

Blue Cross & Blue Shield of Rhode Island (BCBSRI)  
Mental Health Parity and Addiction Equity Act  
NQTL Comparative Analysis:

**Step therapy/fail first (non-pharmacy)**

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Blue Cross & Blue Shield of Rhode Island (BCBSRI), for behavioral health services, does not impose restrictions based on the cost of therapies.

As such, step therapy and fail first policies do not limit the scope or duration of behavioral health benefits and are not non-quantitative treatment limits.

<p><b>Analysis Reviewed/Approved</b> 9/29/2025 <b>by BCBSRI's Mental Health Parity Governance Committee (PGC)</b></p> <p><b>Analysis Performed By:</b></p>	<p><b>Karen Labbe</b> Managing Director, Utilization Management</p> <p><b>Rosalyn Cuevas</b> Manager, Behavioral Health Quality</p>	<p><b>Victor Pinkes</b> Senior Medical Director</p> <p><b>Sarah Fleury</b> Mng Dir, Behavioral Health</p>
<p>I certify that this analysis was reviewed/approved by BCBSRI's Mental Health Parity Governance Committee on the above-mentioned date.</p>	<p>X <b>Sonia Worrell Asare</b> Managing Director, Compliance &amp; Ethics Corporate Compliance Officer</p>	<p><b>Implementation Date: 1/1/2026</b></p> <p><b>DATE: 9/29/2025</b></p>