May 3, 2010

Office of Health Plan Standards and Compliance Assistance  
Employee Benefits Security Administration, Room N-5653  
U.S. Department of Labor  
Attention: RIN 1210-AB30  
200 Constitution Avenue, N.W.  
Washington, DC 20210

Centers for Medicare & Medicaid Services  
U.S. Department of Health and Human Services  
Attention: CMS-4140-IFC  
P.O. Box 8016  
Baltimore, MD 21244-1850

CC:PA:LPD:PR (REG-120692-09), room 5205  
Internal Revenue Service  
P.O. Box 7604  
Ben Franklin Station  
Washington, DC 20044

Re: Interim Final Rules under the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

Dear Secretary Solis, Secretary Sebelius, and Commissioner Shulman:

On behalf of the American Bar Association (ABA) and its almost 400,000 members, I am pleased to submit our enclosed Comments in response to the Departments’ Interim Final Rules request for additional comments (Interim Final Rules, 75 Fed. Reg. 5410) published on February 2, 2010, and in response to the Departments’ request for additional comments as presented during the Departments’ January 29, 2010 constituency briefing on the Interim Final Rules.

Thank you for considering our view on this important subject.

Sincerely,

H. Robert Fiebach  
Chair, ABA Standing Committee on Substance Abuse

/Enclosures

cc: Thomas Susman, Director, ABA Governmental Affairs Office  
Lillian Gaskin, Senior Legislative Counsel, ABA Governmental Affairs Office  
Jared Hess, Legislative Assistant, ABA Governmental Affairs Office