

PUBLIC SUBMISSION

As of: April 27, 2010
Received: April 26, 2010
Status: Pending_Post
Category: Psychiatric Hospital - HPA55
Tracking No. 80ae0ac3
Comments Due: May 03, 2010
Submission Type: Web

Docket: CMS-2009-0040

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

Comment On: CMS-2009-0040-0048

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

Document: CMS-2009-0040-DRAFT-0066

IL-Alan Eaks

Submitter Information

Name: Alan Eaks

Address:

Chicago, IL, 60657

Organization: Aurora Chicago Lakeshore Hospital

General Comment

We are writing to ask for some clarification regarding the six classifications outlined in the regulation that parity will apply to. One of those classifications is emergency care.

Free Standing Psychiatric Hospitals located in some areas of the country serve as a primary provider of emergency care for patients in a psychiatric crisis. Free Standing Psychiatric Hospitals have generally not been reimbursed for emergency services by group health plans. Bound by EMTALA Federal Law, Free Standing Psychiatric Hospitals are required to provide emergency stabilization services if a patient presents for such treatment.

I am the CEO of Chicago Lakeshore Hospital, a 147 bed free standing psychiatric hospital located in a dense urban area of the City of Chicago inhabited by a proportionately high number of persons with serious mental illness. As a result, the hospital commonly receives patients walking or driving directly to the hospital's assessment center in a mental health crisis. Also, the Hospital is designated by the City of Chicago Police Department as the Police Drop Site for handling of persons in need of mental treatment including all children on the north side of Chicago and adults in the Chicago 20th Police District. Approximately half of the 4,200 annual patients presenting for treatment in the Hospital's assessment center require psychiatric emergency stabilization.

Although we provide emergency services, just like our general hospital colleagues, health plans do not provide coverage and reimbursement for these services in our hospital, but do provide coverage in a general hospital emergency room for medical conditions. It seems that if a health plan does provide coverage for emergency

services for medical services, then the health plan should also provide coverage in a free standing psychiatric hospital according to the six classification structure, which includes emergency care.

We would ask that this issue be clarified in the final rule.

C. ALAN EAKS
Chief Executive Officer
Chicago Lakeshore Hospital
4840 N. Marine Drive
Chicago, IL. 60640

p :: 773-907-4600

f :: 773-907-4607

e :: aeaks@chicagolakeshorehospital.com