

From: Mann, Lisa [mailto:lmann@renfrewcenter.com]
Sent: Friday, May 22, 2009 3:29 PM
To: EBSA, E-OHPSCA - EBSA
Subject: Mental Health Parity

Please see our attached comments for your review.

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To Whom It May Concern:

The Renfrew Center has been treating women with eating disorders for twenty five years. In those twenty five years we have seen many changes in the health insurance field and we have seen many women who are unable to access treatment due to the structure of their health insurance plans. We are very hopeful that the new parity legislation will allow for thorough and effective treatment, but we do have some concerns.

We are concerned that the definition of ‘mental health conditions’ leaves room for the exclusion of certain diagnoses. Currently, individual states that have mental health parity or mandates often list a group of diagnoses they consider deserving of parity, labeled “biologically based” or “serious mental” illnesses, and the rest of the mental illnesses are not included under the parity law. We would like to insure that eating disorders are considered serious mental illnesses and are considered biologically based.

Although the elimination of the day and dollar limitation disparity between medical and mental health appears to be a solution to treatment barriers, this new parity law still allows insurance companies to determine whether or not a patient’s treatment is medically necessary. We believe this parity law should insure that insurance/managed care companies use medical necessity criteria as set forth by the professionals in the field, i.e. The American Psychiatric Association.

Thank you for considering our comments.

Sincerely,

The Renfrew Center for Eating Disorders