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# APA Practice Organization

# Information Alert

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**Date:** June 9, 2011

**To:** SPTA and Division Federal Advocacy Coordinators  
APAGS Coordinators

**From:** Marilyn Richmond, J.D., Assistant Executive Director for Government Relations  
American Psychological Association Practice Organization

**Cc:** Katherine Nordal, Ph.D., Executive Director for Professional Practice  
SPTA Executive Directors  
SPTA Directors of Professional Affairs  
CAPP

**Re:** **APA Responds to Proposed Medicare Rule on Care Coordination**

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During the debate over health care reform, APA and the APA Practice Organization focused significant energy and resources to ensure the inclusion of provisions promoting psychologist involvement in integrated care in the Affordable Care Act. The Department of Health and Human Services (HHS) has begun to develop regulations to implement the law, including its recent publishing of a proposed rule to encourage the development of coordinated care by establishing Accountable Care Organizations (ACOs) in Medicare as part of the Medicare Shared Saving Program.

ACOs will allow hospitals, physicians and other Medicare providers and suppliers of services to establish a network that emphasizes primary and coordinated care. Medicare beneficiaries will enroll in an ACO as an alternative to fee-for-services delivery, where the ACO will coordinate their care in an effort to improve quality and contain cost increases. Medicare beneficiaries would still see providers of their choice but their care would be more carefully coordinated by the ACO.

**We are pleased that the proposed rule includes psychologists as health care professionals eligible to participate in ACOs, ensuring better access of Medicare beneficiaries to mental health, substance use disorder and behavioral health services.** This week APA Chief Executive Officer Norman B. Anderson, PhD, and APA Executive Director for Professional Practice Katherine C. Nordal, PhD sent a comment letter to Secretary Kathleen Sebelius as part of our ongoing advocacy to promote psychologists as key players in primary care as it develops.

Among Anderson and Nordal's comments:

- APA agrees with Sebelius's decision to expand the list of providers eligible to participate in ACOS to include clinical psychologists and other providers not specifically named in the statute.
- Clinical psychologists should be incentivized to provide care as part of the ACO primary care team.

- Including clinical psychologists in ACOs ensures the integration of mental, substance use disorder and behavioral health with physical health and a more comprehensive integrated care system.

APA is asking HHS to retain and implement this provision in the proposed rule in the final draft. We anticipate that HHS will finalize the rule in the coming months. APA and the APA Practice Organization will continue to evaluate and provide input on proposed rules of interest to practicing psychologists.

The comment letter is available at <http://www.apapracticecentral.org/update/2011/06-09/accountable-care.pdf>.