



San Diego Psychological Association

Dear Anthem Blue Cross Behavioral Health Networks,

The San Diego Psychological Association (SDPA), is a professional association of Psychologists, LCSWs, MTFs and LPCs with a membership numbering 537 professionals across San Diego and neighboring counties. We wish to take this opportunity to express our concern regarding actions taken by a third-party with whom Anthem has contracted to review psychologists' and other mental health providers' billing practices, many of whom are our members. This third party, Equicclaim [may go by a different name now], has been repeatedly sending our members letters indicating that the recipient is billing for the 90837 CPT code more often than her/his colleagues.

We are aware that our state association--California Psychological Association (CPA)--and our national association--The American Psychological Association through its practice organization (APAPO), have raised this concern as well, and have consequently been invited to work directly with officials at Anthem to address this matter. Notwithstanding, the letters continue to be sent. Therefore as a local professional association, we wish to add our collective voice to the chorus and register our objection to these letters on several grounds.

1. They represent an encroachment on our professional purview and potentially our legal status as independent contractors.
2. They strike an ominous and threatening tone, in the opinion of several of our members.
3. They cite Medical Necessity Criteria, which are not attached to the letters nor included as addendums to provider contracts, and which require a considerable amount of investigation to find on Anthem's Website. Furthermore, applicable to case law, these criteria are complex and may be significantly at variance with the medical standards of the community.
4. They fail entirely to strike a tone of collaboration between Anthem and our professional members.
5. They fail to make available the data on billing practices for review. This is important because we question the veracity of the distributions cited in the letters.
6. They fail to make clear how this monitoring of billing practices promotes the mental well-being of Anthem's members who are seeking care from our members.

Therefore, we formally request that you order Equicclaim to cease and desist in sending any further letters. Please also note that in the event Anthem conducts an audit of any of our members, the SDPA will participate in a review of said audit and advocate on behalf of the affected member through a variety of means, including but not limited to acting as an amicus curiae in any legal proceedings and publicizing our position on Anthem's actions to our broad membership. This could lead to detrimental effects on Anthem's provider network.

We would like to offer an alternative to a potentially contentious relationship: our association would like to work with your provider services department or any other relevant departments to establish mutually agreed-upon standards of practice and billing. We appreciate Anthem's mandate for cost containment, so let us work together to develop a collaborative relationship that may satisfy this mandate, while respecting our members' professional purviews and above all, the health of Anthem's members.