

Remember the Other Mental Health Parity Testing You Should Be Doing

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PRACTICES Employee Benefits and Executive Compensation

As we start the new year, plan administrators for employer-sponsored group health plans are reminded to conduct the financial and quantitative testing that is required to comply with the mental health parity rules. Testing a plan's nonquantitative treatment limitations ("**NQTLs**") on mental health and substance use disorder ("**MH/SUD**") benefits receives the most attention; this testing analyzes limitations such as prior authorization requirements. However, there are also requirements regarding the type and amount of financial requirements and quantitative limitations that can apply to MH/SUD benefits. For example, if most medical/surgical benefits are subject to coinsurance, MH/SUD benefits could not be subject to copayments. Plan administrators thus need to run both the NQTL and financial/quantitative tests to ensure mental health parity compliance.