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From: kirtley thornton [mailto:ket@chp-neurotherapy.com]
Sent: Saturday, May 23, 2009 9:47 AM
To: EBSA, E-OHPSCA - EBSA
Subject: Neurotherapy coverage

I am a licensed clinical psychologist in the state of New Jersey who provides neurofeedback treatment to individuals with Attention Deficit Hyperactivity Disorder, Learning disabilities and traumatic brain injury. There have been numerous studies on the positive effects of Neurofeedback on these conditions. You can go to our website [chp-neurotherapy](http://chp-neurotherapy.com) for a description of what is involved and some references with respect to ADD, LD and TBI. Neurofeedback is an empirically validated and widely recognized effective non-medication treatment for ADHD, as well as other conditions. A recent review of this literature concluded "Neurofeedback meets the American Academy of Child and Adolescent Psychiatry criteria for Clinical Guidelines for treatment of ADHD." This means that neurofeedback meets the same criteria as medication for treating ADHD, of which 60% of prescriptions are in fact prescribed "off label," and that neurofeedback "should always be considered as an intervention for this disorder by the clinician." This service has been denied by almost all insurance companies such as Aetna, United Behavioral Health, Blue Cross, Cigna, Horizon. The reasons given by the insurance companies for this denial generally fall into two categories: 1) our company does not cover biofeedback for mental health problems, attention deficit disorder or learning problems or 2) it is an experimental procedure. The insurance companies are not aware of the research and have not read the material I have sent them regarding the effectiveness of this intervention. There are many routine medical and surgical procedures which have far fewer controlled studies about their efficacy than does neurofeedback. There should be parity between medical/surgical procedures and mental health procedures. The insurance plans are more restrictive in how they review evidenced-based mental health and Substance Abuse Treatments when compared to medical surgical treatments. This violates both the intent and letter of the parity statute and we hope that the regulations will clarify that this can't continue.

Sincerely;

Kirtley Thornton, PhD