



August 17, 2017

Lisa Larson
Regulations Manager
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, Maryland 21202

Dear Ms. Larson:

Thank you for the opportunity to submit comments on the proposed regulations under COMAR 31.10.44 – *Network Adequacy*, which was posted in the Maryland Register on July 21, 2017. After reviewing the proposal, the Licensed Clinical Professional Counselors of Maryland (LCPCM) would like to propose that licensed clinical professional counselors (LCPCs) be included among the distance standard requirements under .04A(4) and B(4).

It is our understanding that the providers included in this proposal were modeled after the Medicaid Advantage plan, which do not currently include LCPCs. We believe Medicaid Advantage did not include LCPCs when they established the Plan standards as some states do not authorize LCPCs to diagnose mental health conditions. While this is not the case in Maryland, LCPCs licensed in the state continue to be excluded from Medicare Advantage. In fact, LCPCs have similar authority compared to other mental health providers included in the regulations, such as social workers and psychologists in that they may evaluate, diagnose, and treat individuals with a mental health condition.

In addition, as communities across the country increasingly focus on behavioral health issues, in large part to the increase of opioid use, overdoses, and increased mortality rates, there has also been a corresponding increase in emphasizing treatment availability. Increasing treatment availability cannot occur when provider groups, including LCPCs, are excluded and not available in all communities.

Thank you again for your consideration of LCPCM's comments. If you should have any questions regarding our comments, please contact Rachael Faulkner, our public policy and government affairs consultant. She can be reached at rfaulkner@policypartners.net or 410-693-4000.

Sincerely,

Susan Roistacher, LCPC
LCPCM Legislative Chair
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