

# PUBLIC SUBMISSION

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

**Comment On:** EBSA-2009-0010-0001

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

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## General Comment

I am writing as a 30+ year MH/SA consultant to individuals, employers and Unions. I have been a special consultant regarding workplace issues to CSAP (SAHMSA) for more than 15 years.

I have very serious concerns about unintended consequences of this Bill. Employers who are attempting to do the "right thing" by covering mental health and substance abuse prevent some degree of misuse of services by placing "out-of-network" limits as well as annual limits. Some, as in the case of UFCW Local 1776 (Philadelphia) have very generous benefits.

However, due to some "un-evolved" providers, lack of "objective" data (such as x-rays, blood tests, etc.) some experiences leads to unnecessary and inappropriate treatment, at a very high cost. Also, individual who are "desperate" for ANY type of treatment fall victim to providers who prey on these prospective patients with exotic locations and air fare.

While some payers have placed unrealistic burdens on their coverage, some have "tried to do the right thing". These will be "caught up in the same net" as those restricting care.

The 2% increase limit will be too much for some benefits to bear. The result will be an elimination of coverage, an unintended consequence of this well meaning initiative.

I urge you to consider the employer/union who is underwriting this very important care. Parity can be achieved without placing the severe restrictions on the payer. For example, continue to allow incentivized use of a network that has been found to eliminate fraud. Help continue to place limits on how many times an active addict can go to detox without receiving any other treatment.

Do not return us to the 1980s when all who went for in-patient treatment were there for 30 days! It will cause employers to eliminate coverage.

I can be reached for further discussion at 215-343-8987 #1205

Thank you,

Edward Haaz, M.Ed., LPC, CAC-D