

REG-120692-09

FEB 23 2010

LEGISLATIVE DIVISION
PUBLICATION & REGULATIONS
BRANCH

PUBLIC SUBMISSION

As of: February 23, 2010
Received: February 22, 2010
Status: Posted
Posted: February 23, 2010
Tracking No. 80aa9841
Comments Due: May 03, 2010
Submission Type: Web

Docket: IRS-2009-0008

Request for Information for Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

Comment On: IRS-2009-0008-0119

Regulations Under the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

Document: IRS-2009-0008-0125

Comment on FR Doc # 2010-02166

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General Comment

Requiring Mental Health and Substance Abuse Specialists to be covered under a Primary Physician copayment arrangement (when a plan has a Primary Physician Copayment and a Specialist Copayment) is not parity. It is preferential treatment of MH/SA Specialists.

This only encourages other specialties to lobby for "parity" in plan design. Will we see Cardiologists or Orthopaedic Surgeons requiring "parity" in plan design copayments next? A MH/SA Specialist is not a Primary Physician and should not be arbitrarily classified as one by these rules.