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General Comment

Requiring Mental Health and Substance Abuse Specialists to be covered under a Primary Physician copayment arrangement (when a plan has a Primary Physician Copayment and a Specialist Copayment) is not parity. It is preferential treatment of MH/SA Specialists.

This only encourages other specialties to lobby for "parity" in plan design. Will we see Cardiologists or Orthopaedic Surgeons requiring "parity" in plan design copayments next? A MH/SA Specialist is not a Primary Physician and should not be arbitrarily classified as one by these rules.