

# PUBLIC SUBMISSION

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The Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

**Comment On:** EBSA-2009-0010-0409

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

1. The interim final rules do not define clearly enough the rules regulating the comprehensive scope of services parity between mental health/substance abuse services and medical/surgical services. Final Rules must clarify that benefits for MH/SUD must be comparable in scope to benefits provided in medical/surgical care both across and within each classification. Unless parity in scope of services is required in the final regulations, the intent of the Act will not be achieved.
2. Regulations must specify more clearly that any treatment limitations that are applied by plans must be comparable for MH/SUD and medical/surgical benefits, and that scientific review criteria employed for MH/SUD services must be no more restrictive than those that are predominant across the broad range of medical/surgical benefits.