

From: [REDACTED]
To: [EBSA MHPAEA Request for Comments](#)
Subject: Comments on new parity rules
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Hello,

I am a Colorado citizen and a licensed professional counselor in Colorado, Washington, Utah, and Nevada. I would like to comment on the new parity rules recently announced.

Insurance companies have been taking advantage of their members seeking mental health and of mental health professionals for decades. It's time for that to stop. Masters level therapists have equivalent education and training to nurse practitioners and physician's assistants. But our rates are pathetically lower. Because of this, more and more therapists are leaving insurance networks in order to make a decent living. Increasing our reimbursement rates is the ONLY way to reliably increase access to care.

The need for mental health services has never been higher, yet our wages have stayed stagnant. Meanwhile, insurance companies rake in record profits. Increasing awareness of mental health is not enough. Increasing services and opportunities to seek care are not enough. Those services have to be staffed by therapists who can make a comfortable wage, be financially secure, and sustain their careers long-term.

I have been in private practice, and I was in network with Cigna, Aetna, and Anthem. I also qualified for Medicaid most of the time I was in private practice, despite having a full caseload consistently. Why? Because the rates paid by insurance are that bad. When I worked in a nonprofit primarily working with clients who had Medicaid or Medicare, I made \$55k a year. I often struggled to pay my rent in Denver. Any extra or unexpected expense, such as a car repair, would threaten my financial security. So many therapists have left networks because they have to make a living. And in a field that is 75% women, it's even harder for us to survive with other wage inequalities factored in. Therapists should not have to choose between being able to offer affordable care and their own financial security. We should not bear the brunt of this system. We should be rewarded for providing the treatments needed.

If our wages do not increase as an entire mental health field, there will eventually be no mental health field. The next generation sees how undesirable this career path is, and they're not taking it. And all the existing therapists are burning out and leaving the field at record rates.

In addition to parity, there need to be safeguards for therapists against arbitrary denials and clawbacks. Random insurance-employed clinicians who have never met our patients should not be allowed to determine our patients didn't need the services they received. Mental health care is life saving care. We are highly educated healthcare professionals who are fully capable of determining medical necessity.

Finally, the covered mental health services need to expand. There is a huge need for couples therapy, group therapy, family therapy, extended sessions (90+ minutes), and behavioral health coaching. But these services are often not covered. Why? There is no reason for this other than insurance companies don't want to cover them. But they are just as necessary to the mental health landscape, and would save insurance companies money from expensive partial and full hospitalization programs.

Insurance companies have failed their members time and again. Washington MUST act to support clinicians and by extension their clients. Insurance companies need to be held accountable to do what they're supposed to do: support their members.

Sincerely,

