From:
 Crystal Selby

 To:
 E-OHPSCA1251.EBSA

 Subject:
 RIN 1210-AB42

Date: Thursday, June 17, 2010 7:21:06 PM

Hello,

Request comment on whether changes to benefit program cost sharing as a result of Mental Health Parity testing will cause a group to lose grandfathered status.

Example: Employer A has a \$20 office copay and a \$20 copay for outpatient mental health.

Insurer testing for parity disqualified this arrangement; and plan only passes testing by changing the outpatient mental health copay to deductible/coinsurance.

The dollar or % impact of this change is immeasurable since it now varies based on number of visits and whether the deductible has been met or not at the time of visit.

Insurer is unilaterally changing all of their fully insured plans 7/1 to accommodate the Mental Health Parity requirement.

Thank you,

Crystal Selby

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