121.6 155.4 249.2 North Carolina Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels Compared to Therapists North Carolina 52.2 77.3 102.0 146.0	All States	7.5	-1.1	18.4	34.3
North Carolina Therapists 96.1 68.6 77.0 101.3 Physician Assistants Reimbursement Levels Compared to Therapists North Carolina 52.2 77.3 102.0 146.0	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists North Carolina 52.2 77.3 102.0 146.0	North Carolina Physician Assistants	146.2	121.6	155.4	249.2
Compared to Therapists North Carolina 52.2 77.3 102.0 146.0	North Carolina Therapists	96.1	68.6	77.0	101.3
All States 29.6 33.8 59.3 101.6	North Carolina	52.2	77.3	102.0	146.0
	All States	29.6	33.8	59.3	101.6

Appendix C-34: North Dakota Disparity Analysis, All Plans

Sample size in 2021: 6,086 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
North Dakota OON Behavioral Health	3.7	1.0	1.8
North Dakota OON Medical/Surgical	1.4	1.9	1.4
Behavioral Health OON Compared to Medical/Surgical OON			
North Dakota	2.6×	0.5×	1.3×*
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
North Dakota OON Behavioral Health	21.4	0.9	45.9
North Dakota OON Medical/Surgical	3.7	2.0	2.6
Behavioral Health OON Compared to Medical/Surgical OON			
North Dakota	5.8×	n/a	17.3×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
North Dakota OON Behavioral Health	23.3	2.9	7.1
North Dakota OON Medical/Surgical	4.0	1.3	4.7
Behavioral Health OON Compared to Medical/Surgical OON	-		
North Dakota	5.8×	2.2×*	1.5×*
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
North Dakota OON All Behavioral Health Clinicians	9.9	5.0	8.5
North Dakota OON All Medical/Surgical Clinicians	2.5	2.7	2.7
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
North Dakota	3.9×	1.8×	3.2×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
North Dakota OON Psychiatrists	3.1	3.7	1.5
North Dakota OON Medical/Surgical Specialist Physicians	1.1	0.7	0.5
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
North Dakota	2.9×	5.2×	2.7×*
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

		Percent, %		
	2019	2020	2021	
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians				
North Dakota OON Psychologists	3.6	6.8	9.0	
North Dakota OON Medical/Surgical Specialist Physicians	1.1	0.7	0.5	
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON				
North Dakota	3.3×	9.4×	16.3×	
All States	10.9×	9.4×	10.6×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Psychiatric Nurses Versus Nurse Practitioners				
North Dakota OON Psychiatric Nurses	n/a	n/a	n/a	
North Dakota OON Nurse Practitioners	n/a	n/a	n/a	
Psychiatric Nurses OON Compared to Nurse Practitioners OON				
North Dakota	n/a	n/a	n/a	
All States	5.2×	5.4×	1.7×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Therapists Versus Physician Assistants				
North Dakota OON Therapists	15.7	4.5	8.9	
North Dakota OON Physician Assistants	1.2	1.1	1.5	
Therapists OON Compared to Physician Assistants OON				
North Dakota	13.1×	4.0×	5.9×	
All States	5.5×	4.7×	4.1×	
Parity Would Be	1.0×	1.0×	1.0×	

 $^{^{*}}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
North Dakota All Medical/Surgical Clinicians	197.8	202.9	206.5
North Dakota All Behavioral Health Clinicians	157.6	157.6	170.0
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
North Dakota	25.5	28.8	21.5
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
North Dakota Medical/Surgical Specialist Physicians	198.2	203.0	208.8
North Dakota Psychiatrists	159.2	156.9	171.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
North Dakota	24.5	29.3	22.0
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
North Dakota Medical/Surgical Specialist Physicians	198.2	203.0	208.8
North Dakota Psychologists	165.6	170.3	177.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
North Dakota	19.7	19.2	17.8
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
North Dakota Nurse Practitioners	185.3	188.7	192.8
North Dakota Psychiatric Nurses	186.4	174.6	180.4
Psychiatric Nurses Compared to Nurse Practitioners			
North Dakota	-0.6*	8.1	6.9
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
North Dakota Physician Assistants	185.6	186.1	194.0
North Dakota Therapists	149.6	150.7	166.8
Physician Assistants Reimbursement Levels Compared to Therapists			
North Dakota	24.1	23.4	16.3
All States	40.6	34.5	29.6

^{*} Reimbursement levels are not statistically different between medical/surgical and behavioral health at a p < .05.

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
North Dakota All Medical/Surgical Clinicians	206.5	191.3	214.1	421.3
North Dakota All Behavioral Health Clinicians	170.0	139.0	159.9	215.6
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
North Dakota	21.5	37.6	33.9	95.4
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
North Dakota Medical/Surgical Specialist Physicians	208.8	210.8	226.4	408.7
North Dakota Psychiatrists	171.2	178.3	209.7	333.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
North Dakota	22.0	18.2	8.0	22.4
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
North Dakota Medical/Surgical Specialist Physicians	208.8	210.8	226.4	408.7
North Dakota Psychologists	177.2	187.2	211.3	239.8
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
North Dakota	17.8	12.6	7.1	95.4
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
North Dakota Nurse Practitioners	192.8	152.5	193.0	274.0
North Dakota Psychiatric Nurses	180.4	151.7	179.8	179.8
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
North Dakota	6.9	0.5	7.3	52.4
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
North Dakota Physician Assistants	194.0	152.6	191.1	262.0
North Dakota Therapists	166.8	128.0	147.8	166.0
Physician Assistants Reimbursement Levels Compared to Therapists				
North Dakota	16.3	19.2	29.3	57.8
All States	29.6	33.8		

Appendix C-35: Ohio Disparity Analysis, All Plans

Sample size in 2021: 509,484 covered lives

Acute Inpatient Facility	Percent, %	
Ohio OON Behavioral Health 10.1 Ohio OON Medical/Surgical 3.2 Behavioral Health OON Compared to Medical/Surgical OON 3.1× All States 7.1× Parity Would Be 1.0× Subacute Inpatient Facility 48.0 Ohio OON Behavioral Health 48.0 Ohio OON Medical/Surgical 8.6 Behavioral Health OON Compared to Medical/Surgical OON 5.6× All States 9.9× Parity Would Be 1.0× Outpatient Facility (Non-Emergency Room) 0hio OON Behavioral Health 17.0 Ohio OON Medical/Surgical 5.8 Behavioral Health OON Compared to Medical/Surgical OON 2.9× All States 3.5× Parity Would Be 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians 9.0 Ohio OON All Medical/Surgical Clinicians 9.0 Ohio OON All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 4.9 All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physi	2020	2021
Ohio OON Medical/Surgical Behavioral Health OON Compared to Medical/Surgical OON Ohio 3.1× All States 7.1× Parity Would Be 1.0× Subacute Inpatient Facility Ohio OON Behavioral Health OON Compared to Medical/Surgical OON Ohio OON Medical/Surgical 8.6 Behavioral Health OON Compared to Medical/Surgical OON Ohio 5.6× All States 9.9× Parity Would Be 1.0× Outpatient Facility (Non-Emergency Room) Ohio OON Behavioral Health OON Compared to Medical/Surgical OON Ohio OON Behavioral Health OON Compared to Medical/Surgical OON Ohio OON Medical/Surgical 5.8 Behavioral Health OON Compared to Medical/Surgical OON Ohio OON Medical/Surgical 5.8 Behavioral Health OON Compared to Medical/Surgical OON Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians OON Ohio 1.9× All States 9.0 Ohio OON All Medical/Surgical Clinicians OON Compared to All Medical/Surgical Clinicians OON Ohio 1.9× All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists OON Compared to Medical/Surgical Specialist Physicians Ohio OON Medical/Surgical Specialist Physicians ONO Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians ONO ON Medical/Surgical Specialist Physicians		
Behavioral Health OON Compared to Medical/Surgical OON	8.3	7.2
Ohio 3.1× All States 7.1× Parity Would Be 1.0× Subacute Inpatient Facility 48.0 Ohio OON Behavioral Health 48.0 Ohio OON Medical/Surgical 8.6 Behavioral Health OON Compared to Medical/Surgical OON 5.6× All States 9.9× Parity Would Be 1.0× Outpatient Facility (Non-Emergency Room) 7.0 Ohio OON Behavioral Health 17.0 Ohio OON Medical/Surgical 5.8 Behavioral Health OON Compared to Medical/Surgical OON 2.9× All States 3.5× Parity Would Be 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians 9.0 Ohio OON All Behavioral Health Clinicians 9.0 Ohio OON All Medical/Surgical Clinicians 4.9 All States 3.9× Parity Would Be 1.0× Ohio OON Psychiatrists Versus Medical/Surgical Specialist Physicians 3.6 Ohio OON Psychiatrists Versus Medical/Surgical Specialist Physicians OON 3.6 Psychiatrists OON Compared to Medical/Surgic	1.9	2.0
All States 7.1× Parity Would Be 1.0× Subacute Inpatient Facility Ohio OON Behavioral Health 48.0 Ohio OON Medical/Surgical 8.6 Behavioral Health OON Compared to Medical/Surgical OON Ohio 5.6× All States 9.9× Parity Would Be 1.0× Outpatient Facility (Non-Emergency Room) Ohio OON Behavioral Health 17.0 Ohio OON Medical/Surgical 5.8 Behavioral Health OON Compared to Medical/Surgical OON Ohio OON Medical/Surgical 5.8 Behavioral Health OON Compared to Medical/Surgical OON Ohio 2.9× All States 3.5× Parity Would Be 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians 9.0 Ohio OON All Medical/Surgical Clinicians 4.9 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Ohio 1.9× All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Medical/Surgical Specialist Physicians ONO ON Medical/Surgical Specialist Physicians		
Parity Would Be Subacute Inpatient Facility Ohio OON Behavioral Health	4.3×	3.6×
Subacute Inpatient Facility Ohio OON Behavioral Health 48.0 Ohio OON Medical/Surgical 8.6 Behavioral Health OON Compared to Medical/Surgical OON Ohio 5.6× All States 9.9× Parity Would Be 1.0× Outpatient Facility (Non-Emergency Room) Ohio OON Behavioral Health 17.0 Ohio OON Medical/Surgical 5.8 Behavioral Health OON Compared to Medical/Surgical OON Ohio OON Medical/Surgical 5.8 Behavioral Health OON Compared to Medical/Surgical OON Ohio Oon Medical/Surgical 5.8 Parity Would Be 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians 9.0 Ohio OON All Medical/Surgical Clinicians 4.9 All States 9.0 Ohio OON All Medical/Surgical Clinicians OON Compared to All Medical/Surgical Clinicians OON Ohio 1.9× All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists OON Compared to Medical/Surgical Specialist Physicians Ohio OON Medical/Surgical Specialist Physicians Ohio OON Medical/Surgical Specialist Physicians OON	6.0×	6.2×
Ohio OON Behavioral Health Ohio OON Medical/Surgical Behavioral Health OON Compared to Medical/Surgical OON Ohio S.6x All States Parity Would Be Outpatient Facility (Non-Emergency Room) Ohio OON Behavioral Health Ohio OON Medical/Surgical Behavioral Health OON Compared to Medical/Surgical OON Ohio Ohio Ohio All States Parity Would Be 1.0x Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians Ohio OON All Medical/Surgical Clinicians All States 3.9x All States Ohio OON All Medical/Surgical Clinicians Ohio OON Separate to All Medical/Surgical Clinicians Ohio OON Separate to All Medical/Surgical Clinicians Ohio Ohio Ohio 1.9x All States 3.9x All States 3.9x Parity Would Be 00ffice Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians Ohio OON Medical/Surgical Specialist Physicians OON	1.0×	1.0×
Ohio OON Medical/Surgical Behavioral Health OON Compared to Medical/Surgical OON Ohio Ohio All States Parity Would Be Outpatient Facility (Non-Emergency Room) Ohio OON Behavioral Health Ohio OON Medical/Surgical Behavioral Health OON Compared to Medical/Surgical OON Ohio Ohio Ohio All States Parity Would Be 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians All States All States Parity Would Be Office Visits - Payental Health Clinicians Ohio OON Soon Ohio Ohio Ohio 1.9× All States Parity Would Be Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Psychiatrists Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians OON		
Behavioral Health OON Compared to Medical/Surgical OON Ohio 5.6× All States 9.9× Parity Would Be 1.0× Outpatient Facility (Non-Emergency Room) Ohio OON Behavioral Health 17.0 Ohio OON Medical/Surgical 5.8 Behavioral Health OON Compared to Medical/Surgical OON Ohio 2.9× All States 3.5× Parity Would Be 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians 9.0 Ohio OON All Medical/Surgical Clinicians 9.0 All Behavioral Health Clinicians 4.9 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Ohio 1.9× All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Medical/Surgical Specialist Physicians OON	41.4	36.0
Behavioral Health OON Compared to Medical/Surgical OON Ohio 5.6× All States 9.9× Parity Would Be 1.0× Outpatient Facility (Non-Emergency Room) Ohio OON Behavioral Health 17.0 Ohio OON Medical/Surgical 5.8 Behavioral Health OON Compared to Medical/Surgical OON Ohio 2.9× All States 3.5× Parity Would Be 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians 9.0 Ohio OON All Medical/Surgical Clinicians 9.0 All Behavioral Health Clinicians 4.9 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Ohio 1.9× All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Medical/Surgical Specialist Physicians OON	3.5	2.5
Ohio 5.6× All States 9.9× Parity Would Be 1.0× Outpatient Facility (Non-Emergency Room) 17.0 Ohio OON Behavioral Health 17.0 Ohio OON Medical/Surgical 5.8 Behavioral Health OON Compared to Medical/Surgical OON 2.9× All States 3.5× Parity Would Be 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians 9.0 Ohio OON All Behavioral Health Clinicians 9.0 Ohio OON All Medical/Surgical Clinicians 4.9 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON 1.9× All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians 11.7 Ohio OON Psychiatrists 11.7 Ohio OON Medical/Surgical Specialist Physicians OON 3.6 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON 3.6		
Parity Would Be Outpatient Facility (Non-Emergency Room) Ohio OON Behavioral Health Ohio OON Medical/Surgical Behavioral Health OON Compared to Medical/Surgical OON Ohio Ohio Ohio Ohio Ohio Ohio Ohio Ohio	11.8×	14.5×
Outpatient Facility (Non-Emergency Room) Ohio OON Behavioral Health Ohio OON Medical/Surgical Behavioral Health OON Compared to Medical/Surgical OON Ohio Ohio All States Parity Would Be Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians All Behavioral Health Clinicians All Behavioral Health Clinicians Ohio Ohio Ohio Ohio Ohio 1.9× All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians Ohio OON Medical/Surgical Specialist Physicians ON	7.9×	19.9×
Ohio OON Behavioral Health Ohio OON Medical/Surgical Behavioral Health OON Compared to Medical/Surgical OON Ohio All States Parity Would Be Ohio OON All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians All Behavioral Health Clinicians Ohio Ohio Ohio Ohio 1.9× All States Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians Ohio OON Medical/Surgical Specialist Physicians ON Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON	1.0×	1.0×
Ohio OON Behavioral Health Ohio OON Medical/Surgical Behavioral Health OON Compared to Medical/Surgical OON Ohio All States Parity Would Be Ohio OON All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians All Behavioral Health Clinicians Ohio Ohio Ohio Ohio 1.9× All States Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians Ohio OON Medical/Surgical Specialist Physicians ON Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON		
Ohio OON Medical/Surgical Behavioral Health OON Compared to Medical/Surgical OON Ohio All States Parity Would Be Ohio OON All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians All Behavioral Health Clinicians All Behavioral Health Clinicians Ohio Ohio 1.9× All States Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians Ohio OON Medical/Surgical Specialist Physicians OON Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON	4.1	4.3
Behavioral Health OON Compared to Medical/Surgical OON Ohio 2.9× All States 3.5× Parity Would Be 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians 4.9 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Ohio 1.9× All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Psychiatrists 11.7 Ohio OON Medical/Surgical Specialist Physicians OON	6.8	6.9
Ohio 2.9× All States 3.5× Parity Would Be 1.0× Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians 9.0 Ohio OON All Medical/Surgical Clinicians 4.9 All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Ohio 1.9× All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists 11.7 Ohio OON Medical/Surgical Specialist Physicians 3.6 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON		
Parity Would Be Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Ohio 1.9× All States Parity Would Be Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist Physicians ON ON ON ON ON ON ON ON ON O	0.6×	0.6×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Ohio All States Parity Would Be Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Psychiatrists 11.7 Ohio OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON	1.7×	1.5×
Medical/Surgical Clinicians Ohio OON All Behavioral Health Clinicians Ohio OON All Medical/Surgical Clinicians All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Ohio 1.9× All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists 11.7 Ohio OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON	1.0×	1.0×
Ohio OON All Medical/Surgical Clinicians All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Ohio All States Parity Would Be Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON		
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON Ohio All States Parity Would Be Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON	6.1	5.3
Clinicians OON Ohio 1.9× All States Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON	3.6	3.2
All States 3.9× Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists 11.7 Ohio OON Medical/Surgical Specialist Physicians 3.6 Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON		
Parity Would Be 1.0× Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON	1.7×	1.6×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON	3.9×	3.5×
Physicians Ohio OON Psychiatrists Ohio OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON 11.7	1.0×	1.0×
Ohio OON Medical/Surgical Specialist Physicians Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON 3.6		
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON	9.6	8.3
OÓN	3.5	2.7
Ohio 3.3×		
0.0	2.8×	3.1×
All States 9.0×	8.7×	8.9×
Parity Would Be 1.0×	1.0×	1.0×

		Percent, %		
	2019	2020	2021	
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians				
Ohio OON Psychologists	8.0	5.7	5.5	
Ohio OON Medical/Surgical Specialist Physicians	3.6	3.5	2.7	
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON				
Ohio	2.2×	1.6×	2.0×	
All States	10.9×	9.4×	10.6×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Psychiatric Nurses Versus Nurse Practitioners				
Ohio OON Psychiatric Nurses	2.9	2.1	3.0	
Ohio OON Nurse Practitioners	1.5	1.6	1.4	
Psychiatric Nurses OON Compared to Nurse Practitioners OON				
Ohio	1.9×	1.3×	2.2×	
All States	5.2×	5.4×	1.7×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Therapists Versus Physician Assistants				
Ohio OON Therapists	8.3	4.9	4.2	
Ohio OON Physician Assistants	2.9	0.7	1.1	
Therapists OON Compared to Physician Assistant OON				
Ohio	2.9×	7.0×	4.0×	
All States	5.5×	4.7×	4.1×	
Parity Would Be	1.0×	1.0×	1.0×	

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			Percent, %	
Ohio All Medical/Surgical Clinicians 107.7 109.5 113.8 Ohio All Behavioral Health Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 96.4 Ohio 29.0 19.5 18.0 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 111.6 113.4 119.4 Ohio Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 83.9 92.3 99.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 87.5 94.5 101.5 Ohio Psychologists 87.5 94.5 101.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 10.2 10.2 10.7 Ohio 27.6 20.0 17.7 17.5 All States 42.0 33.9 28.8 <		2019	2020	2021
Ohio All Behavioral Health Clinicians	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians	Ohio All Medical/Surgical Clinicians	107.7	109.5	113.8
Behavioral Health Clinicians Ohio 29.0 19.5 18.0 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 111.6 113.4 119.4 Ohio Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 83.9 92.3 99.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 87.5 94.5 101.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 87.5 94.5 101.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 42.0 33.9 28.8 Ohio 27.6 20.0 17.7 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 73.5 91.6 97.6 Ohio Psychiatric Nurses 73.5 91.6 97.6 <	Ohio All Behavioral Health Clinicians	83.5	91.6	96.4
All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists				
Medical/Surgical Specialist Physicians Versus Psychiatrists Ohio Medical/Surgical Specialist Physicians 111.6 113.4 119.4 Ohio Psychiatrists 83.9 92.3 99.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 33.1 22.9 19.5 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 111.6 113.4 119.4 Ohio Medical/Surgical Specialist Physicians Versus Psychologists 87.5 94.5 101.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 87.5 94.5 101.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 27.6 20.0 17.7 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 100.2 102.7 106.3 Ohio Psychiatric Nurses 73.5 91.6 97.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.1 8.9 All States 28.3 12.8 <td< td=""><td>Ohio</td><td>29.0</td><td>19.5</td><td>18.0</td></td<>	Ohio	29.0	19.5	18.0
Ohio Medical/Surgical Specialist Physicians 111.6 113.4 119.4 Ohio Psychiatrists 83.9 92.3 99.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 33.1 22.9 19.5 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 111.6 113.4 119.4 Ohio Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 87.5 94.5 101.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 27.6 20.0 17.7 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 30.0 20.0 17.7 All States 100.2 102.7 106.3 Ohio Psychiatric Nurses 73.5 91.6 97.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 12.8 7.5 <td>All States</td> <td>33.3</td> <td>25.7</td> <td>21.7</td>	All States	33.3	25.7	21.7
Ohio Psychiatrists 83.9 92.3 99.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 33.1 22.9 19.5 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 111.6 113.4 119.4 Ohio Medical/Surgical Specialist Physicians 111.6 113.4 119.4 Ohio Psychologists 87.5 94.5 101.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 27.6 20.0 17.7 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 73.5 91.6 97.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 73.5 91.6 97.6 Ohio 36.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 103.4 103.6 106.5 Ohio 100.5	Medical/Surgical Specialist Physicians Versus Psychiatrists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Ohio 33.1 22.9 19.5 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 111.6 113.4 119.4 Ohio Psychologists 87.5 94.5 101.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 87.5 94.5 101.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 27.6 20.0 17.7 Ohio 27.6 20.0 17.7 4ll States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 100.2 102.7 106.3 0hio Psychiatric Nurses 73.5 91.6 97.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 36.3 12.1 8.9 Ohio 36.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 0hio Physician Assistant Reimbursement Levels Compared to Therapists 0hio	Ohio Medical/Surgical Specialist Physicians	111.6	113.4	119.4
The process of the	Ohio Psychiatrists	83.9	92.3	99.9
All States	Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Medical/Surgical Specialist Physicians Versus Psychologists Ohio Medical/Surgical Specialist Physicians 111.6 113.4 119.4 Ohio Psychologists 87.5 94.5 101.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 27.6 20.0 17.7 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 100.2 102.7 106.3 Ohio Psychiatric Nurses 73.5 91.6 97.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 36.3 12.1 8.9 Ohio 36.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 12.8 7.5 Physician Assistants 103.4 103.6 106.5 Ohio Therapists 81.7 90.3 93.6 Physician Assistant Reimbursement Levels Compared to Therapists 26.7 14.8 13.8 <td>Ohio</td> <td>33.1</td> <td>22.9</td> <td>19.5</td>	Ohio	33.1	22.9	19.5
Ohio Medical/Surgical Specialist Physicians 111.6 113.4 119.4 Ohio Psychologists 87.5 94.5 101.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 27.6 20.0 17.7 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 100.2 102.7 106.3 Ohio Nurse Practitioners 100.2 102.7 106.3 Ohio Psychiatric Nurses 73.5 91.6 97.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 36.3 12.1 8.9 Ohio 36.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 103.4 103.6 106.5 Ohio Therapists 81.7 90.3 93.6 Physician Assistant Reimbursement Levels Compared to Therapists 26.7 14.8 13.8	All States	40.8	30.1	24.9
Ohio Psychologists 87.5 94.5 101.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 27.6 20.0 17.7 Ohio 27.6 20.0 17.7 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 100.2 102.7 106.3 Ohio Nurse Practitioners 100.2 102.7 106.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 73.5 91.6 97.6 Ohio 36.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 103.4 103.6 106.5 Ohio Therapists 81.7 90.3 93.6 Physician Assistant Reimbursement Levels Compared to Therapists 26.7 14.8 13.8	Medical/Surgical Specialist Physicians Versus Psychologists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Ohio 27.6 20.0 17.7 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 100.2 102.7 106.3 Ohio Nurse Practitioners 100.2 102.7 106.3 Ohio Psychiatric Nurses 73.5 91.6 97.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 36.3 12.1 8.9 Ohio 36.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 103.4 103.6 106.5 Ohio Therapists 81.7 90.3 93.6 Physician Assistant Reimbursement Levels Compared to Therapists 26.7 14.8 13.8	Ohio Medical/Surgical Specialist Physicians	111.6	113.4	119.4
to Psychologists Ohio 27.6 20.0 17.7 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 100.2 102.7 106.3 Ohio Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 73.5 91.6 97.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 36.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 103.4 103.6 106.5 Ohio Physician Assistants 103.4 103.6 106.5 Physician Assistant Reimbursement Levels Compared to Therapists 81.7 90.3 93.6 Physician Assistant Reimbursement Levels Compared to Therapists 26.7 14.8 13.8	Ohio Psychologists	87.5	94.5	101.5
All States				
Nurse Practitioners Versus Psychiatric Nurses Ohio Nurse Practitioners 100.2 102.7 106.3 Ohio Psychiatric Nurses 73.5 91.6 97.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 80.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 103.4 103.6 106.5 Ohio Physician Assistants 81.7 90.3 93.6 Physician Assistant Reimbursement Levels Compared to Therapists 26.7 14.8 13.8	Ohio	27.6	20.0	17.7
Ohio Nurse Practitioners 100.2 102.7 106.3 Ohio Psychiatric Nurses 73.5 91.6 97.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 36.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 103.4 103.6 106.5 Ohio Physician Assistants 103.4 103.6 106.5 Ohio Therapists 81.7 90.3 93.6 Physician Assistant Reimbursement Levels Compared to Therapists 26.7 14.8 13.8	All States	42.0	33.9	28.8
Ohio Psychiatric Nurses 73.5 91.6 97.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 36.3 12.1 8.9 Ohio 36.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 103.4 103.6 106.5 Ohio Physician Assistants 81.7 90.3 93.6 Physician Assistant Reimbursement Levels Compared to Therapists 26.7 14.8 13.8	Nurse Practitioners Versus Psychiatric Nurses			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Ohio 36.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Ohio Physician Assistants 103.4 103.6 106.5 Ohio Therapists 81.7 90.3 93.6 Physician Assistant Reimbursement Levels Compared to Therapists Ohio 26.7 14.8 13.8	Ohio Nurse Practitioners	100.2	102.7	106.3
Nurses Ohio 36.3 12.1 8.9 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Ohio Physician Assistants 103.4 103.6 106.5 Ohio Therapists 81.7 90.3 93.6 Physician Assistant Reimbursement Levels Compared to Therapists 26.7 14.8 13.8	Ohio Psychiatric Nurses	73.5	91.6	97.6
All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Ohio Physician Assistants 103.4 103.6 106.5 Ohio Therapists 81.7 90.3 93.6 Physician Assistant Reimbursement Levels Compared to Therapists Ohio 26.7 14.8 13.8	· · · · · · · · · · · · · · · · · · ·			
Physician Assistants Versus TherapistsOhio Physician Assistants103.4103.6106.5Ohio Therapists81.790.393.6Physician Assistant Reimbursement Levels Compared to TherapistsOhio26.714.813.8	Ohio	36.3	12.1	8.9
Ohio Physician Assistants103.4103.6106.5Ohio Therapists81.790.393.6Physician Assistant Reimbursement Levels Compared to TherapistsOhio26.714.813.8	All States	28.3	12.8	7.5
Ohio Therapists 81.7 90.3 93.6 Physician Assistant Reimbursement Levels Compared to Therapists Ohio 26.7 14.8 13.8	Physician Assistants Versus Therapists			
Physician Assistant Reimbursement Levels Compared to Therapists Ohio 26.7 14.8 13.8	Ohio Physician Assistants	103.4	103.6	106.5
Ohio 26.7 14.8 13.8	Ohio Therapists	81.7	90.3	93.6
	Physician Assistant Reimbursement Levels Compared to Therapists			
All States 40.6 34.5 29.6	Ohio	26.7	14.8	13.8
	All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians 113.8 100.0 132.5 246.2		Percentile, %			
Dhio All Medical/Surgical Clinicians 113.8 100.0 132.5 246.2		Average		75th	95th
Ohio All Behavioral Health Clinicians 96.4 73.0 91.4 147.3					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Ohio	Ohio All Medical/Surgical Clinicians	113.8	100.0	132.5	246.2
Compared to All Behavioral Health Clinicians 18.0 37.0 44.9 67.2 Ohio 18.0 37.0 44.9 67.2 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Psychiatrists 119.4 111.8 150.1 280.5 Ohio Psychiatrists 99.9 95.2 119.2 150.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 19.5 17.5 25.9 86.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Psychologists 101.5 85.1 110.5 243.0 Ohio Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 101.5 85.1 110.5 243.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.7 31.3 35.9 67.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 97.6 86.1	Ohio All Behavioral Health Clinicians	96.4	73.0	91.4	147.3
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Ohio Medical/Surgical Specialist Physicians 119.4 111.8 150.1 280.5 Ohio Psychiatrists 99.9 95.2 119.2 150.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Ohio 19.5 17.5 25.9 86.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Ohio Medical/Surgical Specialist Physicians Versus Psychologists 101.5 85.1 110.5 243.0 Medical/Surgical Specialist Physicians 119.4 111.8 150.1 280.5 Ohio Psychologists 101.5 85.1 110.5 243.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Ohio 17.7 31.3 35.9 67.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Ohio Nurse Practitioners 106.3 85.2 117.2 182.9 Ohio Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Ohio 8.9 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Ohio Physician Assistants 106.5 85.9 112.1 176.9 Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels					
Medical/Surgical Specialist Physicians Versus Psychiatrists Ohio Medical/Surgical Specialist Physicians 119.4 111.8 150.1 280.5 Ohio Psychiatrists 99.9 95.2 119.2 150.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 19.5 17.5 25.9 86.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 19.4 111.8 150.1 280.5 Ohio Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 101.5 85.1 110.5 243.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.7 31.3 35.9 67.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 106.3 85.2 117.2 182.9 Ohio Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.9 -1.1	Ohio	18.0	37.0	44.9	67.2
Psychiatrists	All States	21.7	26.6	48.0	70.4
Ohio Psychiatrists 99.9 95.2 119.2 150.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 19.5 17.5 25.9 86.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Variance Psychologists 19.4 111.8 150.1 280.5 Ohio Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 101.5 85.1 110.5 243.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.7 31.3 35.9 67.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels 8.9 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 93.6 <th< td=""><td></td><td></td><td></td><td></td><td></td></th<>					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Ohio 19.5 17.5 25.9 86.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8.9 -1.1 280.5 Ohio Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 101.5 85.1 110.5 243.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.7 31.3 35.9 67.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 97.6 86.1 92.0 127.5 All States 7.5 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 93.6	Ohio Medical/Surgical Specialist Physicians	119.4	111.8	150.1	280.5
Reimbursement Levels Compared to Psychiatrists	· · · · · · · · · · · · · · · · · · ·	99.9	95.2	119.2	150.4
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 119.4 111.8 150.1 280.5 Ohio Psychologists 101.5 85.1 110.5 243.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.7 31.3 35.9 67.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 106.3 85.2 117.2 182.9 Ohio Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.9 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.5 85.9 112.1 176.9 Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels					
Medical/Surgical Specialist Physicians Versus Psychologists Ohio Medical/Surgical Specialist Physicians 119.4 111.8 150.1 280.5 Ohio Psychologists 101.5 85.1 110.5 243.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.7 31.3 35.9 67.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.9 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.5 85.9 112.1 176.9 Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels	Ohio	19.5	17.5	25.9	86.5
Psychologists	All States	24.9	12.8	27.8	49.5
Ohio Psychologists 101.5 85.1 110.5 243.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 17.7 31.3 35.9 67.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 0hio Nurse Practitioners 106.3 85.2 117.2 182.9 Ohio Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Ohio 8.9 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.5 85.9 112.1 176.9 Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Ohio 17.7 31.3 35.9 67.2 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 0hio Nurse Practitioners 106.3 85.2 117.2 182.9 Ohio Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20 127.5 127.5 Ohio 8.9 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.5 85.9 112.1 176.9 Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels	Ohio Medical/Surgical Specialist Physicians	119.4	111.8	150.1	280.5
Reimbursement Levels Compared to Psychologists	Ohio Psychologists	101.5	85.1	110.5	243.0
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 106.3 85.2 117.2 182.9 Ohio Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.9 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.5 85.9 112.1 176.9 Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels					
Nurse Practitioners Versus Psychiatric Nurses Ohio Nurse Practitioners 106.3 85.2 117.2 182.9 Ohio Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20 20 127.5 Ohio 8.9 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.5 85.9 112.1 176.9 Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels	Ohio	17.7	31.3	35.9	67.2
Ohio Nurse Practitioners 106.3 85.2 117.2 182.9 Ohio Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.0 20.0 127.5 Ohio 8.9 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.5 85.9 112.1 176.9 Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels	All States	28.8	17.3	44.0	38.5
Ohio Psychiatric Nurses 97.6 86.1 92.0 127.5 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 27.4 43.5 Ohio 8.9 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 106.5 85.9 112.1 176.9 Ohio Physician Assistants 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8.9 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 0hio Physician Assistants 106.5 85.9 112.1 176.9 Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels	Ohio Nurse Practitioners	106.3	85.2	117.2	182.9
Compared to Psychiatric Nurses Ohio 8.9 -1.1 27.4 43.5 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Ohio Physician Assistants 106.5 85.9 112.1 176.9 Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels	Ohio Psychiatric Nurses	97.6	86.1	92.0	127.5
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Ohio Physician Assistants 106.5 85.9 112.1 176.9 Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels					
Physician Assistants Versus TherapistsOhio Physician Assistants106.585.9112.1176.9Ohio Therapists93.668.176.2119.2Physician Assistants Reimbursement Levels	Ohio	8.9	-1.1	27.4	43.5
Ohio Physician Assistants 106.5 85.9 112.1 176.9 Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels	All States	7.5	-1.1	18.4	34.3
Ohio Therapists 93.6 68.1 76.2 119.2 Physician Assistants Reimbursement Levels	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels	Ohio Physician Assistants	106.5	85.9	112.1	176.9
	Ohio Therapists	93.6	68.1	76.2	119.2
Ohio 13.8 26.1 47.1 48.4	Ohio	13.8	26.1	47.1	48.4
All States 29.6 33.8 59.3 101.6	All States	29.6	33.8	59.3	101.6

Appendix C-36: Oklahoma Disparity Analysis, All Plans

Sample size in 2021: 76,940 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Oklahoma OON Behavioral Health	12.9	10.6	10.0
Oklahoma OON Medical/Surgical	5.2	3.0	1.8
Behavioral Health OON Compared to Medical/Surgical OON			
Oklahoma	2.5×	3.6×	5.6×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Oklahoma OON Behavioral Health	69.4	35.0	31.0
Oklahoma OON Medical/Surgical	3.4	2.7	4.3
Behavioral Health OON Compared to Medical/Surgical OON			
Oklahoma	20.5×	12.8×	7.2×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Oklahoma OON Behavioral Health	34.6	11.6	13.1
Oklahoma OON Medical/Surgical	15.2	6.9	9.3
Behavioral Health OON Compared to Medical/Surgical OON			
Oklahoma	2.3×	1.7×	1.4×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Oklahoma OON All Behavioral Health Clinicians	8.9	8.9	5.9
Oklahoma OON All Medical/Surgical Clinicians	5.1	3.9	3.8
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Oklahoma	1.7×	2.3×	1.5×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Oklahoma OON Psychiatrists	7.9	6.5	5.1
Oklahoma OON Medical/Surgical Specialist Physicians	3.2	2.2	2.1
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Oklahoma	2.5×	3.0×	2.4×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Oklahoma OON Psychologists	7.6	13.6	9.5
Oklahoma OON Medical/Surgical Specialist Physicians	3.2	2.2	2.1
Psychologist OON Compared to Medical/Surgical OON			
Oklahoma	2.4×	6.2×	4.5×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Oklahoma OON Psychiatric Nurses	4.9	8.6	2.6
Oklahoma OON Nurse Practitioners	4.6	3.6	4.6
Psychiatric Nurses OON Compared to Nurse Practitioners OONN			
Oklahoma	1.1×*	2.4×	0.6×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Oklahoma OON Therapists	9.6	8.5	5.4
Oklahoma OON Physician Assistants	3.0	2.5	1.6
Therapists OON Compared to Physician Assistants OON			
Oklahoma	3.2×	3.4×	3.4×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Oklahoma All Medical/Surgical Clinicians	118.7	114.0	114.2
Oklahoma All Behavioral Health Clinicians	104.2	89.6	93.6
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Oklahoma	13.9	27.2	22.0
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Oklahoma Medical/Surgical Specialist Physicians	117.8	116.3	117.1
Oklahoma Psychiatrists	100.7	98.9	105.1
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Oklahoma	16.9	17.6	11.4
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Oklahoma Medical/Surgical Specialist Physicians	117.8	116.3	117.1
Oklahoma Psychologists	99.0	95.5	100.8
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Oklahoma	19.0	21.8	16.2
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Oklahoma Nurse Practitioners	108.4	104.8	105.6
Oklahoma Psychiatric Nurses	97.0	100.4	102.2
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Oklahoma	11.8	4.4	3.4
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Oklahoma Physician Assistants	112.0	106.0	105.0
Oklahoma Therapists	107.1	84.3	89.0
Physician Assistant Reimbursement Levels Compared to Therapists			
Oklahoma	4.6	25.7	18.0
All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians		Percentile, %			
Name		Average		75th	95th
Oklahoma All Behavioral Health Clinicians 93.6 69.9 90.2 137.9 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 22.0 50.2 46.4 67.7 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Versus Versus Versus Oklahoma Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 117.1 114.8 136.9 233.9 Oklahoma Psychiatrists 105.1 100.5 125.3 199.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 10.8 89.7 102.8 348.6 Oklahoma Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 100.8 89.7 102.8 348.6 Oklahoma 16.2 28.0 33.1 67.7 All States 28.8 17.3 34.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 105.6 <td></td> <td></td> <td></td> <td></td> <td></td>					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Oklahoma 22.0 50.2 46.4 67.7 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Oklahoma Medical/Surgical Specialist Physicians 117.1 114.8 136.9 233.9 Oklahoma Psychiatrists 105.1 100.5 125.3 199.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Oklahoma Psychiatrists 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Oklahoma Medical/Surgical Specialist Physicians 117.1 114.8 136.9 233.9 Oklahoma Medical/Surgical Specialist Physicians 117.1 114.8 136.9 233.9 Oklahoma Psychologists 100.8 89.7 102.8 348.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Oklahoma Psychologists 100.8 89.7 102.8 348.6 Medical/Surgical Specialist Physicians 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Oklahoma Nurse Practitioners 105.6 86.9 115.6 175.4 Oklahoma Psychiatric Nurses 102.2 92.0 102.4 159.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Oklahoma 3.4 -5.6 12.9 10.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Oklahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists Oklahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists Oklahoma 18.0 37.5 49.9 69.0	Oklahoma All Medical/Surgical Clinicians	114.2	105.0	132.1	231.2
Compared to All Behavioral Health Clinicians	Oklahoma All Behavioral Health Clinicians	93.6	69.9	90.2	137.9
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists Oklahoma Medical/Surgical Specialist Physicians Oklahoma Psychiatrists 117.1 114.8 136.9 233.9 Oklahoma Psychiatrists 105.1 100.5 125.3 199.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 31.4 14.2 9.3 17.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 89.7 102.8 348.6 Oklahoma Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 100.8 89.7 102.8 348.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 89.7 102.8 348.6 Oklahoma 16.2 28.0 33.1 67.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 105.6 86.9 115.6 175.4 Oklahoma Psychiatric Nurses 102.2 92.0 102.4 159.4 Oklahoma Psychiatric Nurses 102.	Oklahoma	22.0	50.2	46.4	67.7
Psychiatrists	All States	21.7	26.6	48.0	70.4
Oklahoma Psychiatrists 105.1 100.5 125.3 199.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 11.4 14.2 9.3 17.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 0klahoma Medical/Surgical Specialist Physicians Psychologists 117.1 114.8 136.9 233.9 Oklahoma Psychologists 100.8 89.7 102.8 348.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 89.7 102.8 348.6 Oklahoma Psychiatric Nurses Oklahoma 16.2 28.0 33.1 67.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 105.6 86.9 115.6 175.4 Oklahoma Psychiatric Nurses 102.2 92.0 102.4 159.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 102.2 92.0 102.4 159.4 Oklahoma 3.4 -5.6 12.9 10.0 <td></td> <td></td> <td></td> <td></td> <td></td>					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Oklahoma 11.4 14.2 9.3 17.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus Versus Versus Versus Versus Versus Versus Versus 348.6 Versus 348.6 Versus 348.6 Versus Versus 348.6	Oklahoma Medical/Surgical Specialist Physicians	117.1	114.8	136.9	233.9
Reimbursement Levels Compared to Psychiatrists	Oklahoma Psychiatrists	105.1	100.5	125.3	199.1
All States 24.9 12.8 27.8 49.5					
Medical/Surgical Specialist Physicians Versus Psychologists Oklahoma Medical/Surgical Specialist Physicians 117.1 114.8 136.9 233.9 Oklahoma Psychologists 100.8 89.7 102.8 348.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 33.1 67.7 Oklahoma 16.2 28.0 33.1 67.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 0klahoma Psychiatric Nurses 105.6 86.9 115.6 175.4 Oklahoma Psychiatric Nurses 102.2 92.0 102.4 159.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 102.2 92.0 102.4 159.4 Oklahoma 3.4 -5.6 12.9 10.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.0 86.5 105.5 167.6 Oklahoma Therapists 89.0 62.9	Oklahoma	11.4	14.2	9.3	17.5
Psychologists 117.1 114.8 136.9 233.9	All States	24.9	12.8	27.8	49.5
Oklahoma Psychologists 100.8 89.7 102.8 348.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 33.1 67.7 Oklahoma 16.2 28.0 33.1 67.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 105.6 86.9 115.6 175.4 Oklahoma Nurse Practitioners Nurses 102.2 92.0 102.4 159.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20.0 102.4 159.4 Oklahoma 3.4 -5.6 12.9 10.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.0 86.5 105.5 167.6 Oklahoma Physician Assistants 105.0 86.5 105.5 167.6 Oklahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists 69.0 69.0					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Oklahoma 16.2 28.0 33.1 67.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 0klahoma Nurse Practitioners Psychiatric Nurses 105.6 86.9 115.6 175.4 Oklahoma Psychiatric Nurses 102.2 92.0 102.4 159.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 3.4 -5.6 12.9 10.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.0 86.5 105.5 167.6 Oklahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists 69.0 Oklahoma 18.0 37.5 49.9 69.0	Oklahoma Medical/Surgical Specialist Physicians	117.1	114.8	136.9	233.9
Reimbursement Levels Compared to Psychologists	Oklahoma Psychologists	100.8	89.7	102.8	348.6
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Oklahoma Nurse Practitioners 105.6 86.9 115.6 175.4 Oklahoma Psychiatric Nurses 102.2 92.0 102.4 159.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Oklahoma 3.4 -5.6 12.9 10.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Oklahoma Physician Assistants 105.0 86.5 105.5 167.6 Oklahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists Oklahoma 18.0 37.5 49.9 69.0					
Nurse Practitioners Versus Psychiatric Nurses Oklahoma Nurse Practitioners 105.6 86.9 115.6 175.4 Oklahoma Psychiatric Nurses 102.2 92.0 102.4 159.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Compared to Psychiatric Nurses 105.0 12.9 10.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.0 86.5 105.5 167.6 Oklahoma Physician Assistants 105.0 86.5 105.5 167.6 Oklahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists 18.0 37.5 49.9 69.0	Oklahoma	16.2	28.0	33.1	67.7
Oklahoma Nurse Practitioners 105.6 86.9 115.6 175.4 Oklahoma Psychiatric Nurses 102.2 92.0 102.4 159.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 200.0 100.0 100.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.0 86.5 105.5 167.6 Oklahoma Physician Assistants 105.0 86.5 105.5 167.6 Oklahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists 18.0 37.5 49.9 69.0	All States	28.8	17.3	44.0	38.5
Oklahoma Psychiatric Nurses 102.2 92.0 102.4 159.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 3.4 -5.6 12.9 10.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 105.0 86.5 105.5 167.6 Oklahoma Physician Assistants 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists 18.0 37.5 49.9 69.0 Oklahoma 18.0 37.5 49.9 69.0	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Oklahoma 3.4 -5.6 12.9 10.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Oklahoma Physician Assistants 105.0 86.5 105.5 167.6 Oklahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists 18.0 37.5 49.9 69.0	Oklahoma Nurse Practitioners	105.6	86.9	115.6	175.4
Compared to Psychiatric Nurses Oklahoma 3.4 -5.6 12.9 10.0 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Oklahoma Physician Assistants 105.0 86.5 105.5 167.6 Oklahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists 18.0 37.5 49.9 69.0	Oklahoma Psychiatric Nurses	102.2	92.0	102.4	159.4
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Oklahoma Physician Assistants 105.0 86.5 105.5 167.6 Oklahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists 200.0 18.0 37.5 49.9 69.0 Oklahoma 18.0 37.5 49.9 69.0					
Physician Assistants Versus Therapists Oklahoma Physician Assistants 105.0 86.5 105.5 167.6 Oklahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists Oklahoma 18.0 37.5 49.9 69.0	Oklahoma	3.4	-5.6	12.9	10.0
Oklahoma Physician Assistants 105.0 0klahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists Oklahoma 18.0 37.5 49.9 69.0	All States	7.5	-1.1	18.4	34.3
Oklahoma Therapists 89.0 62.9 70.3 99.2 Physician Assistants Reimbursement Levels Compared to Therapists Oklahoma 18.0 37.5 49.9 69.0	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists Oklahoma 18.0 37.5 49.9 69.0	Oklahoma Physician Assistants	105.0	86.5	105.5	167.6
Compared to Therapists 18.0 37.5 49.9 69.0	Oklahoma Therapists	89.0	62.9	70.3	99.2
	Oklahoma	18.0	37.5	49.9	69.0
All States 29.6 33.8 59.3 101.6	All States	29.6	33.8	59.3	101.6

Appendix C-37: Oregon Disparity Analysis, All Plans

Sample size in 2021: 227,659 covered lives

		Percent, %	
	2019	2020	2021
Acute Inpatient Facility			
Oregon OON Behavioral Health	7.8	7.2	7.5
Oregon OON Medical/Surgical	1.3	1.1	1.0
Behavioral Health OON Compared to Medical/Surgical OON			
Oregon	6.1×	6.8×	7.5×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Oregon OON Behavioral Health	22.3	28.7	30.4
Oregon OON Medical/Surgical	5.2	1.6	0.6
Behavioral Health OON Compared to Medical/Surgical OON			
Oregon	4.3×	17.8×	54.7×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Oregon OON Behavioral Health	28.1	12.0	21.4
Oregon OON Medical/Surgical	2.6	2.9	4.5
Behavioral Health OON Compared to Medical/Surgical OON		-	-
Oregon	10.9×	4.1×	4.7×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Oregon OON All Behavioral Health Clinicians	22.0	18.2	11.3
Oregon OON All Medical/Surgical Clinicians	3.7	3.1	3.2
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Oregon	5.9×	5.9×	3.5×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Oregon OON Psychiatrists	12.5	8.7	4.4
Oregon OON Medical/Surgical Specialist Physicians	1.4	1.1	1.0
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Oregon	9.1×	7.6×	4.5×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians Oregon OON Psychologists Oregon OON Medical/Surgical Specialist Physicians Psychologists OON Compared to Medical/Surgical Specialist Physicians OON Oregon 22.2× 23.5× All States 10.9× 9.4× Parity Would Be 1.0× 1.0× Office Visits - Psychiatric Nurses Versus Nurse Practitioners Oregon OON Psychiatric Nurses 31.9 48.6 Oregon OON Nurse Practitioners 3.8 2.8 Psychiatric Nurses OON Compared to Nurse Practitioners OON Oregon 8.4× 17.0× All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants			Percent, %	
Physicians Oregon OON Psychologists 30.3 26.8 Oregon OON Medical/Surgical Specialist Physicians 1.4 1.1 Psychologists OON Compared to Medical/Surgical Specialist Physicians OON 22.2× 23.5× All States 10.9× 9.4× Parity Would Be 1.0× 1.0× Office Visits - Psychiatric Nurses Versus Nurse Practitioners 31.9 48.6 Oregon OON Psychiatric Nurses 31.9 48.6 Oregon OON Nurse Practitioners 3.8 2.8 Psychiatric Nurses OON Compared to Nurse Practitioners OON 8.4× 17.0× All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants 25.0 20.5 Oregon OON Therapists 25.0 20.5 Oregon OON Compared to Physician Assistants OON 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×		2019	2020	2021
Oregon OON Medical/Surgical Specialist Physicians 1.4 1.1 Psychologists OON Compared to Medical/Surgical Specialist Physicians OON 22.2× 23.5× All States 10.9× 9.4× Parity Would Be 1.0× 1.0× Office Visits - Psychiatric Nurses Versus Nurse Practitioners 31.9 48.6 Oregon OON Psychiatric Nurses 31.9 48.6 Oregon OON Nurse Practitioners 3.8 2.8 Psychiatric Nurses OON Compared to Nurse Practitioners OON 8.4× 17.0× All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants 25.0 20.5 Oregon OON Therapists 25.0 20.5 Oregon OON Compared to Physician Assistants OON 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×				
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON Oregon 22.2× 23.5× All States 10.9× 9.4× Parity Would Be 1.0× 1.0× Office Visits - Psychiatric Nurses Versus Nurse Practitioners Oregon OON Psychiatric Nurses 31.9 48.6 Oregon OON Nurse Practitioners 3.8 2.8 Psychiatric Nurses OON Compared to Nurse Practitioners OON Oregon 8.4× 17.0× All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants Oregon OON Therapists Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON Oregon Oregon OON Compared to Physician Assistants OON Oregon Oregon OON Compared to Physician Assistants OON Oregon Oregon Source 20.7× 21.2× All States 5.5× 4.7×	Oregon OON Psychologists	30.3	26.8	12.7
OON 22.2× 23.5× All States 10.9× 9.4× Parity Would Be 1.0× 1.0× Office Visits - Psychiatric Nurses Versus Nurse Practitioners Oregon OON Psychiatric Nurses 31.9 48.6 Oregon OON Nurse Practitioners 3.8 2.8 Psychiatric Nurses OON Compared to Nurse Practitioners OON 8.4× 17.0× All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants 25.0 20.5 Oregon OON Therapists 25.0 20.5 Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×	Oregon OON Medical/Surgical Specialist Physicians	1.4	1.1	1.0
All States 10.9× 9.4× Parity Would Be 1.0× 1.0× Office Visits - Psychiatric Nurses Versus Nurse Practitioners Oregon OON Psychiatric Nurses 31.9 48.6 Oregon OON Nurse Practitioners 3.8 2.8 Psychiatric Nurses OON Compared to Nurse Practitioners OON Oregon 8.4× 17.0× All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants Oregon OON Therapists 25.0 20.5 Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON Oregon 20.7× 21.2× All States 5.5× 4.7×				
Parity Would Be 1.0× 1.0× Office Visits - Psychiatric Nurses Versus Nurse Practitioners Oregon OON Psychiatric Nurses 31.9 48.6 Oregon OON Nurse Practitioners 3.8 2.8 Psychiatric Nurses OON Compared to Nurse Practitioners OON 8.4× 17.0× All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants 25.0 20.5 Oregon OON Therapists 25.0 20.5 Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×	Oregon	22.2×	23.5×	13.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners Oregon OON Psychiatric Nurses 31.9 48.6 Oregon OON Nurse Practitioners 3.8 2.8 Psychiatric Nurses OON Compared to Nurse Practitioners OON 8.4× 17.0× All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants 25.0 20.5 Oregon OON Therapists 25.0 20.5 Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×	All States	10.9×	9.4×	10.6×
Oregon OON Psychiatric Nurses 31.9 48.6 Oregon OON Nurse Practitioners 3.8 2.8 Psychiatric Nurses OON Compared to Nurse Practitioners OON 8.4× 17.0× Oregon 8.4× 17.0× All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants 25.0 20.5 Oregon OON Therapists 25.0 20.5 Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×	Parity Would Be	1.0×	1.0×	1.0×
Oregon OON Nurse Practitioners 3.8 2.8 Psychiatric Nurses OON Compared to Nurse Practitioners OON 8.4× 17.0× Oregon 8.4× 17.0× All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants 25.0 20.5 Oregon OON Therapists 25.0 20.5 Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×	Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Psychiatric Nurses OON Compared to Nurse Practitioners OON Oregon 8.4× 17.0× All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants 25.0 20.5 Oregon OON Therapists 25.0 20.5 Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×	Oregon OON Psychiatric Nurses	31.9	48.6	8.5
Oregon 8.4× 17.0× All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants 25.0 20.5 Oregon OON Therapists 25.0 20.5 Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×	Oregon OON Nurse Practitioners	3.8	2.8	2.5
All States 5.2× 5.4× Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants Oregon OON Therapists 25.0 20.5 Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×	Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Parity Would Be 1.0× 1.0× Office Visits - Therapists Versus Physician Assistants 25.0 20.5 Oregon OON Therapists 1.2 1.0 Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×	Oregon	8.4×	17.0×	3.4×
Office Visits - Therapists Versus Physician Assistants Oregon OON Therapists 25.0 20.5 Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×	All States	5.2×	5.4×	1.7×
Oregon OON Therapists 25.0 20.5 Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×	Parity Would Be	1.0×	1.0×	1.0×
Oregon OON Physician Assistants 1.2 1.0 Therapists OON Compared to Physician Assistants OON 20.7× 21.2× All States 5.5× 4.7×	Office Visits - Therapists Versus Physician Assistants			
Therapists OON Compared to Physician Assistants OON Oregon 20.7× 21.2× All States 5.5× 4.7×	Oregon OON Therapists	25.0	20.5	14.7
Oregon 20.7× 21.2× All States 5.5× 4.7×	Oregon OON Physician Assistants	1.2	1.0	1.8
All States 5.5× 4.7×	Therapists OON Compared to Physician Assistants OON			
7.11	Oregon	20.7×	21.2×	8.2×
Parity Would Be 1.0× 1.0×	All States	5.5×	4.7×	4.1×
	Parity Would Be	1.0×	1.0×	1.0×

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Oregon All Medical/Surgical Clinicians	187.7	192.7	198.9
Oregon All Behavioral Health Clinicians	110.8	121.5	130.8
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Oregon	69.5	58.5	52.1
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Oregon Medical/Surgical Specialist Physicians	194.0	199.2	207.1
Oregon Psychiatrists	127.2	133.1	148.1
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Oregon	52.6	49.7	39.8
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Oregon Medical/Surgical Specialist Physicians	194.0	199.2	207.1
Oregon Psychologists	103.1	119.8	130.6
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Oregon	88.2	66.3	58.6
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Oregon Nurse Practitioners	193.9	201.6	213.3
Oregon Psychiatric Nurses	173.7	173.0	174.1
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Oregon	11.6	16.5	22.5
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Oregon Physician Assistants	206.3	216.2	224.9
Oregon Therapists	97.3	112.1	117.6
Physician Assistants Reimbursement Levels Compared to Therapists			
Oregon	112.1	92.9	91.3
All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians		Percentile, %			
Dregon All Medical/Surgical Clinicians 198.9 183.9 232.3 382.9 232.3 382.9 232.3 382.9 232.3 382.9 382.9 383.9 383.9 383.9 383.9 383.9 383.9 383.9 382.9 383		Average		75th	95th
Oregon All Behavioral Health Clinicians 130.8 101.7 146.9 229.7 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 52.1 80.8 58.2 66.7 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Vergon Medical/Surgical Specialist Physicians 207.1 208.8 255.8 341.1 Oregon Psychiatrists 148.1 145.3 196.4 258.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 8 30.3 32.1 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 207.1 208.8 255.8 341.1 Oregon Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 130.6 128.6 161.7 211.8 Oregon Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 66.7 208.8 255.8 341.1 Oregon Psychiatric Nurses 58.6 62.3 58.2 66.7 <td< td=""><td></td><td></td><td></td><td></td><td></td></td<>					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Oregon 52.1 80.8 58.2 66.7 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Oregon Medical/Surgical Specialist Physicians 207.1 208.8 255.8 341.1 Oregon Psychiatrists 148.1 145.3 196.4 258.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Oregon 39.8 43.8 30.3 32.1 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Oregon Medical/Surgical Specialist Physicians Versus Psychologists Oregon Psychologists 130.6 128.6 161.7 211.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Oregon Psychologists 130.6 128.6 161.7 211.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Oregon Psychologists 130.6 128.6 161.7 211.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Oregon Psychiatric Nurses 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Oregon Nurse Practitioners 213.3 182.5 214.9 288.7 Oregon Psychiatric Nurses 174.1 150.9 174.0 226.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Oregon 22.5 21.0 23.5 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Oregon Physician Assistants Reimbursement Levels Compared to Therapists 117.6 84.8 104.8 172.3 Physician Assistants Reimbursement Levels Compared to Therapists 117.6 84.8 104.8 172.3 Prysician Assistants Reimbursement Levels Compared to Therapists 117.6 84.8 104.8 172.3	Oregon All Medical/Surgical Clinicians	198.9	183.9	232.3	382.9
Compared to All Behavioral Health Clinicians 52.1 80.8 58.2 66.7 Oregon 52.1 80.8 58.2 66.7 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus 8 25.8 341.1 Oregon Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 148.1 145.3 196.4 258.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 207.1 208.8 255.8 341.1 Oregon Medical/Surgical Specialist Physicians Versus Psychologists 207.1 208.8 255.8 341.1 Oregon Psychologists 130.6 128.6 161.7 211.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 66.7 28.8 255.8 341.1 Oregon Psychiatric Nurses 28.6 62.3 58.2 66.7 All States 28.8 17.3 44.0 38.5	Oregon All Behavioral Health Clinicians	130.8	101.7	146.9	229.7
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists Oregon Medical/Surgical Specialist Physicians 207.1 208.8 255.8 341.1 Oregon Psychiatrists 148.1 145.3 196.4 258.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 39.8 43.8 30.3 32.1 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 207.1 208.8 255.8 341.1 Oregon Medical/Surgical Specialist Physicians Psychologists 207.1 208.8 255.8 341.1 Oregon Psychologists 130.6 128.6 161.7 211.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 266.7 28.8 255.8 341.1 Oregon Psychiatric Nurses 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 213.3 182.5 214.9 288.7 Oregon Psychiatric Nurses 174.1 150.9 174.0 226.1 Nurse Practitioners Reimburseme	Oregon	52.1	80.8	58.2	66.7
Psychiatrists Oregon Medical/Surgical Specialist Physicians 148.1 145.3 196.4 258.1	All States	21.7	26.6	48.0	70.4
Oregon Psychiatrists 148.1 145.3 196.4 258.1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 39.8 43.8 30.3 32.1 Oregon 39.8 43.8 30.3 32.1 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Oregon Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 130.6 128.6 161.7 211.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 58.6 62.3 58.2 66.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 213.3 182.5 214.9 288.7 Oregon Psychiatric Nurses 174.1 150.9 174.0 226.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 21.0 23.5 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Th					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Oregon 39.8 43.8 30.3 32.1 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Versus Versus Versus Versus 341.1 Oregon Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 130.6 128.6 161.7 211.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 58.6 62.3 58.2 66.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 213.3 182.5 214.9 288.7 Oregon Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 174.1 150.9 174.0 226.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 22.5 21.0 23.5 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 224.9 189.5 223.7	Oregon Medical/Surgical Specialist Physicians	207.1	208.8	255.8	341.1
Reimbursement Levels Compared to Psychiatrists 39.8 43.8 30.3 32.1 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Oregon Medical/Surgical Specialist Physicians 207.1 208.8 255.8 341.1 Oregon Psychologists 130.6 128.6 161.7 211.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Oregon 58.6 62.3 58.2 66.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Oregon Nurse Practitioners 213.3 182.5 214.9 288.7 Oregon Psychiatric Nurses 174.1 150.9 174.0 226.1 Nurse Practitioners Reimbursement Levels 22.5 21.0 23.5 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 224.9 189.5 223.7 293.3 Oregon Therapists 117.6 84.8 104.8 172.3 Physician Assistants Reimbursement Levels 200.00 200.00 Oregon Assistants Reimbursement Levels 200.00 200.00 Oregon Therapists 117.6 84.8 104.8 172.3 Oregon Physician Assistants Reimbursement Levels 200.00 200.00 Oregon Therapists 200.00 Oregon Th	Oregon Psychiatrists	148.1	145.3	196.4	258.1
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Oregon Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 207.1 208.8 255.8 341.1 Oregon Psychologists Dregon 58.6 62.3 58.2 66.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Oregon Nurse Practitioners Peractitioners 213.3 182.5 214.9 288.7 Oregon Psychiatric Nurses 174.1 150.9 174.0 226.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 213.3 182.5 214.9 23.5 27.7 All States 7.5 21.0 23.5 27.7 All States 7.5					

Appendix C-38: Pennsylvania Disparity Analysis, All Plans

Sample size in 2021: 467,806 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Pennsylvania OON Behavioral Health	10.4	9.6	7.5
Pennsylvania OON Medical/Surgical	0.5	0.6	0.4
Behavioral Health OON Compared to Medical/Surgical OON			
Pennsylvania	19.3×	16.8×	16.8×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Pennsylvania OON Behavioral Health	44.1	34.2	43.5
Pennsylvania OON Medical/Surgical	0.7	1.2	5.6
Behavioral Health OON Compared to Medical/Surgical OON			
Pennsylvania	64.0×	28.0×	7.8×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Pennsylvania OON Behavioral Health	29.7	19.7	23.2
Pennsylvania OON Medical/Surgical	2.2	1.3	1.1
Behavioral Health OON Compared to Medical/Surgical OON			
Pennsylvania	13.5×	14.9×	21.0×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Pennsylvania OON All Behavioral Health Clinicians	11.2	9.6	9.8
Pennsylvania OON All Medical/Surgical Clinicians	2.3	2.1	1.9
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Pennsylvania	4.8×	4.5×	5.2×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Pennsylvania OON Psychiatrists	14.7	13.4	13.5
Pennsylvania OON Medical/Surgical Specialist Physicians	0.9	0.8	0.7
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Pennsylvania	17.0×	16.3×	18.1×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

		D 10/	
		Percent, %	
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Pennsylvania OON Psychologists	14.7	13.8	15.7
Pennsylvania OON Medical/Surgical Specialist Physicians	0.9	0.8	0.7
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Pennsylvania	17.0×	16.7×	21.0×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Pennsylvania OON Psychiatric Nurses	2.1	2.4	2.1
Pennsylvania OON Nurse Practitioners	1.1	1.1	0.9
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Pennsylvania	2.0×	2.2×	2.4×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Pennsylvania OON Therapists	8.5	6.9	6.8
Pennsylvania OON Physician Assistants	1.1	0.8	0.5
Therapists OON Compared to Physician Assistants OON			
Pennsylvania	8.0×	8.5×	13.7×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Pennsylvania All Medical/Surgical Clinicians	106.2	111.7	116.3
Pennsylvania All Behavioral Health Clinicians	77.3	90.9	101.7
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Pennsylvania	37.5	22.9	14.3
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Pennsylvania Medical/Surgical Specialist Physicians	110.4	116.0	121.0
Pennsylvania Psychiatrists	86.0	102.1	109.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Pennsylvania	28.4	13.5	10.6
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Pennsylvania Medical/Surgical Specialist Physicians	110.4	116.0	121.0
Pennsylvania Psychologists	77.2	90.1	101.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Pennsylvania	43.1	28.7	19.5
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Pennsylvania Nurse Practitioners	111.1	119.1	121.1
Pennsylvania Psychiatric Nurses	87.5	95.7	99.8
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Pennsylvania	27.0	24.4	21.3
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Pennsylvania Physician Assistants	119.9	122.2	122.8
Pennsylvania Therapists	73.3	87.7	100.1
Physician Assistants Reimbursement Levels Compared to Therapists			
Pennsylvania	63.4	39.3	22.7
All States	40.6	34.5	29.6

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Pennsylvania All Medical/Surgical Clinicians	116.3	95.6	136.7	254.7
Pennsylvania All Behavioral Health Clinicians	101.7	81.6	98.0	151.6
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Pennsylvania	14.3	17.1	39.6	68.0
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Pennsylvania Medical/Surgical Specialist Physicians	121.0	109.2	148.7	269.2
Pennsylvania Psychiatrists	109.5	107.1	133.0	190.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Pennsylvania	10.6	2.0	11.8	41.5
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Pennsylvania Medical/Surgical Specialist Physicians	121.0	109.2	148.7	269.2
Pennsylvania Psychologists	101.3	96.9	108.5	192.6
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Pennsylvania	19.5	12.7	37.0	68.0
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Pennsylvania Nurse Practitioners	121.1	105.7	132.1	190.1
Pennsylvania Psychiatric Nurses	99.8	88.1	105.7	170.6
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Pennsylvania	21.3	19.9	25.0	11.4
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Pennsylvania Physician Assistants	122.8	99.3	131.2	224.5
Pennsylvania Therapists	100.1	74.9	81.8	109.9
Physician Assistants Reimbursement Levels Compared to Therapists				
Pennsylvania	22.7	32.6	60.4	104.2

Appendix C-39: Rhode Island Disparity Analysis, All Plans

Sample size in 2021: 21,971 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Rhode Island OON Behavioral Health	6.1	5.4	4.4
Rhode Island OON Medical/Surgical	0.4	0.4	0.2
Behavioral Health OON Compared to Medical/Surgical OON			
Rhode Island	16.1×	13.3×	20.6×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Rhode Island OON Behavioral Health	n/a	n/a	19.3
Rhode Island OON Medical/Surgical	n/a	n/a	3.6
Behavioral Health OON Compared to Medical/Surgical OON			
Rhode Island	n/a	n/a	5.4×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Rhode Island OON Behavioral Health	9.0	18.7	15.4
Rhode Island OON Medical/Surgical	0.6	6.2	1.2
Behavioral Health OON Compared to Medical/Surgical OON			
Rhode Island	15.6×	3.0×	12.7×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Rhode Island OON All Behavioral Health Clinicians	11.8	11.3	11.3
Rhode Island OON All Medical/Surgical Clinicians	1.6	1.2	1.1
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Rhode Island	7.2×	9.0×	10.3×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Rhode Island OON Psychiatrists	29.9	31.2	20.4
Rhode Island OON Medical/Surgical Specialist Physicians	0.8	0.8	0.5
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Rhode Island	38.7×	37.3×	37.9×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Rhode Island OON Psychologists	8.2	8.0	15.7
Rhode Island OON Medical/Surgical Specialist Physicians	0.8	0.8	0.5
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Rhode Island	10.5×	9.5×	29.2×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Rhode Island OON Psychiatric Nurses	11.5	3.8	0.6
Rhode Island OON Nurse Practitioners	1.2	0.7	0.9
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Rhode Island	9.2×	5.6×	0.7×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Rhode Island OON Therapists	6.9	6.9	8.3
Rhode Island OON Physician Assistants	1.4	0.3	0.2
Therapists OON Compared to Physician Assistants OON			
Rhode Island	4.9×	27.6×	43.0×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{*}}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Rhode Island All Medical/Surgical Clinicians	112.6	115.0	116.8
Rhode Island All Behavioral Health Clinicians	93.3	99.8	106.1
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Rhode Island	20.6	15.2	10.1
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Rhode Island Medical/Surgical Specialist Physicians	116.0	118.7	121.4
Rhode Island Psychiatrists	87.9	102.2	108.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Rhode Island	32.1	16.1	11.4
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Rhode Island Medical/Surgical Specialist Physicians	116.0	118.7	121.4
Rhode Island Psychologists	103.4	105.8	111.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Rhode Island	12.2	12.2	8.6
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Rhode Island Nurse Practitioners	94.6	102.8	107.1
Rhode Island Psychiatric Nurses	85.4	101.0	102.7
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Rhode Island	10.7	1.8	4.3
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Rhode Island Physician Assistants	100.1	104.4	106.1
Rhode Island Therapists	90.4	96.4	103.2
Physician Assistants Reimbursement Levels Compared to Therapists			
Rhode Island	10.7	8.4	2.8
All States	40.6	34.5	29.6

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Rhode Island All Medical/Surgical Clinicians	116.8	101.6	120.2	239.3
Rhode Island All Behavioral Health Clinicians	106.1	81.2	95.2	133.0
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Rhode Island	10.1	25.1	26.2	79.9
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Rhode Island Medical/Surgical Specialist Physicians	121.4	105.3	131.8	254.1
Rhode Island Psychiatrists	108.9	102.6	125.1	163.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Rhode Island	11.4	2.6	5.3	55.2
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Rhode Island Medical/Surgical Specialist Physicians	121.4	105.3	131.8	254.1
Rhode Island Psychologists	111.7	96.8	108.5	169.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Rhode Island	8.6	8.9	21.5	79.9
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Rhode Island Nurse Practitioners	107.1	84.8	108.4	161.2
Rhode Island Psychiatric Nurses	102.7	86.6	102.8	114.8
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Rhode Island	4.3	-2.1	5.4	40.4
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Rhode Island Physician Assistants	106.1	84.8	103.2	173.5
Rhode Island Therapists	103.2	71.4	81.2	102.6
Physician Assistants Reimbursement Levels Compared to Therapists				
Rhode Island	2.8	18.7	27.0	69.1
All States	29.6	33.8	59.3	101.6

Appendix C-40: South Carolina Disparity Analysis, All Plans

Sample size in 2021: 115,704 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
South Carolina OON Behavioral Health	8.4	8.3	9.0
South Carolina OON Medical/Surgical	0.8	1.0	1.3
Behavioral Health OON Compared to Medical/Surgical OON			
South Carolina	10.7×	8.7×	7.2×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
South Carolina OON Behavioral Health	36.6	25.5	28.7
South Carolina OON Medical/Surgical	0.2	0.7	1.0
Behavioral Health OON Compared to Medical/Surgical OON			
South Carolina	162.8×	37.2×	29.3×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
South Carolina OON Behavioral Health	19.9	16.0	5.5
South Carolina OON Medical/Surgical	2.7	1.4	0.4
Behavioral Health OON Compared to Medical/Surgical OON			
South Carolina	7.4×	11.2×	12.9×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
South Carolina OON All Behavioral Health Clinicians	8.1	6.6	5.1
South Carolina OON All Medical/Surgical Clinicians	2.0	1.9	1.6
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
South Carolina	4.0×	3.4×	3.3×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
South Carolina OON Psychiatrists	7.5	5.7	9.1
South Carolina OON Medical/Surgical Specialist Physicians	1.2	1.0	1.4
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
South Carolina	6.4×	5.5×	6.5×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
South Carolina OON Psychologists	14.0	11.1	9.6
South Carolina OON Medical/Surgical Specialist Physicians	1.2	1.0	1.4
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
South Carolina	11.9×	10.7×	7.0×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
South Carolina OON Psychiatric Nurses	1.7	9.1	1.5
South Carolina OON Nurse Practitioners	1.2	2.1	0.9
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
South Carolina	1.4×*	4.3×	1.7×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
South Carolina OON Therapists	7.5	6.1	3.1
South Carolina OON Physician Assistants	0.9	0.7	0.5
Therapists OON Compared to Physician Assistants OON			
South Carolina	8.5×	8.8×	6.6×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians South Carolina All Medical/Surgical Clinicians 113.2 114.6 121.0		Percent, %		
South Carolina All Medical/Surgical Clinicians 113.2 114.6 121.0		2019	2020	2021
South Carolina All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians South Carolina 46.7 44.1 50.2 All States 33.3 25.7 21.7	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians	South Carolina All Medical/Surgical Clinicians	113.2	114.6	121.0
Behavioral Health Clinicians South Carolina 46.7 44.1 50.2 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 25.7 21.7 South Carolina Medical/Surgical Specialist Physicians 114.4 116.0 122.7 South Carolina Psychiatrists 78.9 79.8 74.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 45.1 45.4 65.8 South Carolina 45.1 45.4 65.8 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatric Nurses 89.8 96.4 South Carolina Nurse Practitioners Versus Psychiatric Nurses 77.8 87.8 84.1	South Carolina All Behavioral Health Clinicians	77.2	79.5	80.6
All States 33.3 25.7 21.7				
Medical/Surgical Specialist Physicians Versus Psychiatrists South Carolina Medical/Surgical Specialist Physicians 114.4 116.0 122.7 South Carolina Psychiatrists 78.9 79.8 74.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 45.1 45.4 65.8 South Carolina 45.1 45.4 65.8 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Versus Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physician Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 84.4 89.8 96.4 <td>South Carolina</td> <td>46.7</td> <td>44.1</td> <td>50.2</td>	South Carolina	46.7	44.1	50.2
South Carolina Medical/Surgical Specialist Physicians 114.4 116.0 122.7	All States	33.3	25.7	21.7
South Carolina Psychiatrists 78.9 79.8 74.0	Medical/Surgical Specialist Physicians Versus Psychiatrists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists South Carolina 45.1 45.4 65.8 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists South Carolina Medical/Surgical Specialist Physicians 114.4 116.0 122.7 South Carolina Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists South Carolina Psychologists 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses South Carolina Nurse Practitioners 110.9 110.6 113.7 South Carolina Psychiatric Nurses 77.8 87.8 84.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses South Carolina Psychiatric Nurses 28.3 12.8 7.5 Physician Assistants Versus Therapists South Carolina Physician Assistants 126.5 122.3 131.4 South Carolina Therapists 75.1 77.5 80.3 Physician Assistants Reimbursement Levels Compared to Therapists South Carolina Therapists 75.9 63.6	South Carolina Medical/Surgical Specialist Physicians	114.4	116.0	122.7
to Psychiatrists South Carolina 45.1 45.4 65.8 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 30.1 24.9 South Carolina Medical/Surgical Specialist Physicians 114.4 116.0 122.7 South Carolina Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 29.1 27.3 South Carolina 35.5 29.1 27.3 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 110.9 110.6 113.7 South Carolina Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 77.8 87.8 84.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 26.0 35.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 12.8 7.5 Physician Assistants Reimbursement Levels Compared to Therapists 50.0 35.2 30.3 30.3	South Carolina Psychiatrists	78.9	79.8	74.0
All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists South Carolina Medical/Surgical Specialist Physicians 114.4 116.0 122.7 South Carolina Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 35.5 29.1 27.3 South Carolina 35.5 29.1 27.3 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 110.9 110.6 113.7 South Carolina Nurse Practitioners 110.9 110.6 113.7 South Carolina Psychiatric Nurses 77.8 87.8 84.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 42.5 26.0 35.2 South Carolina 42.5 26.0 35.2 Physician Assistants Versus Therapists 28.3 12.8 7.5 Physician Assistants Reimbursement Levels Compared to Therapists 75.1 77.5 80.3 Physician Assistants Reimbursement Levels Compared to Therapists 57.9 63.6	Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Medical/Surgical Specialist Physicians Versus PsychologistsSouth Carolina Medical/Surgical Specialist Physicians114.4116.0122.7South Carolina Psychologists84.489.896.4Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists35.529.127.3South Carolina35.529.127.3All States42.033.928.8Nurse Practitioners Versus Psychiatric Nurses110.9110.6113.7South Carolina Nurse Practitioners110.9110.6113.7South Carolina Psychiatric Nurses77.887.884.1Nurse Practitioners Reimbursement Levels Compared to Psychiatric NursesSouth Carolina42.526.035.2All States28.312.87.5Physician Assistants Versus Therapists28.312.3131.4South Carolina Physician Assistants126.5122.3131.4South Carolina Therapists75.177.580.3Physician Assistants Reimbursement Levels Compared to Therapists57.963.6	South Carolina	45.1	45.4	65.8
South Carolina Medical/Surgical Specialist Physicians 114.4 116.0 122.7 South Carolina Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 29.1 27.3 South Carolina 35.5 29.1 27.3 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 110.9 110.6 113.7 South Carolina Nurse Practitioners 110.9 110.6 113.7 South Carolina Psychiatric Nurses 77.8 87.8 84.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 South Carolina 42.5 26.0 35.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 12.8 7.5 South Carolina Physician Assistants 126.5 122.3 131.4 South Carolina Therapists 75.1 77.5 80.3 Physician Assistants Reimbursement Levels Compared to Therapists 57.9 63.6	All States	40.8	30.1	24.9
South Carolina Psychologists 84.4 89.8 96.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 35.5 29.1 27.3 South Carolina 35.5 29.1 27.3 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 110.9 110.6 113.7 South Carolina Nurse Practitioners 77.8 87.8 84.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 77.8 87.8 84.1 South Carolina 42.5 26.0 35.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 12.8 7.5 South Carolina Physician Assistants 126.5 122.3 131.4 South Carolina Therapists 75.1 77.5 80.3 Physician Assistants Reimbursement Levels Compared to Therapists 57.9 63.6	Medical/Surgical Specialist Physicians Versus Psychologists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to PsychologistsSouth Carolina35.529.127.3All States42.033.928.8Nurse Practitioners Versus Psychiatric NursesSouth Carolina Nurse Practitioners110.9110.6113.7South Carolina Psychiatric Nurses77.887.884.1Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses26.035.2South Carolina42.526.035.2All States28.312.87.5Physician Assistants Versus Therapists26.5122.3131.4South Carolina Physician Assistants126.5122.3131.4South Carolina Therapists75.177.580.3Physician Assistants Reimbursement Levels Compared to TherapistsSouth Carolina68.557.963.6	South Carolina Medical/Surgical Specialist Physicians	114.4	116.0	122.7
to Psychologists South Carolina 35.5 29.1 27.3 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 110.9 110.6 113.7 South Carolina Nurse Practitioners 77.8 87.8 84.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 87.8 84.1 South Carolina 42.5 26.0 35.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 26.0 122.3 131.4 South Carolina Physician Assistants 126.5 122.3 131.4 South Carolina Therapists 75.1 77.5 80.3 Physician Assistants Reimbursement Levels Compared to Therapists 57.9 63.6	South Carolina Psychologists	84.4	89.8	96.4
All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 110.9 110.6 113.7 South Carolina Psychiatric Nurses 77.8 87.8 84.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 26.0 35.2 South Carolina 42.5 26.0 35.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 126.5 122.3 131.4 South Carolina Physician Assistants 126.5 122.3 131.4 South Carolina Therapists 75.1 77.5 80.3 Physician Assistants Reimbursement Levels Compared to Therapists 68.5 57.9 63.6				
Nurse Practitioners Versus Psychiatric Nurses South Carolina Nurse Practitioners 110.9 110.6 113.7 South Carolina Psychiatric Nurses 77.8 87.8 84.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses South Carolina 42.5 26.0 35.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists South Carolina Physician Assistants 126.5 122.3 131.4 South Carolina Therapists 75.1 77.5 80.3 Physician Assistants Reimbursement Levels Compared to Therapists South Carolina 68.5 57.9 63.6	South Carolina	35.5	29.1	27.3
South Carolina Nurse Practitioners110.9110.6113.7South Carolina Psychiatric Nurses77.887.884.1Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses28.326.035.2South Carolina42.526.035.2All States28.312.87.5Physician Assistants Versus Therapists126.5122.3131.4South Carolina Physician Assistants126.5122.3131.4South Carolina Therapists75.177.580.3Physician Assistants Reimbursement Levels Compared to TherapistsSouth Carolina68.557.963.6	All States	42.0	33.9	28.8
South Carolina Psychiatric Nurses 77.8 87.8 84.1 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses South Carolina 42.5 26.0 35.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists South Carolina Physician Assistants 126.5 122.3 131.4 South Carolina Therapists 75.1 77.5 80.3 Physician Assistants Reimbursement Levels Compared to Therapists South Carolina 68.5 57.9 63.6	Nurse Practitioners Versus Psychiatric Nurses			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses South Carolina 42.5 26.0 35.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists South Carolina Physician Assistants 126.5 122.3 131.4 South Carolina Therapists 75.1 77.5 80.3 Physician Assistants Reimbursement Levels Compared to Therapists South Carolina 68.5 57.9 63.6	South Carolina Nurse Practitioners	110.9	110.6	113.7
Nurses 42.5 26.0 35.2 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists South Carolina Physician Assistants 126.5 122.3 131.4 South Carolina Therapists 75.1 77.5 80.3 Physician Assistants Reimbursement Levels Compared to Therapists 68.5 57.9 63.6	South Carolina Psychiatric Nurses	77.8	87.8	84.1
All States 28.3 12.8 7.5 Physician Assistants Versus Therapists South Carolina Physician Assistants 126.5 122.3 131.4 South Carolina Therapists 75.1 77.5 80.3 Physician Assistants Reimbursement Levels Compared to Therapists South Carolina 68.5 57.9 63.6	· · · · · · · · · · · · · · · · · · ·			
Physician Assistants Versus TherapistsSouth Carolina Physician Assistants126.5122.3131.4South Carolina Therapists75.177.580.3Physician Assistants Reimbursement Levels Compared to TherapistsSouth Carolina68.557.963.6	South Carolina	42.5	26.0	35.2
South Carolina Physician Assistants126.5122.3131.4South Carolina Therapists75.177.580.3Physician Assistants Reimbursement Levels Compared to TherapistsSouth Carolina68.557.963.6	All States	28.3	12.8	7.5
South Carolina Therapists 75.1 77.5 80.3 Physician Assistants Reimbursement Levels Compared to Therapists South Carolina 68.5 57.9 63.6	Physician Assistants Versus Therapists			
Physician Assistants Reimbursement Levels Compared to Therapists South Carolina 68.5 57.9 63.6	South Carolina Physician Assistants	126.5	122.3	131.4
South Carolina 68.5 57.9 63.6	South Carolina Therapists	75.1	77.5	80.3
	Physician Assistants Reimbursement Levels Compared to Therapists			
All States 40.6 34.5 29.6	South Carolina	68.5	57.9	63.6
	All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians		Percentile, %			
South Carolina All Medical/Surgical Clinicians 121.0 100.0 148.5 264.9		Average		75th	95th
South Carolina All Behavioral Health Clinicians					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 50.2 68.1 102.8 155.3	South Carolina All Medical/Surgical Clinicians	121.0	100.0	148.5	264.9
Compared to Ail Behavioral Health Clinicians 50.2 68.1 102.8 155.3	South Carolina All Behavioral Health Clinicians	80.6	59.5	73.2	103.8
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists South Carolina Medical/Surgical Specialist Physicians 122.7 104.1 163.6 298.5 South Carolina Psychiatrists 74.0 64.5 88.6 149.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists South Carolina 65.8 61.3 84.6 99.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists South Carolina Medical/Surgical Specialist Physicians 122.7 104.1 163.6 298.5 South Carolina Medical/Surgical Specialist Physicians 122.7 104.1 163.6 298.5 South Carolina Psychologists 96.4 84.8 103.3 188.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists South Carolina Psychologists South Carolina 27.3 22.7 58.4 155.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses South Carolina Nurse Practitioners 113.7 88.2 121.6 201.6 South Carolina Psychiatric Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses South Carolina 35.2 27.6 32.3 93.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists South Carolina Physician Assistants 131.4 102.7 139.8 252.9 South Carolina Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists					
Medical/Surgical Specialist Physicians Versus Psychiatrists South Carolina Medical/Surgical Specialist Physicians 122.7 104.1 163.6 298.5 South Carolina Psychiatrists 74.0 64.5 88.6 149.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 8 65.8 61.3 84.6 99.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 8 103.3 188.5 South Carolina Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 96.4 84.8 103.3 188.5 South Carolina Psychologists Physicians Reimbursement Levels Compared to Psychologists 22.7 58.4 155.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 80.1 69.1	South Carolina	50.2	68.1	102.8	155.3
South Carolina Medical/Surgical Specialist Physicians 122.7 104.1 163.6 298.5	All States	21.7	26.6	48.0	70.4
South Carolina Psychiatrists 74.0 64.5 88.6 149.6					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists South Carolina 65.8 61.3 84.6 99.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists South Carolina Medical/Surgical Specialist Physicians Psychologists 122.7 104.1 163.6 298.5 South Carolina Psychologists 96.4 84.8 103.3 188.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 27.3 22.7 58.4 155.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 80.3 52.2 32.3 93.9 All States 7.5 -1.1 18.4	South Carolina Medical/Surgical Specialist Physicians	122.7	104.1	163.6	298.5
Reimbursement Levels Compared to Psychiatrists South Carollina 65.8 61.3 84.6 99.5 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists South Carollina Medical/Surgical Specialist Physicians 122.7 104.1 163.6 298.5 South Carollina Psychologists 96.4 84.8 103.3 188.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists South Carollina 27.3 22.7 58.4 155.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 113.7 88.2 121.6 201.6 South Carollina Nurse Practitioners 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses South Carollina 35.2 27.6 32.3 93.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 30.4 102.7 139.8 252.9 South Carollina Physician Assistants 131.4 102.7 139.8 252.9 South Carollina Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists 80.3 57.2 69.1 83.8 Compared to Therapists 80.3 57.2 69.1 83.8	South Carolina Psychiatrists	74.0	64.5	88.6	149.6
All States					
Medical/Surgical Specialist Physicians Versus Psychologists South Carolina Medical/Surgical Specialist Physicians 122.7 104.1 163.6 298.5 South Carolina Psychologists 96.4 84.8 103.3 188.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 27.3 22.7 58.4 155.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 84.1 69.1 91.9 104.0 South Carolina Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 27.6 32.3 93.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists 80.3 57.2 69.1 83.8	South Carolina	65.8	61.3	84.6	99.5
South Carolina Medical/Surgical Specialist Physicians 122.7 104.1 163.6 298.5	All States	24.9	12.8	27.8	49.5
South Carolina Psychologists 96.4 84.8 103.3 188.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 27.3 22.7 58.4 155.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 113.7 88.2 121.6 201.6 South Carolina Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 35.2 27.6 32.3 93.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 35.2 27.6 32.3 93.9 South Carolina Physician Assistants 131.4 102.7 139.8 252.9 South Carolina Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists 69.1 83.8					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists South Carolina 27.3 22.7 58.4 155.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 84.1 69.1 201.6 201.6 South Carolina Nurse Practitioners Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 84.1 69.1 91.9 104.0 South Carolina 35.2 27.6 32.3 93.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 131.4 102.7 139.8 252.9 South Carolina Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists 69.1 83.8	South Carolina Medical/Surgical Specialist Physicians	122.7	104.1	163.6	298.5
Reimbursement Levels Compared to Psychologists South Carolina 27.3 22.7 58.4 155.3 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses	South Carolina Psychologists	96.4	84.8	103.3	188.5
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 113.7 88.2 121.6 201.6 South Carolina Psychiatric Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Compared to Psychiatric Nurses 35.2 27.6 32.3 93.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 131.4 102.7 139.8 252.9 South Carolina Physician Assistants 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists 69.1 83.8					
Nurse Practitioners Versus Psychiatric Nurses South Carolina Nurse Practitioners 113.7 88.2 121.6 201.6 South Carolina Psychiatric Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Compared to Psychiatric Nurses 35.2 27.6 32.3 93.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 131.4 102.7 139.8 252.9 South Carolina Physician Assistants 131.4 102.7 139.8 252.9 South Carolina Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists Compared to Therapists 10.3	South Carolina	27.3	22.7	58.4	155.3
South Carolina Nurse Practitioners 113.7 88.2 121.6 201.6 South Carolina Psychiatric Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 27.6 32.3 93.9 South Carolina 35.2 27.6 32.3 93.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 131.4 102.7 139.8 252.9 South Carolina Physician Assistants 131.4 102.7 139.8 252.9 South Carolina Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists 69.1 83.8	All States	28.8	17.3	44.0	38.5
South Carolina Psychiatric Nurses 84.1 69.1 91.9 104.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 35.2 27.6 32.3 93.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 131.4 102.7 139.8 252.9 South Carolina Physician Assistants 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists 69.1 83.8	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses South Carolina 35.2 27.6 32.3 93.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists South Carolina Physician Assistants 131.4 102.7 139.8 252.9 South Carolina Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists Compared to Therapists 69.1 69.1	South Carolina Nurse Practitioners	113.7	88.2	121.6	201.6
Compared to Psychiatric Nurses South Carolina 35.2 27.6 32.3 93.9 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists South Carolina Physician Assistants 131.4 102.7 139.8 252.9 South Carolina Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists Compared to Therapists 131.4 102.7 139.8 252.9	South Carolina Psychiatric Nurses	84.1	69.1	91.9	104.0
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists South Carolina Physician Assistants 131.4 102.7 139.8 252.9 South Carolina Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists					
Physician Assistants Versus TherapistsSouth Carolina Physician Assistants131.4102.7139.8252.9South Carolina Therapists80.357.269.183.8Physician Assistants Reimbursement Levels Compared to Therapists	South Carolina	35.2	27.6	32.3	93.9
South Carolina Physician Assistants 131.4 102.7 139.8 252.9 South Carolina Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists	All States	7.5	-1.1	18.4	34.3
South Carolina Therapists 80.3 57.2 69.1 83.8 Physician Assistants Reimbursement Levels Compared to Therapists	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists	South Carolina Physician Assistants	131.4	102.7	139.8	252.9
Compared to Therapists	South Carolina Therapists	80.3	57.2	69.1	83.8
South Carolina 63.6 79.5 102.5 201.7					
	South Carolina	63.6	79.5	102.5	201.7
All States 29.6 33.8 59.3 101.6	All States	29.6	33.8	59.3	101.6

Appendix C-41: South Dakota Disparity Analysis, All Plans

Sample size in 2021: 20,128 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
South Dakota OON Behavioral Health	8.5	21.4	13.4
South Dakota OON Medical/Surgical	1.0	12.0	4.1
Behavioral Health OON Compared to Medical/Surgical OON			
South Dakota	8.6×	1.8×	3.3×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
South Dakota OON Behavioral Health	23.1	24.9	22.0
South Dakota OON Medical/Surgical	5.2	22.3	1.9
Behavioral Health OON Compared to Medical/Surgical OON			
South Dakota	4.4×	1.1×*	11.8×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
South Dakota OON Behavioral Health	52.0	19.3	8.8
South Dakota OON Medical/Surgical	6.1	4.8	1.6
Behavioral Health OON Compared to Medical/Surgical OON			
South Dakota	8.5×	4.1×	5.6×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
South Dakota OON All Behavioral Health Clinicians	5.8	10.9	6.3
South Dakota OON All Medical/Surgical Clinicians	1.5	7.6	2.9
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
South Dakota	3.8×	1.4×	2.2×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
South Dakota OON Psychiatrists	7.0	16.1	10.7
South Dakota OON Medical/Surgical Specialist Physicians	1.0	3.9	1.2
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
South Dakota	7.3×	4.1×	9.2×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
South Dakota OON Psychologists	6.2	7.2	3.6
South Dakota OON Medical/Surgical Specialist Physicians	1.0	3.9	1.2
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
South Dakota	6.5×	1.8×	3.1×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
South Dakota OON Psychiatric Nurses	n/a	40.0	4.3
South Dakota OON Nurse Practitioners	n/a	1.2	0.5
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
South Dakota	n/a	34.0×*	8.7×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
South Dakota OON Therapists	5.2	11.0	7.1
South Dakota OON Physician Assistants	0.6	2.5	0.7
Therapists OON Compared to Physician Assistants OON			
South Dakota	8.3×	4.4×	9.7×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
South Dakota All Medical/Surgical Clinicians	149.3	152.2	161.4
South Dakota All Behavioral Health Clinicians	125.4	134.8	133.3
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
South Dakota	19.1	12.9	21.1
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
South Dakota Medical/Surgical Specialist Physicians	152.7	154.8	166.4
South Dakota Psychiatrists	134.4	137.7	141.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
South Dakota	13.6	12.4	17.7
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
South Dakota Medical/Surgical Specialist Physicians	152.7	154.8	166.4
South Dakota Psychologists	112.3	118.2	115.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
South Dakota	36.0	31.0	44.4
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
South Dakota Nurse Practitioners	176.0	179.2	182.3
South Dakota Psychiatric Nurses	132.7	125.4	159.4
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
South Dakota	32.7	42.9	14.3
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
South Dakota Physician Assistants	178.8	183.5	186.4
South Dakota Therapists	130.3	140.3	145.6
Physician Assistants Reimbursement Levels Compared to Therapists			
South Dakota	37.2	30.8	28.0
All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians 161.4 149.2 188.6 264.9 South Dakota All Medical/Surgical Clinicians 133.3 113.7 119.9 149.7		Percentile, %			
South Dakota All Medical/Surgical Clinicians 161.4 149.2 188.6 264.9 264.9 33.3 113.7 119.9 149.7 31.0 349.7 31.0 349.7 31.0 349.7 3		Average		75th	95th
South Dakota All Behavioral Health Clinicians 133.3 113.7 119.9 149.7					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians South Dakota 21.1 31.2 57.3 77.0 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists South Dakota Medical/Surgical Specialist Physicians South Dakota Psychiatrists South Dakota Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists South Dakota Medical/Surgical Specialist Physicians Versus Psychologists South Dakota Medical/Surgical Specialist Physicians Versus Psychologists South Dakota Psychologists South Dakota Psychologists South Dakota Psychologists South Dakota Murse Practitioners South Dakota Psychiatric Nurses South Dakota Physician Assistants All States South Dakota Physician Assistants 186.4 149.7 177.1 227.3 South Dakota Physician Assistants Physician Assistants Versus Therapists South Dakota Physician Assistants 186.4 149.7 177.1 227.3 South Dakota Therapists South Dakota Therapists South Dakota Reimbursement Levels Compared to Therapists South Dakota Therapists	South Dakota All Medical/Surgical Clinicians	161.4	149.2	188.6	264.9
South Dakota 21.1 31.2 57.3 77.0	South Dakota All Behavioral Health Clinicians	133.3	113.7	119.9	149.7
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists 166.4 191.8 217.6 351.7 South Dakota Medical/Surgical Specialist Physicians 141.3 146.1 150.2 196.3 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 31.3 44.8 79.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists South Dakota Medical/Surgical Specialist Physicians Versus Psychologists South Dakota Medical/Surgical Specialist Physicians 166.4 191.8 217.6 351.7 South Dakota Medical/Surgical Specialist Physicians 166.4 191.8 217.6 351.7 South Dakota Psychologists 115.2 113.7 114.4 136.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists South Dakota Psychologists 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 182.3 149.7 171.9 228.4 South Dakota Nurse Practitioners Nurses 159.4 144.3 144.8 161.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses South Dakota Psychiatric Nurses 159.4 144.3 144.8 161.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 140.7 171.1 18.4 34.3 140.1	South Dakota	21.1	31.2	57.3	77.0
South Dakota Medical/Surgical Specialist Physicians 166.4 191.8 217.6 351.7	All States	21.7	26.6	48.0	70.4
South Dakota Psychiatrists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists South Dakota 17.7 31.3 44.8 79.2 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 217.6 351.7 South Dakota Medical/Surgical Specialist Physicians Paychologists 115.2 113.7 114.4 136.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 115.2 113.7 114.4 136.6 South Dakota 44.4 68.7 90.2 77.0 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 182.3 149.7 171.9 228.4 South Dakota Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 159.4 144.3 144.8 161.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 14.3 3.7 18.7 41.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 145.	South Dakota Medical/Surgical Specialist Physicians	166.4	191.8	217.6	351.7
Reimbursement Levels Compared to Psychiatrists South Dakota 17.7 31.3 31.3 44.8 79.2		141.3	146.1	150.2	196.3
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists South Dakota Psychologists 115.2 113.7 114.4 136.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 44.4 68.7 90.2 77.0 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses South Dakota Nurse Practitioners 182.3 149.7 171.9 228.4 South Dakota Psychiatric Nurses 159.4 144.3 144.8 161.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 504 143.3 3.7 18.7 41.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists South Dakota Physician Assistants 186.4 149.7 177.1 227.3 South Dakota Therapists 145.6 113.7 114.4 129.8 Physician Assistants Reimbursement Levels Compared to Therapists 28.0 31.7 <td></td> <td></td> <td></td> <td></td> <td></td>					
Medical/Surgical Specialist Physicians Versus Psychologists South Dakota Medical/Surgical Specialist Physicians 166.4 191.8 217.6 351.7 South Dakota Psychologists 115.2 113.7 114.4 136.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 15.2 113.7 114.4 136.6 South Dakota 44.4 68.7 90.2 77.0 77.0 All States 28.8 17.3 44.0 38.5 38.5 Nurse Practitioners Versus Psychiatric Nurses 182.3 149.7 171.9 228.4 228.4 South Dakota Psychiatric Nurses 159.4 144.3 144.8 161.6 <td>South Dakota</td> <td>17.7</td> <td>31.3</td> <td>44.8</td> <td>79.2</td>	South Dakota	17.7	31.3	44.8	79.2
Psychologists South Dakota Medical/Surgical Specialist Physicians 166.4 191.8 217.6 351.7	All States	24.9	12.8	27.8	49.5
South Dakota Psychologists 115.2 113.7 114.4 136.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 44.4 68.7 90.2 77.0 South Dakota 44.4 68.7 90.2 77.0 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 182.3 149.7 171.9 228.4 South Dakota Psychiatric Nurses 159.4 144.3 144.8 161.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 75.5 -1.1 18.7 41.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 186.4 149.7 177.1 227.3 South Dakota Physician Assistants 186.4 149.7 177.1 227.3 South Dakota Therapists 145.6 113.7 114.4 129.8 Physician Assistants Reimbursement Levels Compared to Therapists 28.0 31.7 54.9 75.1					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists South Dakota 44.4 68.7 90.2 77.0 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 8 182.3 149.7 171.9 228.4 South Dakota Nurse Practitioners 182.3 149.7 171.9 228.4 South Dakota Psychiatric Nurses 159.4 144.3 144.8 161.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 8 145.3 3.7 18.7 41.3 South Dakota 14.3 3.7 18.7 41.3 34.3 Physician Assistants Versus Therapists 186.4 149.7 177.1 227.3 South Dakota Physician Assistants 186.4 149.7 177.1 227.3 South Dakota Therapists 145.6 113.7 114.4 129.8 Physician Assistants Reimbursement Levels Compared to Therapists 28.0 31.7 54.9 75.1	South Dakota Medical/Surgical Specialist Physicians	166.4	191.8	217.6	351.7
Reimbursement Levels Compared to Psychologists South Dakota 44.4 68.7 90.2 77.0 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses South Dakota Nurse Practitioners 182.3 149.7 171.9 228.4 South Dakota Psychiatric Nurses 159.4 144.3 144.8 161.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses South Dakota 14.3 3.7 18.7 41.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists South Dakota Physician Assistants 186.4 149.7 177.1 227.3 South Dakota Therapists 145.6 113.7 114.4 129.8 Physician Assistants Reimbursement Levels Compared to Therapists South Dakota Dakota 28.0 31.7 54.9 75.1	South Dakota Psychologists	115.2	113.7	114.4	136.6
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses South Dakota Nurse Practitioners 182.3 149.7 171.9 228.4 South Dakota Psychiatric Nurses 159.4 144.3 144.8 161.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses South Dakota 14.3 3.7 18.7 41.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists South Dakota Physician Assistants 186.4 149.7 177.1 227.3 South Dakota Therapists 145.6 113.7 114.4 129.8 Physician Assistants Reimbursement Levels Compared to Therapists South Dakota 28.0 31.7 54.9 75.1					
Nurse Practitioners Versus Psychiatric Nurses South Dakota Nurse Practitioners 182.3 149.7 171.9 228.4 South Dakota Psychiatric Nurses 159.4 144.3 144.8 161.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Compared to Psychiatric Nurses 14.3 3.7 18.7 41.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 186.4 149.7 177.1 227.3 South Dakota Physician Assistants 186.4 149.7 177.1 227.3 Physician Assistants Reimbursement Levels Compared to Therapists 28.0 31.7 54.9 75.1	South Dakota	44.4	68.7	90.2	77.0
South Dakota Nurse Practitioners 182.3 149.7 171.9 228.4 South Dakota Psychiatric Nurses 159.4 144.3 144.8 161.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 200 14.3 3.7 18.7 41.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 186.4 149.7 177.1 227.3 South Dakota Physician Assistants 186.4 149.7 177.1 227.3 South Dakota Therapists 145.6 113.7 114.4 129.8 Physician Assistants Reimbursement Levels Compared to Therapists 28.0 31.7 54.9 75.1	All States	28.8	17.3	44.0	38.5
South Dakota Psychiatric Nurses 159.4 144.3 144.8 161.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 3.7 18.7 41.3 South Dakota 14.3 3.7 18.7 41.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 186.4 149.7 177.1 227.3 South Dakota Physician Assistants 145.6 113.7 114.4 129.8 Physician Assistants Reimbursement Levels Compared to Therapists 28.0 31.7 54.9 75.1	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses South Dakota 14.3 3.7 18.7 41.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 186.4 149.7 177.1 227.3 South Dakota Physician Assistants 145.6 113.7 114.4 129.8 Physician Assistants Reimbursement Levels Compared to Therapists 28.0 31.7 54.9 75.1	South Dakota Nurse Practitioners	182.3	149.7	171.9	228.4
Compared to Psychiatric Nurses South Dakota 14.3 3.7 18.7 41.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists South Dakota Physician Assistants 186.4 149.7 177.1 227.3 South Dakota Therapists 145.6 113.7 114.4 129.8 Physician Assistants Reimbursement Levels Compared to Therapists 28.0 31.7 54.9 75.1	South Dakota Psychiatric Nurses	159.4	144.3	144.8	161.6
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists South Dakota Physician Assistants 186.4 149.7 177.1 227.3 South Dakota Therapists 145.6 113.7 114.4 129.8 Physician Assistants Reimbursement Levels Compared to Therapists 28.0 31.7 54.9 75.1					
Physician Assistants Versus Therapists South Dakota Physician Assistants South Dakota Therapists Physician Assistants Reimbursement Levels Compared to Therapists South Dakota 28.0 31.7 54.9 75.1	South Dakota	14.3	3.7	18.7	41.3
South Dakota Physician Assistants 186.4 149.7 177.1 227.3 South Dakota Therapists 145.6 113.7 114.4 129.8 Physician Assistants Reimbursement Levels Compared to Therapists 28.0 31.7 54.9 75.1	All States	7.5	-1.1	18.4	34.3
South Dakota Therapists 145.6 113.7 114.4 129.8 Physician Assistants Reimbursement Levels Compared to Therapists South Dakota 28.0 31.7 54.9 75.1	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists South Dakota 28.0 31.7 54.9 75.1	South Dakota Physician Assistants	186.4	149.7	177.1	227.3
Compared to Therapists South Dakota 28.0 31.7 54.9 75.1	South Dakota Therapists	145.6	113.7	114.4	129.8
All States 29.6 33.8 59.3 101.6	South Dakota	28.0	31.7	54.9	75.1
	All States	29.6	33.8	59.3	101.6

Appendix C-42: Tennessee Disparity Analysis, All Plans

Sample size in 2021: 221,601 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Tennessee OON Behavioral Health	10.1	7.9	10.8
Tennessee OON Medical/Surgical	1.3	1.1	1.5
Behavioral Health OON Compared to Medical/Surgical OON			
Tennessee	7.7×	7.0×	7.1×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Tennessee OON Behavioral Health	27.7	20.8	32.3
Tennessee OON Medical/Surgical	3.3	1.9	1.0
Behavioral Health OON Compared to Medical/Surgical OON			
Tennessee	8.5×	10.9×	31.4×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Tennessee OON Behavioral Health	29.5	19.9	21.9
Tennessee OON Medical/Surgical	6.7	2.4	4.5
Behavioral Health OON Compared to Medical/Surgical OON			
Tennessee	4.4×	8.3×	4.9×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Tennessee OON All Behavioral Health Clinicians	7.7	6.0	4.5
Tennessee OON All Medical/Surgical Clinicians	2.2	1.8	1.7
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Tennessee	3.5×	3.3×	2.7×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Tennessee OON Psychiatrists	7.2	4.7	3.8
Tennessee OON Medical/Surgical Specialist Physicians	1.0	0.7	0.6
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Tennessee	7.3×	6.4×	6.0×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Tennessee OON Psychologists	8.9	9.5	7.6
Tennessee OON Medical/Surgical Specialist Physicians	1.0	0.7	0.6
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Tennessee	9.0×	12.9×	11.9×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Tennessee OON Psychiatric Nurses	5.1	2.7	2.3
Tennessee OON Nurse Practitioners	3.1	2.5	2.2
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Tennessee	1.7×	1.1×*	1.1×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Tennessee OON Therapists	7.6	5.4	4.0
Tennessee OON Physician Assistants	0.8	1.0	0.9
Therapists OON Compared to Physician Assistants OON			
Tennessee	9.2×	5.6×	4.6×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians Tennessee All Medical/Surgical Clinicians Tennessee All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Tennessee All States Medical/Surgical Specialist Physicians Versus Psychiatrists Tennessee Medical/Surgical Specialist Physicians Tennessee Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Tennessee	2019 129.2 75.7 70.8 33.3	2020 131.0 79.3	133.4 83.5
Tennessee All Medical/Surgical Clinicians Tennessee All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Tennessee All States Medical/Surgical Specialist Physicians Versus Psychiatrists Tennessee Medical/Surgical Specialist Physicians Tennessee Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Tennessee	75.7 70.8 33.3	79.3 65.3	
Tennessee All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Tennessee All States Medical/Surgical Specialist Physicians Versus Psychiatrists Tennessee Medical/Surgical Specialist Physicians Tennessee Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Tennessee	75.7 70.8 33.3	79.3 65.3	
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Tennessee All States Medical/Surgical Specialist Physicians Versus Psychiatrists Tennessee Medical/Surgical Specialist Physicians Tennessee Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Tennessee	70.8 33.3	65.3	83.5
Behavioral Health Clinicians Tennessee All States Medical/Surgical Specialist Physicians Versus Psychiatrists Tennessee Medical/Surgical Specialist Physicians Tennessee Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Tennessee	33.3		
All States Medical/Surgical Specialist Physicians Versus Psychiatrists Tennessee Medical/Surgical Specialist Physicians Tennessee Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Tennessee	33.3		
Medical/Surgical Specialist Physicians Versus Psychiatrists Tennessee Medical/Surgical Specialist Physicians Tennessee Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Tennessee			59.8
Tennessee Medical/Surgical Specialist Physicians Tennessee Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Tennessee	400.5	25.7	21.7
Tennessee Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Tennessee	400 5		
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Tennessee	132.5	134.5	137.2
to Psychiatrists Tennessee	76.2	76.6	81.4
	74.0	75.8	68.6
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Tennessee Medical/Surgical Specialist Physicians	132.5	134.5	137.2
Tennessee Psychologists	75.2	81.4	86.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Tennessee	76.1	65.4	58.5
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Tennessee Nurse Practitioners	118.6	121.8	125.3
Tennessee Psychiatric Nurses	76.4	92.3	100.5
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Tennessee	55.3	32.0	24.7
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Tennessee Physician Assistants	127.3	129.9	134.9
Tennessee Therapists	75.6	79.3	82.7
Physician Assistants Reimbursement Levels Compared to Therapists			
Tennessee	68.5	63.7	60.4
All States	00.0		63.1

Autorage		Percentile, %			
Tennessee All Medical/Surgical Clinicians 133.4 116.6 157.9 289.4 126.5		Average		75th	95th
Tennessee All Behavioral Health Clinicians					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Tennessee	Tennessee All Medical/Surgical Clinicians	133.4	116.6	157.9	289.4
Tennessee	Tennessee All Behavioral Health Clinicians	83.5	65.9	82.8	126.5
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists Tennessee Medical/Surgical Specialist Physicians 137.2 132.3 176.7 332.1 Tennessee Psychiatrists 81.4 79.9 100.6 138.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 86.6 65.6 75.7 140.7 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 86.5 80.6 98.5 196.7 Tennessee Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 80.6 98.5 196.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 64.2 79.3 128.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 125.3 97.9 139.0 204.1 Tennessee Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 100.5 84.1 100.1 139.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 16.3 <	Tennessee	59.8	77.0	90.6	128.9
Tennessee Medical/Surgical Specialist Physicians 137.2 132.3 176.7 332.1	All States	21.7	26.6	48.0	70.4
Tennessee Psychiatrists 81.4 79.9 100.6 138.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 86.6 65.6 75.7 140.7 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Tennessee Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 80.6 98.5 196.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 80.6 98.5 196.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 80.6 98.5 196.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatric Nurses 58.5 64.2 79.3 128.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 125.3 97.9 139.0 204.1 Tennessee Psychiatric Nurses 100.5 84.1 100.1 139.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 24.7 <td></td> <td></td> <td></td> <td></td> <td></td>					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Tennessee 68.6 65.6 75.7 140.7 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 88.5 80.6 98.5 196.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 80.6 98.5 196.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 86.5 64.2 79.3 128.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 125.3 97.9 139.0 204.1 Tennessee Psychiatric Nurses 100.5 84.1 100.1 139.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 24.7 16.3 38.8 46.2 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists	Tennessee Medical/Surgical Specialist Physicians	137.2	132.3	176.7	332.1
Reimbursement Levels Compared to Psychiatrists Tennessee	Tennessee Psychiatrists	81.4	79.9	100.6	138.0
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians 137.2 132.3 176.7 332.1 Tennessee Medical/Surgical Specialist Physicians 86.5 80.6 98.5 196.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Tennessee 58.5 64.2 79.3 128.9 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Tennessee Psychiatric Nurses 125.3 97.9 139.0 204.1 Tennessee Psychiatric Nurses Tennessee 24.7 16.3 38.8 46.2 All States 7.5 -1.1 18.4 34.2 Tennessee Physician Assistants 134.9 110.6 146.6					

Appendix C-43: Texas Disparity Analysis, All Plans

Sample size in 2021: 1,033,786 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Texas OON Behavioral Health	14.6	12.5	10.1
Texas OON Medical/Surgical	2.5	2.7	2.4
Behavioral Health OON Compared to Medical/Surgical OON			
Texas	5.9×	4.7×	4.3×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Texas OON Behavioral Health	40.4	37.2	36.3
Texas OON Medical/Surgical	2.2	1.6	0.8
Behavioral Health OON Compared to Medical/Surgical OON			
Texas	18.2×	22.7×	47.8×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Texas OON Behavioral Health	26.9	16.1	15.2
Texas OON Medical/Surgical	10.0	16.3	19.1
Behavioral Health OON Compared to Medical/Surgical OON			
Texas	2.7×	1.0×*	0.8×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Texas OON All Behavioral Health Clinicians	8.2	6.3	6.0
Texas OON All Medical/Surgical Clinicians	2.9	2.6	2.3
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Texas	2.8×	2.5×	2.6×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Texas OON Psychiatrists	5.3	4.0	4.1
Texas OON Medical/Surgical Specialist Physicians	1.9	1.5	1.3
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Texas	2.7×	2.8×	3.3×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Texas OON Psychologists	10.0	7.8	7.9
Texas OON Medical/Surgical Specialist Physicians	1.9	1.5	1.3
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Texas	5.1×	5.3×	6.2×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Texas OON Psychiatric Nurses	5.0	4.2	2.0
Texas OON Nurse Practitioners	5.2	6.6	4.4
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Texas	1.0×*	0.6×	0.5×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Texas OON Therapists	9.9	7.3	6.5
Texas OON Physician Assistants	2.4	2.7	2.5
Therapists OON Compared to Physician Assistants OON			
Texas	4.1×	2.7×	2.6×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Texas All Medical/Surgical Clinicians	108.3	111.3	115.2
Texas All Behavioral Health Clinicians	83.9	89.8	93.1
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Texas	29.1	23.9	23.8
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Texas Medical/Surgical Specialist Physicians	110.9	114.0	118.2
Texas Psychiatrists	86.3	93.7	99.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Texas	28.6	21.7	19.0
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Texas Medical/Surgical Specialist Physicians	110.9	114.0	118.2
Texas Psychologists	91.0	96.7	102.8
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Texas	21.9	17.9	15.0
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Texas Nurse Practitioners	98.6	105.0	109.0
Texas Psychiatric Nurses	87.5	102.4	107.5
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Texas	12.7	2.5	1.3
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Texas Physician Assistants	111.6	113.7	118.3
Texas Therapists	78.1	83.8	86.1
Physician Assistants Reimbursement Levels Compared to Therapists			
Texas	42.9	35.6	37.4
All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians		Percentile, %			
Texas All Medical/Surgical Clinicians		Average		75th	95th
Texas All Behavioral Health Clinicians 93.1 75.4 93.0 142.7					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Texas 23.8 29.1 38.0 64.8 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Texas Medical/Surgical Specialist Physicians 118.2 103.7 133.8 264.3 Texas Psychiatrists 99.3 96.0 117.8 159.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Texas 19.0 8.0 13.6 65.4 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Texas Medical/Surgical Specialist Physicians Versus Psychologists Texas Psychologists 118.2 103.7 133.8 264.3 Texas Psychologists 102.8 89.2 101.2 306.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Texas 15.0 16.4 32.2 64.8 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Texas Nurse Practitioners 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Texas 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.9 39.4 Texas Physician Assistants Versus Therapists Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists Texas Therapists 86.1 60.6 70.4 90.8	Texas All Medical/Surgical Clinicians	115.2	97.3	128.3	235.3
Texas 23.8 29.1 38.0 64.8	Texas All Behavioral Health Clinicians	93.1	75.4	93.0	142.7
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Texas Medical/Surgical Specialist Physicians 99.3 96.0 117.8 159.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Texas 19.0 8.0 13.6 65.4 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Texas 19.0 8.0 13.6 65.4 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Texas 19.0 8.0 13.6 65.4 19.5 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Texas Medical/Surgical Specialist Physicians 118.2 103.7 133.8 264.3 16.2 89.2 101.2 306.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Texas 15.0 16.4 32.2 64.8 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Texas Nurse Practitioners Versus Psychiatric Nurses Texas Nurse Practitioners 109.0 82.4 113.2 169.1 1					
Medical/Surgical Specialist Physicians Versus Psychiatrists Texas Medical/Surgical Specialist Physicians 118.2 103.7 133.8 264.3 Texas Psychiatrists 99.3 96.0 117.8 159.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 19.0 8.0 13.6 65.4 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 89.2 103.7 133.8 264.3 Texas Medical/Surgical Specialist Physicians Psychologists 118.2 103.7 133.8 264.3 Texas Psychologists 102.8 89.2 101.2 306.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 89.2 101.2 306.2 Texas Psychologists 15.0 16.4 32.2 64.8 All States 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 109.0 82.4 113.2 169.1 169.1 Texas Psychiatric Nurses 107.5 94.5 98.2 125.0	Texas	23.8	29.1	38.0	64.8
Psychiatrists	All States	21.7	26.6	48.0	70.4
Texas Psychiatrists 99.3 96.0 117.8 159.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 19.0 8.0 13.6 65.4 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 118.2 103.7 133.8 264.3 Texas Medical/Surgical Specialist Physicians Psychologists 102.8 89.2 101.2 306.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 15.0 16.4 32.2 64.8 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 118.3 92.1 118.9 194.4					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Texas 19.0 8.0 13.6 65.4 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Psychologists 103.7 133.8 264.3 Texas Psychologists 102.8 89.2 101.2 306.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 15.0 16.4 32.2 64.8 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Texas Therapists 86.1 60.6 <t< td=""><td>Texas Medical/Surgical Specialist Physicians</td><td>118.2</td><td>103.7</td><td>133.8</td><td>264.3</td></t<>	Texas Medical/Surgical Specialist Physicians	118.2	103.7	133.8	264.3
Reimbursement Levels Compared to Psychiatrists Texas 19.0 8.0 13.6 65.4 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Texas Medical/Surgical Specialist Physicians 118.2 103.7 133.8 264.3 Texas Psychologists 102.8 89.2 101.2 306.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Texas Psychologists 15.0 16.4 32.2 64.8 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Texas Nurse Practitioners Versus Psychiatric Nurses 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Texas 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Texas Physician Assistants 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists Compared to Therapists 114.1 Texas Therapist	Texas Psychiatrists	99.3	96.0	117.8	159.8
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians 118.2 103.7 133.8 264.3 Texas Psychologists 102.8 89.2 101.2 306.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Texas 15.0 16.4 32.2 64.8 All States 15.0 16.4 32.2 64.8 Nurse Practitioners Versus Psychiatric Nurses Texas Psychiatric Nurses 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 1 Texas 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4	Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Medical/Surgical Specialist Physicians Versus Psychologists Texas Medical/Surgical Specialist Physicians 118.2 103.7 133.8 264.3 Texas Psychologists 102.8 89.2 101.2 306.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 15.0 16.4 32.2 64.8 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 118.3 92.1 118.9 194.4 Texas Physician Assistants Reimbursement Levels Compared to Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1	Texas	19.0	8.0	13.6	65.4
Psychologists	All States	24.9	12.8	27.8	49.5
Texas Psychologists 102.8 89.2 101.2 306.2 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 15.0 16.4 32.2 64.8 All States 15.0 16.4 32.2 64.8 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Texas Physician Assistants 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Texas 15.0 16.4 32.2 64.8 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 109.0 82.4 113.2 169.1 Texas Nurse Practitioners 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1	Texas Medical/Surgical Specialist Physicians	118.2	103.7	133.8	264.3
Reimbursement Levels Compared to Psychologists Texas 15.0 16.4 32.2 64.8 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Texas Nurse Practitioners 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Texas Physician Assistants 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1	Texas Psychologists	102.8	89.2	101.2	306.2
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Texas Nurse Practitioners 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 1.3 -12.8 15.3 35.3 Texas 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Texas Physician Assistants 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1					
Nurse Practitioners Versus Psychiatric Nurses Texas Nurse Practitioners 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 118.3 92.1 118.9 194.4 Texas Physician Assistants 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1	Texas	15.0	16.4	32.2	64.8
Texas Nurse Practitioners 109.0 82.4 113.2 169.1 Texas Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 118.3 92.1 118.9 194.4 Texas Physician Assistants 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1	All States	28.8	17.3	44.0	38.5
Texas Psychiatric Nurses 107.5 94.5 98.2 125.0 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Texas Physician Assistants 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Texas 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Texas Physician Assistants 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1	Texas Nurse Practitioners	109.0	82.4	113.2	169.1
Compared to Psychiatric Nurses Texas 1.3 -12.8 15.3 35.3 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Texas Physician Assistants 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1	Texas Psychiatric Nurses	107.5	94.5	98.2	125.0
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Texas Physician Assistants 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1					
Physician Assistants Versus Therapists Texas Physician Assistants 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1		1.3	-12.8	15.3	35.3
Texas Physician Assistants 118.3 92.1 118.9 194.4 Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1	All States	7.5	-1.1	18.4	34.3
Texas Therapists 86.1 60.6 70.4 90.8 Physician Assistants Reimbursement Levels Compared to Therapists 37.4 52.0 68.8 114.1	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists Texas 37.4 52.0 68.8 114.1	Texas Physician Assistants	118.3	92.1	118.9	194.4
Compared to Therapists 37.4 52.0 68.8 114.1		86.1	60.6	70.4	90.8
All States 29.6 33.8 59.3 101.6	Texas	37.4	52.0	68.8	114.1
	All States	29.6	33.8	59.3	101.6

Appendix C-44: Utah Disparity Analysis, All Plans

Sample size in 2021: 80,575 covered lives

		Percent, %	
	2019	2020	2021
Acute Inpatient Facility			
Utah OON Behavioral Health	10.2	7.5	8.7
Utah OON Medical/Surgical	1.9	1.9	1.7
Behavioral Health OON Compared to Medical/Surgical OON			
Utah	5.3×	4.0×	5.1×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Utah OON Behavioral Health	50.8	40.0	n/a
Utah OON Medical/Surgical	4.4	0.2	n/a
Behavioral Health OON Compared to Medical/Surgical OON			
Utah	11.6×	191.4×	n/a
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Utah OON Behavioral Health	19.5	10.1	10.4
Utah OON Medical/Surgical	6.5	6.5	5.5
Behavioral Health OON Compared to Medical/Surgical OON			
Utah	3.0×	1.6×	1.9×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Utah OON All Behavioral Health Clinicians	9.8	6.9	5.8
Utah OON All Medical/Surgical Clinicians	1.6	1.6	1.7
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Utah	6.1×	4.4×	3.4×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Utah OON Psychiatrists	6.3	6.3	3.1
Utah OON Medical/Surgical Specialist Physicians	0.8	1.1	0.9
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Utah	7.8×	5.7×	3.4×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

		Percent, %	
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Utah OON Psychologists	6.5	5.2	5.5
Utah OON Medical/Surgical Specialist Physicians	0.8	1.1	0.9
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Utah	8.0×	4.7×	6.1×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Utah OON Psychiatric Nurses	15.3	2.6	3.3
Utah OON Nurse Practitioners	1.4	2.1	4.1
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Utah	11.1×	1.2×*	0.8×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Utah OON Therapists	11.1	7.5	6.3
Utah OON Physician Assistants	0.6	1.4	1.3
Therapists OON Compared to Physician Assistants OON			
Utah	17.2×	5.4×	4.8×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{*}}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Utah All Medical/Surgical Clinicians	123.0	124.7	127.0
Utah All Behavioral Health Clinicians	83.2	89.4	91.2
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Utah	47.9	39.5	39.2
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Utah Medical/Surgical Specialist Physicians	125.3	128.1	131.5
Utah Psychiatrists	110.2	111.7	114.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Utah	13.7	14.7	15.1
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Utah Medical/Surgical Specialist Physicians	125.3	128.1	131.5
Utah Psychologists	84.3	91.6	95.8
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Utah	48.7	39.8	37.3
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Utah Nurse Practitioners	120.2	118.7	119.5
Utah Psychiatric Nurses	93.6	94.7	102.9
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Utah	28.4	25.4	16.2
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Utah Physician Assistants	124.4	123.2	123.6
Utah Therapists	77.3	85.2	86.3
Physician Assistant Reimbursement Levels Compared to Therapists			
Utah	61.0	44.6	43.3
All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians 127.0		Percentile, %			
Utah All Medical/Surgical Clinicians 127.0 113.0 140.7 235.7		Average		75th	95th
Utah All Behavioral Health Clinicians 91.2 67.0 80.9 132.6					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Utah 39.2 68.7 73.9 77.7 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Utah Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9 Utah Psychiatrists 114.2 114.1 127.3 191.6 Medical/Surgical Specialist Physicians 114.2 114.1 127.3 191.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Utah 15.1 13.2 32.3 42.9 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Utah Medical/Surgical Specialist Physicians Versus Psychologists 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9 Utah Psychologists 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9 Utah Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9 Utah Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9 Utah Psychologists 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9 Utah Psychologists 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9 Utah Psychologists 95.8 79.3 96.8 291.5 Nurse Practitioners Versus Psychiatric Nurses Utah Nurse Practitioners 119.5 98.8 115.2 201.9 Utah Psychiatric Nurses 119.5 98.8 119.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists Utah 43.3 49.1 72.2 97.1	Utah All Medical/Surgical Clinicians	127.0	113.0	140.7	235.7
Compared to All Behavioral Health Clinicians Utah 39.2 68.7 73.9 77.7 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists 131.5 129.1 168.4 273.9 Utah Psychiatrists Utah 114.2 114.1 127.3 191.6 Wedical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Utah Medical/Surgical Specialist Physicians Versus Psychologists Utah Psychologists 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 79.3 96.8 291.5 Utah Psychologists 95.8 79.3 96.8 291.5 Wedical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 74.0 77.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 119.5 98.8	Utah All Behavioral Health Clinicians	91.2	67.0	80.9	132.6
All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Utah Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9 Utah Psychiatrists 114.2 114.1 127.3 191.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Utah 15.1 13.2 32.3 42.9 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Utah Medical/Surgical Specialist Physicians Versus Psychologists Utah Medical/Surgical Specialist Physicians 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Utah Psychologists 37.3 62.8 74.0 77.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Utah Nurse Practitioners Versus Psychiatric Nurses Utah Psychiatric Nurses 119.5 98.8 115.2 201.9 Utah Psychiatric Nurses 102.9 80.1 101.1 137.6 Nurse Practitioners Reimbursement Levels Compared to Psychologists Utah 16.2 23.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Utah Physician Assistants 123.6 99.8 119.3 184.1 Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists Utah Physician Assistant Reimbursement Levels Compared to Therapists Utah Physician Assistant Reimbursement Levels Compared to Therapists Utah 43.3 49.1 72.2 97.1					
Medical/Surgical Specialist Physicians Versus Psychiatrists Utah Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9 Utah Psychiatrists 114.2 114.1 127.3 191.6 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 32.3 42.9 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 79.3 96.8 291.5 Utah Medical/Surgical Specialist Physicians Psychologists 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 79.3 96.8 291.5 Utah 37.3 62.8 74.0 77.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 119.5 98.8 115.2 201.9 Utah Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 102.9 80.1 101.1 137.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses	Utah	39.2	68.7	73.9	77.7
Psychiatrists	All States	21.7	26.6	48.0	70.4
Utah Psychiatrists					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Utah 15.1 13.2 32.3 42.9 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Utah Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9 Utah Psychologists 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Utah 37.3 62.8 74.0 77.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Utah Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 102.9 80.1 101.1 137.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 102.9 80.1 101.1 137.6 Utah 16.2 23.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists <t< td=""><td>Utah Medical/Surgical Specialist Physicians</td><td>131.5</td><td>129.1</td><td>168.4</td><td>273.9</td></t<>	Utah Medical/Surgical Specialist Physicians	131.5	129.1	168.4	273.9
Nurse Practitioners Versus Psychiatric Nurses 119.5 129.1 12.6 12.7 12.7 12.7 12.7 12.7 12.7 12.8	· · · · ·	114.2	114.1	127.3	191.6
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Utah Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9 Utah Psychologists 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians 8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians 8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians 37.3 62.8 74.0 77.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Utah Psychiatric Nurses 102.9 80.1 101.1 137.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 102.9 80.1 101.1 137.6 Witah 16.2 23.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 <td></td> <td></td> <td></td> <td></td> <td></td>					
Medical/Surgical Specialist Physicians Versus Psychologists Utah Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9 Utah Psychologists 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 74.0 77.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 119.5 98.8 115.2 201.9 Utah Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 102.9 80.1 101.1 137.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 16.2 23.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 123.6 99.8 119.3 184.1 Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists 243.3 49.1 72.2 97.1	Utah	15.1	13.2	32.3	42.9
Description Psychologists Utah Medical/Surgical Specialist Physicians 131.5 129.1 168.4 273.9	All States	24.9	12.8	27.8	49.5
Utah Psychologists 95.8 79.3 96.8 291.5 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 77.7 77.7 Utah 37.3 62.8 74.0 77.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 8.8 115.2 201.9 Utah Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 102.9 80.1 101.1 137.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 7.5 -1.1 18.4 34.3 Utah 16.2 23.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 123.6 99.8 119.3 184.1 Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists 43.3 49.1 72.2 97.1					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Utah 37.3 62.8 74.0 77.7 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 119.5 98.8 115.2 201.9 Utah Nurse Practitioners 119.5 98.8 115.2 201.9 Utah Psychiatric Nurses 102.9 80.1 101.1 137.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.3 14.0 46.7 Utah 16.2 23.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Utah Physician Assistants 123.6 99.8 119.3 184.1 Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists 67.0 69.3 93.4 Utah 43.3 49.1 72.2 97.1	Utah Medical/Surgical Specialist Physicians	131.5	129.1	168.4	273.9
Nurse Practitioners Versus Psychiatric Nurses 119.5 98.8 115.2 201.9	Utah Psychologists	95.8	79.3	96.8	291.5
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Utah Nurse Practitioners 119.5 98.8 115.2 201.9 Utah Psychiatric Nurses 102.9 80.1 101.1 137.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 123.6 99.8 119.3 184.1 Utah Physician Assistants 123.6 99.8 119.3 184.1 Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists 43.3 49.1 72.2 97.1					
Nurse Practitioners Versus Psychiatric Nurses Utah Nurse Practitioners 119.5 98.8 115.2 201.9 Utah Psychiatric Nurses 102.9 80.1 101.1 137.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 123.6 99.8 119.3 184.1 Utah Physician Assistants 123.6 99.8 119.3 184.1 Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists 43.3 49.1 72.2 97.1	Utah	37.3	62.8	74.0	77.7
Utah Nurse Practitioners 119.5 98.8 115.2 201.9 Utah Psychiatric Nurses 102.9 80.1 101.1 137.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 123.6 99.8 119.3 184.1 Utah Physician Assistants 123.6 99.8 119.3 184.1 Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists 43.3 49.1 72.2 97.1	All States	28.8	17.3	44.0	38.5
Utah Psychiatric Nurses 102.9 80.1 101.1 137.6 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 123.6 99.8 119.3 184.1 Utah Physician Assistants 123.6 99.8 119.3 184.1 Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists 43.3 49.1 72.2 97.1	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Utah 16.2 23.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Utah Physician Assistants 123.6 99.8 119.3 184.1 Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists 43.3 49.1 72.2 97.1	Utah Nurse Practitioners	119.5	98.8	115.2	201.9
Compared to Psychiatric Nurses Utah 16.2 23.3 14.0 46.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Utah Physician Assistants 123.6 99.8 119.3 184.1 Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists 43.3 49.1 72.2 97.1	Utah Psychiatric Nurses	102.9	80.1	101.1	137.6
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Utah Physician Assistants 123.6 99.8 119.3 184.1 Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists 43.3 49.1 72.2 97.1					
Physician Assistants Versus TherapistsUtah Physician Assistants123.699.8119.3184.1Utah Therapists86.367.069.393.4Physician Assistant Reimbursement Levels Compared to TherapistsCompared to TherapistsUtah43.349.172.297.1	Utah	16.2	23.3	14.0	46.7
Utah Physician Assistants 123.6 99.8 119.3 184.1 Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists 43.3 49.1 72.2 97.1	All States	7.5	-1.1	18.4	34.3
Utah Therapists 86.3 67.0 69.3 93.4 Physician Assistant Reimbursement Levels Compared to Therapists Utah 43.3 49.1 72.2 97.1	Physician Assistants Versus Therapists				
Physician Assistant Reimbursement Levels Compared to Therapists Utah 43.3 49.1 72.2 97.1	Utah Physician Assistants	123.6	99.8	119.3	184.1
Compared to Therapists 43.3 49.1 72.2 97.1	Utah Therapists	86.3	67.0	69.3	93.4
All States 29.6 33.8 59.3 101.6	Utah	43.3	49.1	72.2	97.1
	All States	29.6	33.8	59.3	101.6

Appendix C-45: Vermont Disparity Analysis, All Plans

Sample size in 2021: 9,227 covered lives

		Percent, %		
	2019	2020	2021	
Acute Inpatient Facility				
Vermont OON Behavioral Health	4.1	12.9	7.4	
Vermont OON Medical/Surgical	1.1	3.6	3.4	
Behavioral Health OON Compared to Medical/Surgical OON				
Vermont	3.7×	3.6×	2.2×	
All States	7.1×	6.0×	6.2×	
Parity Would Be	1.0×	1.0×	1.0×	
Subacute Inpatient Facility				
Vermont OON Behavioral Health	7.5	n/a	18.4	
Vermont OON Medical/Surgical	0.2	n/a	0.5	
Behavioral Health OON Compared to Medical/Surgical OON				
Vermont	41.6×	n/a	36.5×	
All States	9.9×	7.9×	19.9×	
Parity Would Be	1.0×	1.0×	1.0×	
Outpatient Facility (Non-Emergency Room)				
Vermont OON Behavioral Health	n/a	9.3	2.1	
Vermont OON Medical/Surgical	n/a	7.1	4.2	
Behavioral Health OON Compared to Medical/Surgical OON				
Vermont	n/a	1.3×*	0.5×*	
All States	3.5×	1.7×	1.5×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians		<u> </u>	-	
Vermont OON All Behavioral Health Clinicians	16.6	12.0	11.1	
Vermont OON All Medical/Surgical Clinicians	1.8	2.9	2.5	
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON				
Vermont	9.4×	4.1×	4.4×	
All States	3.9×	3.9×	3.5×	
Parity Would Be	1.0×	1.0×	1.0×	
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians				
Vermont OON Psychiatrists	18.9	14.3	9.4	
Vermont OON Medical/Surgical Specialist Physicians	1.5	2.5	1.9	
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON				
Vermont	12.3×	5.7×	5.0×	
Vermont All States	12.3× 9.0×	5.7× 8.7×	5.0× 8.9×	

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Vermont OON Psychologists	20.2	10.1	12.1
Vermont OON Medical/Surgical Specialist Physicians	1.5	2.5	1.9
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Vermont	13.1×	4.0×	6.5×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Vermont OON Psychiatric Nurses	n/a	25.0	43.2
Vermont OON Nurse Practitioners	n/a	1.0	0.5
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Vermont	n/a	25.2×	88.4×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Vermont OON Therapists	14.8	12.0	10.9
Vermont OON Physician Assistants	0.8	0.6	0.3
Therapists OON Compared to Physician Assistants OON			
Vermont	19.3×	21.6×	33.9×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Vermont All Medical/Surgical Clinicians	130.5	132.2	137.7
Vermont All Behavioral Health Clinicians	79.9	83.1	85.8
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Vermont	63.2	59.0	60.4
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Vermont Medical/Surgical Specialist Physicians	132.4	133.4	139.4
Vermont Psychiatrists	101.3	96.5	105.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Vermont	30.7	38.1	32.6
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Vermont Medical/Surgical Specialist Physicians	132.4	133.4	139.4
Vermont Psychologists	68.7	72.7	74.4
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Vermont	92.7	83.3	87.3
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Vermont Nurse Practitioners	136.2	138.5	143.3
Vermont Psychiatric Nurses	134.2	125.5	110.6
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Vermont	1.5*	10.4	29.5
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Vermont Physician Assistants	131.7	131.6	140.4
Vermont Therapists	80.0	84.7	87.6
Physician Assistant Reimbursement Levels Compared to Therapists			
Vermont	64.6	55.3	60.1
All States	40.6	34.5	29.6

^{*} Reimbursement levels are not statistically different between medical/surgical and behavioral health at a p < .05. Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test.

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians Vermont All Medical/Surgical Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Vermont All States Medical/Surgical Specialist Physicians Versus Psychiatrists Vermont Medical/Surgical Specialist Physicians 1 Vermont Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Vermont All States Medical/Surgical Specialist Physicians Versus Psychologists Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians Versus Psychologists	verage	50th (Median)	75th	95th
Vermont All Medical/Surgical Clinicians Vermont All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Vermont All States Medical/Surgical Specialist Physicians Versus Psychiatrists Vermont Medical/Surgical Specialist Physicians 1 Vermont Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Vermont All States Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians Versus Psychologists		1123		
Vermont All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Vermont All States Medical/Surgical Specialist Physicians Versus Psychiatrists Vermont Medical/Surgical Specialist Physicians 1 Vermont Psychiatrists 1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Vermont All States Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians		112 3		
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Vermont All States Medical/Surgical Specialist Physicians Versus Psychiatrists Vermont Medical/Surgical Specialist Physicians 1 Vermont Psychiatrists 1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Vermont All States Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians		112.0	156.2	314.7
Compared to All Behavioral Health Clinicians Vermont All States Medical/Surgical Specialist Physicians Versus Psychiatrists Vermont Medical/Surgical Specialist Physicians 1 Vermont Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Vermont All States Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians	85.8	66.9	83.6	122.6
All States Medical/Surgical Specialist Physicians Versus Psychiatrists Vermont Medical/Surgical Specialist Physicians Vermont Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Vermont All States Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians Versus Psychologists				
Medical/Surgical Specialist Physicians Versus Psychiatrists Vermont Medical/Surgical Specialist Physicians 1 Vermont Psychiatrists 1 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Vermont All States Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians	60.4	67.8	86.8	156.7
Psychiatrists Vermont Medical/Surgical Specialist Physicians Vermont Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Vermont All States Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians	21.7	26.6	48.0	70.4
Vermont Psychiatrists Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Vermont All States Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians 1				
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Vermont All States Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians	139.4	123.8	184.3	345.4
Reimbursement Levels Compared to Psychiatrists Vermont All States Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians 1	105.2	102.9	122.6	170.7
All States Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians 1				
Medical/Surgical Specialist Physicians Versus Psychologists Vermont Medical/Surgical Specialist Physicians	32.6	20.3	50.4	102.4
Psychologists Vermont Medical/Surgical Specialist Physicians 1	24.9	12.8	27.8	49.5
	139.4	123.8	184.3	345.4
Vermont Psychologists	74.4	72.3	89.4	120.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Vermont	87.3	71.2	106.2	156.7
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Vermont Nurse Practitioners 1	143.3	111.3	137.2	245.0
Vermont Psychiatric Nurses 1	110.6	89.2	94.1	122.7
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Vermont	29.5	24.7	45.8	99.7
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Vermont Physician Assistants	140.4	111.3	132.2	210.4
·	87.6	66.9	72.8	94.2
Physician Assistants Reimbursement Levels Compared to Therapists				
Vermont	60.1	66.4	81.6	123.4
All States	29.6	33.8	59.3	101.6

Appendix C-46: Virginia Disparity Analysis, All Plans

Sample size in 2021: 557,448 covered lives

		Percent, %	
	2019	2020	2021
Acute Inpatient Facility			
Virginia OON Behavioral Health	6.1	5.8	5.0
Virginia OON Medical/Surgical	0.5	0.4	0.4
Behavioral Health OON Compared to Medical/Surgical OON			
Virginia	13.5×	15.4×	11.2×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Virginia OON Behavioral Health	10.6	18.5	50.0
Virginia OON Medical/Surgical	1.1	0.7	3.5
Behavioral Health OON Compared to Medical/Surgical OON			
Virginia	9.9×	27.2×	14.3×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Virginia OON Behavioral Health	12.7	11.6	10.8
Virginia OON Medical/Surgical	0.5	1.0	1.0
Behavioral Health OON Compared to Medical/Surgical OON			
Virginia	26.1×	11.2×	10.4×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Virginia OON All Behavioral Health Clinicians	8.5	7.9	7.8
Virginia OON All Medical/Surgical Clinicians	1.6	1.2	1.2
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Virginia	5.5×	6.5×	6.5×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Virginia OON Psychiatrists	7.7	7.5	8.3
Virginia OON Medical/Surgical Specialist Physicians	0.8	0.7	0.6
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Virginia	10.0×	11.4×	13.5×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

		Percent, %	
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Virginia OON Psychologists	12.0	13.2	13.8
Virginia OON Medical/Surgical Specialist Physicians	0.8	0.7	0.6
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Virginia	15.6×	20.1×	22.4×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Virginia OON Psychiatric Nurses	2.7	3.2	1.9
Virginia OON Nurse Practitioners	6.6	1.3	1.0
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Virginia	0.4×	2.6×	1.9×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Virginia OON Therapists	7.5	6.4	6.2
Virginia OON Physician Assistants	3.1	0.4	0.3
Therapists OON Compared to Physician Assistants OON			
Virginia	2.4×	15.0×	18.1×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			Percent, %	
Virginia All Medical/Surgical Clinicians 116.6 119.7 122.3 Virginia All Behavioral Health Clinicians 80.5 92.2 111.9 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 29.9 9.3 Virginia 44.9 29.9 9.3 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 121.3 123.6 126.9 Virginia Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 78.9 95.2 110.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 121.3 123.6 126.9 Virginia Psychologists 38.8 92.6 108.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 44.7 33.5 17.1 All States 42.0 33.9 28.8 N		2019	2020	2021
Virginia All Behavioral Health Clinicians All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 44.9 29.9 9.3	Virginia All Medical/Surgical Clinicians	116.6	119.7	122.3
Behavioral Health Clinicians Virginia	Virginia All Behavioral Health Clinicians	80.5	92.2	111.9
All States 3.3.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists Virginia Medical/Surgical Specialist Physicians 121.3 123.6 126.9 Virginia Psychiatrists 78.9 95.2 110.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Virginia 53.6 29.8 14.5 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists Virginia Medical/Surgical Specialist Physicians Versus Psychologists Virginia Psychologists 83.8 92.6 108.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Virginia Psychologists 44.7 33.5 17.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses Virginia Nurse Practitioners Serimbursement Levels Compared to Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Virginia Assistants Versus Therapists Virginia Physician Assistants Versus Therapists Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists Virginia Formatic Nurse 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists Virginia Formatic Nurse 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists Virginia Formatic Nurse 79.7 91.1 113.3				
Medical/Surgical Specialist Physicians Versus Psychiatrists Virginia Medical/Surgical Specialist Physicians 121.3 123.6 126.9 Virginia Psychiatrists 78.9 95.2 110.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 53.6 29.8 14.5 Virginia 53.6 29.8 14.5 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 121.3 123.6 126.9 Virginia Medical/Surgical Specialist Physicians Versus Psychologists 83.8 92.6 108.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.8 92.6 108.4 Virginia Psychologists 44.7 33.5 17.1 17.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 78.1 92.8 101.2 Virginia Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 <t< td=""><td>Virginia</td><td>44.9</td><td>29.9</td><td>9.3</td></t<>	Virginia	44.9	29.9	9.3
Virginia Medical/Surgical Specialist Physicians 121.3 123.6 126.9 Virginia Psychiatrists 78.9 95.2 110.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 53.6 29.8 14.5 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 30.1 24.9 Virginia Medical/Surgical Specialist Physicians Versus Psychologists 83.8 92.6 108.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.8 92.6 108.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 44.7 33.5 17.1 Virginia 44.7 33.5 17.1 17.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 78.1 92.8 101.2 Virginia 45.0 37.8 29.5 All States 28.3 12.8 7	All States	33.3	25.7	21.7
Virginia Psychiatrists 78.9 95.2 110.9 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 53.6 29.8 14.5 Virginia 53.6 29.8 14.5 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists Virginia Medical/Surgical Specialist Physicians 121.3 123.6 126.9 Virginia Psychologists 83.8 92.6 108.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 44.7 33.5 17.1 Virginia 44.7 33.5 17.1 41 44.7 33.5 17.1 All States 42.0 33.9 28.8 28.8 Nurse Practitioners Versus Psychiatric Nurses 78.1 92.8 101.2 Virginia Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 78.1 92.8 101.2 Virginia 45.0 37.8 29.5 All States 28.3 12.8	Medical/Surgical Specialist Physicians Versus Psychiatrists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Virginia 53.6 29.8 14.5 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 121.3 123.6 126.9 Virginia Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 83.8 92.6 108.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 44.7 33.5 17.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 113.3 127.9 131.1 Virginia Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 78.1 92.8 101.2 Virginia 45.0 37.8 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists 79.7 91.1	Virginia Medical/Surgical Specialist Physicians	121.3	123.6	126.9
Virginia 53.6 29.8 14.5 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists Virginia Medical/Surgical Specialist Physicians 121.3 123.6 126.9 Virginia Psychologists 83.8 92.6 108.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 44.7 33.5 17.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses Virginia Nurse Practitioners 113.3 127.9 131.1 Virginia Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 78.1 92.8 101.2 Virginia 45.0 37.8 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 125.3 130.0 133.4 Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists 79.7 91.1 113.3	Virginia Psychiatrists	78.9	95.2	110.9
All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists Virginia Psychologists 83.8 92.6 108.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 33.8 92.6 108.4 Virginia 44.7 33.5 17.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 113.3 127.9 131.1 Virginia Nurse Practitioners 113.3 127.9 131.1 Virginia Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 37.8 29.5 Virginia 45.0 37.8 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 125.3 130.0 133.4 Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists 57.3 42.7 17.8	Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Medical/Surgical Specialist Physicians Versus Psychologists Virginia Medical/Surgical Specialist Physicians 121.3 123.6 126.9 Virginia Psychologists 83.8 92.6 108.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 44.7 33.5 17.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Virginia 45.0 37.8 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 125.3 130.0 133.4 Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists 57.3 42.7 17.8	Virginia	53.6	29.8	14.5
Virginia Medical/Surgical Specialist Physicians 121.3 123.6 126.9 Virginia Psychologists 83.8 92.6 108.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 108.4 108.4 Virginia 44.7 33.5 17.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 113.3 127.9 131.1 Virginia Nurse Practitioners 113.3 127.9 131.1 Virginia Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 128. 7.5 Virginia 45.0 37.8 29.5 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 125.3 130.0 133.4 Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists 57.3 42.7 17.8	All States	40.8	30.1	24.9
Virginia Psychologists 83.8 92.6 108.4 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 44.7 33.5 17.1 Virginia 44.7 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 Virginia Nurse Practitioners Versus Psychiatric Nurses 113.3 127.9 131.1 Virginia Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Virginia 45.0 37.8 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 125.3 130.0 133.4 Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists 57.3 42.7 17.8	Medical/Surgical Specialist Physicians Versus Psychologists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Virginia 44.7 33.5 17.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses Virginia Nurse Practitioners 113.3 127.9 131.1 Virginia Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Virginia 45.0 37.8 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Virginia Physician Assistants 125.3 130.0 133.4 Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists Virginia States 79.7 91.1 113.3	Virginia Medical/Surgical Specialist Physicians	121.3	123.6	126.9
to Psychologists Virginia 44.7 33.5 17.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 113.3 127.9 131.1 Virginia Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Virginia 45.0 37.8 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 125.3 130.0 133.4 Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists 57.3 42.7 17.8	Virginia Psychologists	83.8	92.6	108.4
All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 113.3 127.9 131.1 Virginia Nurse Practitioners 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 37.8 29.5 Virginia 45.0 37.8 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 125.3 130.0 133.4 Virginia Physician Assistants 125.3 130.0 133.4 Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists 57.3 42.7 17.8				
Nurse Practitioners Versus Psychiatric Nurses Virginia Nurse Practitioners Virginia Psychiatric Nurses Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Virginia Virginia 45.0 37.8 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Virginia Physician Assistants Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists Virginia 57.3 42.7 17.8	Virginia	44.7	33.5	17.1
Virginia Nurse Practitioners 113.3 127.9 131.1 Virginia Psychiatric Nurses 78.1 92.8 101.2 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 37.8 29.5 Virginia 45.0 37.8 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 125.3 130.0 133.4 Virginia Physician Assistants 125.3 130.0 133.4 Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists 57.3 42.7 17.8	All States	42.0	33.9	28.8
Virginia Psychiatric Nurses78.192.8101.2Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses37.829.5Virginia45.037.829.5All States28.312.87.5Physician Assistants Versus TherapistsVirginia Physician Assistants125.3130.0133.4Virginia Therapists79.791.1113.3Physician Assistants Reimbursement Levels Compared to TherapistsVirginia57.342.717.8	Nurse Practitioners Versus Psychiatric Nurses			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Virginia 45.0 37.8 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Virginia Physician Assistants 125.3 130.0 133.4 Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists Virginia 57.3 42.7 17.8	Virginia Nurse Practitioners	113.3	127.9	131.1
Nurses Virginia 45.0 37.8 29.5 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Virginia Physician Assistants 125.3 130.0 133.4 Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists 57.3 42.7 17.8	Virginia Psychiatric Nurses	78.1	92.8	101.2
All States 28.3 12.8 7.5 Physician Assistants Versus Therapists Virginia Physician Assistants 125.3 130.0 133.4 Virginia Therapists 79.7 91.1 113.3 Physician Assistants Reimbursement Levels Compared to Therapists Virginia 57.3 42.7 17.8				
Physician Assistants Versus TherapistsVirginia Physician Assistants125.3130.0133.4Virginia Therapists79.791.1113.3Physician Assistants Reimbursement Levels Compared to TherapistsVirginia57.342.717.8	Virginia	45.0	37.8	29.5
Virginia Physician Assistants125.3130.0133.4Virginia Therapists79.791.1113.3Physician Assistants Reimbursement Levels Compared to TherapistsVirginia57.342.717.8	All States	28.3	12.8	7.5
Virginia Therapists79.791.1113.3Physician Assistants Reimbursement Levels Compared to TherapistsVirginia57.342.717.8	Physician Assistants Versus Therapists			
Physician Assistants Reimbursement Levels Compared to Therapists Virginia 57.3 42.7 17.8	Virginia Physician Assistants	125.3	130.0	133.4
Virginia 57.3 42.7 17.8	Virginia Therapists	79.7	91.1	113.3
<u> </u>	Physician Assistants Reimbursement Levels Compared to Therapists			
All States 40.6 34.5 29.6	Virginia	57.3	42.7	17.8
	All States	40.6	34.5	29.6

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Virginia All Medical/Surgical Clinicians	122.3	106.1	133.8	227.0
Virginia All Behavioral Health Clinicians	111.9	93.2	100.0	139.3
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Virginia	9.3	13.9	33.8	63.0
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Virginia Medical/Surgical Specialist Physicians	126.9	113.5	148.8	244.3
Virginia Psychiatrists	110.9	111.0	125.5	184.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Virginia	14.5	2.3	18.6	32.4
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Virginia Medical/Surgical Specialist Physicians	126.9	113.5	148.8	244.3
Virginia Psychologists	108.4	102.2	105.9	212.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Virginia	17.1	11.1	40.5	63.0
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Virginia Nurse Practitioners	131.1	107.2	140.9	195.8
Virginia Psychiatric Nurses	101.2	91.6	99.4	149.6
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Virginia	29.5	17.1	41.8	30.9
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Virginia Physician Assistants	133.4	108.6	129.8	187.8
Virginia Therapists	113.3	86.2	97.6	109.3
Physician Assistants Reimbursement Levels Compared to Therapists				
Virginia	17.8	25.9	32.9	71.7

Appendix C-47: Washington Disparity Analysis, All Plans

Sample size in 2021: 174,145 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Washington OON Behavioral Health	13.1	14.5	13.5
Washington OON Medical/Surgical	0.8	1.7	0.8
Behavioral Health OON Compared to Medical/Surgical OON			
Washington	17.1×	8.5×	16.7×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Washington OON Behavioral Health	56.2	51.2	23.0
Washington OON Medical/Surgical	5.5	5.2	2.2
Behavioral Health OON Compared to Medical/Surgical OON			
Washington	10.2×	9.9×	10.5×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Washington OON Behavioral Health	45.6	39.3	52.9
Washington OON Medical/Surgical	4.0	7.1	4.4
Behavioral Health OON Compared to Medical/Surgical OON			
Washington	11.5×	5.5×	12.1×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Washington OON All Behavioral Health Clinicians	39.5	34.8	36.3
Washington OON All Medical/Surgical Clinicians	4.9	3.9	5.1
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Washington	8.0×	9.0×	7.1×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Washington OON Psychiatrists	40.1	31.9	36.0
Washington OON Medical/Surgical Specialist Physicians	3.0	2.7	2.3
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Washington	13.3×	11.8×	15.6×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Washington OON Psychologists	52.2	53.9	54.6
Washington OON Medical/Surgical Specialist Physicians	3.0	2.7	2.3
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Washington	17.4×	19.9×	23.7×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Washington OON Psychiatric Nurses	7.1	7.8	3.7
Washington OON Nurse Practitioners	2.5	2.3	1.5
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Washington	2.9×	3.4×	2.5×
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Washington OON Therapists	32.3	25.1	28.9
Washington OON Physician Assistants	0.4	0.1	0.6
Therapists OON Compared to Physician Assistants OON			
Washington	83.7×	391.8×	48.9×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test. Delta method standard errors were derived for the reimbursement ratios for medical/surgical and behavioral health. Reimbursement between medical/surgical and behavioral health was statistically tested using a two-tailed test. All differences tested in this table were statistically significant.

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Washington All Medical/Surgical Clinicians	147.5	146.2	152.4
Washington All Behavioral Health Clinicians	96.2	101.4	107.9
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Washington	53.3	44.2	41.3
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Washington Medical/Surgical Specialist Physicians	160.0	155.0	163.1
Washington Psychiatrists	115.0	117.3	128.4
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Washington	39.1	32.1	27.1
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Washington Medical/Surgical Specialist Physicians	160.0	155.0	163.1
Washington Psychologists	98.8	103.8	111.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Washington	61.9	49.4	46.6
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Washington Nurse Practitioners	148.3	153.4	159.0
Washington Psychiatric Nurses	106.6	120.7	128.4
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Washington	39.1	27.1	23.8
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Washington Physician Assistants	153.1	160.7	166.8
Washington Therapists	91.2	97.5	102.9
Physician Assistant Reimbursement Levels Compared to Therapists			
Washington	68.0	64.8	62.0
All States	40.6	34.5	29.6

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Washington All Medical/Surgical Clinicians	152.4	127.3	184.1	280.8
Washington All Behavioral Health Clinicians	107.9	77.7	99.1	174.8
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Washington	41.3	63.8	85.7	60.7
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Washington Medical/Surgical Specialist Physicians	163.1	156.3	202.6	296.7
Washington Psychiatrists	128.4	122.6	153.7	250.8
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Washington	27.1	27.5	31.8	18.3
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Washington Medical/Surgical Specialist Physicians	163.1	156.3	202.6	296.7
Washington Psychologists	111.3	98.5	119.5	252.4
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Washington	46.6	58.8	69.5	60.7
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Washington Nurse Practitioners	159.0	130.3	175.4	262.2
Washington Psychiatric Nurses	128.4	111.9	114.7	163.3
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Washington	23.8	16.4	52.9	60.6
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Washington Physician Assistants	166.8	137.9	180.6	258.4
Washington Therapists	102.9	73.9	84.6	114.0
Physician Assistants Reimbursement Levels Compared to Therapists				
Washington	62.0	86.7	113.3	126.6
All States	29.6	33.8	59.3	101.6

Appendix C-48: Washington, D.C. Disparity Analysis, All Plans

Sample size in 2021: 29,225 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Washington, D.C. OON Behavioral Health	4.1	2.0	4.5
Washington, D.C. OON Medical/Surgical	0.3	0.3	0.6
Behavioral Health OON Compared to Medical/Surgical OON			
Washington, D.C.	12.7×	7.0×	7.2×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Washington, D.C. OON Behavioral Health	25.0	37.3	27.9
Washington, D.C. OON Medical/Surgical	0.1	6.2	1.8
Behavioral Health OON Compared to Medical/Surgical OON			
Washington, D.C.	219.0×	6.0×	15.8×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Washington, D.C. OON Behavioral Health	12.7	11.6	21.9
Washington, D.C. OON Medical/Surgical	0.5	1.0	6.5
Behavioral Health OON Compared to Medical/Surgical OON			
Washington, D.C.	26.1×	11.2×	3.4×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Washington, D.C. OON All Behavioral Health Clinicians	19.5	17.2	15.3
Washington, D.C. OON All Medical/Surgical Clinicians	2.4	2.5	2.4
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Washington, D.C.	8.1×	6.8×	6.4×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Washington, D.C. OON Psychiatrists	21.1	19.0	18.6
Washington, D.C. OON Medical/Surgical Specialist Physicians	1.0	1.7	1.7
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Washington, D.C.	20.2×	11.4×	10.9×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Washington, D.C. OON Psychologists	18.9	18.5	16.5
Washington, D.C. OON Medical/Surgical Specialist Physicians	1.0	1.7	1.7
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Washington, D.C.	18.1×	11.1×	9.7×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Washington, D.C. OON Psychiatric Nurses	9.1	6.9	1.9
Washington, D.C. OON Nurse Practitioners	1.7	2.0	2.0
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Washington, D.C.	5.4×	3.4×	1.0×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Washington, D.C. OON Therapists	20.1	16.9	15.1
Washington, D.C. OON Physician Assistants	0.7	1.7	1.3
Therapists OON Compared to Physician Assistants OON			
Washington, D.C.	30.5×	9.7×	11.4×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Washington, D.C. All Medical/Surgical Clinicians	101.9	109.6	111.3
Washington, D.C. All Behavioral Health Clinicians	79.9	87.9	94.5
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Washington, D.C.	27.5	24.6	17.7
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Washington, D.C. Medical/Surgical Specialist Physicians	108.4	114.2	118.5
Washington, D.C. Psychiatrists	93.4	104.3	112.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Washington, D.C.	16.1	9.6	5.0
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Washington, D.C. Medical/Surgical Specialist Physicians	108.4	114.2	118.5
Washington, D.C. Psychologists	80.6	90.3	104.3
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Washington, D.C.	34.5	26.5	13.7
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Washington, D.C. Nurse Practitioners	102.3	110.2	120.5
Washington, D.C. Psychiatric Nurses	66.5	80.1	86.2
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Washington, D.C.	53.7	37.6	39.8
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Washington, D.C. Physician Assistants	114.2	143.5	153.4
Washington, D.C. Therapists	73.4	81.8	86.4
Physician Assistants Reimbursement Levels Compared to Therapists			
Washington, D.C.	55.5	75.5	77.5
All States	40.6	34.5	29.6

	Percentile, %				
	Average	50th (Median)	75th	95th	
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians					
Washington, D.C. All Medical/Surgical Clinicians	111.3	85.2	136.3	225.1	
Washington, D.C. All Behavioral Health Clinicians	94.5	68.7	95.1	188.5	
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians					
Washington, D.C.	17.7	24.0	43.3	19.4	
All States	21.7	26.6	48.0	70.4	
Medical/Surgical Specialist Physicians Versus Psychiatrists					
Washington, D.C. Medical/Surgical Specialist Physicians	118.5	105.0	146.0	240.9	
Washington, D.C. Psychiatrists	112.9	97.2	145.0	232.3	
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists					
Washington, D.C.	5.0	8.0	0.7	3.7	
All States	24.9	12.8	27.8	49.5	
Medical/Surgical Specialist Physicians Versus Psychologists					
Washington, D.C. Medical/Surgical Specialist Physicians	118.5	105.0	146.0	240.9	
Washington, D.C. Psychologists	104.3	96.4	113.0	272.9	
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists					
Washington, D.C.	13.7	8.9	29.2	19.4	
All States	28.8	17.3	44.0	38.5	
Nurse Practitioners Versus Psychiatric Nurses					
Washington, D.C. Nurse Practitioners	120.5	99.8	138.2	195.7	
Washington, D.C. Psychiatric Nurses	86.2	81.4	81.6	114.6	
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses					
Washington, D.C.	39.8	22.6	69.4	70.8	
All States	7.5	-1.1	18.4	34.3	
Physician Assistants Versus Therapists					
Washington, D.C. Physician Assistants	153.4	140.1	172.2	201.6	
Washington, D.C. Therapists	86.4	57.9	75.5	141.0	
Physician Assistant Reimbursement Levels Compared to Therapists					
Washington, D.C.	77.5	142.2	128.1	43.0	
All States	29.6	33.8	59.3	101.6	

Appendix C-49: West Virginia Disparity Analysis, All Plans

Sample size in 2021: 42,261 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
West Virginia OON Behavioral Health	10.0	9.8	7.9
West Virginia OON Medical/Surgical	0.4	0.5	0.9
Behavioral Health OON Compared to Medical/Surgical OON			
West Virginia	22.7×	19.2×	8.7×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
West Virginia OON Behavioral Health	50.7	22.3	48.3
West Virginia OON Medical/Surgical	0.4	0.5	1.7
Behavioral Health OON Compared to Medical/Surgical OON			
West Virginia	126.9×	40.8×	28.3×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
West Virginia OON Behavioral Health	54.1	1.5	3.2
West Virginia OON Medical/Surgical	4.2	1.6	0.3
Behavioral Health OON Compared to Medical/Surgical OON			
West Virginia	12.8×	0.9×*	9.7×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
West Virginia OON All Behavioral Health Clinicians	5.8	4.6	3.3
West Virginia OON All Medical/Surgical Clinicians	0.9	1.1	1.3
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
West Virginia	6.2×	4.2×	2.5×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
West Virginia OON Psychiatrists	3.1	3.6	2.6
West Virginia OON Medical/Surgical Specialist Physicians	0.9	0.9	1.3
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
West Virginia	3.4×	4.0×	2.1×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
West Virginia OON Psychologists	4.7	6.1	3.7
West Virginia OON Medical/Surgical Specialist Physicians	0.9	0.9	1.3
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
West Virginia	5.2×	6.7×	2.9×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
West Virginia OON Psychiatric Nurses	14.5	5.5	2.4
West Virginia OON Nurse Practitioners	1.0	1.5	1.2
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
West Virginia	14.9×	3.6×	2.0×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
West Virginia OON Therapists	8.2	4.3	3.4
West Virginia OON Physician Assistants	1.0	1.4	1.3
Therapists OON Compared to Physician Assistants OON			
West Virginia	8.2×	3.2×	2.5×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			Percent, %	
West Virginia All Medical/Surgical Clinicians 125.3 127.0 132.1 West Virginia All Behavioral Health Clinicians 110.2 115.6 124.5 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 8 6.1 West Virginia 13.6 9.8 6.1 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 24.0 125.7 130.6 West Virginia Psychiatrists 99.5 100.8 111.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 24.6 24.7 16.8 West Virginia 24.6 24.7 16.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 124.0 125.7 130.6 West Virginia Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 10.8 9.1 West Virginia 9.1 10.8 9.1 All States <t< th=""><th></th><th>2019</th><th>2020</th><th>2021</th></t<>		2019	2020	2021
West Virginia All Behavioral Health Clinicians 110.2 115.6 124.5 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 8 6.1 West Virginia 13.6 9.8 6.1 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists 124.0 125.7 130.6 West Virginia Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 124.0 125.7 16.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 124.0 125.7 130.6 West Virginia Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 10.8 9.1 West Virginia Psychologists 110.8 9.1 10.8 9.1 Mest Virginia Nurse Practitioners 9.1 10.8 9.1 10.8	All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians 13.6 9.8 6.1	West Virginia All Medical/Surgical Clinicians	125.3	127.0	132.1
Mest Virginia 13.6 9.8 6.1 All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists West Virginia Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 124.0 125.7 130.6 West Virginia Psychiatrists 99.5 100.8 111.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 40.8 30.1 24.9 West Virginia Medical/Surgical Specialist Physicians Versus Psychologists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 124.0 125.7 130.6 West Virginia Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 9.1 10.8 9.1 West Virginia Psychologists 9.1 10.8 9.1 Mest Virginia Nurse Practitioners 128.1 129.6 139.1 West Virginia Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 70.3 96.1 104.4	West Virginia All Behavioral Health Clinicians	110.2	115.6	124.5
All States 33.3 25.7 21.7 Medical/Surgical Specialist Physicians Versus Psychiatrists West Virginia Medical/Surgical Specialist Physicians 124.0 125.7 130.6 West Virginia Psychiatrists 99.5 100.8 111.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists West Virginia Psychiatrists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists West Virginia Medical/Surgical Specialist Physicians 124.0 125.7 130.6 West Virginia Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists West Virginia Psychologists 9.1 10.8 9.1 All States 42.0 33.9 28.8 West Virginia Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 128.1 129.6 139.1 West Virginia Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Physician Assistants Versus Therapists 132.3 135.3 144.5 West Virginia Physician Assistants Reimbursement Levels Compared to Therapists 118.0 126.2 133.4 Physician Assistants Reimbursement Levels Compared to Therapists 12.1 7.3 8.3 West Virginia Resistants Reimbursement Levels Compared to Therapists 12.1 7.3 8.3 West Virginia Resistants Reimbursement Levels Compared to Therapists 12.1 7.3 8.3 West Virginia Resistants Reimbursement Levels Compared to Therapists 12.1 7.3 8.3 West Virginia Resistants Reimbursement Levels Compared to Therapists 12.1 7.3 8.3 West Virginia Therapista 12.1 7.3 8.3				
Medical/Surgical Specialist Physicians Versus Psychiatrists West Virginia Medical/Surgical Specialist Physicians 124.0 125.7 130.6 West Virginia Psychiatrists 99.5 100.8 111.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 24.6 24.7 16.8 West Virginia 24.6 24.7 16.8 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists West Virginia Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 124.0 125.7 130.6 West Virginia Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 9.1 10.8 9.1 West Virginia 9.1 10.8 9.1 10.8 9.1 Murse Practitioners Versus Psychiatric Nurses West Virginia Nurse Practitioners Neimbursement Levels Compared to Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 82.4 34.8 33.3 All States	West Virginia	13.6	9.8	6.1
West Virginia Medical/Surgical Specialist Physicians 124.0 125.7 130.6 West Virginia Psychiatrists 99.5 100.8 111.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 24.6 24.7 16.8 West Virginia 24.6 24.7 16.8 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists West Virginia Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 9.1 10.8 9.1 West Virginia Psychologists 9.1 10.8 9.1 Mest Virginia Nurse Practitioners Versus Psychiatric Nurses 9.1 10.8 9.1 West Virginia Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 82.4 34.8 33.3 All States 82.4 34.8 33.3 All States 82.4 34.8 33.3	All States	33.3	25.7	21.7
West Virginia Psychiatrists 99.5 100.8 111.8 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 24.6 24.7 16.8 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 124.0 125.7 130.6 West Virginia Medical/Surgical Specialist Physicians 124.0 125.7 130.6 West Virginia Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 9.1 10.8 9.1 West Virginia 9.1 10.8 9.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 West Virginia Nurse Practitioners 128.1 129.6 139.1 West Virginia Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 28.3 12.8 7.5 Physician Assistants Versus Therapists 132.3 135.3 144.5 West Virginia Physician Assistants 132.3 135.3	Medical/Surgical Specialist Physicians Versus Psychiatrists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists West Virginia 24.6 24.7 16.8 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists 124.0 125.7 130.6 West Virginia Medical/Surgical Specialist Physicians Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 9.1 10.8 9.1 West Virginia 9.1 10.8 9.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 70.3 96.1 104.4 West Virginia Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 82.4 34.8 33.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 132.3 135.3 144.5 West Virginia Therapists 118.0 126.2 133.4 Physician Assistants Reimbursement Levels Compared to Therapists<	West Virginia Medical/Surgical Specialist Physicians	124.0	125.7	130.6
West Virginia 24.6 24.7 16.8 All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists West Virginia Medical/Surgical Specialist Physicians 124.0 125.7 130.6 West Virginia Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 9.1 10.8 9.1 West Virginia 9.1 10.8 9.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 82.4 34.8 33.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 132.3 135.3 144.5 West Virginia Therapists 118.0 126	West Virginia Psychiatrists	99.5	100.8	111.8
All States 40.8 30.1 24.9 Medical/Surgical Specialist Physicians Versus Psychologists West Virginia Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 113.7 113.4 119.7 West Virginia Specialist Physicians Reimbursement Levels Compared to Psychologists 9.1 10.8 9.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 82.4 34.8 33.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 132.3 135.3 144.5 West Virginia Therapists 118.0 126.2 133.4 Physician Assistants Reimbursement Levels Compared to Therapists 12.1 7.3 8.3				
Medical/Surgical Specialist Physicians Versus Psychologists West Virginia Medical/Surgical Specialist Physicians 124.0 125.7 130.6 West Virginia Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 113.7 110.8 9.1 West Virginia 9.1 10.8 9.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 128.1 129.6 139.1 West Virginia Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 82.4 34.8 33.3 West Virginia 82.4 34.8 33.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 132.3 135.3 144.5 West Virginia Therapists 118.0 126.2 133.4 Physician Assistants Reimbursement Levels Compared to Therapists 12.1 7.3 8.3	West Virginia	24.6	24.7	16.8
West Virginia Medical/Surgical Specialist Physicians 124.0 125.7 130.6 West Virginia Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 110.8 1	All States	40.8	30.1	24.9
West Virginia Psychologists 113.7 113.4 119.7 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 9.1 10.8 9.1 West Virginia 9.1 10.8 9.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 42.0 33.9 28.8 West Virginia Nurse Practitioners Versus Psychiatric Nurses 70.3 96.1 139.1 West Virginia Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 82.4 34.8 33.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 28.3 12.8 7.5 West Virginia Physician Assistants 132.3 135.3 144.5 West Virginia Therapists 118.0 126.2 133.4 Physician Assistants Reimbursement Levels Compared to Therapists West Virginia 12.1 7.3 8.3	Medical/Surgical Specialist Physicians Versus Psychologists			
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to PsychologistsWest Virginia9.110.89.1All States42.033.928.8Nurse Practitioners Versus Psychiatric NursesWest Virginia Nurse Practitioners128.1129.6139.1West Virginia Psychiatric Nurses70.396.1104.4Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses82.434.833.3All States28.312.87.5Physician Assistants Versus TherapistsWest Virginia Physician Assistants132.3135.3144.5West Virginia Therapists118.0126.2133.4Physician Assistants Reimbursement Levels Compared to Therapists12.17.38.3	West Virginia Medical/Surgical Specialist Physicians	124.0	125.7	130.6
to Psychologists West Virginia 9.1 10.8 9.1 All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses 128.1 129.6 139.1 West Virginia Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 82.4 34.8 33.3 West Virginia 82.4 34.8 33.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 132.3 135.3 144.5 West Virginia Physician Assistants 132.3 135.3 144.5 Physician Assistants Reimbursement Levels Compared to Therapists 118.0 126.2 133.4 Physician Assistants Reimbursement Levels Compared to Therapists 12.1 7.3 8.3	West Virginia Psychologists	113.7	113.4	119.7
All States 42.0 33.9 28.8 Nurse Practitioners Versus Psychiatric Nurses West Virginia Nurse Practitioners 128.1 129.6 139.1 West Virginia Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 82.4 34.8 33.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists West Virginia Physician Assistants 132.3 135.3 144.5 West Virginia Therapists 118.0 126.2 133.4 Physician Assistants Reimbursement Levels Compared to Therapists 12.1 7.3 8.3				
Nurse Practitioners Versus Psychiatric NursesWest Virginia Nurse Practitioners128.1129.6139.1West Virginia Psychiatric Nurses70.396.1104.4Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses82.434.833.3All States28.312.87.5Physician Assistants Versus TherapistsWest Virginia Physician Assistants132.3135.3144.5West Virginia Therapists118.0126.2133.4Physician Assistants Reimbursement Levels Compared to TherapistsWest Virginia12.17.38.3	West Virginia	9.1	10.8	9.1
West Virginia Nurse Practitioners 128.1 129.6 139.1 West Virginia Psychiatric Nurses 70.3 96.1 104.4 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 82.4 34.8 33.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists 132.3 135.3 144.5 West Virginia Physician Assistants 132.3 135.3 144.5 West Virginia Therapists 118.0 126.2 133.4 Physician Assistants Reimbursement Levels Compared to Therapists 12.1 7.3 8.3	All States	42.0	33.9	28.8
West Virginia Psychiatric Nurses70.396.1104.4Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses82.434.833.3West Virginia82.434.833.3All States28.312.87.5Physician Assistants Versus TherapistsWest Virginia Physician Assistants132.3135.3144.5West Virginia Therapists118.0126.2133.4Physician Assistants Reimbursement Levels Compared to TherapistsWest Virginia12.17.38.3	Nurse Practitioners Versus Psychiatric Nurses			
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses West Virginia 82.4 34.8 33.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists West Virginia Physician Assistants 132.3 135.3 144.5 West Virginia Therapists 118.0 126.2 133.4 Physician Assistants Reimbursement Levels Compared to Therapists West Virginia 12.1 7.3 8.3	West Virginia Nurse Practitioners	128.1	129.6	139.1
Nurses West Virginia 82.4 34.8 33.3 All States 28.3 12.8 7.5 Physician Assistants Versus Therapists West Virginia Physician Assistants 132.3 135.3 144.5 West Virginia Therapists 118.0 126.2 133.4 Physician Assistants Reimbursement Levels Compared to Therapists 12.1 7.3 8.3	West Virginia Psychiatric Nurses	70.3	96.1	104.4
All States 28.3 12.8 7.5 Physician Assistants Versus Therapists West Virginia Physician Assistants 132.3 135.3 144.5 West Virginia Therapists 118.0 126.2 133.4 Physician Assistants Reimbursement Levels Compared to Therapists West Virginia 12.1 7.3 8.3	· · · · · · · · · · · · · · · · · · ·			
Physician Assistants Versus TherapistsWest Virginia Physician Assistants132.3135.3144.5West Virginia Therapists118.0126.2133.4Physician Assistants Reimbursement Levels Compared to TherapistsWest Virginia12.17.38.3	West Virginia	82.4	34.8	33.3
West Virginia Physician Assistants132.3135.3144.5West Virginia Therapists118.0126.2133.4Physician Assistants Reimbursement Levels Compared to TherapistsWest Virginia12.17.38.3	All States	28.3	12.8	7.5
West Virginia Therapists 118.0 126.2 133.4 Physician Assistants Reimbursement Levels Compared to Therapists West Virginia 12.1 7.3 8.3	Physician Assistants Versus Therapists			
Physician Assistants Reimbursement Levels Compared to Therapists West Virginia 12.1 7.3 8.3	West Virginia Physician Assistants	132.3	135.3	144.5
West Virginia 12.1 7.3 8.3	West Virginia Therapists	118.0	126.2	133.4
	Physician Assistants Reimbursement Levels Compared to Therapists			
All States 40.6 34.5 29.6	West Virginia	12.1	7.3	8.3
	All States	40.6	34.5	29.6

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
West Virginia All Medical/Surgical Clinicians	132.1	112.4	149.6	262.9
West Virginia All Behavioral Health Clinicians	124.5	112.8	125.6	163.3
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
West Virginia	6.1	-0.4	19.2	61.0
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
West Virginia Medical/Surgical Specialist Physicians	130.6	120.0	165.8	267.6
West Virginia Psychiatrists	111.8	110.2	129.5	178.1
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
West Virginia	16.8	8.9	28.1	50.3
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
West Virginia Medical/Surgical Specialist Physicians	130.6	120.0	165.8	267.6
West Virginia Psychologists	119.7	113.5	125.9	213.0
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
West Virginia	9.1	5.7	31.8	61.0
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
West Virginia Nurse Practitioners	139.1	111.5	144.5	209.0
West Virginia Psychiatric Nurses	104.4	91.3	101.7	129.1
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
West Virginia	33.3	22.1	42.1	61.9
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
West Virginia Physician Assistants	144.5	116.4	148.6	211.9
West Virginia Therapists	133.4	112.8	114.3	127.7
Physician Assistant Reimbursement Levels Compared to Therapists				
	_			
West Virginia	8.3	3.2	30.0	65.9

Appendix C-50: Wisconsin Disparity Analysis, All Plans

Sample size in 2021: 100,617 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Wisconsin OON Behavioral Health	6.3	4.0	4.8
Wisconsin OON Medical/Surgical	3.7	1.9	2.7
Behavioral Health OON Compared to Medical/Surgical OON			
Wisconsin	1.7×	2.1×	1.8×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Wisconsin OON Behavioral Health	25.6	33.2	64.7
Wisconsin OON Medical/Surgical	2.6	1.0	4.3
Behavioral Health OON Compared to Medical/Surgical OON			
Wisconsin	9.8×	33.2×	15.0×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Wisconsin OON Behavioral Health	11.8	5.0	5.2
Wisconsin OON Medical/Surgical	4.0	3.0	4.2
Behavioral Health OON Compared to Medical/Surgical OON			
Wisconsin	2.9×	1.6×	1.3×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Wisconsin OON All Behavioral Health Clinicians	4.8	3.5	3.1
Wisconsin OON All Medical/Surgical Clinicians	2.1	2.0	2.1
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Wisconsin	2.3×	1.7×	1.5×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Wisconsin OON Psychiatrists	3.0	2.1	1.9
Wisconsin OON Medical/Surgical Specialist Physicians	1.2	0.9	1.0
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Wisconsin	2.6×	2.4×	1.9×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Wisconsin OON Psychologists	5.3	4.6	5.3
Wisconsin OON Medical/Surgical Specialist Physicians	1.2	0.9	1.0
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Wisconsin	4.5×	5.2×	5.2×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Wisconsin OON Psychiatric Nurses	0.5	n/a	n/a
Wisconsin OON Nurse Practitioners	1.0	n/a	n/a
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Wisconsin	0.5×*	n/a	n/a
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Wisconsin OON Therapists	6.1	4.0	3.1
Wisconsin OON Physician Assistants	0.8	0.9	1.1
Therapists OON Compared to Physician Assistants OON			
Wisconsin	7.9×	4.6×	2.9×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{\}star}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Wisconsin All Medical/Surgical Clinicians	220.8	227.3	218.8
Wisconsin All Behavioral Health Clinicians	135.4	138.5	128.3
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Wisconsin	63.1	64.1	70.5
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Wisconsin Medical/Surgical Specialist Physicians	232.9	242.3	233.1
Wisconsin Psychiatrists	132.7	134.3	125.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Wisconsin	75.4	80.4	85.7
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Wisconsin Medical/Surgical Specialist Physicians	232.9	242.3	233.1
Wisconsin Psychologists	136.1	139.2	129.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Wisconsin	71.1	74.1	79.7
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Wisconsin Nurse Practitioners	216.9	219.6	214.7
Wisconsin Psychiatric Nurses	115.9	113.5	132.7
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Wisconsin	87.1	93.5	61.8
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Wisconsin Physician Assistants	227.8	236.6	231.6
Wisconsin Therapists	137.8	142.5	129.7
Physician Assistants Reimbursement Levels Compared to Therapists			
Wisconsin	65.3	66.0	78.6
All States	40.6	34.5	29.6

All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians Wisconsin All Medical/Surgical Clinicians 218.8 189.7 252.1 507 Wisconsin All Behavioral Health Clinicians 128.3 90.8 125.8 258 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Wisconsin 70.5 109.0 100.4 96 All States 21.7 26.6 48.0 70	5.2
Health CliniciansWisconsin All Medical/Surgical Clinicians218.8189.7252.1507Wisconsin All Behavioral Health Clinicians128.390.8125.8258All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians70.5109.0100.496Wisconsin70.5109.0100.496All States21.726.648.070	5.2
Wisconsin All Behavioral Health Clinicians 128.3 90.8 125.8 255 All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Wisconsin 70.5 109.0 100.4 96 All States 21.7 26.6 48.0 70	5.2
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Wisconsin 70.5 109.0 100.4 96 All States 21.7 26.6 48.0 70	5.4).4).9
Compared to All Behavioral Health Clinicians Wisconsin 70.5 109.0 100.4 96 All States 21.7 26.6 48.0 70).4
All States 21.7 26.6 48.0 70).4
).9
Medical/Surgical Specialist Physicians Versus Psychiatrists	
Wisconsin Medical/Surgical Specialist Physicians 233.1 222.7 309.4 620	
Wisconsin Psychiatrists 125.5 110.0 152.4 248	4.ز
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists	
Wisconsin 85.7 102.4 103.0 149).9
All States 24.9 12.8 27.8 49	9.5
Medical/Surgical Specialist Physicians Versus Psychologists	
Wisconsin Medical/Surgical Specialist Physicians 233.1 222.7 309.4 620).9
Wisconsin Psychologists 129.7 95.2 140.3 402	2.1
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists	
Wisconsin 79.7 133.9 120.6 96	6.4
All States 28.8 17.3 44.0 38	3.5
Nurse Practitioners Versus Psychiatric Nurses	
Wisconsin Nurse Practitioners 214.7 177.4 227.5 37	.4
Wisconsin Psychiatric Nurses 132.7 103.3 131.1 209).4
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses	
Wisconsin 61.8 71.8 73.6 77	7.3
All States 7.5 -1.1 18.4 34	1.3
Physician Assistants Versus Therapists	
Wisconsin Physician Assistants 231.6 196.5 235.2 416	3.9
Wisconsin Therapists 129.7 89.5 99.6 238	3.5
Physician Assistants Reimbursement Levels Compared to Therapists	
Wisconsin 78.6 119.5 136.2 74	1.8
All States 29.6 33.8 59.3 10 ⁻²	.6

Appendix C-51: Wyoming Disparity Analysis, All Plans

Sample size in 2021: 7,414 covered lives

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Wyoming OON Behavioral Health	9.6	18.5	13.4
Wyoming OON Medical/Surgical	1.1	3.3	2.4
Behavioral Health OON Compared to Medical/Surgical OON			
Wyoming	8.8×	5.7×	5.6×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Wyoming OON Behavioral Health	12.6	n/a	64.7
Wyoming OON Medical/Surgical	0.4	n/a	4.3
Behavioral Health OON Compared to Medical/Surgical OON			
Wyoming	33.1×	n/a	15.0×*
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Wyoming OON Behavioral Health	72.6	42.9	23.6
Wyoming OON Medical/Surgical	0.6	2.9	6.2
Behavioral Health OON Compared to Medical/Surgical OON			
Wyoming	114.7×	14.9×	3.8×
All States	3.5×	1.7×	1.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - All Behavioral Health Clinicians Versus All Medical/Surgical Clinicians			
Wyoming OON All Behavioral Health Clinicians	17.0	13.6	8.8
Wyoming OON All Medical/Surgical Clinicians	2.9	4.0	3.8
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Wyoming	5.8×	3.4×	2.3×
All States	3.9×	3.9×	3.5×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatrists Versus Medical/Surgical Specialist Physicians			
Wyoming OON Psychiatrists	18.3	14.5	6.6
Wyoming OON Medical/Surgical Specialist Physicians	1.9	2.0	2.9
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Wyoming	9.4×	7.4×	2.3×
All States	9.0×	8.7×	8.9×
Parity Would Be	1.0×	1.0×	1.0×

	Percent, %		
	2019	2020	2021
Office Visits - Psychologists Versus Medical/Surgical Specialist Physicians			
Wyoming OON Psychologists	10.0	15.7	9.8
Wyoming OON Medical/Surgical Specialist Physicians	1.9	2.0	2.9
Psychologists OON Compared to Medical/Surgical Specialist Physicians OON			
Wyoming	5.1×	8.0×	3.3×
All States	10.9×	9.4×	10.6×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Psychiatric Nurses Versus Nurse Practitioners			
Wyoming OON Psychiatric Nurses	40.0	11.8	2.4
Wyoming OON Nurse Practitioners	2.1	2.8	3.0
Psychiatric Nurses OON Compared to Nurse Practitioners OON			
Wyoming	18.7×	4.2×	0.8×*
All States	5.2×	5.4×	1.7×
Parity Would Be	1.0×	1.0×	1.0×
Office Visits - Therapists Versus Physician Assistants			
Wyoming OON Therapists	18.0	13.1	8.9
Wyoming OON Physician Assistants	1.0	1.6	2.4
Therapists OON Compared to Physician Assistants OON			
Wyoming	17.2×	8.3×	3.8×
All States	5.5×	4.7×	4.1×
Parity Would Be	1.0×	1.0×	1.0×

 $^{^{*}}$ Out-of-network use is not statistically different between medical/surgical and behavioral health at a p < .05. n/a = Data not available.

Out-of-network use between medical/surgical and behavioral health was statistically tested using a two-tailed test.

		Percent, %	
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Wyoming All Medical/Surgical Clinicians	164.9	171.0	173.6
Wyoming All Behavioral Health Clinicians	121.1	122.2	129.3
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Wyoming	36.2	40.0	34.3
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Wyoming Medical/Surgical Specialist Physicians	166.0	172.9	178.6
Wyoming Psychiatrists	129.7	116.7	131.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Wyoming	28.0	48.1	36.1
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Wyoming Medical/Surgical Specialist Physicians	166.0	172.9	178.6
Wyoming Psychologists	103.7	104.9	111.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Wyoming	60.1	64.8	60.1
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Wyoming Nurse Practitioners	151.9	156.6	166.9
Wyoming Psychiatric Nurses	115.0	112.2	149.9
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Wyoming	32.1	39.6	11.3
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Wyoming Physician Assistants	162.4	167.6	169.8
Wyoming Therapists	124.9	127.9	132.8
Physician Assistants Reimbursement Levels Compared to Therapists			
Wyoming	30.1	31.0	27.9
All States	40.6	34.5	29.6

Autorage		Percentile, %			
Wyoming All Medical/Surgical Clinicians 173.6 158.3 167.1 392.7		Average		75th	95th
Wyoming All Behavioral Health Clinicians 129.3 101.7 124.9 160.6					
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians Wyoming 34.3 55.6 33.8 144.6 All States 21.7 26.6 48.0 70.4 Medical/Surgical Specialist Physicians Versus Psychiatrists Wyoming Medical/Surgical Specialist Physicians 178.6 160.3 201.5 493.0 Wyoming Psychiatrists 131.2 132.7 161.0 259.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Wyoming All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Wyoming Medical/Surgical Specialist Physicians Versus Psychologists Wyoming Psychologists 111.5 104.0 136.8 159.0 Medical/Surgical Specialist Physicians 178.6 160.3 201.5 493.0 Wyoming Psychologists 111.5 104.0 136.8 159.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Wyoming All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Wyoming Nurse Practitioners 166.9 149.9 161.0 273.6 Wyoming Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Wyoming 11.3 23.0 -2.8 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Wyoming Physician Assistants 169.8 150.1 161.3 268.3 Wyoming Therapists 132.8 98.8 118.6 160.3 Physician Assistants Reimbursement Levels Compared to Therapists Wyoming Horapists Wyoming 17.9 51.9 36.0 67.4	Wyoming All Medical/Surgical Clinicians	173.6	158.3	167.1	392.7
Myoming	Wyoming All Behavioral Health Clinicians	129.3	101.7	124.9	160.6
All States					
Medical/Surgical Specialist Physicians Versus Psychiatrists Wyoming Medical/Surgical Specialist Physicians 178.6 160.3 201.5 493.0 Wyoming Psychiatrists 131.2 132.7 161.0 259.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 36.1 20.8 25.2 90.4 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 160.3 201.5 493.0 Wyoming Medical/Surgical Specialist Physicians Versus Psychologists 178.6 160.3 201.5 493.0 Wyoming Psychologists 111.5 104.0 136.8 159.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 493.0 493.0 493.0 Wyoming 60.1 54.1 47.3 144.6 418.5 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 49.9 161.0 273.6 Wyoming Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses <td>Wyoming</td> <td>34.3</td> <td>55.6</td> <td>33.8</td> <td>144.6</td>	Wyoming	34.3	55.6	33.8	144.6
Psychiatrists Wyoming Medical/Surgical Specialist Physicians 178.6 160.3 201.5 493.0 Wyoming Psychiatrists 131.2 132.7 161.0 259.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 8 25.2 90.4 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 8 28.8 49.5 Wyoming Medical/Surgical Specialist Physicians Psychologists 111.5 104.0 136.8 159.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 111.5 104.0 136.8 159.0 Myoming Psychologists 60.1 54.1 47.3 144.6 441.8 441.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 166.9 149.9 161.0 273.6 Wyoming Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels	All States	21.7	26.6	48.0	70.4
Wyoming Psychiatrists 131.2 132.7 161.0 259.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists 36.1 20.8 25.2 90.4 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Wyoming Medical/Surgical Specialist Physicians 178.6 160.3 201.5 493.0 Wyoming Psychologists 111.5 104.0 136.8 159.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 493.0 493.0 493.0 Wyoming 60.1 54.1 47.3 144.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 49.9 161.0 273.6 Wyoming Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 169.8 150.1 161.3 268.3 Wyoming Physician Assistan					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists Wyoming 36.1 20.8 25.2 90.4 All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists Vyoming Medical/Surgical Specialist Physicians 178.6 160.3 201.5 493.0 Wyoming Psychologists 111.5 104.0 136.8 159.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 47.3 144.6 Wyoming 60.1 54.1 47.3 144.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 166.9 149.9 161.0 273.6 Wyoming Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 169.8 150.1	Wyoming Medical/Surgical Specialist Physicians	178.6	160.3	201.5	493.0
Number N		131.2	132.7	161.0	259.0
All States 24.9 12.8 27.8 49.5 Medical/Surgical Specialist Physicians Versus Psychologists 178.6 160.3 201.5 493.0 Wyoming Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 111.5 104.0 136.8 159.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 60.1 54.1 47.3 144.6 Myoming 60.1 54.1 47.3 144.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 166.9 149.9 161.0 273.6 Wyoming Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels 20 23.0 -2.8 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 169.8 150.1 161.3 268.3 Wyoming Physician Assistants Reimbursement Levels Compared to Therapists 132.8 98.8 118.6 160.3 Physician					
Medical/Surgical Specialist Physicians Versus Psychologists Wyoming Medical/Surgical Specialist Physicians Wyoming Psychologists 111.5 104.0 136.8 159.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 47.3 144.6 Wyoming 60.1 54.1 47.3 144.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 46.9 149.9 161.0 273.6 Wyoming Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Therapists 166.9 149.9 161.0 23.0 -2.8 27.7	Wyoming	36.1	20.8	25.2	90.4
Psychologists Wyoming Medical/Surgical Specialist Physicians 178.6 160.3 201.5 493.0 Wyoming Psychologists 111.5 104.0 136.8 159.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 159.0 Wyoming 60.1 54.1 47.3 144.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 166.9 149.9 161.0 273.6 Wyoming Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 -2.8 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 169.8 150.1 161.3 268.3 Wyoming Therapists 132.8 98.8 118.6 160.3 Physician Assistants Reimbursement Levels Compared to Therapists 27.9 51.9 36.0 67.4	All States	24.9	12.8	27.8	49.5
Wyoming Psychologists 111.5 104.0 136.8 159.0 Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists 8 159.0 149.0 147.3 144.6 146.0 149.0 144.0 38.5 144.6 38.5 144.0 38.5 149.0 161.0 273.6 166.9 149.9 161.0 273.6 166.9 149.9 161.0 273.6 166.9 149.9 161.0 273.6 165.6 214.3 165.6					
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists Wyoming 60.1 54.1 47.3 144.6 All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses 166.9 149.9 161.0 273.6 Wyoming Nurse Practitioners 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 20 22.8 27.7 Wyoming 11.3 23.0 -2.8 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 169.8 150.1 161.3 268.3 Wyoming Physician Assistants 169.8 150.1 161.3 268.3 Physician Assistants Reimbursement Levels Compared to Therapists 132.8 98.8 118.6 160.3 Wyoming 27.9 51.9 36.0 67.4	Wyoming Medical/Surgical Specialist Physicians	178.6	160.3	201.5	493.0
Nurse Practitioners Versus Psychiatric Nurses 166.9 149.9 161.0 273.6	Wyoming Psychologists	111.5	104.0	136.8	159.0
All States 28.8 17.3 44.0 38.5 Nurse Practitioners Versus Psychiatric Nurses Wyoming Nurse Practitioners 166.9 149.9 161.0 273.6 Wyoming Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Wyoming 11.3 23.0 -2.8 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Wyoming Physician Assistants 169.8 150.1 161.3 268.3 Wyoming Therapists 132.8 98.8 118.6 160.3 Physician Assistants Reimbursement Levels Compared to Therapists Wyoming 27.9 51.9 36.0 67.4					
Nurse Practitioners Versus Psychiatric Nurses Wyoming Nurse Practitioners 166.9 149.9 161.0 273.6 Wyoming Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 -2.8 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 169.8 150.1 161.3 268.3 Wyoming Physician Assistants 169.8 150.1 161.3 268.3 Wyoming Therapists 132.8 98.8 118.6 160.3 Physician Assistants Reimbursement Levels Compared to Therapists 27.9 51.9 36.0 67.4	Wyoming	60.1	54.1	47.3	144.6
Wyoming Nurse Practitioners 166.9 149.9 161.0 273.6 Wyoming Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 23.0 -2.8 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists 169.8 150.1 161.3 268.3 Wyoming Physician Assistants 169.8 150.1 161.3 268.3 Physician Assistants Reimbursement Levels Compared to Therapists 27.9 51.9 36.0 67.4 Wyoming 27.9 51.9 36.0 67.4	All States	28.8	17.3	44.0	38.5
Wyoming Psychiatric Nurses 149.9 121.8 165.6 214.3 Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses 214.3 23.0 -2.8 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Wyoming Physician Assistants 169.8 150.1 161.3 268.3 Wyoming Therapists 132.8 98.8 118.6 160.3 Physician Assistants Reimbursement Levels Compared to Therapists 27.9 51.9 36.0 67.4 Wyoming 27.9 51.9 36.0 67.4	Nurse Practitioners Versus Psychiatric Nurses				
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses Wyoming 11.3 23.0 -2.8 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Wyoming Physician Assistants 169.8 150.1 161.3 268.3 Wyoming Therapists 132.8 98.8 118.6 160.3 Physician Assistants Reimbursement Levels Compared to Therapists 27.9 51.9 36.0 67.4 Wyoming 27.9 51.9 36.0 67.4	Wyoming Nurse Practitioners	166.9	149.9	161.0	273.6
Compared to Psychiatric Nurses Wyoming 11.3 23.0 -2.8 27.7 All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Wyoming Physician Assistants 169.8 150.1 161.3 268.3 Wyoming Therapists 132.8 98.8 118.6 160.3 Physician Assistants Reimbursement Levels Compared to Therapists 27.9 51.9 36.0 67.4	Wyoming Psychiatric Nurses	149.9	121.8	165.6	214.3
All States 7.5 -1.1 18.4 34.3 Physician Assistants Versus Therapists Wyoming Physician Assistants 169.8 150.1 161.3 268.3 Wyoming Therapists 132.8 98.8 118.6 160.3 Physician Assistants Reimbursement Levels Compared to Therapists 27.9 51.9 36.0 67.4					
Physician Assistants Versus TherapistsWyoming Physician Assistants169.8150.1161.3268.3Wyoming Therapists132.898.8118.6160.3Physician Assistants Reimbursement Levels Compared to Therapists27.951.936.067.4	Wyoming	11.3	23.0	-2.8	27.7
Wyoming Physician Assistants 169.8 150.1 161.3 268.3 Wyoming Therapists 132.8 98.8 118.6 160.3 Physician Assistants Reimbursement Levels Compared to Therapists Wyoming 27.9 51.9 36.0 67.4	All States	7.5	-1.1	18.4	34.3
Wyoming Therapists 132.8 98.8 118.6 160.3 Physician Assistants Reimbursement Levels Compared to Therapists Wyoming 27.9 51.9 36.0 67.4	Physician Assistants Versus Therapists				
Physician Assistants Reimbursement Levels Compared to Therapists Wyoming 27.9 51.9 36.0 67.4	Wyoming Physician Assistants	169.8	150.1	161.3	268.3
Wyoming 27.9 51.9 36.0 67.4	, ,	132.8	98.8	118.6	160.3
All States 29.6 33.8 59.3 101.6	Wyoming	27.9	51.9	36.0	67.4
	All States	29.6	33.8	59.3	101.6