PUBLIC SUBMISSION

Docket: IRS-2009-0008
Request for Information for Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

Comment On: IRS-2009-0008-0119
Regulations Under the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

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Submitter Information

Name: Mary Keerins Whaley
Address:
    4746 N Placita Ventana del Rio
    Tucson, AZ, 85750
Email: mwhaley@lovitt-touche.com
Phone: 520-722-7171
Fax: 520-722-7199
Organization: Lovitt & Touche, Inc.

General Comment

Requiring Mental Health and Substance Abuse Specialists to be covered under a Primary Physician copayment arrangement (when a plan has a Primary Physician Copayment and a Specialist Copayment) is not parity. It is preferential treatment of MH/SA Specialists.

This only encourages other specialties to lobby for “parity” in plan design. Will we see Cardiologists or Orthopaedic Surgeons requiring “parity” in plan design copayments next? A MH/SA Specialist is not a Primary Physician and should not be arbitrarily classified as one by these rules.