



United States Government Accountability Office  
Washington, DC 20548

May 31, 2012

The Honorable George Miller  
Ranking Member  
Committee on Education and the Workforce  
House of Representatives

Subject: *Mental Health and Substance Use: Treatment Exclusions in Employers' Health Insurance Coverage*

Dear Mr. Miller:

On November 30, 2011, we issued a report entitled *Mental Health and Substance Use: Employers' Insurance Coverage Maintained or Enhanced Since Parity Act, but Effect of Coverage on Enrollees Varied*.<sup>1</sup> The report was written to fulfill a mandate in the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008 (MHPAEA) that required us to examine trends in coverage for mental health conditions and substance use disorders (MH/SU).<sup>2</sup> As a follow-up to the report, you asked us to provide additional information about plans' treatment exclusions for MH/SU.<sup>3</sup>

The information about treatment exclusions for MH/SU was based on survey data that we collected for our report to determine the extent to which employers covered MH/SU during the plan year in effect at the time of our survey—either 2011 or 2010—and in 2008. We surveyed a stratified random sample of small, medium, large, and very large employers about their most popular health plans for either the 2011 or 2010 plan year, as well as for 2008. We fielded our web-based survey between May 18, 2011, and July 1, 2011, to 707 employers, selected from the sampling frame we developed using the Lexis Nexis corporate database.<sup>4</sup> We received usable responses from 168 employers, after following up with nonrespondents to encourage their participation, for a 24 percent response rate. All 168 employers offered coverage of mental health conditions, substance use

<sup>1</sup>See [GAO-12-63](#), Nov. 30, 2011.

<sup>2</sup>Pub. L. No. 110-343, Div. C, Tit. V, Sub. B, § 512, 122 Stat. 3765, 3892 (Oct. 3, 2008).

<sup>3</sup>This follow-up information was initially provided to you on December 16, 2011.

<sup>4</sup>To develop our sampling frame, we used the Dossier function of the Lexis Nexis corporate database to select 32,431 U.S.-based companies on January 18, 2011. We selected privately held and publicly traded parent companies with between 51 to 100,000 employees that were headquartered in the United States. We drew our random sample of employers from this sampling frame. We excluded employers from our survey that had 50 or fewer employees because MHPAEA did not apply to them.

disorders, or both, in either the 2011 or 2010 plan year, 2008 plan year, or both plan years. Given our overall response rate of 24 percent, our survey results are not generalizable. Rather, the survey responses provide information limited to responding employers' coverage of MH/SU in the 2011 or 2010 plan year and 2008 plan year. We did not verify the accuracy of the employers' responses or assess compliance with MHPAEA.

We conducted our work in December 2011 and April and May 2012 in accordance with all sections of GAO's Quality Assurance Framework that are relevant to our objectives. The framework requires that we plan and perform the engagement to obtain sufficient and appropriate evidence to meet our stated objectives and to discuss any limitations in our work. We believe that the information and data obtained, and the analysis conducted, provide a reasonable basis for any findings and conclusions.

In summary, table 1 provides the incidence of treatment exclusions for MH/SU for the 2011 or 2010 plan year and the 2008 plan year for employers that responded to our survey. In total, for the 2011 or 2010 plan year, of the 96 employers that responded to our question about whether their most popular plan excluded coverage for any specific treatments related to MH/SU, 39 employers reported excluding a treatment. In comparison, for the 2008 plan year, of the 81 employers that responded to our question about whether their most popular excluded coverage for any specific treatments related to MH/SU, 27 employers reported excluding a treatment. The enclosure provides details on the treatment exclusions summarized in table 1.

**Table 1: The Incidence of Plan Treatment Exclusions for Mental Health Conditions and Substance Use Disorders Among Survey Respondents**

Treatment exclusion	Number of times a treatment was listed as an exclusion		Percent of plans that excluded a treatment (based on number of plans in each year where employer indicated a treatment was excluded)	
	2011 or 2010 <sup>a</sup>	2008 <sup>b</sup>	2011 or 2010 <sup>a</sup>	2008 <sup>b</sup>
Alcoholism	2	3	5.1%	11.1%
Attention deficit disorder	2	0	5.1%	0.0%
Autism	4	2	10.3%	7.4%
Behavioral disorders/problems/delays/counseling/health/training/services	12	3	30.8%	11.1%
Bioenergetic therapy	2	1	5.1%	3.7%
Biofeedback	4	2	10.3%	7.4%
Borderline intellectual functioning	5	4	12.8%	14.8%
Conditions not in the Diagnostic and Statistical Manual	3	5	7.7%	18.5%
Conduct/impulse disorders	2	3	5.1%	11.1%
Court-ordered treatments/treatments for the incarcerated	11	9	28.2%	33.3%
Custodial services	10	5	25.6%	18.5%
Developmental disorder/disabilities/delays	10	6	25.6%	22.2%
Developmental reading, arithmetic, and language disorders	5	4	12.8%	14.8%
Educational testing	2	1	5.1%	3.7%
Experimental/investigational	3	1	7.7%	3.7%
Feeding disorders	2	0	5.1%	0.0%
Hypnosis	5	1	12.8%	3.7%
I.Q. testing	5	4	12.8%	14.8%
Learning disabilities	9	5	23.1%	18.5%
Marital therapy/counseling	4	4	10.3%	14.8%
Mental retardation	7	3	18.0%	11.1%
Organic mental disorders	6	5	15.4%	18.5%
Primal therapy	2	1	5.1%	3.7%
Psychological testing	6	4	15.4%	14.8%
Residential treatment facility	6	3	15.4%	11.1%
Rolfing/structural integration	2	1	5.1%	3.7%
Sex change/transsexual surgery	7	2	18.0%	7.4%
Sex counseling	2	2	5.1%	7.4%
Sexual dysfunction/deviation	9	2	23.1%	7.4%
Sleep disorders/insomnia	3	3	7.7%	11.1%
Smoking cessation/tobacco addiction	8	2	20.5%	7.4%
Special education	4	1	10.3%	3.7%
V-code	3	1	7.7%	3.7%
Vocational/religious (pastoral) counseling	12	5	30.8%	18.5%

Source: GAO analysis of employers' survey responses on health insurance coverage.

Note: The list of treatment exclusions was determined based on the responses provided to us by employers in our survey for the employers' most popular plan in the plan year in effect at the time of our survey (2011 or 2010) and the 2008 plan year.

<sup>a</sup>For the 2011 or 2010 plan year, of the 96 employers that responded to the question about whether their most popular health plan excluded coverage for any specific treatments related to MH/SU, 39 employers reported excluding a treatment.

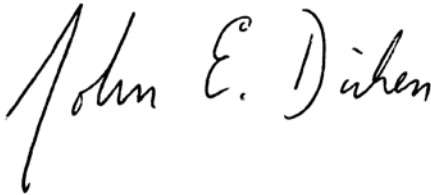
<sup>b</sup>For the 2008 plan year, of the 81 employers that responded to the question about whether their most popular health plan excluded coverage for any specific treatments related to MH/SU, 27 employers reported excluding a treatment.

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The report will be available at no charge on our website at <http://www.gao.gov>.

If you or your staff have any questions about this information, please contact me at (202) 512-7114 or [dickenj@gao.gov](mailto:dickenj@gao.gov). Jennifer Grover, Assistant Director, and Elizabeth Conklin also made key contributions to this product. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report.

Sincerely yours,

A handwritten signature in black ink that reads "John E. Dicken". The signature is written in a cursive style with a large initial 'J' and 'D'.

John E. Dicken  
Director, Health Care

Enclosure

### Details of Plan Treatment Exclusions for Mental Health Conditions and Substance Use Disorders

This enclosure provides the specific language regarding treatment exclusions for mental health conditions and substance use disorders for the 2011 or 2010 plan year and the 2008 plan year for employers who responded to our survey. When specific language for a treatment exclusion was used by more than one plan, the enclosure table provides information about the number of plans that used the language. The enclosure table provides details of the treatment exclusions summarized in table 1.

**Table 2: Details of Plan Treatment Exclusions for Mental Health Conditions and Substance Use Disorders Among Survey Respondents**

Treatment exclusion	Details of responses on treatment exclusions	
	2011 or 2010 Plan Year	2008 Plan Year
Alcoholism	<ul style="list-style-type: none"> <li>• Alcohol and/or Substance Abuse treatments are not considered mental health benefits.</li> <li>• Alcohol. Services or supplies furnished for diagnosis or treatment of alcoholism, controlled substance abuse, chemical dependency, tobacco addiction, or codependency treatment for any of the above except as provided in the Schedule of Benefits.</li> </ul>	<ul style="list-style-type: none"> <li>• Alcohol and/or Substance Abuse treatments are not considered mental health benefits.</li> <li>• Services or supplies furnished for diagnosis or treatment of alcoholism, controlled substance abuse, chemical dependency, tobacco addiction, or codependency treatment for any of the above except as provided in the Schedule of Benefits.</li> <li>• For Acute Care, rehabilitative care, or diagnostic testing or evaluation of Mental or Nervous Conditions, Alcoholism, Substance Abuse or Addiction, or for Pain Rehabilitation, except as specified as a Covered Service in this Plan.</li> </ul>
Attention deficit disorder	<ul style="list-style-type: none"> <li>• Charges for education, learning disabilities, job training, behavioral problems or attention deficit disorders whether or not provided by a facility that also provides medical or psychiatric treatment.</li> <li>• For any care that extends beyond traditional medical management for autistic disease of childhood, Pervasive Development Disorders, Attention Deficit Disorder, learning disabilities, behavioral problems, or mental retardation.</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>

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<b>Details of responses on treatment exclusions</b>		
<b>Treatment exclusion</b>	<b>2011 or 2010 Plan Year</b>	<b>2008 Plan Year</b>
Autism	<ul style="list-style-type: none"> <li>• Educational therapy or other nonmedical ancillary services for learning disabilities, developmental delays, autism, or mental retardation.</li> <li>• For any care that extends beyond traditional medical management for autistic disease of childhood, Pervasive Development Disorders, Attention Deficit Disorder, learning disabilities, behavioral problems, or mental retardation.</li> <li>• Expenses for nonmedical ancillary services and treatment related to learning disabilities, developmental delays, autism, or mental retardation.</li> <li>• Intensive behavioral therapy for treatment of autism spectrum disorders.</li> </ul>	<ul style="list-style-type: none"> <li>• Autism and Other Pervasive Developmental Disorders (PDD).</li> <li>• Expenses for nonmedical ancillary services and treatment related to learning disabilities, developmental delays, autism, or mental retardation.</li> </ul>
Behavioral disorders/problems/delays/counseling/health/training/services	<ul style="list-style-type: none"> <li>• Special education, school testing or evaluations, counseling, therapy or care for learning deficiencies or behavioral problems.</li> <li>• Educational services and treatment of behavioral disorders, together with services for remedial education including evaluation or treatment of learning disabilities, minimal brain dysfunction, developmental and learning disorders, behavioral training, and cognitive rehabilitation. This includes services, treatment, or educational testing and training related to behavioral (conduct) problems, learning disabilities, or developmental delays.</li> <li>• Educational/behavioral services that are focused on primarily building skills and capabilities in communication, social interaction, and learning.</li> <li>• Behavioral problems and learning disabilities. Charges for education, learning disabilities, job training, behavioral problems, or attention deficit disorders whether or not provided by a facility that also provides medical or psychiatric treatment.</li> </ul>	<ul style="list-style-type: none"> <li>• Special education, school testing or evaluations, counseling, therapy or care for learning deficiencies or behavioral problems.</li> <li>• Service or care related to the educational treatment of behavioral disorders.</li> <li>• Services and supplies which are rendered in connection with mental illnesses not classified in the International Classification of Diseases of the U.S. Department of Health and Human Services or extended beyond the period necessary for evaluation and diagnosis of learning and behavioral disabilities or for mental retardation.</li> </ul>

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Treatment exclusion	Details of responses on treatment exclusions	
	2011 or 2010 Plan Year	2008 Plan Year
Behavioral disorders/problems/delays/counseling/health/training/services (cont.)	<ul style="list-style-type: none"> <li>• Nonmedical counseling or ancillary services, including, but not limited to, Custodial Services, education, training, vocational rehabilitation, behavioral training, biofeedback, neurofeedback, hypnosis, sleep therapy, employment counseling, back school, return-to-work services, work hardening programs, driving safety, and services training, educational therapy or other nonmedical ancillary services for learning disabilities, developmental delays, autism, or mental retardation.</li> <li>• Services and supplies which are rendered in connection with mental illnesses not classified in the International Classification of diseases of the U.S. Department of Health and Human Services; or extended beyond the period necessary for evaluation and diagnosis of learning and behavioral disabilities or for mental retardation. (Two plans used this language.)</li> <li>• For any care that extends beyond traditional medical management for autistic disease of childhood, Pervasive Development Disorders, Attention Deficit Disorder, learning disabilities, behavioral problems, or mental retardation.</li> <li>• Behavioral training and services, educational therapy or other nonmedical ancillary services for learning disabilities, developmental delays, or mental retardation are also excluded except as specified in the Severe Mental Illness of a Member of any Age and Serious Emotional Disturbances of a Child section of Section IV.</li> <li>• Treatment of behavioral disorders.</li> <li>• Behavioral counseling.</li> <li>• Treatment for behavioral health conditions.</li> </ul>	

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<b>Details of responses on treatment exclusions</b>		
<b>Treatment exclusion</b>	<b>2011 or 2010 Plan Year</b>	<b>2008 Plan Year</b>
Bioenergetic therapy	<ul style="list-style-type: none"> <li>• Therapies that do not meet national standards for mental health professional practice, including but not unlimited to, Erhard/The Forum, primal therapy, rolfing, sensitivity training, bioenergetic therapy, or crystal healing therapy.</li> <li>• Treatment modalities that have not been incorporated into the commonly accepted therapeutic repertoire as determined by broad-based professional consensus, such as primal therapy, rolfing or structural integration, bioenergetic therapy, and obesity control therapy.</li> </ul>	<ul style="list-style-type: none"> <li>• Therapies that do not meet national standards for mental health professional practice, including but not limited to, Erhard/The Forum, primal therapy, rolfing, sensitivity training, bioenergetic therapy, or crystal healing therapy.</li> </ul>
Biofeedback	<ul style="list-style-type: none"> <li>• Nonmedical counseling or ancillary services, including but not limited to, Custodial Services, education, training, vocational rehabilitation, behavioral training, biofeedback, neurofeedback, hypnosis, sleep therapy, employment counseling, back school, return-to-work services, work hardening programs, driving safety, and services training, educational therapy or other nonmedical ancillary services for learning disabilities, developmental delays, autism, or mental retardation.</li> <li>• Nonmedical counseling or ancillary services including but not limited to, Custodial Services, education, training, vocational rehabilitation, biofeedback, neurofeedback, hypnosis, sleep therapy, employment counseling, back school, return-to-work services, work hardening programs, and driving safety.</li> <li>• Biofeedback. (Two plans used this language.)</li> </ul>	<ul style="list-style-type: none"> <li>• Biofeedback. (Two plans used this language.)</li> </ul>
Borderline intellectual functioning	<ul style="list-style-type: none"> <li>• Counseling for borderline intellectual functioning. (Five plans used this language.)</li> </ul>	<ul style="list-style-type: none"> <li>• Counseling for borderline intellectual functioning. (Four plans used this language.)</li> </ul>
“Conditions not in the Diagnostic and Statistical Manual”	<ul style="list-style-type: none"> <li>• Services performed in connection with conditions not classified in the current edition of the Diagnostic and Statistical Manual of the American Psychiatric Association. (Three plans used this language.)</li> </ul>	<ul style="list-style-type: none"> <li>• Services performed in connection with conditions not classified in the current edition of the Diagnostic and Statistical Manual of the American Psychiatric Association. (Three plans used this language.)</li> </ul>



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<b>Details of responses on treatment exclusions</b>		
<b>Treatment exclusion</b>	<b>2011 or 2010 Plan Year</b>	<b>2008 Plan Year</b>
<p>“Conditions not in the Diagnostic and Statistical Manual” (cont.)</p>		<ul style="list-style-type: none"> <li>• Conditions which (the plan) determines to lack a recognizable III-R classification in the most current edition of the Diagnostic and Statistical Manual of Mental Disorders of the American Psychiatric Association.</li> <li>• Treatment of any condition categorized as an Axis II condition under the then current Diagnostic and Statistical Manual of the American Psychiatric Association without any clinical likelihood of improvement, except for acute exacerbations of the condition.</li> </ul>
<p>Conduct/impulse disorders</p>	<ul style="list-style-type: none"> <li>• Educational services and treatment of behavioral disorders, together with services for remedial education including evaluation or treatment of learning disabilities, minimal brain dysfunction, developmental and learning disorders, behavioral training, and cognitive rehabilitation. This includes services, treatment, or educational testing and training related to behavioral (conduct) problems, learning disabilities, or developmental delays.</li> <li>• Treatments for the primary diagnoses of learning disabilities, conduct and impulse control disorders, personality disorders, and paraphilias.</li> </ul>	<ul style="list-style-type: none"> <li>• Treatment for conduct and impulse control disorders, personality disorders, paraphilias, and other Mental Illnesses that will not substantially improve beyond the current level of functioning, or that are not subject to favorable modification or management according to prevailing national standards of clinical practice, as reasonably determined by the Mental Health/ Substance Abuse Designee. (Three plans used this language.)</li> </ul>
<p>Court-ordered treatments/treatments for the incarcerated</p>	<ul style="list-style-type: none"> <li>• Court-ordered evaluation or treatment, or treatment that is a condition of parole or probation or in lieu of sentencing, such as psychiatric evaluation or therapy.</li> <li>• Treatment provided in connection with services for individuals who are presently incarcerated, confined, or committed to a local correctional facility or prison, or a custodial facility for youth operated by the office of children and family services, unless authorized by the Mental Health/Substance Use Disorder Designee.</li> </ul>	<ul style="list-style-type: none"> <li>• Court-mandated treatment or treatment that is a condition of parole or probation or in lieu of sentencing.</li> <li>• Any court-ordered treatment or therapy, or any treatment or therapy ordered as a condition of parole, probation, or custody or visitation evaluations unless Medically Necessary and otherwise covered under this policy or agreement. (Four plans used this language.)</li> <li>• Charges for services, treatment, or care of any kind of Chemical Dependency if the participant is convicted in any court of law and is required by the court, or arranges in lieu of conviction, to undergo care or treatment as an alternative to, or in addition to, a fine or imprisonment.</li> </ul>

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<b>Details of responses on treatment exclusions</b>		
<b>Treatment exclusion</b>	<b>2011 or 2010 Plan Year</b>	<b>2008 Plan Year</b>
Court-ordered treatments/treatments for the incarcerated (cont.)	<ul style="list-style-type: none"> <li>• Any court-ordered treatment or therapy, or any treatment or therapy ordered as a condition of parole, probation, or custody or visitation evaluations unless Medically Necessary and otherwise covered under this policy or agreement. (Five plans used this language.)</li> <li>• Court-ordered psychiatric or substance abuse treatment except when certified by (the plan) as medically necessary.</li> <li>• Court-ordered behavioral health services.</li> <li>• Court-ordered examinations and treatment, unless Medically Necessary.</li> <li>• Court-ordered testing and/or evaluation.</li> </ul>	<ul style="list-style-type: none"> <li>• Court-ordered psychiatric or substance abuse treatment except when certified by (the plan) as medically necessary.</li> <li>• Counseling, studies, services, or confinements ordered by a court or law enforcement officer that are not determined to be medically necessary by the Plan Administrator or its designee.</li> <li>• Court-ordered behavioral health services.</li> </ul>
Custodial services	<ul style="list-style-type: none"> <li>• Treatment provided in connection with services for individuals who are presently incarcerated, confined, or committed to a local correctional facility or prison, or a custodial facility for youth operated by the office of children and family services, unless authorized by the Mental Health/Substance Use Disorder Designee.</li> <li>• Custodial care, including but not limited to, geriatric day care. (Four plans use this language.)</li> <li>• Custodial care. (Two plans use this language.)</li> <li>• Nonmedical counseling or ancillary services, including but not limited to, Custodial Services, education, training, vocational rehabilitation, behavioral training, biofeedback, neurofeedback, hypnosis, sleep therapy, employment counseling, back school, return-to-work services, work hardening programs, driving safety, and services training, educational therapy, or other nonmedical ancillary services for learning disabilities, developmental delays, autism, or mental retardation.</li> </ul>	<ul style="list-style-type: none"> <li>• Custodial care, including but not limited to, geriatric day care. (Three plans used this language.)</li> <li>• Custodial care.</li> <li>• Custodial or domiciliary care.</li> </ul>

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Treatment exclusion	Details of responses on treatment exclusions	
	2011 or 2010 Plan Year	2008 Plan Year
Custodial services (cont.)	<ul style="list-style-type: none"> <li>Nonmedical counseling or ancillary services, including but not limited to, Custodial Services, education, training, vocational rehabilitation, biofeedback, neurofeedback, hypnosis, sleep therapy, employment counseling, back school, return-to-work services, work hardening programs, and driving safety.</li> <li>Custodial or domiciliary care.</li> </ul>	
Developmental disorder/ disabilities/delays	<ul style="list-style-type: none"> <li>Learning disabilities and developmental delays.</li> <li>Developmental disorders, including but not limited to, developmental reading disorders, developmental arithmetic disorders, developmental language disorders, or developmental articulation disorders. (Five plans use this language.)</li> <li>Educational services and treatment of behavioral disorders, together with services for remedial education including evaluation or treatment of learning disabilities, minimal brain dysfunction, developmental and learning disorders, behavioral training, and cognitive rehabilitation. This includes services, treatment, or educational testing and training related to behavioral (conduct) problems, learning disabilities, or developmental delays.</li> <li>Educational therapy or other nonmedical ancillary services for learning disabilities, developmental delays, autism, or mental retardation.</li> <li>Behavioral training and services, educational therapy, or other nonmedical ancillary services for learning disabilities, developmental delays, or mental retardation are also excluded except as specified in the Severe Mental Illness of a Member of any Age and Serious Emotional Disturbances of a Child section of Section IV.</li> <li>Treatment related to learning disabilities, developmental delays, autism, or mental retardation.</li> </ul>	<ul style="list-style-type: none"> <li>Developmental disorders, including but not limited to, developmental reading disorders, developmental arithmetic disorders, developmental language disorders, or developmental articulation disorders. (Four plans used this language.)</li> <li>Autism and Other Pervasive Developmental Disorders (PDD).</li> <li>Expenses for nonmedical ancillary services and treatment related to learning disabilities, developmental delays, autism, or mental retardation.</li> </ul>

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<b>Details of responses on treatment exclusions</b>		
<b>Treatment exclusion</b>	<b>2011 or 2010 Plan Year</b>	<b>2008 Plan Year</b>
Developmental reading, arithmetic, and language disorders	<ul style="list-style-type: none"> <li>• Developmental disorders, including but not limited to, developmental reading disorders, developmental arithmetic disorders, developmental language disorders, or developmental articulation disorders. (Five plans use this language.)</li> </ul>	<ul style="list-style-type: none"> <li>• Developmental disorders, including but not limited to, developmental reading disorders, developmental arithmetic disorders, developmental language disorders, or developmental articulation disorders. (Four plans used this language.)</li> </ul>
Educational testing	<ul style="list-style-type: none"> <li>• Learning disabilities and developmental delays. Those for or related to services, treatment, educational testing, or training related to learning disabilities or developmental delays.</li> <li>• Educational services and treatment of behavioral disorders, together with services for remedial education, including evaluation or treatment of learning disabilities, minimal brain dysfunction, developmental and learning disorders, behavioral training, and cognitive rehabilitation. This includes services, treatment, or educational testing and training related to behavioral (conduct) problems, learning disabilities, or developmental delays.</li> </ul>	<ul style="list-style-type: none"> <li>• Academic or educational testing, counseling.</li> </ul>
Experimental/ investigational	<ul style="list-style-type: none"> <li>• Experimental or Investigational Care, as determined by (the plan), including any charges for related services or supplies furnished in connection with Experimental or Investigational Care.</li> <li>• Experimental or investigational therapies.</li> <li>• Services or supplies for the diagnosis or treatment of Mental Illness, alcoholism, or substance use disorders that, in the reasonable judgment of the Mental Health/ Substance Use Disorder Administrator, are any of the following: Not consistent with generally accepted standards of medical practice for the treatment of such conditions. Not consistent with services backed by credible research soundly demonstrating that the services or supplies will have a measurable and beneficial health outcome, and therefore considered experimental.</li> </ul>	<ul style="list-style-type: none"> <li>• Experimental or investigational therapies.</li> </ul>

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Details of responses on treatment exclusions		
Treatment exclusion	2011 or 2010 Plan Year	2008 Plan Year
Feeding disorders	<ul style="list-style-type: none"> <li>• Mental Health Services as treatment for a primary diagnosis of insomnia and other sleep disorders, sexual dysfunction disorders, feeding disorders, neurological disorders, and other disorders with a known physical basis.</li> <li>• Psychotherapy or counseling services for feeding and eating disorder in early childhood and infancy, tic disorder, except for Tourette disorder, elimination disorder, mental disorder due to general medical condition, sexual function disorder, sleep disorder, medication-induced movement disorder, and nicotine dependence unless specifically covered in the contract.</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
Hypnosis	<ul style="list-style-type: none"> <li>• Nonmedical counseling or ancillary services, including but not limited to, Custodial Services, education, training, vocational rehabilitation, behavioral training, biofeedback, neurofeedback, hypnosis, sleep therapy, employment counseling, back school, return-to-work services, work hardening programs, driving safety, and services training, educational therapy or other nonmedical ancillary services for learning disabilities, developmental delays, autism, or mental retardation.</li> <li>• Nonmedical counseling or ancillary services, including but not limited to, Custodial Services, education, training, vocational rehabilitation, biofeedback, neurofeedback, hypnosis, sleep therapy, employment counseling, back school, return-to-work services, work hardening programs, and driving safety.</li> <li>• Hypnosis or regressive hypnotic techniques.</li> <li>• Treatment of nicotine habit or addiction, including but not limited to, nicotine patches, hypnosis, smoking cessation classes, or tapes.</li> <li>• Hypnosis.</li> </ul>	<ul style="list-style-type: none"> <li>• Hypnosis.</li> </ul>
I.Q. testing	<ul style="list-style-type: none"> <li>• I.Q. testing. (Five plans used this language.)</li> </ul>	<ul style="list-style-type: none"> <li>• I.Q. testing. (Four plans used this language.)</li> </ul>

<b>Details of responses on treatment exclusions</b>		
<b>Treatment exclusion</b>	<b>2011 or 2010 Plan Year</b>	<b>2008 Plan Year</b>
Learning disabilities	<ul style="list-style-type: none"> <li>• Learning disabilities and developmental delays.</li> <li>• Educational rehabilitation or treatment of learning disabilities, regardless of the setting in which such services are provided.</li> <li>• Educational services and treatment of behavioral disorders, together with services for remedial education, including evaluation or treatment of learning disabilities, minimal brain dysfunction, developmental and learning disorders, behavioral training, and cognitive rehabilitation. This includes services, treatment, or educational testing and training related to behavioral (conduct) problems, learning disabilities, or developmental delays.</li> <li>• Treatment for the primary diagnoses of learning disabilities, conduct and impulse control disorders, personality disorders, and paraphilias.</li> <li>• Behavioral problems and learning disabilities. Charges for education, learning disabilities, job training, behavioral problems or attention deficit disorders whether or not provided by a facility that also provides medical or psychiatric treatment.</li> <li>• Nonmedical counseling or ancillary services, including but not limited to, Custodial Services, education, training, vocational rehabilitation, behavioral training, biofeedback, neurofeedback, hypnosis, sleep therapy, employment counseling, back school, return-to-work services, work hardening programs, driving safety, and services, training, educational therapy, or other nonmedical ancillary services for learning disabilities, developmental delays, autism, or mental retardation.</li> </ul>	<ul style="list-style-type: none"> <li>• Charges for education, learning disabilities, job training, behavior problems, or attention deficit disorders whether or not provided by a facility that also provides medical or Psychiatric treatment.</li> <li>• Conditions related to behavior problems or learning disabilities, except as may be required by law with respect to the treatment of biologically-based mental illness.</li> <li>• Educational rehabilitation or treatment of learning disabilities, regardless of the setting in which such services are provided.</li> <li>• Service or care related to the educational treatment of behavioral disorders together with services for remedial education, including learning disabilities, minimal brain dysfunction, development and learning disorders, behavioral training, and cognitive rehabilitation.</li> <li>• Social adjustment counseling, expenses for nonmedical ancillary services and treatment related to learning disabilities, developmental delays, autism, or mental retardation.</li> </ul>

Enclosure

Treatment exclusion	Details of responses on treatment exclusions	
	2011 or 2010 Plan Year	2008 Plan Year
Learning disabilities (cont.)	<ul style="list-style-type: none"> <li>For any care that extends beyond traditional medical management for autistic disease of childhood, Pervasive Development Disorders, Attention Deficit Disorder, learning disabilities, behavioral problems, or mental retardation.</li> <li>Behavioral training and services, educational therapy or other nonmedical ancillary services for learning disabilities, developmental delays, or mental retardation are also excluded except as specified in the Severe Mental Illness of a Member of any Age and Serious Emotional Disturbances of a Child section of Section IV.</li> <li>Expenses for nonmedical ancillary services and treatment related to learning disabilities.</li> </ul>	
Marital therapy/ counseling	<ul style="list-style-type: none"> <li>Marriage therapy. (Two plans used this language.)</li> <li>Marriage counseling.</li> <li>Marriage and family counseling without a behavioral health diagnosis.</li> </ul>	<ul style="list-style-type: none"> <li>Marital counseling, relationship counseling, family counseling except as described in this Summary Plan Document, or other similar counseling or training services.</li> <li>Marital therapy.</li> <li>Marriage counseling.</li> <li>Marital counseling.</li> </ul>
Mental retardation	<ul style="list-style-type: none"> <li>Nonmedical counseling or ancillary services, including but not limited to, Custodial Services, education, training, vocational rehabilitation, behavioral training, biofeedback, neurofeedback, hypnosis, sleep therapy, employment counseling, back school, return-to-work services, work hardening programs, driving safety, and services, training, educational therapy, or other nonmedical ancillary services for learning disabilities, developmental delays, autism, or mental retardation.</li> </ul>	<ul style="list-style-type: none"> <li>Mental retardation or mental conditions that, according to generally accepted professional standards, are not amenable to favorable modification, except for initial evaluation, diagnosis, or crisis intervention.</li> <li>Services and supplies which are rendered in connection with mental illnesses not classified in the International Classification of Diseases of the U.S. Department of Health and Human Services or extended beyond the period necessary for evaluation and diagnosis of learning and behavioral disabilities or for mental retardation.</li> </ul>

<b>Details of responses on treatment exclusions</b>		
<b>Treatment exclusion</b>	<b>2011 or 2010 Plan Year</b>	<b>2008 Plan Year</b>
Mental retardation (cont.)	<ul style="list-style-type: none"> <li>• Services and supplies which are rendered in connection with mental illnesses not classified in the International Classification of diseases of the U.S. Department of Health and Human Services; or extended beyond the period necessary for evaluation and diagnosis of learning and behavioral disabilities or for mental retardation. (Two plans used this language.)</li> <li>• For any care that extends beyond traditional medical management for autistic disease of childhood, Pervasive Development Disorders, Attention Deficit Disorder, learning disabilities, behavioral problems, or mental retardation.</li> <li>• Behavioral training and services, educational therapy or other nonmedical ancillary services for learning disabilities, developmental delays, or mental retardation are also excluded except as specified in the Severe Mental Illness of a Member of any Age and Serious Emotional Disturbances of a Child section of Section IV.</li> <li>• Services related to mental retardation.</li> <li>• Expenses for nonmedical ancillary services and treatment related to learning disabilities, developmental delays, autism, or mental retardation.</li> </ul>	<ul style="list-style-type: none"> <li>• Expenses for nonmedical ancillary services and treatment related to learning disabilities, developmental delays, autism, or mental retardation.</li> </ul>
Organic mental disorders	<ul style="list-style-type: none"> <li>• Treatment of disorders which have been diagnosed as organic mental disorders associated with permanent dysfunction of the brain. (Five plans used this language).</li> <li>• For treatment of sexual dysfunction not related to organic disease except for sexual dysfunction resulting from an injury.</li> </ul>	<ul style="list-style-type: none"> <li>• Treatment of disorders which have been diagnosed as organic mental disorders associated with permanent dysfunction of the brain. (Four plans used this language.)</li> <li>• Treatment of organic mental disorders associated with permanent dysfunction of the brain except for acute exacerbations of the condition.</li> </ul>
Primal therapy	<ul style="list-style-type: none"> <li>• Therapies that do not meet national standards for mental health professional practice, including but not limited to, Erhard/The Forum, primal therapy, rolfing, sensitivity training, bioenergetic therapy, or crystal healing therapy.</li> </ul>	<ul style="list-style-type: none"> <li>• Therapies that do not meet national standards for mental health professional practice, including but not limited to, Erhard/The Forum, primal therapy, rolfing, sensitivity training, bioenergetic therapy, or crystal healing therapy.</li> </ul>



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Details of responses on treatment exclusions		
Treatment exclusion	2011 or 2010 Plan Year	2008 Plan Year
Primal therapy (cont.)	<ul style="list-style-type: none"> <li>• Treatment modalities that have not been incorporated into the commonly accepted therapeutic repertoire as determined by broad-based professional consensus, such as primal therapy, rolfing or structural integration, bioenergetic therapy, and obesity control therapy.</li> </ul>	
Psychological testing	<ul style="list-style-type: none"> <li>• Psychological testing when not medically necessary.</li> <li>• Psychological testing on children requested by or for a school system. (Two plans used this language.)</li> <li>• Psychological testing, except when precertified as medically necessary by (the plan).</li> <li>• Psychological testing. (Two plans used this language.)</li> </ul>	<ul style="list-style-type: none"> <li>• Psychological testing when not medically necessary.</li> <li>• Psychological testing on children requested by or for a school system. (Two plans used this language.)</li> <li>• Psychological testing, except when precertified as medically necessary by (the plan).</li> </ul>
Residential treatment facility	<ul style="list-style-type: none"> <li>• Residential Treatment Centers used for the treatment of any condition other than Alcoholism and/or Substance Abuse.</li> <li>• Mental Health Residential Treatment.</li> <li>• Covered services in a residential treatment facility, provided in a residential treatment facility, when the member fails to complete that phase of treatment.</li> <li>• Residential Care by a Residential Treatment Facility.</li> <li>• Necessary services such as vocational programs or employment counseling residential treatment program.</li> <li>• Covered expense does not include charges for inpatient or outpatient services rendered in a residential treatment facility.</li> </ul>	
Rolfing/structural integration	<ul style="list-style-type: none"> <li>• Therapies that do not meet national standards for mental health professional practice, including but not limited to, Erhard/The Forum, primal therapy, rolfing, sensitivity training, bioenergetic therapy, or crystal healing therapy.</li> </ul>	

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Details of responses on treatment exclusions		
Treatment exclusion	2011 or 2010 Plan Year	2008 Plan Year
Rolfing/structural integration (cont.)	<ul style="list-style-type: none"> <li>Treatment modalities that have not been incorporated into the commonly accepted therapeutic repertoire as determined by broad-based professional consensus, such as primal therapy, rolfing or structural integration, bioenergetic therapy, and obesity control therapy.</li> </ul>	
Sex change/transsexual surgery	<ul style="list-style-type: none"> <li>Sex changes. Care, services, or treatment for noncongenital transsexualism, gender dysphoria, or sexual reassignment or change.</li> <li>Transsexual surgery, including medical or psychological counseling and hormonal therapy in preparation for, or subsequent to, any such surgery.</li> <li>For any treatment of either gender leading to or in connection with transsexual surgery, gender transformation, sexual dysfunction, or sexual inadequacy, including erectile dysfunction and/or impotence, even if related to a medical condition.</li> <li>For any treatment leading to or in connection with transsexual surgery except for illness or injury resulting from such surgery.</li> <li>Sex changes.</li> <li>Transsexual surgery and related services.</li> <li>Sex changes services, regardless of any diagnosis of gender role or psychosexual orientation problems.</li> </ul>	
Sex counseling	<ul style="list-style-type: none"> <li>Treatment for codependency, or sex counseling.</li> <li>Sex counseling.</li> </ul>	
Sexual dysfunction/deviation	<ul style="list-style-type: none"> <li>Any services, supplies, medications, or drugs for the treatment of male or female sexual dysfunction such as, but not limited to, treatment of erectile dysfunction (including penile implants), anorgasmia, and premature ejaculation.</li> </ul>	

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<b>Details of responses on treatment exclusions</b>		
<b>Treatment exclusion</b>	<b>2011 or 2010 Plan Year</b>	<b>2008 Plan Year</b>
Sexual dysfunction/ deviation (cont.)	<ul style="list-style-type: none"> <li>• Mental Health Services as treatment for a primary diagnosis of insomnia and other sleep disorders, sexual dysfunction disorders, feeding disorders, neurological disorders, and other disorders with a known physical basis.</li> <li>• Services for sexual deviation and dysfunction.</li> <li>• For any treatment of either gender leading to or in connection with transsexual surgery, gender transformation, sexual dysfunction, or sexual inadequacy, including erectile dysfunction and/or impotence, even if related to a medical condition.</li> <li>• For treatment of sexual dysfunction not related to organic disease except for sexual dysfunction resulting from an injury.</li> <li>• Sexual function disorder.</li> <li>• Charges for treatment of sexual dysfunction except as stated.</li> <li>• Treatment of sexual dysfunction.</li> <li>• Your coverage does not include benefits for services for sex transformation or sexual dysfunction.</li> </ul>	<ul style="list-style-type: none"> <li>• Treatment of sexual dysfunction or inadequacies including therapy, supplies, or counseling.</li> </ul>
Sleep disorders/ insomnia	<ul style="list-style-type: none"> <li>• Mental Health Services as treatment for a primary diagnosis of insomnia and other sleep disorders, sexual dysfunction disorders, feeding disorders, neurological disorders, and other disorders with a known physical basis.</li> <li>• Sleep disorders. (Two plans used this language.)</li> </ul>	<ul style="list-style-type: none"> <li>• Mental Health Services as treatment for insomnia and other sleep disorders, neurological disorders, and other disorders with a known physical basis. (Three plans used this language.)</li> </ul>
Smoking cessation/ tobacco addiction	<ul style="list-style-type: none"> <li>• Smoking cessation. Care and treatment for smoking cessation programs, including smoking deterrent products, unless medically necessary due to a severe active lung illness such as emphysema or asthma.</li> </ul>	<ul style="list-style-type: none"> <li>• Services or supplies furnished for diagnosis or treatment of alcoholism, controlled substance abuse, chemical dependency, tobacco addiction, or codependency treatment for any of the above except as provided in the Schedule of Benefits.</li> </ul>

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Details of responses on treatment exclusions		
Treatment exclusion	2011 or 2010 Plan Year	2008 Plan Year
Smoking cessation/ tobacco addiction (cont.)	<ul style="list-style-type: none"> <li>• Stand-alone multidisciplinary smoking cessation programs unless medically necessary as determined by us.</li> <li>• Services or supplies furnished for diagnosis or treatment of alcoholism, controlled substance abuse, chemical dependency, tobacco addiction, or codependency treatment for any of the above except as provided in the Schedule of Benefits.</li> <li>• Additionally, we will not cover any "V code" diagnoses except the following when medically necessary: parent-child relational problems for children 5 years of age or younger, neglect or abuse of a child for children 5 years of age or younger, and bereavement for children 5 years of age or younger, tobacco addiction treatment.</li> <li>• Smoking Cessation. (Two plans used this language.)</li> <li>• Treatment of nicotine habit or addiction, including but not limited to, nicotine patches, hypnosis, smoking cessation classes, or tapes.</li> <li>• Your coverage does not include benefits for smoking cessation programs not affiliated with us.</li> </ul>	<ul style="list-style-type: none"> <li>• Smoking cessation.</li> </ul>
Special education	<ul style="list-style-type: none"> <li>• Special education, school testing or evaluations, counseling, therapy, or care for learning deficiencies or behavioral problems.</li> <li>• Special education, including lessons in sign language to instruct a member whose ability to speak has been lost or impaired, to function without that ability, are not covered.</li> <li>• Remedial or special education services. (Two plans use this language.)</li> </ul>	<ul style="list-style-type: none"> <li>• Special education, school testing or evaluations, counseling, therapy, or care for learning deficiencies or behavioral problems. This applies whether or not associated with manifest mental illness or other disturbances.</li> </ul>
V-code	<ul style="list-style-type: none"> <li>• Mental Health Services as treatments for V-code conditions as listed within the current edition of the Diagnostic and Statistical Manual of the American Psychiatric Association. (Two plans used this language.)</li> </ul>	<p>These include relational problems such as: parent-child conflicts; problems related to abuse or neglect when intervention is focused on the perpetrator; and situations not attributable to a diagnosable disorder, including bereavement, academic, occupational, religious, and spiritual problems.</p>

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Details of responses on treatment exclusions		
Treatment exclusion	2011 or 2010 Plan Year	2008 Plan Year
V-code (cont.)	<ul style="list-style-type: none"> <li>• Additionally, we will not cover any “V code” diagnoses except the following when medically necessary: parent-child relational problems for children 5 years of age or younger, neglect or abuse of a child for children 5 years of age or younger, and bereavement for children 5 years of age or younger, tobacco addiction treatment.</li> </ul>	
Vocational/religious (pastoral) counseling	<ul style="list-style-type: none"> <li>• Vocational or religious counseling. (Six plans use this language.)</li> <li>• Vocational rehabilitation. (Two plans used this language.)</li> <li>• Vocational and recreational activities. (Two plans use this language.)</li> <li>• Vocational and educational training and/or services.</li> <li>• Referral for nonmedically necessary services such as vocational programs or employment counseling residential treatment program.</li> </ul>	<ul style="list-style-type: none"> <li>• Vocational or religious counseling. (Four plans used this language.)</li> <li>• Conditions classified as V-codes in the most current edition of the Diagnostic and Statistical Manual of Mental Disorders of the American Psychiatric Association. These include relational problems such as: parent-child conflicts; problems related to abuse or neglect when intervention is focused on the perpetrator; and situations not attributable to a diagnosable disorder, including bereavement, academic, occupational, religious, and spiritual problems.</li> </ul>

Source: GAO analysis of employers' survey responses on health insurance coverage.

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