

December 10, 2020

Maine Department of Health and Human Services
Rate Evaluation Team

To Whom It May Concern,

I am writing on behalf of NASW Maine, as follow-up on my comments on Monday, 12/7/2020 concerning Section 65, Outpatient Mental Health and Substance Use Treatment rate methodology. A 2019 NASW Maine survey of 5,000 Social Workers in Maine identified low pay and low reimbursement as their top two highest concerns. Low reimbursement and payment for these services contribute to social work shortages and patient access issues, particularly in rural parts of Maine. In reviewing your summary documents, the adult outpatient Medicaid comparison rates for overall adult mental health services (88%) are lower in comparison to the overall comparison rates for Substance Use Disorder services (92%), Adult Community Based Behavioral Health Services (91%) and Children Community Based Behavioral Health Services (106%).

Looking at specific codes for independent LCSW services, the comparison rate for outpatient adult mental health services is amongst the lowest (74%) and only has comparison data with Vermont. In addition, it is unclear whether or not the Vermont rate comparison figures include the additional payment provided through their value-based per-member-per-month payments. The low comparison rates for adult outpatient mental health services and substance use disorder services contributes to the shortage of social work and other clinical mental health services in rural parts of our state AND to independent mental health clinicians choosing not to accept MaineCare clients. This contributes to mental health access issues for MaineCare clients, who tend to have a higher rate of mental health and substance use disorders than the commercial payer population.

Finally, in addition to comparing rates to other states, we hope that you are taking into consideration the comparison of rates to overall medical services rates. The Mental Health and Parity and Addiction Equity Act of 2008 aims to ensure that mental health and addiction reimbursement has parity with medical service reimbursement. The rate evaluation data indicating rate discrepancy in medication management by physicians and non-physicians might lead you to believe that parity has not been fully addressed in Maine.

Thank you for your consideration of these details. Please let me know if you have any additional questions for me.

Respectfully submitted,



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