

PUBLIC SUBMISSION

As of: May 29, 2009 Tracking No. 809bc203 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-2009-0008-0095](#)

Comment on FR Doc # E9-09629

Submitter Information

General Comment

I am a doctoral level licensed professional counselor who provides biofeedback to children with headache disorders. Over the past 25 years, multiple research studies have been performed that have shown efficacy for treating pediatric headaches. This has been endorsed by the American Headache Society and the College of Child Neurology as a significant component to treatment combined with medicine. Unfortunately, this service has been denied by Aetna, United Behavioral Health, Cigna Behavioral Health, Amerigroup, and Blue Cross Blue Shield and thus, potential patients that could benefit from this treatment - cannot due to out of pocket costs. The typical reasons for this lack of coverage are: 1) Biofeedback is not covered for mental health disorders, or 2) There is not sufficient evidence that biofeedback is effective. There are many routine medical and surgical procedures which have far fewer research studies about their efficacy than biofeedback. These medical and surgical procedures are generally not limited because of concerns about how many controlled studies have been performed.

I 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 medical and surgical benefits. Today, plans are being more restrictive in how they review evidenced based mental health and substance abuse treatments when compared to medical and surgical treatments. This violates both the intent and letter of the parity statute and we hope that the regulations will clarify that this cannot continue.