

# PUBLIC SUBMISSION

As of: May 28, 2009  
Tracking No. 809aed3b  
Comments Due: May 28, 2009

**Docket:** IRS-2009-0008

Request for Information for Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

**Comment On:** IRS-2009-0008-0001

Request for Information Regarding the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

**Document:** IRS-2009-0008-0040

Comment on FR Doc # E9-09629

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## Submitter Information

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**Organization:** Biofeedback Counseling Center

**Government Agency Type:** Federal

**Government Agency:** HHS

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## General Comment

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

I am writing this letter because current insurance non-coverage policies deny biofeedback, a proven beneficial treatment for headaches, anxiety, and pain management for children and adults. Therefore, it is my ethical responsibility to bring to your attention a disparity in treatment options. Currently, it is only those persons with the financial means to pay privately that are able to receive the effective treatment that all should be able to receive.

A meta-analysis of biofeedback for tension headaches published in the J Consult Clin Psychol (2008) 76: 379-96 studied 53 outcome studies. Biofeedback was shown to be efficacious. Effects were particularly large in children and adolescents. It was concluded that biofeedback constitutes an evidence-based treatment option for tension-type headache. Another meta-analysis of biofeedback for migraine headaches published in 2007 found biofeedback to be an evidence-based treatment option for migraine headache.

In fact, Biofeedback has been shown through scientifically rigorous controlled studies to be empirically supported for the following conditions:

1. Anxiety
2. Attention Deficit Disorder

3. Headache
4. Hypertension
5. Temporomandibular Disorders
6. Alcoholism/Substance Abuse
7. Arthritis
8. Chronic Pain
9. Epilepsy
10. Insomnia
11. Traumatic Brain Injury
12. Asthma
13. Chronic Obstructive Pulmonary Disease
14. Depressive Disorders
15. Diabetes Mellitus
16. Fibromyalgia
17. Foot Ulcers
18. Hand Dystonia
19. Irritable Bowel Syndrome
20. Myocardial Infarction
21. Post Traumatic Stress disorder
22. Raynaud's Disease
23. Stroke

Why then are insurance companies denying payment for these treatment options, yet will pay for any FDA approved medication with less efficacy than the biofeedback? We 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 for your consideration, Krystal Angevine, LCSW,