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STATE OF VERMONT
MENTAL HEALTH OVERSIGHT COMMITTEE

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September 27, 2013

Commissioner Susan Donegan
Department of Financial Regulation
89 Main Street
Montpelier, VT 05620

Dear Commissioner Donegan,

I am writing on behalf of the Mental Health Oversight Committee (MHOC) concerning testimony presented at our last meeting. The charge of the MHOC is to oversee issues concerning mental health, and in that role the MHOC has been particularly focused on achieving parity between physical and mental health. Among the goals of Vermont's health care reform efforts is to eliminate distinctions between the mental and physical health care systems, and to remove roadblocks to achieving true mental health parity in the State.

At the last MHOC meeting, members heard testimony pertaining to Vermont Collaborative Care, LLC (VCC) and mental health parity. Individuals representing the Vermont Psychological Association and the American Psychiatric Association raised concerns that VCC's billing practices did not conform to the federal Mental Health Parity and Addiction Equity Act of 2008. Specifically, witnesses testified that psychiatrists and psychologists billing for the same code as primary care physicians and nurse practitioners earned less for the same service despite the fact that the psychiatrists and psychologists had more specialized training.

The MHOC would like the Department of Financial Regulation to examine this disparity. It would be helpful for the Department to inform the MHOC in writing as to whether VCC's billing practices conform to both State and federal laws governing mental health parity. If the Department has already conducted an investigation into this matter, the MHOC would appreciate it if the Department would share the results of this work with its members.

Thank you for your assistance in this matter.

Sincerely,

Senator Sally Fox, Chair
Mental Health Oversight Committee

Cc: Peter Albert, President, Vermont Collaborative Care, LLC
Richard Barnett, Vermont Psychological Association
Colleen Coyle, General Counsel, American Psychiatric Association
Albert Gobeille, Chair, Green Mountain Care Board