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**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-2009-0008-0001

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

**Document:** IRS-2009-0008-0003

Comment on FR Doc # E9-09629

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## General Comment

If a health plan carves out behavioral health benefits administration to a managed behavioral health organization, can it have parallel deductibles for medical and behavioral health as long as the behavioral health deductible is equal or less than the medical? If only one deductible is applied, it will increase the administrative cost tremendously because all claims transactions will have to be shared in real time and could cause some smaller managed behavioral health companies to go out of business.

Can the out of network allowable that a plan pays be based on the network allowable? An example: the plans pays 70% of out of network allowable on the medical and the behavioral health benefits. The behavioral health benefits pays 70% of what they pay their network providers and the enrollee is responsible for the remainder of billed charges. Out of network facilities are reimbursed at 70% of the average in network facility rate.

If a medical plan covers skilled nursing care does that mean the residential

care has to be covered on the behavioral health side?