



# Illinois Department of Insurance

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JB PRITZKER  
Governor

DANA POPISH SEVERINGHAUS  
Acting Director

## MEMORANDUM

TO: ALL COMPANIES WRITING ACCIDENT AND HEALTH INSURANCE AND  
MANAGED CARE PLANS IN ILLINOIS

FROM: Dana Popish Severinghaus, Acting Director of Insurance *dana popish-severinghaus*

Date: April 2, 2021

RE: Company Bulletin 2021-03

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Under Public Act 100-1024, each issuer is required to file annually with the Illinois Department of Insurance (IDOI) specific data and procedures as outlined under 215 ILCS 5/370c.1(j) and (k). The format for the collection of this information was created by the Mental Health Parity Working Group composed of collaborative members from regulatory agencies, consumer groups, and carrier representatives as prescribed in 215 ILCS 5/370c.1(j). The required data to be filed is non-quantitative treatment limitation (NQTL) comparative analysis. These NQTLs have been broken down into three separate Phases. Refer to the Department's website for specific information required in each phase. The annual due dates for data submission for each phase are as follows:

Phase I: Due July 1, 2021, annually thereafter

Phase II: Beginning July 1, 2022, annually thereafter

Phase III: Beginning July 1, 2023, annually thereafter

You may access instructions for completion and the required reporting template for submission of NQTL comparative analysis located on the Department's website, under Companies, Checklists Life-Accident Health, labeled "MH/SUD NQTL Comparative Analysis". Note that issuers are required to utilize this format when completing and submitting the respective NQTL comparative analysis.

### Instructions for Submission:

As determined by the Working Group, each issuer should submit one NQTL comparative analysis each. The reporting period will be as of year-end of the most recent calendar year.

Issuers are to submit their analysis under the supporting documentation tab in a SERFF filing using the below Type of Insurance (TOI) with a filing type of “Report”:

TOI: NQTL Report

Sub-TOI: PA 100-1024

These requirements are pursuant to the Department’s authority under the Illinois Insurance Code, specifically 215 ILCS 5/370c.1(j) & (k), 215 ILCS 5/132 and 215 ILCS 5/401 to receive and examine the non-financial business practices, performance and operations of any insurance company and to administer the insurance laws of Illinois. Confidentiality of the underlying data filed with the Department is preserved under 215 ILCS 132.5(f).

Please direct questions regarding this Bulletin to Assistant Deputy Director & Chief Market Conduct Examiner Erica Weyhenmeyer at [Erica.Weyhenmeyer@illinois.gov](mailto:Erica.Weyhenmeyer@illinois.gov).