

From: Daniel Hoffman [mailto:daniel@hoffmanemail.com]
Sent: Friday, May 22, 2009 7:26 PM
To: EBSA, E-OHPSCA - EBSA
Subject: Mental Health Parity

I am writing about the request for comments regarding the mental health parity and in particular the use of Quantitative-EEG and EEG Neurofeedback (biofeedback).

I am well credentialed having published over 40 papers in peer reviewed journals, am a consulting editor for 4 national peer reviewed journals, am a national and international lecturer and help national positions in professional societies.

The exclusion of using these modalities in the diagnosis and treatment of many behavioral disorders, including but not limited to Attention Deficit Disorder, Addictions, Head Injury and Autism provide successful interventions that either have very little to offer traditionally or suffer from a high degree of treatment resistance. Neuro-imaging is clearly evolving into sub-typing of disorders, yet anyone with an attentional problem is considered to suffer from ADD or ADHD. In fact, all the literature demonstrates that one third of these cases do not respond to stimulant medication and are now being seen as a different disorder in which amphetamines, for example, may make these patients worse. To exclude the tool that can differentiate these cases as well as treat those in which medications are inappropriate, if not contraindicated, endangers the health of many.

The research in these modalities is equal to or superior to many usual and customary treatments in which huge amount of resources are being spent with little or no success in the wrong population.

Many of these tests, for example, are being denied because the code is not in the behavioral science carve-out's computer, so a denial is issued when the same test ordered under the medical side of the insurance carrier would be paid for without question.

While it would be easy to write an entire essay on this subject, suffice it to say that I want to bring to your attention the inequality and often harmful manner in which current treatments are being reimbursed

while safer and more specific modalities are denied. I implore you to make the Parity bill truly inclusive of fair practices for the mental and nervous disorders category.

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