



August 16, 2022

Amanda Levy  
Mary Watanabe

Director of the Department of Managed Care  
Deputy Director of Health Policy & Stakeholder Relations  
California Department of Managed Health Care  
Department of Managed Health Care  
980 9th Street  
Sacramento, CA 95814

Dear Ms. Levy and Watanabe,

Psychotherapy Action Network (PsiAN), a national organization that advocates for the accessibility of psychotherapy services and recognizes the importance of the relationship in the curative process, strongly supports the decision of Kaiser Permanente mental health workers to undertake an open-ended strike in protest of the lack of accessibility and adequacy of mental health care for its consumers. While Kaiser's affordability has made it an exceptionally large system, its lack of internal resources has left large numbers of its subscribers without care and with unacceptable delays in receiving treatment. These concerns are further complicated by a staff burdened not only with inadequate pay and benefits, but with the demoralizing task of working in a system in which they can offer so little help to patients.

In 2018, PsiAN submitted a similar letter in support of a NUHW strike option. Since then, the national mental health crisis has worsened significantly and demand for treatment has increased. Kaiser continues to report significant profits (\$8.1B in net profits last year, with \$54B in reserves), yet its mental health workers report the same systemic failures to address inequities in the provision of mental health services and the treatment of mental health workers. Despite a year of negotiations, Kaiser and NUHW have been unable to reach agreement.

We see in Kaiser's business model a fundamental failure to place the clinical needs of patients before cost containment, one not tolerated in medical/surgical patient care. Those of us who treat people suffering from emotional challenges understand that adequate care requires the use of therapist judgment in determining what is helpful for each unique individual, which plays a primary role in decisions about length, frequency and modality of treatment. We can no more subsume our judgment to cost

considerations than an oncologist can ethically justify half a course of chemotherapy. Yet, this is exactly what happens when profits motives determine care, despite our national commitments to parity embodied in the Mental Health Parity and Addiction Equity Act since 2008 and reinforced by the Affordable Care Act of 2010.

Extraordinarily long waiting lists for limited evidence-based treatment options, confined largely to medication and short-term treatment which for too many simply isn't adequate, cannot be justified as the provision of quality care. Those in need of mental health care should undergo prompt triage and initiation of treatment. Therapists working under these conditions for low salaries are no better treated than their patients.

PsiAN applauds NUHW's decision to stand up for quality mental health care, and thanks its dedicated members not only for striving to establish working conditions under which their patients can be adequately served, but for providing a brave example to health care workers across the country of true quality and compassionate patient care. This is one action among many that must be taken to make real the need for appropriate corporate investment in the provision of quality mental health care.

We at PsiAN will do what we can to support this effort by NUHW. We also hope that its mental health professional members will use this opportunity to push further for optimal care by challenging their employer's de facto rationing of treatments of adequate length, depth and relationship. For too long, Kaiser has cited a restrictive and outdated, and therefore misleading, definition of "evidence-based care" in order to justify its over-reliance upon medications and short-term, manualized treatments over the kinds of psychotherapeutic treatments that lead to lasting change. It is our hope that NUHW's principled stand can open the door to a revolution in mental health care at Kaiser, one of which the world and its own employees can be proud.

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