September 26, 2023

The Honorable Michelle Steel  
1127 Longworth House Office Building  
United States House of Representatives  
Washington, DC 20515

The Honorable Dan Kildee  
200 Cannon House Office Building  
United States House of Representatives  
Washington, DC 20515

The Honorable Gus M. Bilirakis  
2306 Rayburn House Office Building  
Washington, DC, 20515

The Honorable Susie Lee  
365 Cannon HOB  
Washington, DC 20515

The Honorable Lizzy Fletcher  
346 Cannon HOB  
Washington, DC 20515

Dear Representative Steel, Representative Kildee, Representative Lee, and Representative Fletcher,

I write to commend you for your leadership on behalf of integrated, whole-person care and to express the strong support of the Primary Care Collaborative (PCC) and the Better Health – NOW (BHN) Campaign for the Connecting Our Medical Providers with Links to Expand Tailored and Effective Care (COMPLETE) Care Act of 2023.

The Primary Care Collaborative (PCC) is a nonprofit, nonpartisan multi-stakeholder coalition of 66 organizational Executive Members ranging from clinicians and patient advocates to employer groups and health plans. PCC’s members share a commitment to an equitable, high value health care system with primary care at its base. (See the Shared Principles of Primary Care). In March 2022, PCC launched the Better Health – NOW (BHN) campaign to realize bold policy change rooted in a simple principle: We need strong primary care in every community so we can achieve better health for all.

America’s mental health and substance use crises impact families and communities from the most remote rural communities to our largest cities. In the United States, 1 in 4 adults will have a diagnosable mental health condition throughout their life¹ and according to a systematic review across 24 studies, the median years of potential life lost due to mental illness was 10 years.² In Medicare alone, nearly one in four beneficiaries live

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with mental illness, according to the Commonwealth Fund. As of 2021, drugs, alcohol and suicide together claimed an estimated 229,225 lives in the United States, with higher rates of suicide and suicide-related behaviors observed among seniors 75 and over and people with disabilities.

PCC and Better Health – NOW supports the COMPLETE Care Act as a constructive step to empower primary care and respond to these overlapping behavioral health crises. It would:

- Enhance Medicare payment rates for collaborative care and behavioral health integration services, to help primary care practices to defray the costs associated with implementing integrated care;
- Support quality measure reporting for behavioral health integration; and
- Invest in technical assistance to broaden adoption of integrated care.

According to a study of the Medical Expenditure Panel Survey from 2016-2018, primary care practices facilitated nearly 4 out of 10 visits for depression, anxiety, or another mental illness and treated about a third of patients with severe mental illness. Two evidence-based models for behavioral health integration, the collaborative care and primary care behavioral health models (PCBH), can help primary care practices respond to their patients’ needs.

However, utilization of the Medicare payment codes established to support these models has been limited. The transition to these proven, integrated models of whole-person primary care involves significant expense, training, technology upgrades and workflow changes. It may involve retraining or expanding the primary care team, including, but not

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limited to, nurse case managers, psychiatrists, nurse practitioners, psychologists, social workers, counselors and peer support workers. Practices and clinics serving Medicare beneficiaries, especially those in rural or underserved areas, are often unable to implement these models of care. **The COMPLETE Care Act would provide additional resources, measures, and technical assistance that will help more practices deliver the whole-person, integrated care Medicare beneficiaries need.**

As the legislation moves forward, we urge you to work with your House colleagues to remove other barriers to broader implementation of evidence-based integrated care, including the cost-sharing required for Medicare’s integrated care codes. Once enacted, we encourage you to work with the Department of Health and Human Services to ensure behavioral health integration measures are aligned across public programs and other sources of coverage.

As Medicare beneficiaries and their primary care teams grapple with today’s mental health and substance use crises, the COMPLETE Care Act would come not a moment too soon. Please contact PCC’s Director of Policy, Larry McNeely ([lmcneely@thepcc.org](mailto:lmcneely@thepcc.org)) with any questions.

Sincerely,

Ann Greiner  
President & CEO  
Primary Care Collaborative