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March 27, 2019

To the Members of the Medicaid Rate Review Advisory Committee,

Thank you for the opportunity to provide feedback on Provider rates. As you may know, Rite of Passage provides residential and community-based services for youth and families in Colorado. When necessary, behavioral health services are provided to Medicaid eligible clients in each program. Our facilities are CARF accredited, licensed and aligned for compliance with the Family First Act.

An essential therapeutic emphasis is family therapy as we work exclusively with youth. As you know, a high percentage of clients are in residential care results from significant disruption in the home. In the current labor market, it is challenging to hire, train, and retain therapists with a specialty in family therapy (90847) with the current rate of \$60.83, which is \$41.38 less than the rate for a 60 minute individual therapy (90837) session. For this reason, we believe the family therapy rate should be equal to the individual therapy rate as these interventions require at least the same credential and training to be completed.

Another area of for your consideration is the group psychotherapy (90853) rate which is currently \$12 per encounter per client. In the treatment setting, the research suggests that the ideal ratio, group members to therapists, is 6-8 to 1. It is difficult to maintain these ratios with the current reimbursement rate. In comparison, the reimbursement rate is \$29.86 for substance use groups (H0005) in the state of Colorado. In contrast, Wyoming the reimbursement rate for a 1-hour mental health group is \$42.06. An increased group psychotherapy rate would provide the opportunity to deliver more effective and efficient treatment to the youth we serve.

Lastly, we have an overall concern about the in-home and community-based therapy rates for the entire state of Colorado. We know that under the Family First Act, residential providers will be required to provide 6 months of aftercare for their clients. With the current rates in place, this will create a tremendous financial burden on an agency and lead to a much lower quality of care for the clients who are in the community along with potential disruptions in their permanency plan.

Again, thank you for the opportunity to provide suggestions and for your consideration.

Respectfully Submitted,

Jamie Glick, LCSW, LAC  
Regional Director of Behavioral Health  
Rite of Passage

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RITE OF PASSAGE

*"Dedicated to Improving the Lives of Youth."*

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