

From: Kristi Tarver [mailto:kristi.tarver@mohrpartners.com]
Sent: Monday, May 11, 2009 1:21 PM
To: EBSA, E-OHPSCA - EBSA
Subject: Input on MHPAEA

I wanted to take a moment to provide input on this new Act. Our insurance carrier stated you were seeking input on the following:

1. Types of financial requirements or treatment limits plans currently impose. – Pays the same for inpatient/outpatient as does for any other illness, EXCEPT it limits the number of visits per year to 45 visits for inpatient and 60 visits for outpatient
2. What policies, procedures, or practices of group health plans and health insurance issuers may be impacted by MHPAEA? I believe that once the insurer has to pay the same as any other illness, they will begin to limit the coverage they provide for other illnesses. What direct or indirect costs would result? Loss of coverage to the insured, or higher rate increases. What direct or indirect benefits would result? The benefit would be that coverage limits are increased for mental illness which is long over-due. Which stakeholders will be impacted by such benefits and costs? Again, I think policyholders and employers will ultimately lose coverage in other areas and/or increase rates at a higher than normal pace or more than likely both.
3. Are there additional paperwork burdens related to MHPAEA compared to those related to Mental Health Parity Act of 1996, and, if so, what estimated hours and costs are associated with those additional burdens? As the employer, no. The burden would fall on the insurer. And as history has told us, additional administrative burdens and increased coverage will be ultimately passed on to the insured and employers who contribute to their employee's premium.

Bottom line for me, the coverage for mental health is long over-due. However, it will create a financial burden through increased rates or loss of other coverages. Wish that there could be mandates on these concerns. Wish we had better mental health providers available. Not only has the coverage been lacking, but the mental health providers are sorely lacking in their approach to treatment and a lot of fraud has occurred in this industry. Hoping this Act will somehow help that.

Thank you for your time and consideration.

Sincerely,

Kristi Tarver

Executive Administrative Assistant/
HR Specialist