

# Illinois Parity Implementation Roadmap

---



# Legislative Actions (General Assembly)

## Immediate Priority

- Codify the 2024 Federal MHPAEA Final Rule.

## Additional Statutory Enhancements

- Require annual NQTL comparative analysis submissions.
- Establish enforcement timelines and cessation authority.
- Strengthen penalty structures tied to enrollee impact.
- Require standardized annual parity data reporting.
- Clarify Medicaid parity deliverables and withholding authority.
- Require disaggregated MH/SUD network standards.

# Regulatory Actions (Illinois DOI)

## Rulemaking

- Promulgate comprehensive GASC implementation regulations.
- Adopt disaggregated network adequacy standards.
- Establish structured corrective action plan templates.
- Define parity enforcement escalation framework.

## Administrative Actions

- Require standardized annual data submissions.
- Conduct targeted market conduct examinations focused on NQTLs.
- Review denial letters and utilization review documentation for GASC compliance.
- Implement independent validation of network access (e.g., secret shopper integration).
- Publish standardized annual parity performance reports.

# Medicaid Contractual Actions (HFS)

## Contract Amendments

- Require annual parity comparative analyses from MCOs.
- Tie parity compliance to procurement and contract renewal.
- Incorporate clawback or withholding provisions for noncompliance.
- Require submission of parity analyses prior to benefit changes.

## Oversight Enhancements

- Integrate parity metrics into EQRO review.
- Use secret shopper results to evaluate parity in operation.
- Strengthen EPSDT-focused parity monitoring.

# Transparency and Public Accountability

Across markets:

- Publish standardized parity performance tables.
- Disaggregate MH and SUD reporting.
- Report denial and appeal outcomes by benefit category.
- Issue annual parity dashboards for consumers and stakeholders.

# Implementation Timeline Concept

## Year 1

- Introduce and pass codification legislation.
- Begin rulemaking on GASC and network adequacy.
- Launch standardized data collection.

## Year 2

- Publish first standardized parity report.
- Implement structured corrective action protocols.
- Integrate Medicaid contractual parity deliverables.

## Year 3

- Evaluate enforcement outcomes.
- Refine penalty framework if needed.
- Expand dashboard metrics.

# Implementation Timeline Concept

Illinois does not require wholesale structural reform. The State already has:

- Strong statutory parity foundations,
- Enforcement authority,
- Data infrastructure,
- Managed care contracting leverage,
- Clinical standards protections.

This roadmap organizes the next phase of work to ensure that parity compliance is measurable, enforceable, transparent, and durable.