

March 26, 2020

The Honorable Governor Lamont Governor State of Connecticut 120 Capitol Avenue Hartford, CT 06106

Dear Governor Lamont:

I am writing as Chair of the Connecticut Association for Marriage and Family Therapy (CTAMFT), a component of the American Association for Marriage and Family Therapy (AAMFT). I would like to thank you for your leadership in ensuring that Connecticut residents remain safe, healthy, and able to access critical services during the current COVID-19 public health crisis. The mental health needs of Connecticut residents are more acute than ever. While many of the executive orders and policies you have put in place have helped create access to medical and mental health services, Marriage and Family Therapists and other mental health professionals continue to experience barriers in providing needed services to Connecticut residents.

There are over 1,300 licensed Marriage and Family Therapists (MFTs) practicing in Connecticut. MFTs treat Connecticut residents for a myriad of mental health needs, and although they sometimes serve as marriage counselors, their education and training allow them to treat various mental health illnesses. MFTs are trained to assess, diagnose and treat individuals, however MFTs have uniquely extensive training in assessing individuals, couples and families from a systemic perspective. Four of Connecticut's Universities offer MFT programs including: Fairfield University; Central Connecticut State University; Southern Connecticut State University; and the University of St. Joseph, all of which are nationally accredited.

Our members have been faced with many professional challenges as a result of the current climate of the COVID-19 crisis. These challenges encompass their desire to adhere to current licensing requirements while the training opportunities are restricted, cancelled or suspended because of social distancing. These challenges are both for currently licensed MFTs in Connecticut as well as MFTs in-training. State statutes for MFTs in-training require practice hours of supervision and work experience hours and state regulations require continuing education units (CEUs) for licensed professionals. MFTs are trying to adhere to these requirements while preventing the spread of illness, which is impossible.

Many CEU courses have been postponed or cancelled. According to regulations, though notably not found in the governing statutes, the hours of supervision and training for licensure require *in- person contact* with patients and licensed professionals. Obtaining these clinical hours is a lengthy process, taking graduates about 2 years to complete. An uncertain timeframe of when

these clinicians may return to in-office visitations creates uncertainty and extends the time it takes for them to meet full licensure criteria, which CTAMFT and AAMFT endorse and support.

We understand that you have granted the Commissioner of Public Health the ability to suspend current regulatory requirements to protect public health and safety, including licensure requirements and urge their suspension though the current health care crisis.

Additionally to enforce safe distancing measures, which you prescribe and our profession endorses, many MFTs transitioned to tele-therapy treatment to continue to offer mental health services to their clients. However, insurance coverage and reimbursement for tele-health services by insurance providers are a barrier for both providers and clients. Tele-health treatment is consistently reimbursed at a lower rate; up to 20% less than in-person therapy. These lower reimbursement rates are not sustainable for therapists. MFTs have chosen tele-therapy not for convenience but out of compliance with orders and for the safety of their clients, themselves and their families

MFTs have ongoing expenses (rent, utilities, insurance, etc.) that are not lowered due to social distancing requirements. Furthermore, many MFTs have had to purchase additional equipment and software to offer tele-health services. Insurers refusal to provide reimbursement parity continues to be a barrier at a time when mental health needs are increasing because of anxiety and fear due to the public health crisis. Other states including Arizona, Massachusetts, and Texas, have recently required insurance carriers to provide parity reimbursement between inperson and tele-therapy visits during this crisis.

I urge you to consider the following, which will help remove barriers for MFTs and other mental health professionals during this time of crisis:

- Ease the current licensing regulations and allow on-line platforms to be a substitute for inperson contact during a declared public health crisis. These regulations include requirements for CEU credits, practicum hours for students, client contact hours, supervision hours for licensed-eligible masters clinicians, and ongoing supervision for clinicians;
- Provide extensions for licensure renewal requirements, particularly for CEUs; and
- Direct Connecticut Insurers to provide parity for reimbursement for tele-therapy services.

Thank you for your leadership during this public health crisis. Connecticut MFTs appreciate your efforts in keeping Connecticut safe and healthy, both physically and mentally during this trying time. Please do not hesitate to contact me if you have any questions or need further information. You may reach me at chair@ctamft.org or at (860) 579-3258.

Sincerely,

Rebecca L Ruitto, LMFT

Rebecca L. Ruitto, LMFT Chair, CTAMFT

Owner, Revive Family Therapy LLC AAMFT Clinical Fellow

cc: Renee Coleman- Mitchell, MPH, Commissioner of the Department of Public Health Andrew Mais, Commissioner of the Department of Insurance