

**From:** [REDACTED]  
**To:** [EBSA MHPAEA Request for Comments](#)  
**Subject:** Comments for NQTL data requirements  
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Hi!

First of all I would like to say thank you as a provider and as someone with insurance for trying to improve the system. I am an LCSW in Philadelphia with certification in EMDR therapy. I'm working in private practice and I have some insights. First off, as a therapist with my own expensive self pay insurance, I cannot use my own insurance for MH services because the amount of in network providers is low and my copay is \$100. I see a provider that is self pay and giving me a discount as a provider myself.

As a provider billing insurance, last year, some insurances lowered reimbursement from what it was the year before even though we are dealing with inflation. And before they lowered it they weren't even reaching half my self-pay rate. In the city of Philadelphia, providing EMDR therapy, insurance companies want to reimburse me less than \$80 per session. I get reimbursed less than my own copay would be for my own therapy. The system is broken. I maintain a full caseload of trauma cases and anxiety cases but with these rates I'm considering shifting to self-pay only because it's not enough for it to be worth it to me. I need to pay my bills, my student loans, and live without having to take 40 clients a week. The low reimbursement increasing the cases I take leads to burn out and poor care. That is why I'm shifting.

Not only would I love to see reimbursement up to the market value but I would also like to see improvements for self-employed insurance. It's like a punishment if you want to start a business. Everything is terrible unless you are willing to pay 1k a month for insurance.

The money, time, and effort therapists invest to be able to provide help to those struggling should be considered when choosing these rates. Along with the fact that a therapist cannot have a typical 40hr work week. \$80 from insurance is not my hourly rate, cut that in half and then even less for cancellation that do happen and you have more like \$30 an hour for several years of school and training and licensure and more training. Living in Philadelphia on \$30 an hour isn't easy.

Thank you for listening,

[REDACTED]