

DATE: December 21, 2016

TO: Bureau of Program and Policy Coordination
Division of Medical Programs
Healthcare and Family Services
201 South Grand Avenue East
Springfield, IL 62763-0001

FROM: The Illinois School-Based Health Alliance (ISBHA) and EverThrive Illinois

RE: Comments on Proposed Changes in Methods and Standards for Establishing Medical Assistance Payment Rates for Licensed Clinical Psychologists (LCPs) and Licensed Clinical Social Workers (LCSWs)

On behalf of the Illinois School-Based Health Alliance (ISBHA) and EverThrive Illinois, we thank you for the opportunity to comment on the Proposed Changes in Methods and Standards for Establishing Medicaid Assistance Payment Rates for Licensed Clinical Psychologists (LCPs) and Licensed Clinical Social Workers (LCSWs).

The Illinois School-Based Health Alliance (ISBHA), sponsored by the Child and Adolescent Health Initiative at EverThrive Illinois, brings together a broad-based coalition of organizations and individuals to advocate for and support school-based/linked health centers (SBLHCs) as school and community assets.

A school-based/linked health center (SBLHC) is like a doctor's office in or linked to a school. SBLHCs provide access to primary care, behavioral health, dental, nutrition, and preventive services to nearly 50,000 children and adolescents in Illinois. Roughly 90% of the 63 SBLHCs in Illinois employ or contract with an external entity to provide behavioral health services where students spend the majority of their time: in schools. Many SBLHCs serve individuals from the community as well, and SBLHCs successfully link individuals to mental health counseling at higher rates than community health centers.

We urge the Department of Healthcare and Family Services (HFS) to consider Licensed Clinical Psychologists (LCPs) and Licensed Clinical Social Workers (LCSWs) that provide services in school-based/linked health centers (SBLHCs) as eligible providers under this proposed rule and to reimburse them at the same proposed rate. Additionally, we urge that they are reimbursed for all mental health services covered by this rule, including psychiatric diagnostic evaluations, psychotherapy, and counseling. We also encourage the Department to include group counseling and IEP's/504's as a covered service under this rule. Ensuring proper payment



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structures for these already established providers will increase access to services for the thousands of students and community members that utilize SBLHCs.

We appreciate the opportunity to comment on this positive expansion of access to care and quality services, and please feel free to reach out to us with any questions.

Sincerely,

Nadeen Israel
Policy Director
EverThrive Illinois
nisrael@everthriveil.org
(847) 620-9758 (cell)

Heidi Ortolaza-Alvear
Director, Child and Adolescent Health Initiative
EverThrive Illinois
hortalaza-alvear@everthriveil.org
(312) 491-8161 x31