

Hello, and thank you for the opportunity to provide feedback to the Rural and Underserved Communities Health Task Force pursuant to your recent request for information. Given the wide range of potential issues raised in the RFI and space limitations, we are restricting our comments to major Medicare policies affecting beneficiaries' access to mental health and substance use disorder services.

The comments below are most applicable to questions 3 and/or 10 from the Task Force's solicitation:

We are deeply concerned about the effect of the 7% reduction in Medicare reimbursement rates for psychological services CMS projects will occur in 2021 under proposed changes for evaluation and management (E/M) services contained in the 2020 Medicare physician fee schedule. Psychologists who do not participate in Medicare cite the program's low reimbursement rates as the primary reason for not participating. Substantial further Medicare rate cuts would inevitably cause many psychologists to reduce, if not eliminate, their Medicare caseloads. Maintaining reimbursement rates for psychologists is especially important since the number of psychiatrists in the U.S. is projected to decline by 27% by 2030.

We urge the committee to approve H.R. 884, the Medicare Mental Health Access Act, introduced by Reps. Judy Chu and Jason Smith. This bill would improve rural and underserved communities' access to behavioral health services in two ways. First, it would remove the outdated and unnecessary physician referral requirement for psychologists' services provided in certain Medicare treatment settings. Second, it would make psychologists eligible for Medicare's 10% bonus payments for services provided in mental health professional shortage areas. This would directly incentivize psychologists to practice in rural and underserved areas.

APA applauds the Committee for its approval of the BETTER Act, including Sec. 103 to broaden coverage of mental health telehealth services. Mental disorders are the principal diagnoses associated with telehealth services, and removing geographic area and originating site requirements for psychotherapy will significantly expand patient access.

Thank you for your consideration, and please feel free to contact if you would like more information or have any questions on our recommendations.

Scott Barstow
Director of Congressional Affairs
American Psychological Association Services, Inc.
750 First Street NE, Washington, DC 20002-4242
Tel: 202-336-5908 | Cell: 571-319-1428
email: sbarstow@apa.org | www.apaservices.org