



April 1, 2022

The Honorable Ron Wyden
Chair
Senate Committee on Finance
221 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Mike Crapo
Ranking Member
Senate Committee on Finance
239 Dirksen Senate Office Building
Washington, DC 20510

Dear Senator Wyden and Senator Crapo:

On behalf of the over 5,000 Rural Health Clinics (RHCs) across the country, the National Association of Rural Health Clinics (NARHC) strongly supports the proposal to recognize Licensed Professional Counselors (LPCs) and Marriage and Family Therapists (MFTs) as covered Medicare mental health providers in President Biden's proposed FY 2023 budget.

For more than 40 years, RHCs have been providing essential care to residents of rural medically underserved communities. RHCs, along with rural hospitals and Critical Access Hospitals (CAHs), provide an indispensable safety net of care to this population. In their efforts to truly meet the needs of their communities, RHCs strive to offer both medical and behavioral health services. A myriad of factors, including workforce limitations and reimbursement challenges, limit RHCs ability to employ designated behavioral health professionals.

NARHC is grateful for the prominent role that expanding access to behavioral health services plays in President Biden's budget and specifically the provisions that address RHCs. The proposal to recognize LPCs and MFTs as covered mental health professionals in both fee-for-service Medicare as well as in the RHC setting has the potential to greatly expand access to behavioral health care services, particularly in rural, underserved areas.

In offering our support for this proposal, we would like to also acknowledge that the proposal to cover MFTs in the RHC setting is not new. Starting in the early 2000s Senator Craig Thomas (R-WY) introduced the first bill to authorize Medicare coverage of MFTs in RHCs and this bill enjoyed bi-partisan support. Senator Thomas was successful in getting his proposal passed by the Senate but unfortunately at that time, the House did not pass the legislation. We would note that since 2003, the House and Senate have each passed legislation expanding Medicare covered providers to include LPCs and MFTs, but never concurrently. With the support of the President and the tradition of bi-partisan support for this proposal, we hope 2022 is the year when this finally gets across the finish line!

In conjunction with this proposal, the President's budget also includes \$10 million for a new RHC Behavioral Health Initiative, which will allow clinics without behavioral health providers to fund salaries and expand available services within their communities. If approved by Congress, this would be the first federal grant program specifically for federally certified Rural Health Clinics. Together, these components increase the pool of mental health providers that can

provide crucial care within RHCs, while providing financial tools to recruit and retain these providers.

Recently, the 2022 Medicare Physician Fee Schedule further increased access to behavioral health services for RHC patients by permanently extending Medicare telehealth coverage for mental health services provided by Medicare recognized mental health professionals working in RHCs.

All of these components – working together – will allow RHCs to provide this essential care to their communities. NARHC encourages you to support recognizing LPCs and MFTs as covered Medicare providers.

Please contact us if you would like to further discuss this provision of the proposed budget or if you have any questions about Rural Health Clinics.

Sincerely,

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