

From: Phillip Ellis [mailto:wncphil@msn.com]
Sent: Thursday, May 28, 2009 4:58 PM
To: EBSA, E-OHPSCA - EBSA
Subject: Comments on Upcoming Parity bill

To Whom it May Concern:

Comments regarding Regulatory Guidance USCG-2007-27022
page 19157, II B specific areas 1 and 4

I am a Clinical Psychologist running a small outpatient mental health clinic in Asheville, N.C.

I have been in the field over 30 years and have seen many changes, both in service delivery and health insurance utilization.

Ten years ago I made a shift in my practice to offer EEG Biofeedback, also known as Neurofeedback. It has made a dramatic difference in the lives of my patients. Patients who once suffered from ADHD, anxiety, depression, autism and bipolar disorder are now reporting significant and lasting relief. They are accomplishing this without medication, in fact, many are reducing or eliminating their medications while in treatment.

Unfortunately, this remarkable service is now only available to those who can pay cash for the service. Insurance typically denies coverage and often returns a comment to the health provider describing neurofeedback as "experimental" or "not well enough researched."

I was in my first volunteer position at the UCLA Neuropsychiatric Institute when, somewhere upstairs, Dr. Barry Sterman first discovered the clinical utility of neurofeedback, 30 YEARS AGO. Since then well over 500 research articles with better and better research controls have demonstrated how effective and how safe this service is for many emotional, neurological, behavioral and learning disorders. Indeed, the quality of research being generated now has brought the praise of clinicians all over the world (where it is now being accessed more easily than where it was invented, the U.S.).

It is time we allowed significant advancements in mental health services (such as Neurofeedback) to be made available. No one aware of the research disputes it is effective, no one disputes it helps patients over a wide spectrum (www.ISNR.org and look at the Comprehensive Bibliography) of disorders. It even helps to lessen America's dependence on psychotropic medication. It seems that we have come to allow insurance companies to dictate when, or if, significant advancements should become available to the public?

Sincerely,

Phil Ellis, Ph.D., BCIA-EEG
Director
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