

# PUBLIC SUBMISSION

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The Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

**Comment On:** EBSA-2009-0010-0409

Interim Final Rules Under the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

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## Submitter Information

**Name:** Carlton Clark

**Address:**

350 S Williams Blvd Ste 140

Tucson, AZ, 85711

**Email:** perk@psychod.com

**Phone:** 520-519-8475

**Organization:** Psychotherapy & Organiza Develp, LLC

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## General Comment

I am a licensed clinical social worker in private practice since 1981, working with 'managed care' insurance companies in Tucson since 1989. I have witnessed an upsurge in phone calls from these companies the the purpose of 'assessing medical necessity of treatment' since this bill was passed. It appears that the companies are now not holding clients to twenty sessions per year but are rather grilling clinicians on whether or not clients' current symptoms should generate further treatment. I am unaware of any physical medical diagnosis that is managed in this fashion. It is perhaps accepted or rejected by the insurance company in the beginning, but never declared to be 'inactive' or 'no longer medically necessary' at some random point in time. This appears to be a clear violation of the intent and the law as written in the Mental Health Parity Act.