



The final victory after Independence Day!

The Department of Health and Human Services of Medicaid and Long – Term Care was holding this hearing to accept comments on proposed changes to regulations for the Nebraska Medicaid Assistance Program, also known as Medicaid.

The proposed change will allow Medicaid to cover the services of licensed independent mental health practitioners (LIMHP) within the array of Medicaid covered mental health/substance abuse services when they practice without the supervision of a psychiatrist or a psychologist. The proposed change will also allow a licensed independent mental health practitioner to provide clinical supervision for other practitioners as allowed under Laws 2008, LB 1108.

Note: NAMFT had fought five years to achieve the credentialing of Licensed Independent Mental health Practitioners (LIMHPs).

TO: The Department of Health and Human Services Division of Medicaid and Long Term Care

FROM: Nebraska Association for Marriage & Family Therapy

RE: Title 471, Chapters 20 and 32 of the Nebraska Administrative Code. The proposed changes revise Medicaid regulations for psychiatric services for individuals age 21 and older and for mental health and substance abuse treatment services for children and adolescents

DATE: June 19, 2008.

I am Anne Buettner. I am president of the Nebraska Association for Marriage & Family Therapy.

1. On behalf of our professional association, I would like to commend the state Medicaid division for choosing the right and fair decision in making the regulations **congruent with the laws that were passed last year (LB 247e) and this year (LB 1108)**. The laws give qualified Licensed Mental Health Practitioners independent practice without requirement of consultation in the event of major mental disorders. The laws also include Licensed Independent Mental Health Practitioners as professionals, along

with licensed psychologists and qualified physicians, to do consultation with Licensed Mental Health Practitioners on major mental disorders. They can also supervise LMHPs to become LIMHPs. *It's the "I" that makes the difference.*

2. This prudent decision put Nebraska at par with most states pertaining to Medicaid behavioral /mental health providers. The **preponderant number of states that have master level Medicaid providers do not require supervision** and the credentialing standards of the providers across the states are comparable.

3. Private health insurances do not require supervision for Licensed Marriage & Family Therapists.

4. **The federal government funds about 57 % of all Medicaid Funding** (The Kaiser Commission on Medicaid and the Uninsured, March, 2007). Speaking again specifically for our marriage and family therapy profession, **family therapists are recognized by the federal government as qualified mental health providers.** The Public Health Service Act recognizes Marriage and Family Therapists as one of the five core mental health professions. Other core professionals are psychiatrists, clinical psychologists, clinical social workers, and psychiatric nurse specialists. *Core professionals are mental health professionals trained and licensed to **independently** diagnose and treat mental health and substance abuse problems*

5. I am from Grand Island. I work at the central part of Nebraska which is rural to semi rural. In Nebraska, there are ¼ of the counties have only one mental health professional, and ¼ of the counties have no mental health professional. In the removal of the supervision requirement from LIMHPs, you are making this category of mental health providers **more affordable and accessible to the public (in terms of travel)** of which rural Nebraska will be most appreciative.



We thank you for the improvement of delivery of services to Medicaid consumers.

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