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Sent: Thursday, April 30, 2009 5:27 PM
To: EBSA, E-OHPSCA - EBSA
Subject: Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

Hi:

We appreciate the opportunity to provide comments about federal parity standards.

A question that has come up repeatedly on several web casts that I've participated in involved developing an equitable benefit design for Partial Hospitalization and Residential Treatment Programs as compared to the medical benefit. Those two commonly used behavioral health treatment services do not have a counterpart on the medical side. Is it appropriate to use a skilled nursing benefit as the equitable benefit for Residential Treatment? What about Partial Hospitalization - is that considered an outpatient visit or an inpatient day?

Any direction would be appreciated and would create a level playing field for organizations like ours.

Thank you!

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