



WASHINGTON STATE  
PSYCHOLOGICAL ASSOCIATION  
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Duals Project Team

April 12, 2012

P.O. Box 45600

Olympia, Washington 98504-5600

Dear Team Members:

The Washington State Psychological Association has followed with interest the development of the joint Health Care Authority (HCA)/Department of Social & Health Services (DSHS) proposal to integrate services for state residents dually eligible for Medicare and Medicaid services. We have read the March 12, 2012 design proposal and would like to submit comments.

By way of context for our comments, psychologists do provide treatment for mental disorders to Medicare Part B enrollees. However, psychologists in independent practice may not currently receive reimbursement for treating Medicaid enrollees, except under quite limited circumstances. We urge you to consider allowing psychologists who are treating dual eligible patients to be fully reimbursed for their services in an integrated services plan.

WSPA agrees fully with the themes of the design proposal including care coordination, flexibility, and integration. We concur with stakeholder's concern that health plans in Washington State are currently able to meet demand for behavioral health services to dual eligible enrollees, particularly those with developmental disabilities. We are also concerned as Medicaid expands coverage to an additional 100,000 covered lives by 2014 under federal health reform implementation, that access to affordable and effective mental health services for both Medicaid recipients and dually eligible enrollees will be a significant problem.

It is well established in Washington State that integrated care and the creation of health homes for enrollees with chronic diseases, including mental illnesses, reduces costs. In fact, the single most important factor in cost savings in two state pilot programs (Group Health Cooperative and the Boeing Company) was the addition of access to appropriate and effective mental health services that reduced ER visits and hospitalizations. Residents dually eligible for both Medicaid and Medicare who also suffer from chronic illnesses generate significant health related costs. Access to timely effective outpatient mental health services demonstrably reduces the health costs of this population.

However, as mentioned above, as federal health reform is implemented in Washington State by 2014, over 100,000 residents will become enrolled in Medicaid alone. This in and of itself will place significant strain on the current outpatient mental health system. WSPA predicts that the current system will not be able to manage timely access to cost effective outpatient mental health services such as those listed (page 24) as benefits to be incorporated in all three



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care models. WSPA urges DSHS and HCA consider inclusion of independent psychologists to receive both Medicare and Medicaid reimbursement for patients who are dually eligible.

WSPA welcomes your thoughts on this matter, and appreciates both the opportunity to provide these written comments and the work that has resulted in a compelling design proposal. If you have any questions for us, please feel free to contact me at the information below. Thank you.

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Director of Professional Affairs

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