



701 13th Street, NW, Suite 950
Washington, DC 20005-3903
Phone: 202/393-6700
Fax: 202/783-6041
E-mail: naphs@naphs.org
Web: www.naphs.org

VIA ELECTRONIC SUBMISSION: www.regulations.gov

February 27, 2009

Secretary Robert M. Gates
Office of the Secretary of Defense
c/o Federal Docket Management System Office
1160 Defense Pentagon
Washington, DC 20301-1160

**RE: TRICARE: Outpatient Hospital Prospective Payment System (OPPS)
[RIN 0720-AB28; DoD-2008-HA-0073], 32 CFR Part 199**

Dear Secretary Gates,

As an association representing behavioral healthcare provider organizations and professionals, the National Association of Psychiatric Health Systems (NAPHS) appreciates the opportunity to provide comments on "TRICARE: Hospital-Based Psychiatric Partial Hospitalization Programs" as published in the December 30, 2008, *Federal Register* [RIN 0720-AB28; DoD-2008-HA-0073].

ABOUT NAPHS

Founded in 1933, NAPHS advocates for behavioral health and represents provider systems that are committed to the delivery of responsive, accountable, and clinically effective prevention, treatment, and care for children, adolescents, adults, and older adults with mental and substance use disorders. Our members are behavioral healthcare provider organizations, including more than 600 psychiatric hospitals, general hospital psychiatric and addiction treatment units, residential treatment centers, youth services organizations, outpatient networks, and other providers of care. Our members deliver all levels of care, including partial hospitalization services, outpatient services, residential treatment, and inpatient care. These services are paid for by all types of payers, including TRICARE, as well as commercial insurers, Medicare, Medicaid, states, and others.

"PARTIAL HOSPITALIZATION" COMMENTS

In this proposed rule, TRICARE is:

recommending that TRICARE approval of a hospital is sufficient for its psychiatric partial hospitalization program (PHP) to be an authorized TRICARE provider. Upon

implementation of this provision, separate TRICARE certification of hospital-based psychiatric PHPs would no longer be required.

NAPHS would like to provide the following comments on this provision.

We applaud the decision to find TRICARE approval of a hospital sufficient for its psychiatric partial hospitalization program to be an authorized TRICARE provider. Separate TRICARE certification as currently required has been a duplicative and costly process – with no additional value to patient care. This policy decision will help certified providers to stay in the TRICARE program and also help to provide adequate access to PHP services for beneficiaries. This is particularly important as providers struggle to make the transition to the Medicare reimbursement structure for TRICARE beneficiaries.

CONCLUSION

Thank you for your consideration of our comments. We look forward to continuing to work with the Department of Defense to ensure that TRICARE beneficiaries continue to have access to necessary mental health services.

Sincerely,

Mark Covall
Executive Director