Re: Recommendations for Changes to NAIC's Network Adequacy Model Act

Mr. J.P. Wieske  
Wisconsin Office of the Commissioner of Insurance  
Chair, NAIC Network Adequacy Model Review (B) Subgroup  
c/o National Association of Insurance Commissioners (NAIC)  
444 North Capitol Street, N.W., Suite 701  
Washington, D.C. 20001

ATTN: Jolie Matthews, NAIC Senior Health and Life Policy Counsel  
JMatthews@naic.org

Dear Mr. Wieske, Mr. Matthews, and Network Adequacy Review (B) Subgroup Members:

NAMI is the National Alliance on Mental Illness, the nation’s largest grassroots mental health organization. NAMI provides advocacy, education, support and public awareness so that all individuals and families affected by mental illness can build better lives.

NAMI would like to thank NAIC for the opportunity to comment on proposed changes to the NAIC’s Network Adequacy Model Act. First, NAMI wants to express concern about the shortage of mental health providers available to provide services to individuals with mental illness. Insurance networks should include adequate numbers of mental health professionals, including psychiatrists, psychologists, psychiatric nurses, social workers and other mental health professionals.

Second, NAMI believes that the Act should recognize the important role that people living with mental illness (peers) and family members play in treatment and recovery. We believe that insurance plans must include peers and family supporters within provider networks and should reimburse certified peer specialists and family support specialists for services provided.

Finally, we wish to emphasize the importance of community based services and supports, including rehabilitative services, in mental health recovery. We urge that the availability of these services be considered in evaluating the adequacy of provider networks.

Previously, NAMI signed on to the American Medical Association’s comment letter dated November 16, 2014. NAMI reiterates its support for that letter and the concerns expressed therein. Thank you for affording us the opportunity to comment on these draft standards.

Sincerely,

Ronald S. Honberg, J.D.  
National Director of Policy and Legal Affairs  
NAMI, the National Alliance on Mental Illness