February 19, 2016

Senator Pete Kelly, Co-Chair
Senator Anna McKinnon, Co-Chair
Senate Finance Committee
Alaska State Capitol Building
Juneau, AK 99801-1120

RE: Proposed Medicaid Reform Legislation

Dear Senate Finance Co-Chairs and Members of the Committee:

The Alaska Psychological Association (AK-PA) was formed as a member-based organization to advance psychology as science, profession and as a means for promoting human welfare in Alaska. Licensed psychologists are highly trained, independent professionals who, if permitted to practice to the full extent of their licenses, can contribute meaningfully to improve patient mental health and primary care outcomes. There is a shortage of mental health professionals in Alaska, and the anticipated expansion of the Medicaid population, along with the movement toward integrated healthcare will increase demand for quality mental health services. Thus, Medicaid programs should recognize and cover on a consistent basis psychotherapy, testing and evaluation services performed by psychologists within the state’s scope of practice. This will promote patient choice of provider, and allow Medicaid patients to access the range of psychological services available to patients in the private sector.

Therefore, as the State of Alaska and the Alaska Legislature undertakes Medicaid Reform, we are advocating for specific policy changes that would result in more effective, accessible, and efficient mental health treatment, and result in reduced healthcare costs.

Our recommendations are as follows:

I. **Revise the definition of ‘physician’ to include licensed psychologists for the purposes of providing mental health services under the State of Alaska Medicaid program.** Currently, psychologists are required to practice under the supervision of a physician, often resulting in unnecessary additional costs; bottlenecked delivery of mental health services and under-utilization of Alaska licensed professional psychologists. Other states have incorporated such a model in their Medicaid plans and received federal approval. We commit to working with your staff and DHSS to craft language to accomplish this recommendation.

II. **Expand the services that licensed psychologists are approved to provide in accordance with 7 AAC 105.210.** Currently, licensed psychologists can only provide psychological testing in an unrestricted manner. Licensed psychologists cannot provide the full array of psychological services, unless they work under the supervision of a physician or within a state grantee recipient organization. Additionally, licensed psychologists in integrated care settings are not able to bill for the Health and Behavior (H&B) Assessment/Intervention codes or for the Screening, Brief Intervention, Treatment to Referral (SBIRT) interventions unless they are supervised by a physician and located within a Federally Qualified Health Center (FQHC). This represents an unnecessary limitation in the provision of services that psychologists are trained to deliver.
III. Allow for the inclusion of doctoral intern trainees, under proper supervision, to receive compensation for Medicaid services. Doctoral Psychology Interns are subject to strict supervision and training requirements and typically have more formal education and training than Master's level interns. Thus, Doctoral Psychology Interns, with appropriate supervision, should be able to bill under the psychotherapy and psychological testing codes. This will allow for additional training sites and opportunities in Alaska that will attract and retain more interns, thus providing more qualified providers to serve our growing communities. These interns are then likely to remain in our state and become resident Licensed Psychologists.

AK-PA stands ready to assist you in your efforts. We can access tremendous resources through our national association database to support these and other proposals. Please consider us as a resource.

Sincerely,

Michael Sobociński, PhD
President, Alaska Psychological Association

cc: Members of Senate Finance Committee
Commissioner Davidson, DHSS
Randall Burns, Director, Division of Behavior Health, DHSS
Jeff Jesse, CEO Alaska Mental Health Trust Authority