The effectiveness of an NQTL Comparative Analysis is greatly diminished if those interacting with participants are unaware of its existence. The excessive time spent attempting to obtain these documents raises concerns about the value of the proposed rules. What is the purpose of such a substantial economic investment if there is only one phone number available, leading to multiple transfers without providing the correct information? The proposed rule must include clarifying information on how plans and issuers can ensure accurate and timely information is provided to participants from the outset.

Additionally, parity analysis must consider the length and complexity of customer service interactions between mental health/substance use disorder (MH/SUD) and medical/surgical services. Ensuring operational parity means examining the real-world experience of the average person when they seek assistance.





## **Comparative Analysis**

5:05 PM

Insurance company: Excellus BCBS (SimplyBlue

Plus Gold 6)

Date of call: 7/17/24 Duration: 15 minutes

I asked twice, and the representative did not recognize the terminology or see an option. I was placed on hold (12 minutes) while a representative sought assistance.

Can only offer the corporate medical review for inpatient policy, a representative emailed it to me and I will forward.