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Interim Final Rules Under the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

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General Comment

On behalf of NAMI Sedona (Arizona), I am writing to submit comments on the Interim Final Rules under the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008 and in doing so NAMI Sedona endorses the separate comments submitted by the Parity Implementation Coalition and the National Alliance on Mental Illness.

The new law, known as the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008, requires most group health plans to cover treatment for mental illness and substance use disorders on the same terms and conditions as medical conditions such as diabetes, heart disease, cancer and asthma. Specifically the new law bars health plans from imposing durational treatment limits (caps on inpatient days or outpatient visits) or financial limitations (higher cost sharing, deductibles or out of pocket limits) that do not also apply to medical-surgical coverage.

The regulations provide new standards with respect to equitable coverage for "non-quantitative" treatment limits, which are defined in the regulations as medical management, drug formulary design, step therapy, "fail first" policies and exclusions from coverage based on failure to complete a course of treatment. This means that the standards for equitable coverage will apply to discriminatory application of medical management techniques as applied to mental illness treatment.

NAMI Sedona looks forward to the timely implementation of the parity regulations.