

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, November 17, 2016 7:15:13 AM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, November 16, 2016 6:02 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS MARRIAGE AND FAMILY THERAPISTS

First Name: Erika

Last Name: Judkins

Title: Licensed Professional Counselor-Supervisor

Organization you are affiliated with:

Email:

City: Addison

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

Increase reimbursement rates for Provider Types 16, 18, & 40/51, to 100% of fees paid to fully licensed psychologists. LPCs, LMFTs and LCSWs are fully licensed, independent mental health providers who have clinical training as extensive as fully licensed psychologists. There is no basis to limit their reimbursement rates to only 70 percent of the billable rate for other fully licensed health care providers. Increasing reimbursement rates for LPCs, LMFTs and LCSWs is likely to increase their willingness to remain or become Medicaid providers and help address the extensive unmet need for this fragile population. It is unconscionable and discriminatory to reimburse unlicensed psychology interns and fellows (Modifier UB), as well as LPAs and PLPs (Modifiers UC, U9), who are required to work under supervision, at the same rate as fully licensed, independent practitioners such as LPCs, LCSWs and LMFTs.

Expand the definition of the Modifier UB to include LPC-Interns and LMFT-Associates. Currently, LPC-Interns and LMFT-Associates are provisionally licensed mental health providers. They have earned their graduate degrees, passed their licensing and jurisprudence examinations. Their professional qualifications exceed those of psychology interns and fellows. To exclude LPC-Interns and LMFT-Associates from the list of authorized Medicaid providers does not protect the public. Including LPC-Intern and LMFT-Associates will increase access to care especially in our mental health workforce shortage areas. Including LPC-Interns and LMFT-Associates will expand their opportunities to complete their required hours of supervision and the probability that they will continue to work with this fragile, underserved population throughout their careers.

Any Alternative or New Recommendations on This Agency: See above

My Comment Will Be Made Public: I agree