



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

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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 8.9 times more often for *psychiatrist office visits* (15.3% as compared to 1.7%) and 10.6 times 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 6.9 times more often for *psychiatrist office visits* (15.3% as compared to 2.2%) and 8.2 times 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 6.2 times 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 19.9 times 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 1.5 times 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 4.7 times 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 22.4% higher than for *psychologists* (105.1% of Medicare for psychologists as compared to 128.7% for physician assistants) and average reimbursement for *nurse practitioners* was 11.5% higher 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-of-network 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, 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).

“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)

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

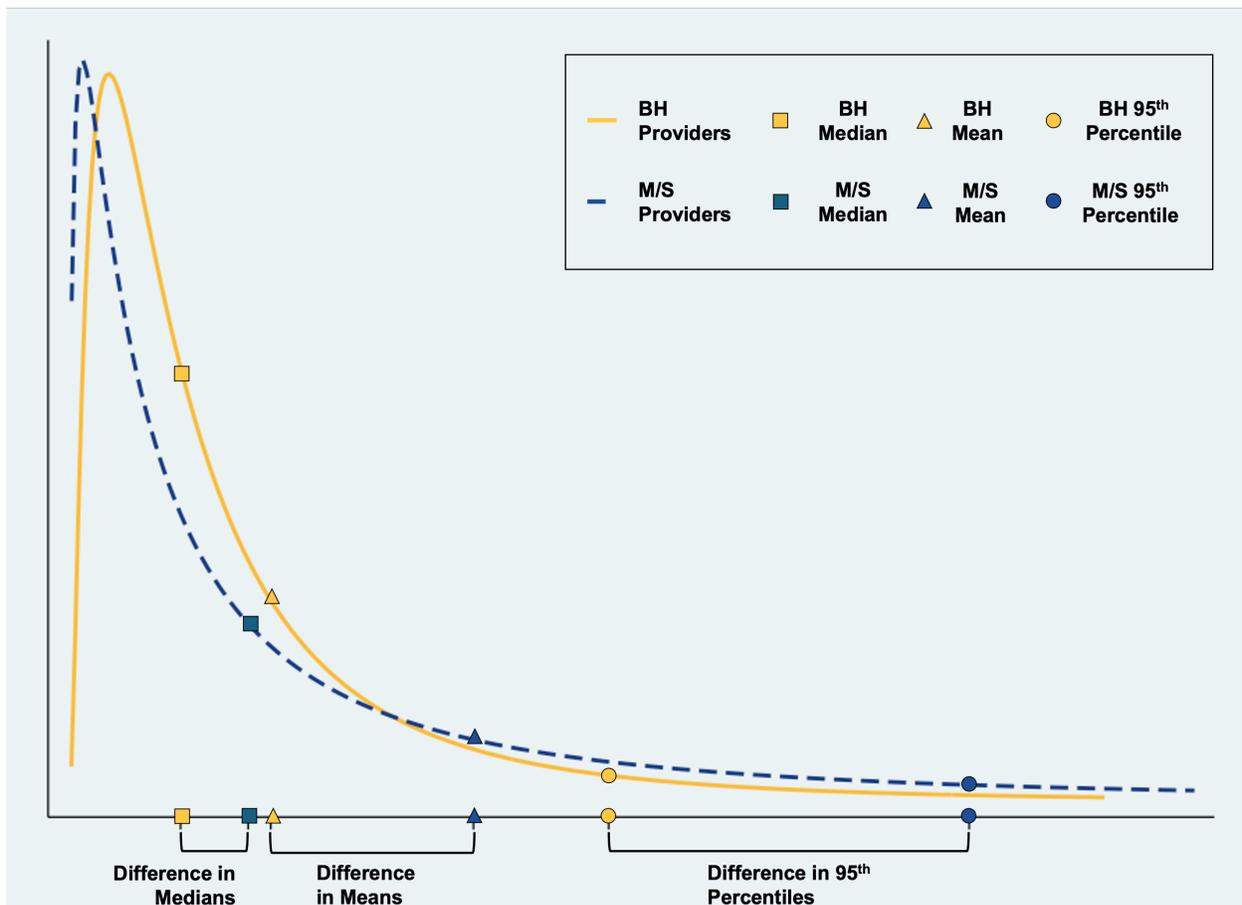
value as representative of an entire distribution of reimbursement rates and provides an accurate description of the entire data. There are three main measures of central tendency:

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:

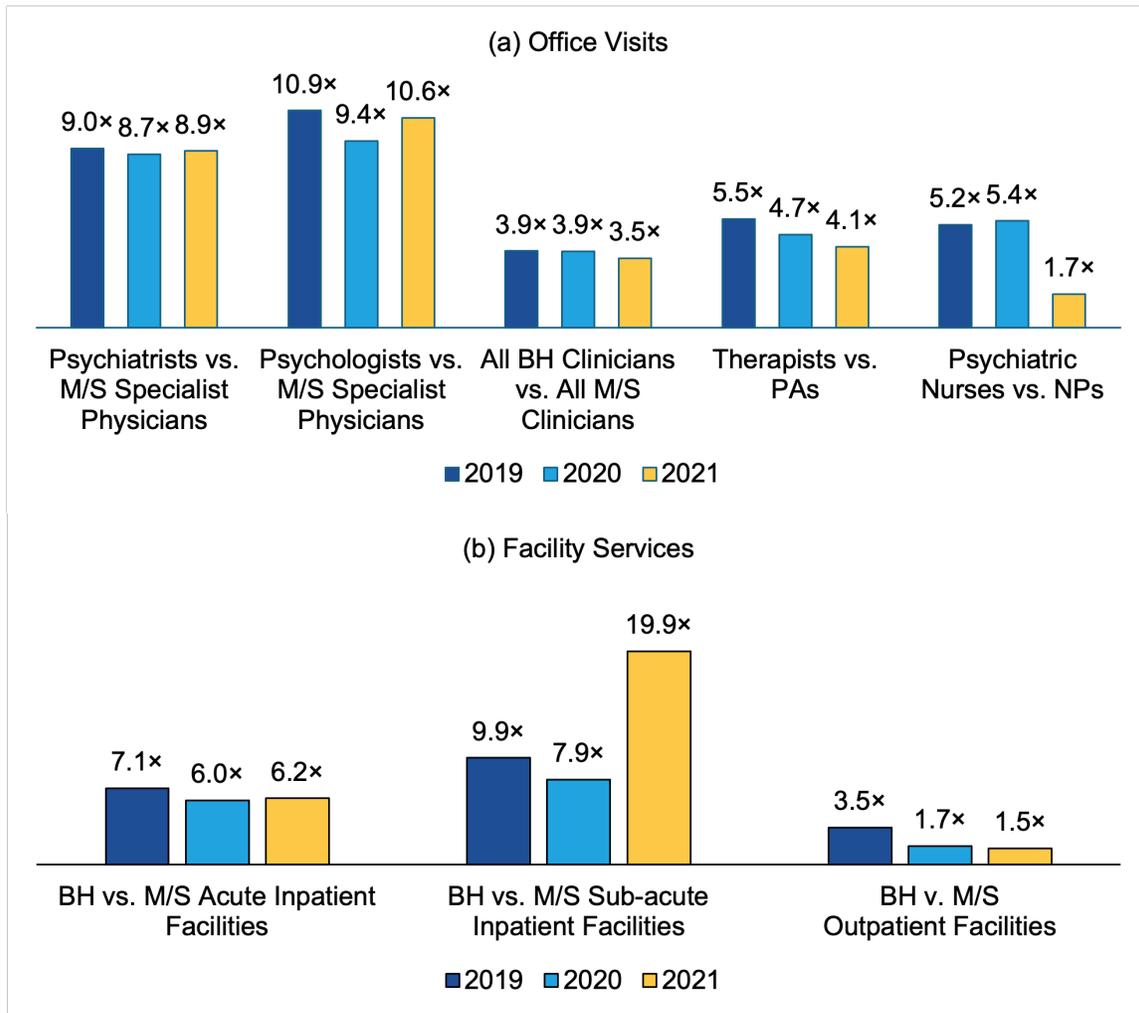
- Compared to office visits with medical/surgical specialist physicians, patients had out-of-network visits with psychiatrists 8.9 times more often (15.3% vs. 1.7%) and with psychologists 10.6 times more often (18.2% vs. 1.7%).
- Compared to office visits with all medical/surgical clinician (i.e., non-physician 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	Higher Proportion of All Behavioral Clinicians Out-of-Network Use
2019	4.3%	16.5%	3.9×
2020	3.9%	15.1%	3.9×
2021	3.8%	13.4%	3.5×

Year	Physician Assistants	Therapists	Higher Proportion of Therapists Out-of- Network 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	Higher Proportion of Psychiatric Nurses Out-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

Year	Medical/Surgical Acute Inpatient Facilities	Behavioral Acute Inpatient Facilities	Higher Proportion of Behavioral Acute Inpatient Facilities Out-of-Network Use
2019	1.4%	10.2%	7.1×
2020	1.6%	9.8%	6.0×
2021	1.5%	9.0%	6.2×

Year	Medical/Surgical Subacute Inpatient Facilities	Behavioral Subacute Inpatient Facilities	Higher Proportion of Behavioral Subacute Inpatient Facilities Out-of- Network Use
2019	3.5%	34.4%	9.9×
2020	4.7%	37.5%	7.9×
2021	1.7%	34.5%	19.9×

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

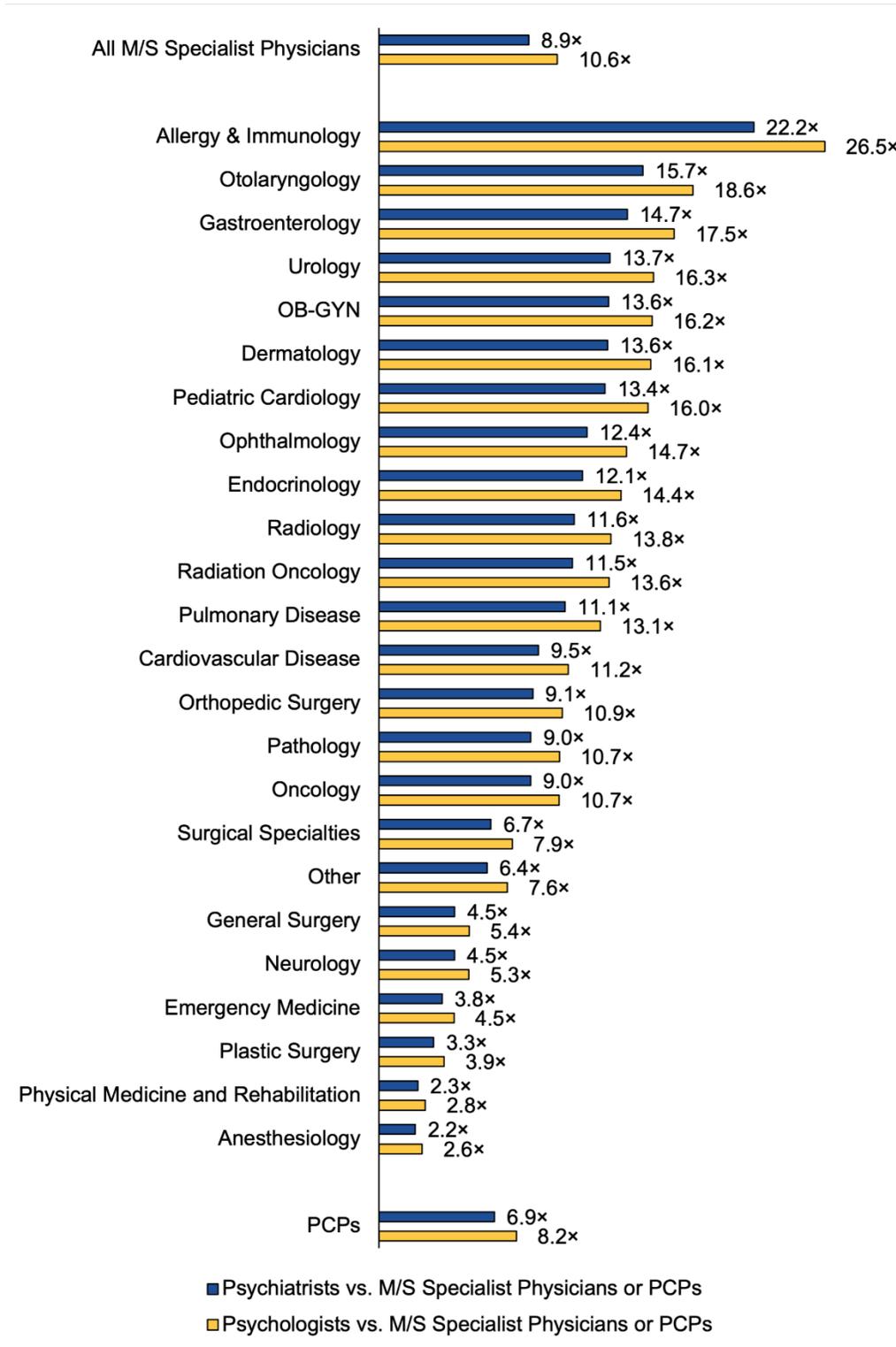


Exhibit 7. Higher Proportion of Out-of-Network Use for Psychiatrist and Psychologist Office Visits as Compared to Medical/Surgical Specialist Physician and Primary Care Physician Office Visits, 2021

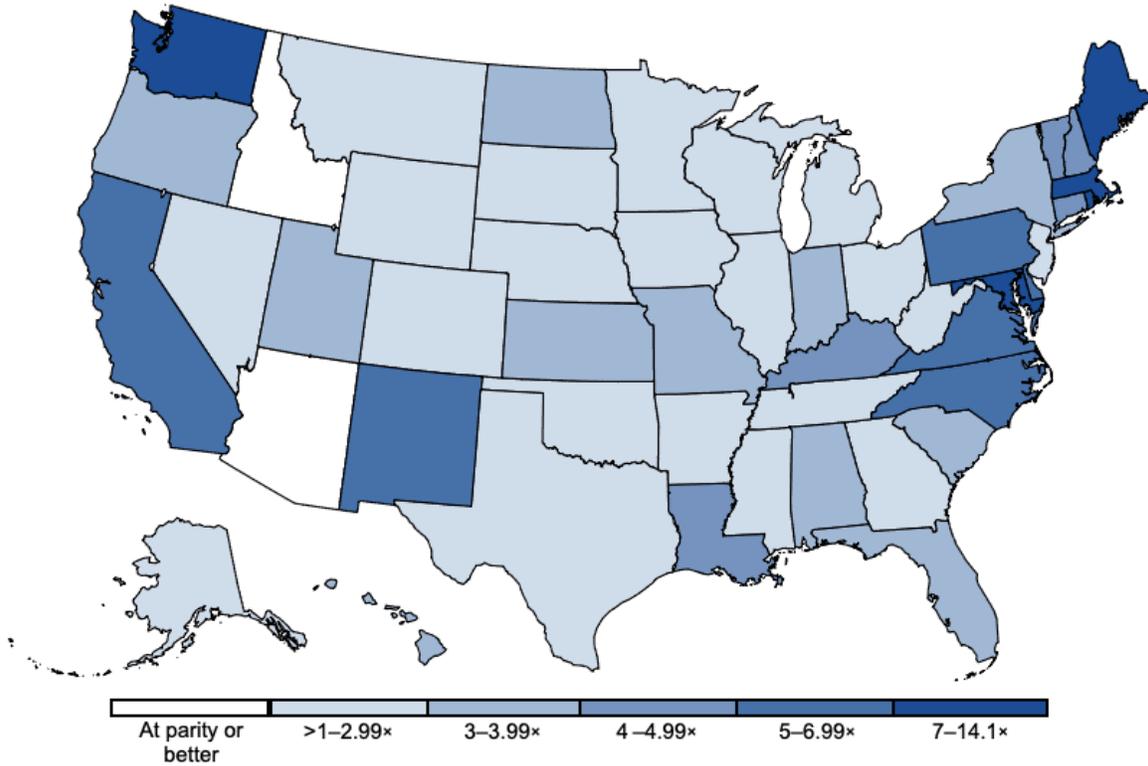
Provider Specialty	Out-of-Network Use	Higher Proportion of Psychiatrists Out-of-Network Use	Higher Proportion of Psychologists Out-of-Network Use
Psychiatrists	15.3%	—	—
Psychologists	18.2%	—	—
All Medical/Surgical Specialist Physicians	1.7%	8.9×	10.6×
Primary Care Physicians	2.2%	6.9×	8.2×
Medical/Surgical Subspecialties			
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

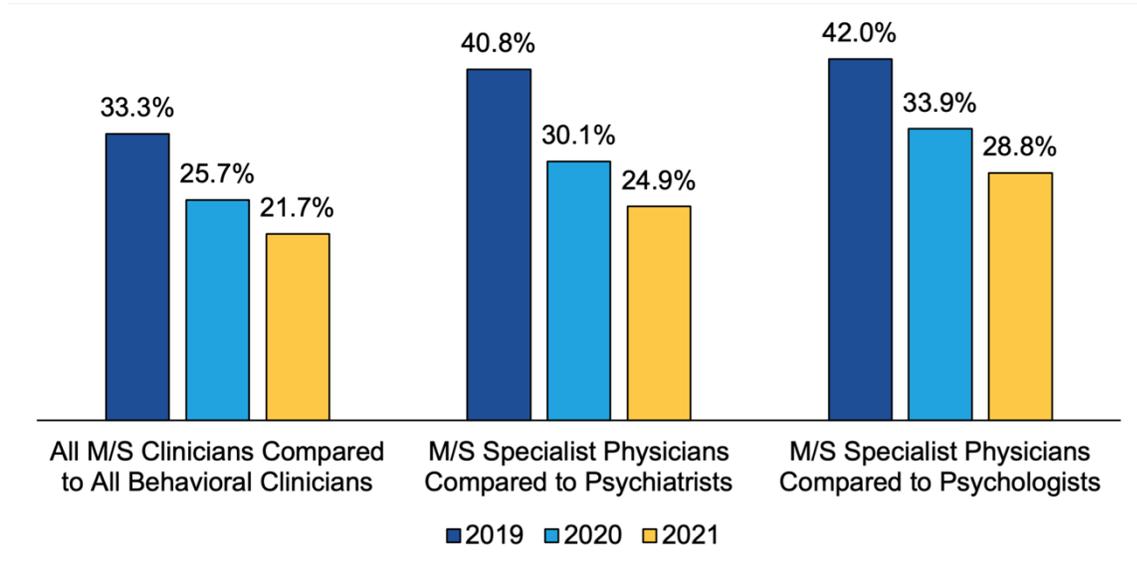
Reimbursement rates are a key lever that health plans use to encourage providers to participate in their networks. In this section, we describe the reimbursement rates (i.e., allowed amounts) paid to behavioral health clinicians for in-network office visits relative to medical/surgical clinician office 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 10. Average In-Network Reimbursement Indexed to Medicare for Medical/Surgical and Behavioral Health Clinician Office Visits

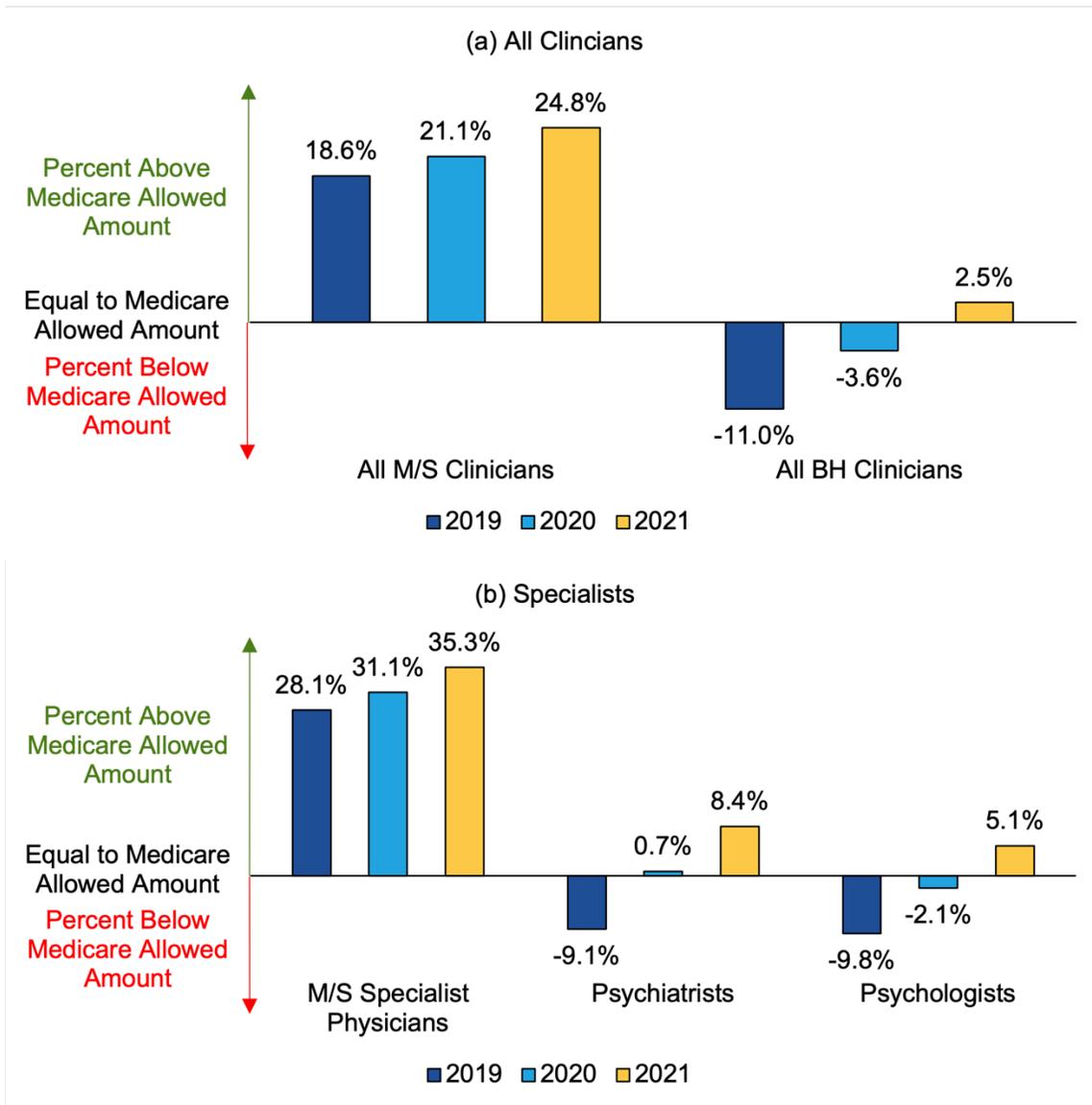


Exhibit 11a. Office Visits—Average In-Network Provider Reimbursement Levels Relative to Medicare Reimbursement Levels: Medical/Surgical Clinicians as Compared to Behavioral Clinicians

Year	Allowed Amounts Relative to Medicare		Percentage Higher Allowed Amounts for Medical/Surgical Compared to Behavioral Health Clinicians
	Medical/Surgical Clinicians	Behavioral 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

Year	Allowed Amounts Relative to Medicare			Percentage Higher Allowed Amounts for All Medical/Surgical Specialist Physicians Compared to Psychiatrists and Psychologists	
	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

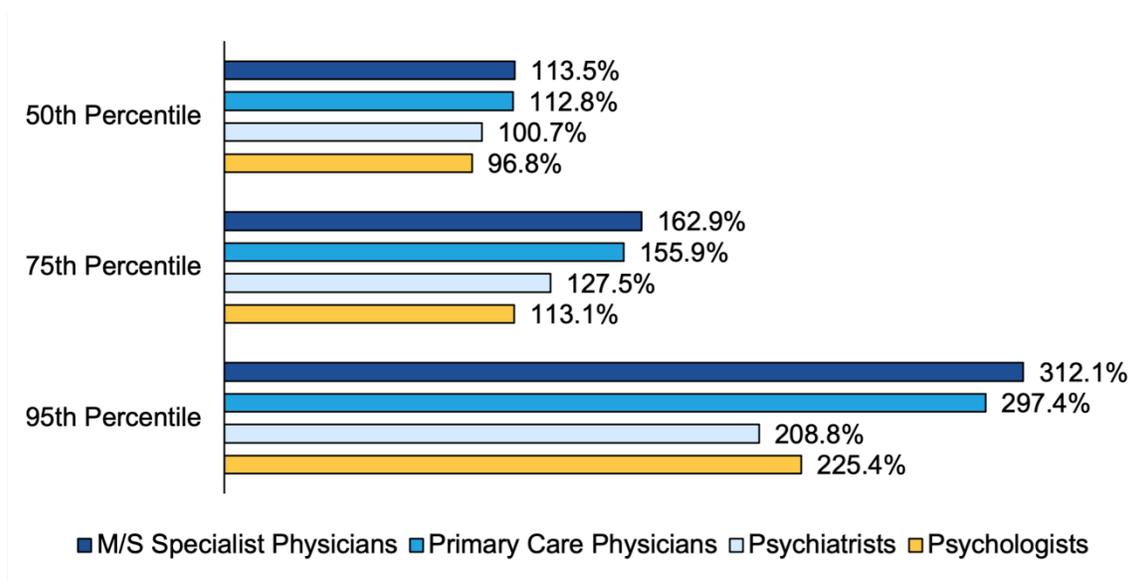


Exhibit 13. Percentage Higher In-Network Reimbursement Indexed to Medicare for Medical/Surgical Clinician Office Visits as Compared to Behavioral Health Clinician Office Visits, by Percentile

Year	Indexed to Medicare						Percentage Higher Reimbursement for All Medical/Surgical Clinicians		
	All Medical/Surgical Clinicians			All Behavioral Health Clinicians			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%

Behavioral Health Parity – Pervasive Disparities in Access to In-Network Care Continue

Year	Indexed to Medicare						Percentage Higher Reimbursement for Medical/Surgical Specialist Physicians		
	Medical/Surgical Specialist Physicians			Psychiatrists			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%

Year	Indexed to Medicare						Percentage Higher Reimbursement for Medical/Surgical Specialist Physicians		
	Medical/Surgical Specialist Physicians			Psychologists			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%

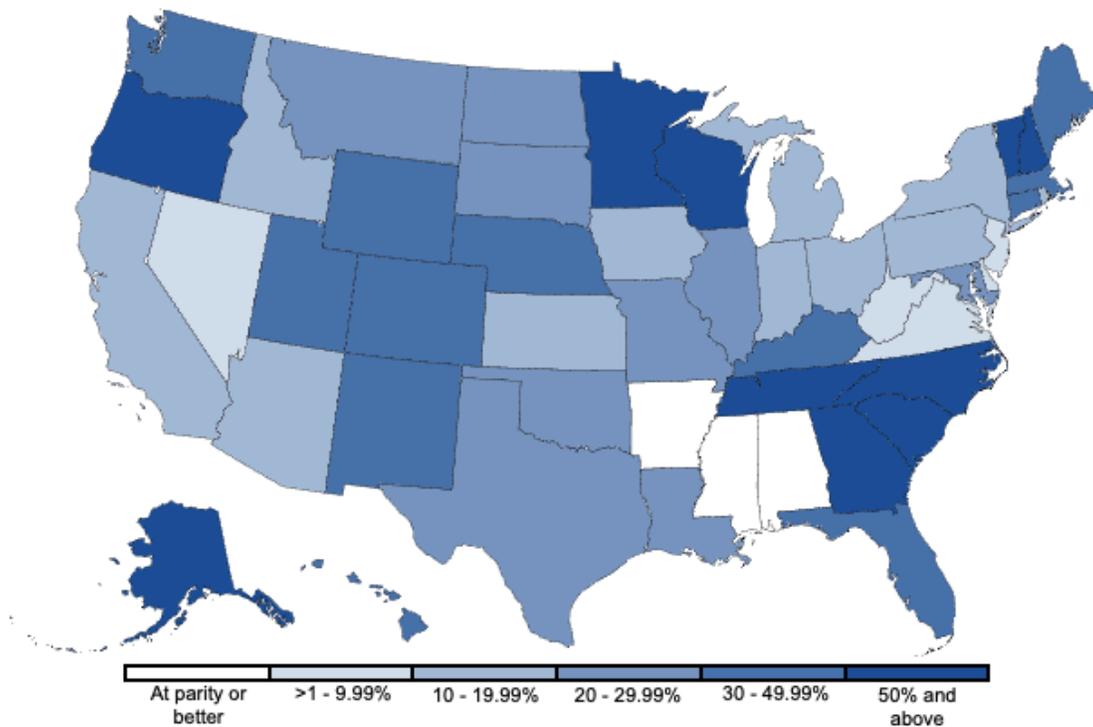
Year	Indexed to Medicare						Percentage Higher Reimbursement for Physician Assistants		
	Physician Assistants			Therapists			50 th	75 th	95 th
	50 th	75 th	95 th	50 th	75 th	95 th			
2019	92.1%	130.9%	221.4%	63.4%	74.1%	113.6%	45.2%	76.7%	94.8%
2020	97.3%	137.0%	229.1%	68.9%	80.8%	112.8%	41.1%	69.5%	103.1%
2021	98.8%	137.8%	231.4%	73.9%	86.5%	114.8%	33.8%	59.3%	101.6%

Year	Indexed to Medicare						Percentage Higher Reimbursement for Nurse Practitioners		
	Nurse Practitioners			Psychiatric Nurses			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 all 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 all 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%

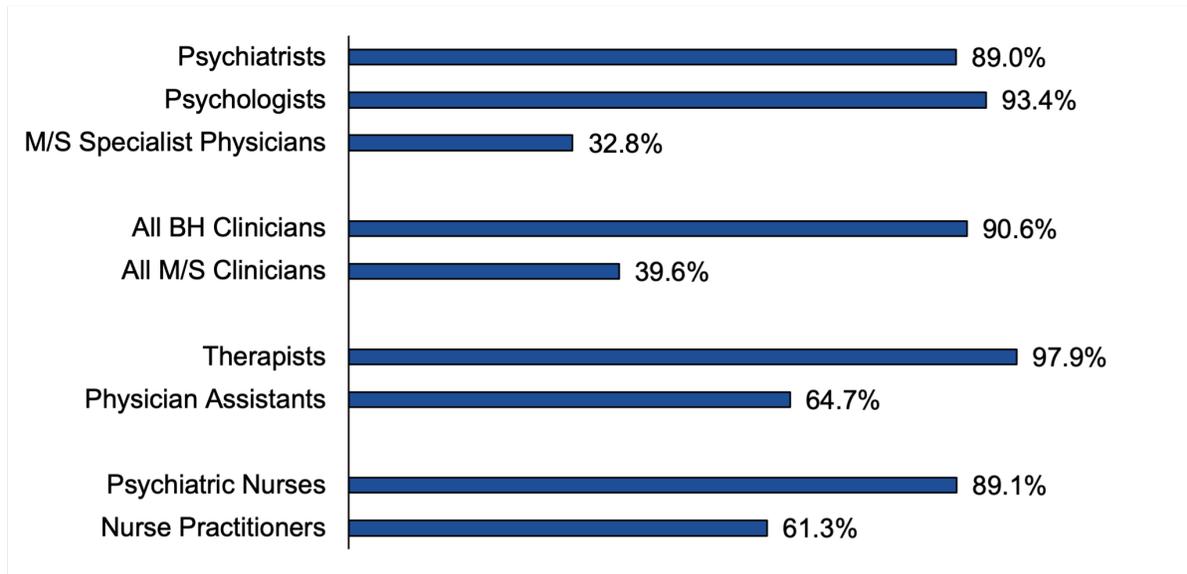
It Is Inaccurate to Use a Subset of Billing Codes for Reimbursement and Out-of-Network Use Disparity Analyses

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:

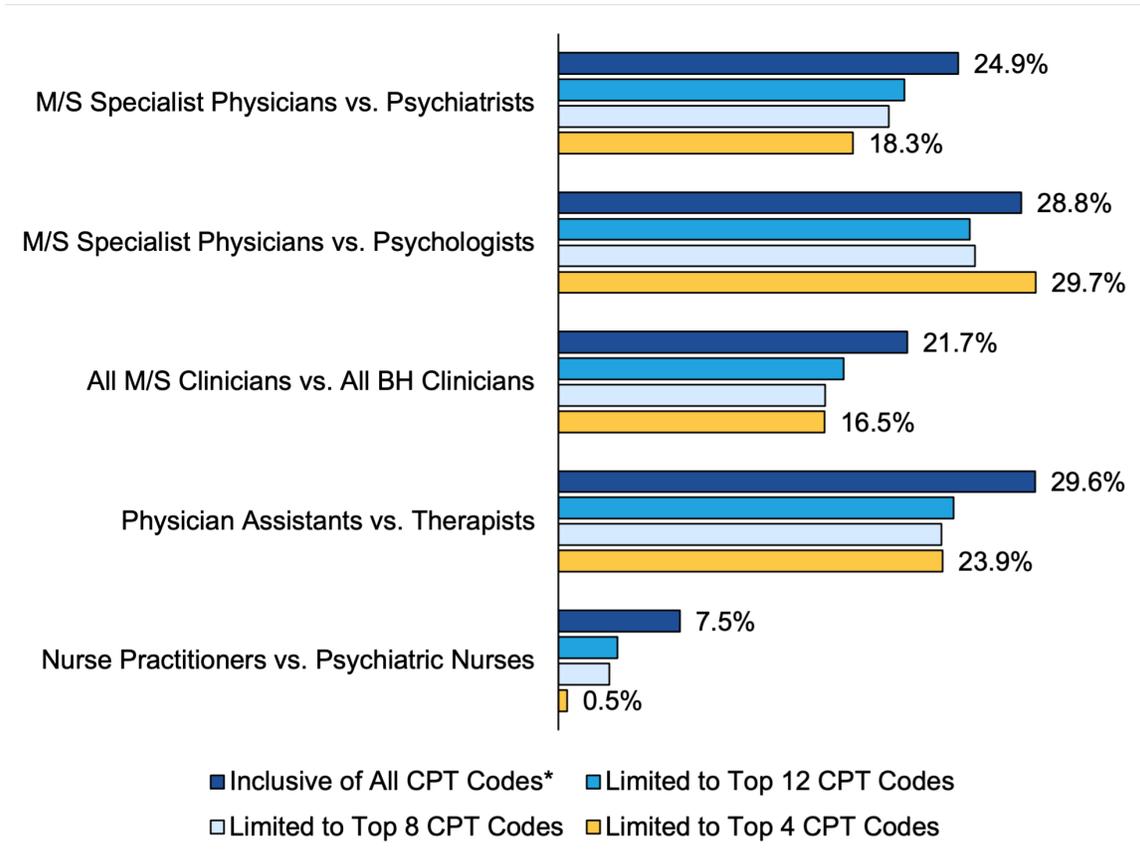
- The top 12 CPT codes captured 89.0% and 93.4% of aggregate reimbursements for psychiatrists and psychologists, respectively. In contrast, the top 12 CPT codes only captured 32.8% of aggregate reimbursements for medical/surgical specialist physicians.
- The top 12 CPT codes captured 90.6% of aggregate 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



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

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

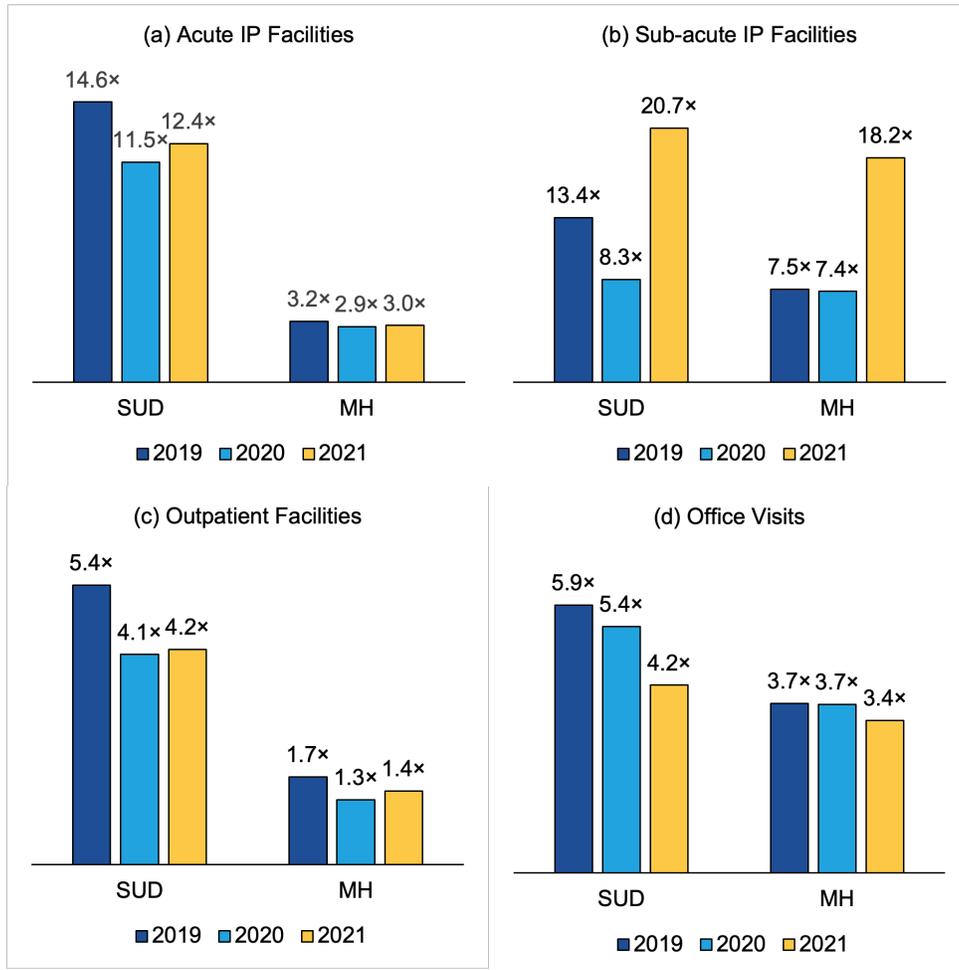
Exhibit 20 shows that the disparities in out-of-network use were higher for patients who received care for substance use disorders than for patients who received care for mental health conditions. In 2021, compared to medical/surgical care:

- 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

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

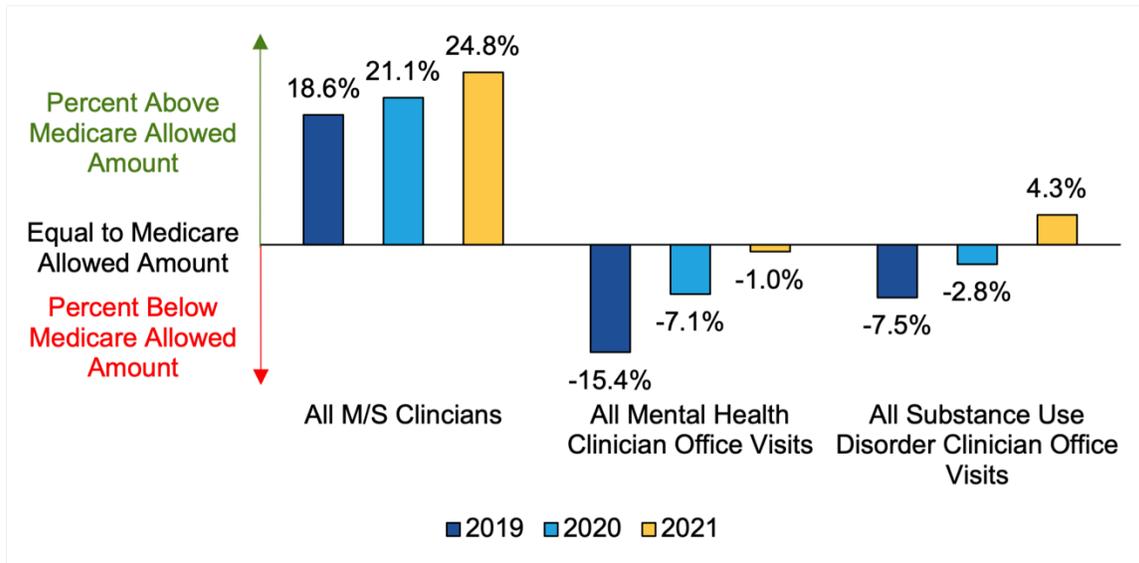
Behavioral Health Clinicians Were Reimbursed Less for Treating Mental Health Conditions Than for Substance Use Disorders

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



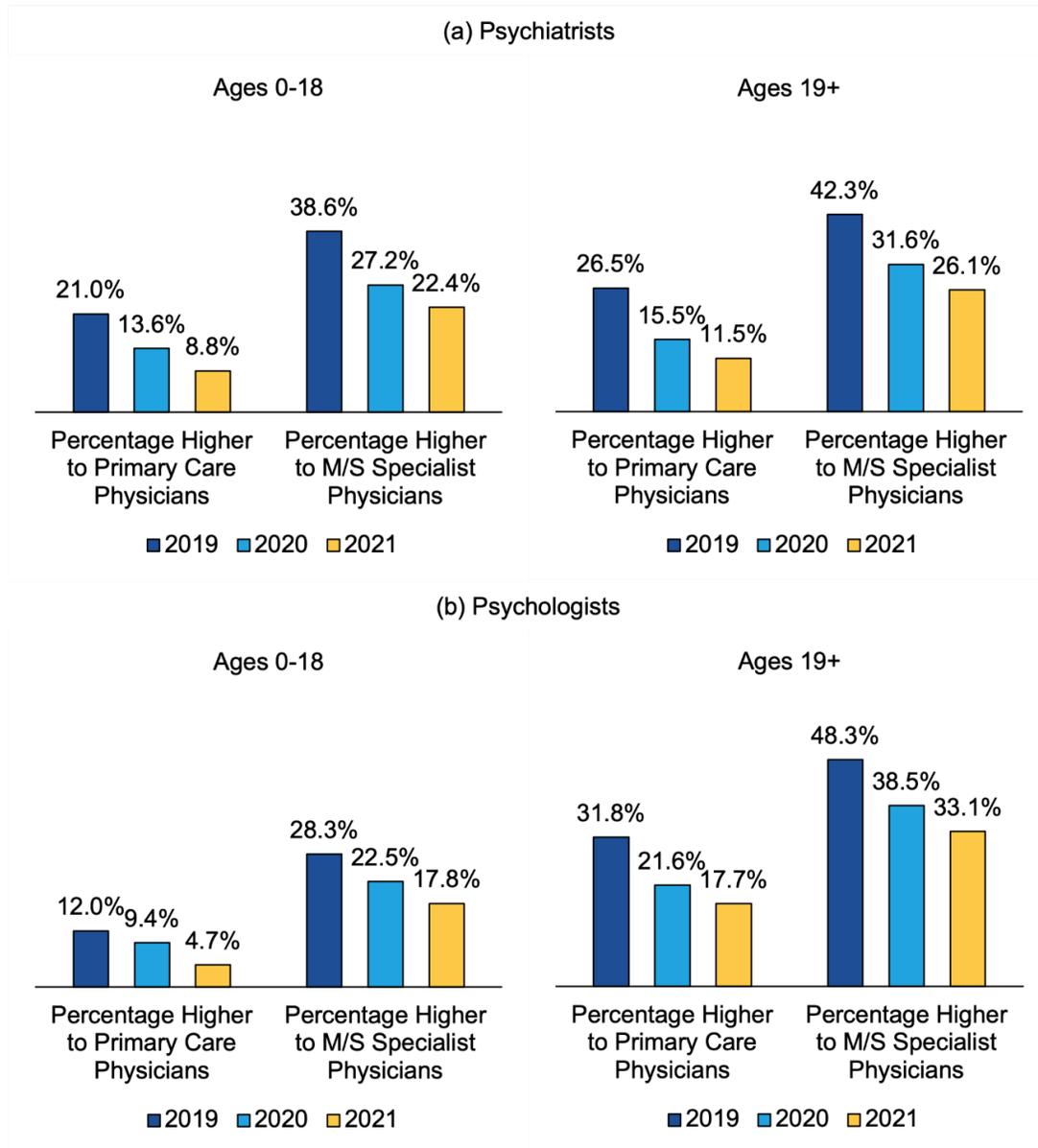
Disparities in Reimbursements Are Higher for Adults Than for Children and Youth

Exhibit 22 shows that adults aged 19 years and older had higher disparities in average in-network 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 23. Higher Proportion of Out-of-Network Use for Behavioral Health as Compared to Medical/Surgical, In-Person Visits and Telehealth Visits

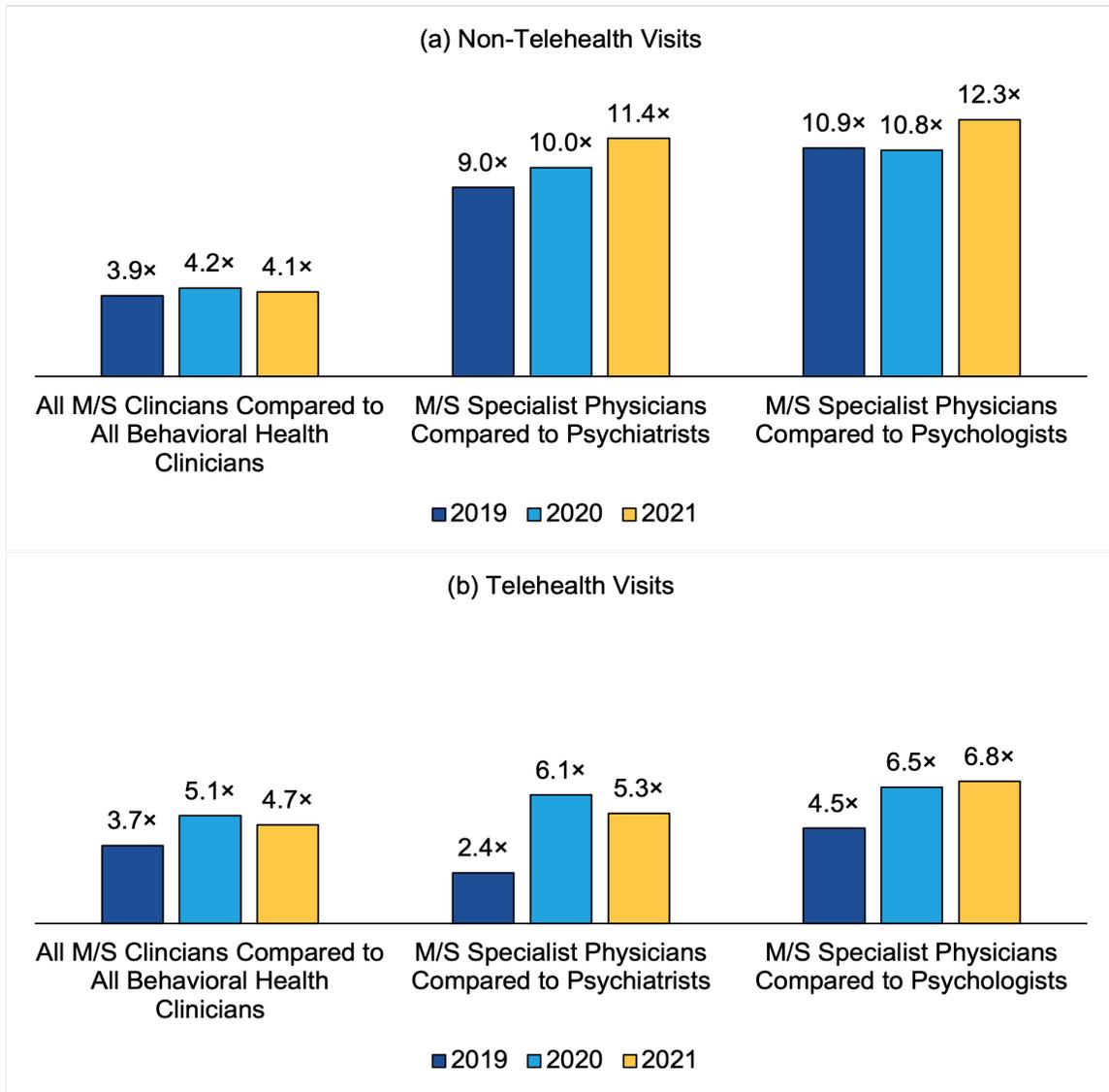
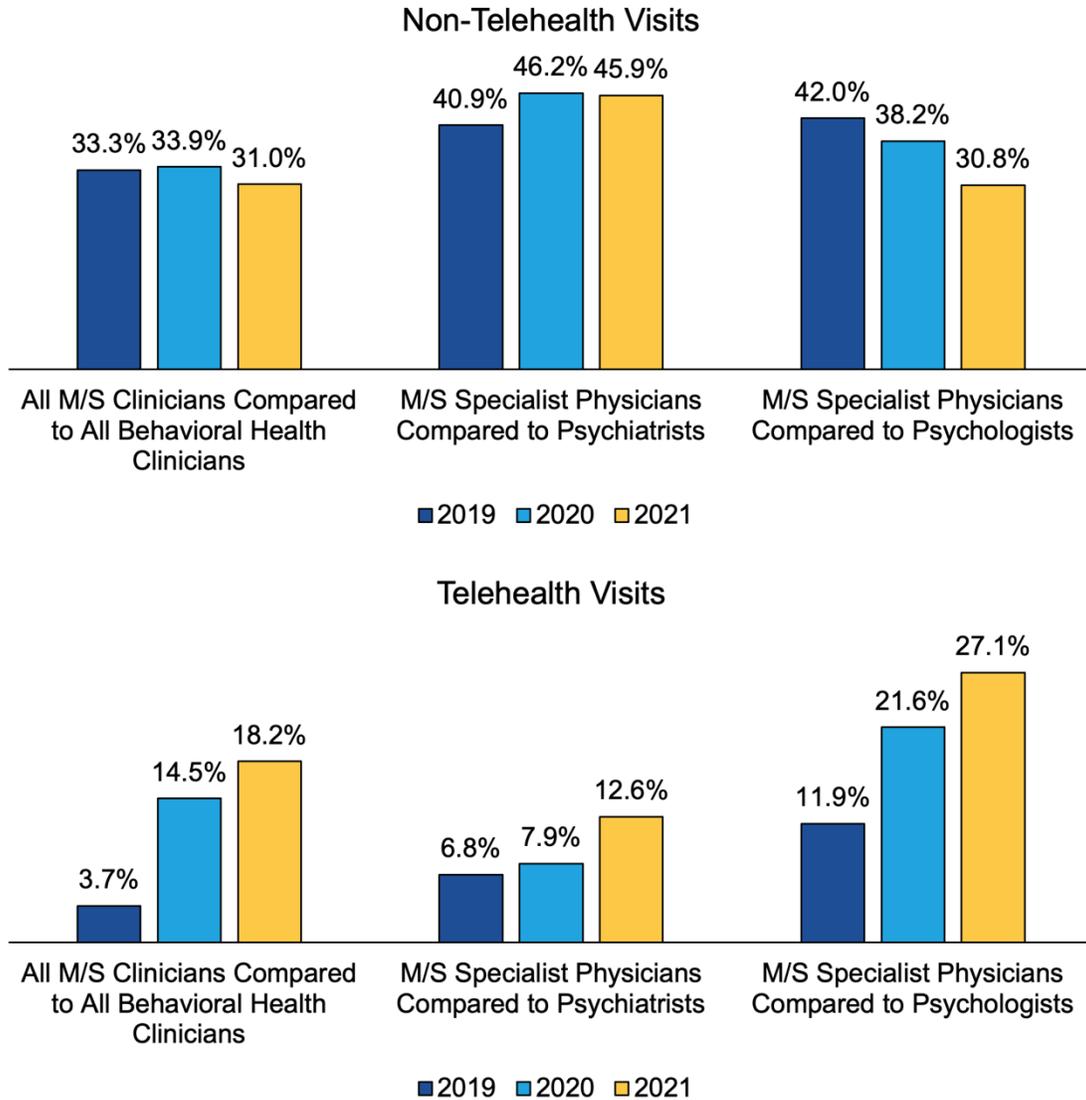


Exhibit 24. Percentage Higher Average In-Network Reimbursement Indexed to Medicare for Medical/Surgical Clinician Office Visits Compared to Behavioral Health Clinician Office Visits, Non-Telehealth Visits as Compared to Telehealth Visits



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 co-insurance 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

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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: $([\text{Medical/Surgical provider}] \text{ reimbursement rate} - [\text{Behavioral Health provider}] \text{ reimbursement rate}) / [\text{Behavioral Health provider}] \text{ reimbursement rate}$. 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

State	Out-of-Network Utilization, %		Behavioral Health Out-of-Network Use Compared to Medical/Surgical
	Medical/ Surgical	Behavioral Health	
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×

Behavioral Health Parity – Pervasive Disparities in Access to In-Network Care Continue

State	Out-of-Network Utilization, %		Behavioral Health Out-of-Network Use Compared to Medical/Surgical
	Medical/ Surgical	Behavioral Health	
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

* 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

State	Out-of-Network Utilization, %		Behavioral Health Out-of-Network Use Compared to Medical/Surgical
	Medical/Surgical	Behavioral Health	
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×
Iowa	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×

State	Out-of-Network Utilization, %		Behavioral Health Out-of-Network Use Compared to Medical/Surgical
	Medical/Surgical	Behavioral Health	
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

* 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)—Out-of-Network Utilization Disparity Levels, All Plans

State	Out-of-Network Utilization, %		Behavioral Health Out-of-Network Use Compared to Medical/Surgical
	Medical/Surgical	Behavioral Health	
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×*

State	Out-of-Network Utilization, %		Behavioral Health Out-of-Network Use Compared to Medical/Surgical
	Medical/Surgical	Behavioral Health	
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×
Iowa	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

State	Out-of-Network Utilization, %		All Behavioral Health Clinicians Out-of-Network Use Compared to All Medical/Surgical Clinicians
	All Medical/ Surgical Clinicians	All Behavioral Health 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×

Behavioral Health Parity – Pervasive Disparities in Access to In-Network Care Continue

State	Out-of-Network Utilization, %		All Behavioral Health Clinicians Out-of-Network Use Compared to All Medical/Surgical Clinicians
	All Medical/ Surgical Clinicians	All Behavioral Health 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

State	Out-of-Network Utilization, %		Psychiatrists Out-of-Network Use Compared to Medical/Surgical Specialist Physicians
	Medical/Surgical Specialist Physicians	Psychiatrists	
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×

State	Out-of-Network Utilization, %		Psychiatrists Out-of-Network Use Compared to Medical/Surgical Specialist Physicians
	Medical/Surgical Specialist Physicians	Psychiatrists	
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×
Iowa	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

State	Out-of-Network Utilization, %		Psychologists Out-of-Network Use Compared to Medical/Surgical Specialist Physicians
	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×

State	Out-of-Network Utilization, %		Psychologists Out-of-Network Use Compared to Medical/Surgical Specialist Physicians
	Medical/Surgical Specialist Physicians	Psychologists	
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×
Iowa	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

* 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

State	Out-of-Network Utilization, %		Psychiatric Nurses Out-of-Network Use Compared to Nurse Practitioners
	Nurse Practitioners	Psychiatric Nurses	
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×*

State	Out-of-Network Utilization, %		Psychiatric Nurses Out-of-Network Use Compared to Nurse Practitioners
	Nurse Practitioners	Psychiatric Nurses	
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

State	Out-of-Network Utilization, %		Therapists Out-of-Network Use Compared to Physician Assistants
	Physician Assistants	Therapists	
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×

State	Out-of-Network Utilization, %		Therapists Out-of-Network Use Compared to Physician Assistants
	Physician Assistants	Therapists	
West Virginia	1.3	3.4	2.5×
Iowa	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

State	Percent, %		
	Reimbursement Relative to Medicare		Reimbursement for Medical/Surgical Compared to Behavioral Health
	All Medical/Surgical Clinicians	All Behavioral Health Clinicians	
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

State	Percent, %		
	Reimbursement Relative to Medicare		Reimbursement for Medical/Surgical Compared to Behavioral Health
	All Medical/Surgical Clinicians	All Behavioral Health Clinicians	
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

State	Percent, %		
	Reimbursement Relative to Medicare		Reimbursement for Medical/Surgical Specialist Physicians Compared to Psychiatrists
	Medical/Surgical Specialist Physicians	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
Iowa	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

State	Percent, %		
	Reimbursement Relative to Medicare		
	Medical/ Surgical Specialist Physicians	Psychiatrists	Reimbursement for Medical/Surgical Specialist Physicians Compared to Psychiatrists
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

State	Percent, %		
	Reimbursement Relative to Medicare		
	Medical/Surgical Specialist Physicians	Psychologists	Reimbursement for Medical/Surgical Specialist Physicians Compared to Psychologists
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

State	Percent, %		
	Reimbursement Relative to Medicare		
	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

State	Percent, %		
	Reimbursement Relative to Medicare		Reimbursement for Nurse Practitioners Compared to Psychiatric Nurses
	Nurse Practitioners	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
Iowa	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

State	Percent, %		
	Reimbursement Relative to Medicare		Reimbursement for Nurse Practitioners Compared to Psychiatric Nurses
	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

State	Percent, %		
	Reimbursement Relative to Medicare		Reimbursement for Physician Assistants Compared to Therapists
	Physician Assistants	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
Iowa	160.0	136.4	17.3
Hawaii	117.9	100.7	17.1
North Dakota	194.0	166.8	16.3

State	Percent, %		
	Reimbursement Relative to Medicare		Reimbursement for Physician Assistants Compared to Therapists
	Physician Assistants	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

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.

Appendix C: State-Specific Disparity Analysis Results

Appendix C-1: Alabama Disparity Analysis, All Plans

Sample size in 2021: 262,665 covered lives

Out-of-network utilization

	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			

	Percent, %		
	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Alabama All Medical/Surgical Clinicians	106.7	102.2	141.5	243.4
Alabama All Behavioral Health Clinicians	114.0	91.6	102.6	134.7
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Alabama	-6.4	11.5	38.0	80.7
All States	21.7	26.6	48.0	70.4
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				
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				
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				
Alabama	-10.5	-7.7	9.8	80.7
All States	28.8	17.3	44.0	38.5
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				
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				
Alabama	-41.0	-41.6	-19.8	47.4
All States	29.6	33.8	59.3	101.6

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.

Appendix C-2: Alaska Disparity Analysis, All Plans

Sample size in 2021: 7,294 covered lives

Out-of-network utilization

	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			
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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Alaska All Medical/Surgical Clinicians	221.5	222.1	237.7
Alaska All Behavioral Health Clinicians	127.8	135.7	145.7
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Alaska	73.3	63.7	63.2
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Alaska Medical/Surgical Specialist Physicians	230.9	235.4	255.0
Alaska Psychiatrists	142.4	160.2	170.9
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Alaska	62.1	46.9	49.2
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Alaska Medical/Surgical Specialist Physicians	230.9	235.4	255.0
Alaska Psychologists	163.7	193.7	237.8
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Alaska	41.0	21.5	7.2
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Alaska Nurse Practitioners	202.7	200.4	202.4
Alaska Psychiatric Nurses	164.5	168.7	153.3
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Alaska	23.3	18.8	32.0
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Alaska Physician Assistants	223.2	218.0	223.4
Alaska Therapists	113.2	119.1	120.2
Physician Assistant Reimbursement Levels Compared to Therapists			
Alaska	97.2	83.1	85.9
All States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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

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.

Appendix C-3: Arizona Disparity Analysis, All Plans

Sample size in 2021: 215,925 covered lives

Out-of-network utilization

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
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			
Arizona	8.0×	9.2×	8.8×
All States	7.1×	6.0×	6.2×
Parity Would Be	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×
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×
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×
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			
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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Arizona All Medical/Surgical Clinicians	104.9	86.2	112.5	214.8
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				
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 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	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				
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	-4.5	-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
All States	29.6	33.8	59.3	101.6

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.

Appendix C-4: Arkansas Disparity Analysis, All Plans

Sample size in 2021: 42,735 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Arkansas All Medical/Surgical Clinicians	125.2	122.1	142.1	248.9
Arkansas All Behavioral Health Clinicians	130.1	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	127.2	134.2	147.9	270.4
Arkansas Psychiatrists	114.3	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	127.2	134.2	147.9	270.4
Arkansas Psychologists	129.5	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	109.0	84.9	109.0	153.0
Arkansas Psychiatric Nurses	105.4	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	111.2	90.6	109.0	152.8
Arkansas Therapists	133.5	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

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.

Appendix C-5: California Disparity Analysis, All Plans

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

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
California All Medical/Surgical Clinicians	129.0	88.0	167.8	354.6
California All Behavioral Health Clinicians	116.7	90.2	119.1	252.5
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	-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	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	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	-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				
California	2.3	2.3	26.3	71.8
All States	29.6	33.8	59.3	101.6

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.

Appendix C-6: Colorado Disparity Analysis, All Plans

Sample size in 2021: 171,047 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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	34.7
All States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Colorado All Medical/Surgical Clinicians	129.2	112.1	142.0	256.5
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 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	45.2	35.5	43.5	88.7
All States	28.8	17.3	44.0	38.5
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				
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
All States	29.6	33.8	59.3	101.6

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.

Appendix C-7: Connecticut Disparity Analysis, All Plans

Sample size in 2021: 58,119 covered lives

Out-of-Network Utilization

	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			
Connecticut OON Medical/Surgical	49.7	16.9	5.2
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×

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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Connecticut All Medical/Surgical Clinicians	142.5	122.1	165.8	300.4
Connecticut All Behavioral Health Clinicians	102.1	79.3	97.7	159.3
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 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	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	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				
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				
Connecticut	31.7	38.4	63.8	119.5
All States	29.6	33.8	59.3	101.6

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.

Appendix C-8: Delaware Disparity Analysis, All Plans

Sample size in 2021: 58,468 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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				
Delaware	0.3	11.0	16.6	78.9
All States	29.6	33.8	59.3	101.6

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.

Appendix C-9: Florida Disparity Analysis, All Plans

Sample size in 2021: 961,333 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Florida All Medical/Surgical Clinicians	110.7	94.0	128.4	236.3
Florida All Behavioral Health Clinicians	82.8	66.1	89.2	138.7
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 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	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				
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 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 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	37.5	45.2	50.7	102.3
All States	29.6	33.8	59.3	101.6

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.

Appendix C-10: Georgia Disparity Analysis, All Plans

Sample size in 2021: 870,186 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Georgia All Medical/Surgical Clinicians	133.9	139.4	141.2
Georgia All Behavioral Health Clinicians	86.5	90.8	93.8
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	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	137.6	143.1	145.1
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	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	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	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Georgia All Medical/Surgical Clinicians	141.2	122.8	171.7	311.1
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	71.1
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Georgia Medical/Surgical Specialist Physicians	145.1	145.7	189.3	340.3
Georgia Psychologists	100.4	78.9	96.8	298.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Georgia	44.6	84.5	95.6	92.0
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Georgia Nurse Practitioners	118.9	94.4	141.3	174.3
Georgia Psychiatric Nurses	110.0	98.3	109.6	128.3
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Georgia	8.2	-4.0	28.9	35.9
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Georgia Physician Assistants	133.4	102.6	128.8	262.5
Georgia Therapists	85.9	63.0	66.3	101.3
Physician Assistants Reimbursement Levels Compared to Therapists				
Georgia	55.3	62.7	94.3	159.2
All States	29.6	33.8	59.3	101.6

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.

Appendix C-11: Hawaii Disparity Analysis, All Plans

Sample size in 2021: 1,243 covered lives

Out-of-network utilization

	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			
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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Hawaii All Medical/Surgical Clinicians	127.3	98.1	142.3	348.0
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 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				
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 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 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				
Hawaii	17.1	27.7	58.8	98.5
All States	29.6	33.8	59.3	101.6

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.

Appendix C-12: Idaho Disparity Analysis, All Plans

Sample size in 2021: 231 covered lives

Out-of-network utilization

	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	0.8	0.8	n/a
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Idaho	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			
Idaho	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			
Idaho	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			
Idaho	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Illinois All Medical/Surgical Clinicians	123.4	126.5	132.0
Illinois All Behavioral Health Clinicians	100.0	105.2	109.0
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Illinois	23.4	20.2	21.0
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Illinois Medical/Surgical Specialist Physicians	125.9	128.9	134.9
Illinois Psychiatrists	95.3	100.0	107.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Illinois	32.1	28.9	25.6
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Illinois Medical/Surgical Specialist Physicians	125.9	128.9	134.9
Illinois Psychologists	103.0	103.4	106.6
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Illinois	22.3	24.6	26.6
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Illinois Nurse Practitioners	117.3	119.9	125.6
Illinois Psychiatric Nurses	91.5	98.4	104.2
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Illinois	28.2	21.8	20.6
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Illinois Physician Assistants	119.1	120.7	127.0
Illinois Therapists	100.1	107.7	110.5
Physician Assistants Reimbursement Levels Compared to Therapists			
Illinois	19.0	12.1	14.9
All States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Illinois All Medical/Surgical Clinicians	132.0	108.7	151.4	285.5
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	21.0	28.7	53.0	119.6
All States	21.7	26.6	48.0	70.4
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				
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				
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	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Illinois Physician Assistants	127.0	97.8	120.7	225.1
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
All States	29.6	33.8	59.3	101.6

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.

Appendix C-14: Indiana Disparity Analysis, All Plans

Sample size in 2021: 231,243 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
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				
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	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				
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
All States	29.6	33.8	59.3	101.6

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.

Appendix C-15: Iowa Disparity Analysis, All Plans

Sample size in 2021: 120,790 covered lives

Out-of-network utilization

	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			
Iowa	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			
Iowa	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			
Iowa	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			
Iowa	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			
Iowa	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			
Iowa	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			
Iowa	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			
Iowa	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
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			
Iowa	28.8	21.5	18.0
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			
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	166.2	170.8	174.9
Iowa Psychologists	115.6	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			
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	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Iowa All Medical/Surgical Clinicians	160.9	135.6	176.2	275.3
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				
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 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	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	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
All States	29.6	33.8	59.3	101.6

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.

Appendix C-16: Kansas Disparity Analysis, All Plans

Sample size in 2021: 128,361 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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 States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Kansas All Medical/Surgical Clinicians	118.1	104.0	137.1	231.3
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	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	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				
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				
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
All States	29.6	33.8	59.3	101.6

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.

Appendix C-17: Kentucky Disparity Analysis, All Plans

Sample size in 2021: 185,558 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Kentucky All Medical/Surgical Clinicians	110.7	93.4	122.9	232.3
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	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	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				
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				
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				
Kentucky	26.1	60.4	53.6	74.2
All States	29.6	33.8	59.3	101.6

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.

Appendix C-18: Louisiana Disparity Analysis, All Plans

Sample size in 2021: 118,264 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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

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.

Appendix C-19: Maine Disparity Analysis, All Plans

Sample size in 2021: 39,286 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral 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				
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				
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				
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 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				
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				
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				
Maine	59.7	75.2	102.5	118.1
All States	29.6	33.8	59.3	101.6

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.

Appendix C-20: Maryland Disparity Analysis, All Plans

Sample size in 2021: 194,550 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Maryland All Medical/Surgical Clinicians	105.0	109.7	112.0
Maryland All Behavioral Health Clinicians	78.0	84.5	90.7
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Maryland	34.6	29.9	23.4
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Maryland Medical/Surgical Specialist Physicians	110.7	115.2	119.2
Maryland Psychiatrists	82.5	89.7	96.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Maryland	34.2	28.4	23.9
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Maryland Medical/Surgical Specialist Physicians	110.7	115.2	119.2
Maryland Psychologists	84.1	88.9	97.0
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Maryland	31.6	29.5	22.8
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Maryland Nurse Practitioners	107.1	111.0	113.8
Maryland Psychiatric Nurses	79.4	86.7	95.0
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Maryland	34.9	28.1	19.8
All States	28.3	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Maryland All Medical/Surgical Clinicians	112.0	90.8	130.0	223.7
Maryland All Behavioral Health Clinicians	90.7	71.9	90.0	141.3
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Maryland	23.4	26.3	44.5	58.3
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Maryland Medical/Surgical Specialist Physicians	119.2	109.1	145.3	243.8
Maryland Psychiatrists	96.2	90.5	118.9	172.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Maryland	23.9	20.5	22.2	41.2
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Maryland Medical/Surgical Specialist Physicians	119.2	109.1	145.3	243.8
Maryland Psychologists	97.0	94.4	110.3	184.4
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Maryland	22.8	15.5	31.8	58.3
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Maryland Nurse Practitioners	113.8	92.1	134.7	187.9
Maryland Psychiatric Nurses	95.0	85.0	96.0	120.9
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses				
Maryland	19.8	8.4	40.2	55.4
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Maryland Physician Assistants	130.1	102.2	141.4	209.3
Maryland Therapists	86.6	63.6	76.7	100.9
Physician Assistants Reimbursement Levels Compared to Therapists				
Maryland	50.2	60.8	84.3	107.5
All States	29.6	33.8	59.3	101.6

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.

Appendix C-21: Massachusetts Disparity Analysis, All Plans

Sample size in 2021: 250,239 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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				
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

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.

Appendix C-22: Michigan Disparity Analysis, All Plans

Sample size in 2021: 88,725 covered lives

Out-of-network utilization

	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	0.8	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
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				
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	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				
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				
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				
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				
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
All States	29.6	33.8	59.3	101.6

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.

Appendix C-23: Minnesota Disparity Analysis, All Plans

Sample size in 2021: 187,575 covered lives

Out-of-network utilization

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
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			
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 Medical/Surgical	1.7	1.1	0.5
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			
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×
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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Minnesota All Medical/Surgical Clinicians	207.0	181.7	245.4	416.3
Minnesota All Behavioral Health Clinicians	107.2	90.7	107.9	211.4
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Minnesota	93.1	100.3	127.4	96.9
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
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

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.

Appendix C-24: Mississippi Disparity Analysis, All Plans

Sample size in 2021: 63,171 covered lives

Out-of-network utilization

	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	0.8
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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	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
All States	29.6	33.8	59.3	101.6

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.

Appendix C-25: Missouri Disparity Analysis, All Plans

Sample size in 2021: 293,914 covered lives

Out-of-network utilization

	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	0.8
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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral 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				
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 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				
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				
Missouri	32.6	38.5	44.3	81.3
All States	28.8	17.3	44.0	38.5
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				
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 Compared to Therapists				
Missouri	25.6	44.4	57.5	78.3
All States	29.6	33.8	59.3	101.6

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.

Appendix C-26: Montana Disparity Analysis, All Plans

Sample size in 2021: 9,993 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Montana All Medical/Surgical Clinicians	153.2	155.3	158.8
Montana All Behavioral Health Clinicians	119.6	122.6	129.2
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Montana	28.1	26.6	22.9
All States	33.3	25.7	21.7
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			
Montana	17.2	19.1	-0.2*
All States	40.8	30.1	24.9
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			
Montana	21.8	26.3	25.1
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
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			
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	40.6	34.5	29.6

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

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Nebraska All Medical/Surgical Clinicians	177.6	154.7	191.8	311.3
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				
Nebraska	30.1	45.7	49.7	55.5
All States	21.7	26.6	48.0	70.4
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				
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	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				
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
All States	29.6	33.8	59.3	101.6

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.

Appendix C-28: Nevada Disparity Analysis, All Plans

Sample size in 2021: 58,197 covered lives

Out-of-network utilization

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Nevada OON Behavioral Health	13.6	14.1	16.0
Nevada OON Medical/Surgical	1.2	1.0	0.8
Behavioral Health OON Compared to Medical/Surgical OON			
Nevada	11.3×	13.7×	20.7×
All States	7.1×	6.0×	6.2×
Parity Would Be	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	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			
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			
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	1.2×	1.3×	1.1×
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			
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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Nevada All Medical/Surgical Clinicians	97.6	100.0	105.4
Nevada All Behavioral Health Clinicians	83.0	88.5	98.8
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Nevada	17.7	13.0	6.7
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Nevada Medical/Surgical Specialist Physicians	99.0	101.2	106.9
Nevada Psychiatrists	81.9	89.1	97.2
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Nevada	20.9	13.5	9.9
All States	40.8	30.1	24.9
Medical/Surgical Specialist Physicians Versus Psychologists			
Nevada Medical/Surgical Specialist Physicians	99.0	101.2	106.9
Nevada Psychologists	79.4	85.4	97.5
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists			
Nevada	24.7	18.4	9.7
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
Nevada Nurse Practitioners	93.0	100.4	103.9
Nevada Psychiatric Nurses	103.0	109.9	114.7
Nurse Practitioners Reimbursement Levels Compared to Psychiatric Nurses			
Nevada	-9.7	-8.6	-9.4
All States	28.3	12.8	7.5
Physician Assistants Versus Therapists			
Nevada Physician Assistants	98.8	103.9	113.0
Nevada Therapists	83.9	88.6	99.0
Physician Assistants Reimbursement Levels Compared to Therapists			
Nevada	17.7	17.3	14.1
All States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Nevada All Medical/Surgical Clinicians	105.4	89.9	119.6	225.0
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	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	29.6	33.8	59.3	101.6

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.

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

Sample size in 2021: 30,168 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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

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.

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

Sample size in 2021: 429,973 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
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	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			
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
All States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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
All States	29.6	33.8	59.3	101.6

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.

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

Sample size in 2021: 32,651 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
New Mexico All Medical/Surgical Clinicians	133.9	137.5	137.3
New Mexico All Behavioral Health Clinicians	90.8	97.4	103.1
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
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			
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			
New Mexico	59.5	55.0	48.6
All States	42.0	33.9	28.8
Nurse Practitioners Versus Psychiatric Nurses			
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			
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
All States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
New Mexico All Medical/Surgical Clinicians	137.3	122.2	158.4	298.1
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				
New Mexico	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 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	40.4	61.8	71.5	91.1
All States	29.6	33.8	59.3	101.6

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.

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

Sample size in 2021: 491,906 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
New York All Medical/Surgical Clinicians	118.0	121.7	129.8
New York All Behavioral Health Clinicians	85.5	100.1	113.5
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
New York	38.1	21.6	14.4
All States	33.3	25.7	21.7
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			
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			
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	29.2	13.5	15.5
All States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
New York All Medical/Surgical Clinicians	129.8	107.7	153.0	284.1
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	14.4	19.3	29.4	50.9
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	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	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	15.5	25.5	50.2	73.2
All States	29.6	33.8	59.3	101.6

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.

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

Sample size in 2021: 387,960 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
North Carolina All Medical/Surgical Clinicians	152.3	128.8	181.5	307.9
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				
North Carolina	53.9	76.0	98.8	81.6
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
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	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				
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	29.6	33.8	59.3	101.6

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.

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

Sample size in 2021: 6,086 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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 $p < .05$.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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	59.3	101.6

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.

Appendix C-35: Ohio Disparity Analysis, All Plans

Sample size in 2021: 509,484 covered lives

Out-of-network utilization

	Percent, %		
	2019	2020	2021
Acute Inpatient Facility			
Ohio OON Behavioral Health	10.1	8.3	7.2
Ohio OON Medical/Surgical	3.2	1.9	2.0
Behavioral Health OON Compared to Medical/Surgical OON			
Ohio	3.1×	4.3×	3.6×
All States	7.1×	6.0×	6.2×
Parity Would Be	1.0×	1.0×	1.0×
Subacute Inpatient Facility			
Ohio OON Behavioral Health	48.0	41.4	36.0
Ohio OON Medical/Surgical	8.6	3.5	2.5
Behavioral Health OON Compared to Medical/Surgical OON			
Ohio	5.6×	11.8×	14.5×
All States	9.9×	7.9×	19.9×
Parity Would Be	1.0×	1.0×	1.0×
Outpatient Facility (Non-Emergency Room)			
Ohio OON Behavioral Health	17.0	4.1	4.3
Ohio OON Medical/Surgical	5.8	6.8	6.9
Behavioral Health OON Compared to Medical/Surgical OON			
Ohio	2.9×	0.6×	0.6×
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			
Ohio OON All Behavioral Health Clinicians	9.0	6.1	5.3
Ohio OON All Medical/Surgical Clinicians	4.9	3.6	3.2
All Behavioral Health Clinicians OON Compared to All Medical/Surgical Clinicians OON			
Ohio	1.9×	1.7×	1.6×
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			
Ohio OON Psychiatrists	11.7	9.6	8.3
Ohio OON Medical/Surgical Specialist Physicians	3.6	3.5	2.7
Psychiatrists OON Compared to Medical/Surgical Specialist Physicians OON			
Ohio	3.3×	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Ohio All Medical/Surgical Clinicians	107.7	109.5	113.8
Ohio All Behavioral Health Clinicians	83.5	91.6	96.4
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Ohio	29.0	19.5	18.0
All States	33.3	25.7	21.7
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			
Ohio	33.1	22.9	19.5
All States	40.8	30.1	24.9
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			
Ohio	27.6	20.0	17.7
All States	42.0	33.9	28.8
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			
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
All States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Ohio All Medical/Surgical Clinicians	113.8	100.0	132.5	246.2
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	18.0	37.0	44.9	67.2
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	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 Compared to Therapists				
Ohio	13.8	26.1	47.1	48.4
All States	29.6	33.8	59.3	101.6

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.

Appendix C-36: Oklahoma Disparity Analysis, All Plans

Sample size in 2021: 76,940 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Oklahoma All Medical/Surgical Clinicians	114.2	105.0	132.1	231.2
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				
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	11.4	14.2	9.3	17.5
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				
Oklahoma	16.2	28.0	33.1	67.7
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
All States	29.6	33.8	59.3	101.6

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.

Appendix C-37: Oregon Disparity Analysis, All Plans

Sample size in 2021: 227,659 covered lives

Out-of-network utilization

	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×

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

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Oregon All Medical/Surgical Clinicians	198.9	183.9	232.3	382.9
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				
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	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 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	224.9	189.5	223.7	293.3
Oregon Therapists	117.6	84.8	104.8	172.3
Physician Assistants Reimbursement Levels Compared to Therapists				
Oregon	91.3	123.4	113.5	70.3
All States	29.6	33.8	59.3	101.6

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.

Appendix C-38: Pennsylvania Disparity Analysis, All Plans

Sample size in 2021: 467,806 covered lives

Out-of-network utilization

	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×

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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
All States	29.6	33.8	59.3	101.6

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.

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

Sample size in 2021: 21,971 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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

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.

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

Sample size in 2021: 115,704 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
South Carolina All Medical/Surgical Clinicians	113.2	114.6	121.0
South Carolina All Behavioral Health Clinicians	77.2	79.5	80.6
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
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			
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	35.5	29.1	27.3
All States	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	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
All States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
South Carolina All Medical/Surgical Clinicians	121.0	100.0	148.5	264.9
South Carolina All Behavioral Health Clinicians	80.6	59.5	73.2	103.8
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
South Carolina	50.2	68.1	102.8	155.3
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 Psychologists	96.4	84.8	103.3	188.5
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				
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				
South Carolina	63.6	79.5	102.5	201.7
All States	29.6	33.8	59.3	101.6

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.

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

Sample size in 2021: 20,128 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
South Dakota All Medical/Surgical Clinicians	161.4	149.2	188.6	264.9
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	166.4	191.8	217.6	351.7
South Dakota Psychiatrists	141.3	146.1	150.2	196.3
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				
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	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	28.0	31.7	54.9	75.1
All States	29.6	33.8	59.3	101.6

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.

Appendix C-42: Tennessee Disparity Analysis, All Plans

Sample size in 2021: 221,601 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
Tennessee All Medical/Surgical Clinicians	129.2	131.0	133.4
Tennessee All Behavioral Health Clinicians	75.7	79.3	83.5
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians			
Tennessee	70.8	65.3	59.8
All States	33.3	25.7	21.7
Medical/Surgical Specialist Physicians Versus Psychiatrists			
Tennessee Medical/Surgical Specialist Physicians	132.5	134.5	137.2
Tennessee Psychiatrists	76.2	76.6	81.4
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists			
Tennessee	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	63.1
All States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Tennessee All Medical/Surgical Clinicians	133.4	116.6	157.9	289.4
Tennessee All Behavioral Health Clinicians	83.5	65.9	82.8	126.5
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Tennessee	59.8	77.0	90.6	128.9
All States	21.7	26.6	48.0	70.4
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				
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				
Tennessee Medical/Surgical Specialist Physicians	137.2	132.3	176.7	332.1
Tennessee Psychologists	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 Nurse Practitioners	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				
Tennessee	24.7	16.3	38.8	46.2
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Tennessee Physician Assistants	134.9	110.6	146.6	205.9
Tennessee Therapists	82.7	63.6	72.0	100.1
Physician Assistants Reimbursement Levels Compared to Therapists				
Tennessee	63.1	73.9	103.7	105.6
All States	29.6	33.8	59.3	101.6

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.

Appendix C-43: Texas Disparity Analysis, All Plans

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

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Texas All Medical/Surgical Clinicians	115.2	97.3	128.3	235.3
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	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	18.4	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				
Texas	37.4	52.0	68.8	114.1
All States	29.6	33.8	59.3	101.6

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.

Appendix C-44: Utah Disparity Analysis, All Plans

Sample size in 2021: 80,575 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Utah All Medical/Surgical Clinicians	127.0	113.0	140.7	235.7
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 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	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				
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	43.3	49.1	72.2	97.1
All States	29.6	33.8	59.3	101.6

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.

Appendix C-45: Vermont Disparity Analysis, All Plans

Sample size in 2021: 9,227 covered lives

Out-of-network utilization

	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			
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×
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			
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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Vermont All Medical/Surgical Clinicians	137.7	112.3	156.2	314.7
Vermont All Behavioral Health Clinicians	85.8	66.9	83.6	122.6
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Vermont	60.4	67.8	86.8	156.7
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Vermont Medical/Surgical Specialist Physicians	139.4	123.8	184.3	345.4
Vermont Psychiatrists	105.2	102.9	122.6	170.7
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychiatrists				
Vermont	32.6	20.3	50.4	102.4
All States	24.9	12.8	27.8	49.5
Medical/Surgical Specialist Physicians Versus Psychologists				
Vermont Medical/Surgical Specialist Physicians	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	143.3	111.3	137.2	245.0
Vermont Psychiatric Nurses	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
Vermont Therapists	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

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.

Appendix C-46: Virginia Disparity Analysis, All Plans

Sample size in 2021: 557,448 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
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			
Virginia	44.9	29.9	9.3
All States	33.3	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	121.3	123.6	126.9
Virginia Psychologists	83.8	92.6	108.4
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	57.3	42.7	17.8
All States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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
All States	29.6	33.8	59.3	101.6

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.

Appendix C-47: Washington Disparity Analysis, All Plans

Sample size in 2021: 174,145 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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

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.

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

Sample size in 2021: 29,225 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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

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.

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

Sample size in 2021: 42,261 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	Percent, %		
	2019	2020	2021
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians			
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			
West 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	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	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			
West Virginia	9.1	10.8	9.1
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			
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
All States	40.6	34.5	29.6

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	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
All States	29.6	33.8	59.3	101.6

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.

Appendix C-50: Wisconsin Disparity Analysis, All Plans

Sample size in 2021: 100,617 covered lives

Out-of-network utilization

	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×

* 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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Wisconsin All Medical/Surgical Clinicians	218.8	189.7	252.1	501.2
Wisconsin All Behavioral Health Clinicians	128.3	90.8	125.8	255.2
All Medical/Surgical Clinicians Reimbursement Levels Compared to All Behavioral Health Clinicians				
Wisconsin	70.5	109.0	100.4	96.4
All States	21.7	26.6	48.0	70.4
Medical/Surgical Specialist Physicians Versus Psychiatrists				
Wisconsin Medical/Surgical Specialist Physicians	233.1	222.7	309.4	620.9
Wisconsin Psychiatrists	125.5	110.0	152.4	248.4
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	49.5
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	402.1
Medical/Surgical Specialist Physicians Reimbursement Levels Compared to Psychologists				
Wisconsin	79.7	133.9	120.6	96.4
All States	28.8	17.3	44.0	38.5
Nurse Practitioners Versus Psychiatric Nurses				
Wisconsin Nurse Practitioners	214.7	177.4	227.5	371.4
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	77.3
All States	7.5	-1.1	18.4	34.3
Physician Assistants Versus Therapists				
Wisconsin Physician Assistants	231.6	196.5	235.2	416.9
Wisconsin Therapists	129.7	89.5	99.6	238.5
Physician Assistants Reimbursement Levels Compared to Therapists				
Wisconsin	78.6	119.5	136.2	74.8
All States	29.6	33.8	59.3	101.6

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.

Appendix C-51: Wyoming Disparity Analysis, All Plans

Sample size in 2021: 7,414 covered lives

Out-of-network utilization

	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.

Average in-network reimbursement levels relative to Medicare reimbursement for office visits

	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

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.

Average and percentile in-network reimbursement levels relative to Medicare reimbursement for office visits, 2021

	Percentile, %			
	Average	50th (Median)	75th	95th
All Medical/Surgical Clinicians Versus All Behavioral Health Clinicians				
Wyoming All Medical/Surgical Clinicians	173.6	158.3	167.1	392.7
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	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				
Wyoming	60.1	54.1	47.3	144.6
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
All States	29.6	33.8	59.3	101.6

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.