



April 30, 2015

Edith Ramirez
Chairwoman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Comments to the FTC Concerning Health Care Workshop, Project No. P131207

Dear Chairwoman Ramirez:

On behalf of the American Association for Marriage and Family Therapy (AAMFT), we would like to thank the FTC for holding its second public workshop as part of the “Examining Health Care Competition” series, and for providing AAMFT with an opportunity to provide the FTC with comments concerning competition in the health care industry.

As the national association representing the professional interests of more than 60,000 licensed marriage and family therapists (LMFTs) throughout the United States, AAMFT is concerned about regulatory and other barriers that impact competition in the health care field. AAMFT is also a member of the Coalition for Patients’ Rights, a coalition of over 35 health professional organizations committed to ensuring health care choices for all consumers.

Marriage and family therapists are licensed to provide mental health services in all 50 states and the District of Columbia. Like psychiatrists, psychologists, licensed clinical social workers (LCSWs), and licensed professional counselors (LPCs), LMFTs practice independently in a variety of practice settings. Family therapists provide individual psychotherapy, as well as couples, family and group psychotherapy. Marriage and family therapists are one of the core mental health disciplines recognized by the federal government under the Public Health Services Act.

We are writing to address provider network and benefit design strategies. AAMFT is concerned about the growth of narrow provider networks, particularly among plans that participate in the health care exchanges that were created under the Affordable Care Act. By significantly limiting the number of providers that enrollees in narrow network plans can choose from, the plans are not only reducing competition among healthcare providers who are network providers within these networks, but also impacting enrollees’ access to care by leaving enrollees to select from an insufficient number of providers. In addition to limiting the number of providers available to enrollees, these plans fail to include a sufficient number of providers by license type. For example, a narrow network plan could include LCSWs and psychologists as eligible providers, but exclude LMFTs or LPCs.

It is essential that regulators create and enforce strong network adequacy standards that ensure that health plans maintain provider networks that are sufficient both in numbers and types of providers. A robust network of providers fosters competition among providers and ensures that patients can obtain necessary healthcare services without an unreasonable delay.

Federal Trade Commission
April 30, 2015
Page Two

We encourage the FTC to comment to regulators on the competitive benefits of regulations that require networks to maintain adequate numbers and types of providers. The National Association of Insurance Commissioners is currently in the process of working on revisions to its network adequacy model act. Several state regulators are also considering revisions to their states' network adequacy laws. The FTC's guidance to regulators and health care plans regarding the potential competitive impact of provider network designs is necessary in order to help ensure competition in the health care industry.

Thank you for providing AAMFT with an opportunity to comment. If you have any questions or need any information from AAMFT, please contact Roger Smith at 703-253-0485 or at rsmith@aamft.org.

Sincerely,

Tracy Todd, PhD
Executive Director
American Association for Marriage and Family Therapy