Comments regarding Regulatory Guidance USCG-2007-27022
page 19157, II B specific areas 1 and 4
re; CMS-4140_-NC
I am a clinician who provides mental health treatment to individuals with
Attention Deficit Hyperactivity Disorder and Mood Disorders.

I believe that the parity regulations, based on legal reviews of the parity
statute should require that employers and plans pay for the same range and
scope of services for Behavioral Treatments as they do for Med Surg benefits and
that a plan cannot be more restrictive in their managed care criteria and
reviews for MH and SA disorders when compared to Med Surg. Today plans are being
more restrictive in how they review evidenced based Mental Health and Substance
Abuse Treatments when compared to Med Surg treatments. This violates both the
intent and letter of the parity statute and we hope that the regulations will
clarify that this can't continue.
Thank you very much,

Alan J. Strohmayer, Ph.D.