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Via email to E-OHPSCA-FAQ39@dol.gov.

June 22, 2018

The Maryland Psychiatric Society, which represents 700 psychiatrists in the state of Maryland, is responding to the April 23, 2018 request for comments on "FAQs About Mental Health and Substance Use Disorder Parity Implementation and the 21st Century Cures Act Part XX."

We have signed on to a separate set of comments submitted by the Coalition for Whole Health, which we fully support. We would also like to offer the following general recommendations, which are outlined in great detail with numerous examples in the comments submitted by the Parity Implementation Coalition.

- State health authorities should develop quantitative analyses that would specifically compare elements of care provided for behavioral health/addiction services to those provided for medical/surgical services.
- A series of facts or examples should be included so providers and patients can more easily recognize when care is being restricted in behavioral health/addiction areas as compared to the medical surgical areas.
- A regulation section should be added that details the penalties for violations.

The MPS would be glad to discuss these recommendations in greater detail. Please contact our Executive Director Heidi Bunes at heidi@mdpsych.org.

Sincerely,

Patrick Triplett, M.D.
President