



NATIONAL BOARD FOR
CERTIFIED COUNSELORS®

NBCC Responds to CMS's CY 2027 Medicare Physician Fee Schedule Proposals

The National Board for Certified Counselors (NBCC) submitted comments to the Centers for Medicare & Medicaid Services (CMS) on the CY 2027 Medicare Physician Fee Schedule Proposed Rule.

NBCC recognized CMS's efforts to strengthen behavioral health services, support integrated care, and expand access for Medicare beneficiaries.

Recognizing Mental Health Counselors

NBCC urged CMS to fully recognize qualified Mental Health Counselors in new and emerging Medicare delivery and payment models, including Accountable Care Organizations (ACOs).

Meaningful participation of Mental Health Counselors can:

- expand the behavioral health workforce.
- improve access in rural and underserved communities.
- reduce disparities.
- help Medicare beneficiaries receive care closer to home.

Protecting Continuity, Choice, and Telehealth Access

NBCC encouraged CMS to:

- protect continuity of care and beneficiary choice as new policies are finalized to preserve appropriate telehealth flexibility.
- provide clear implementation guidance.
- avoid unnecessary administrative or frequency restrictions that could interrupt treatment.



Addressing Reimbursement Concerns

NBCC expressed concern about the proposed reduction in the Medicare conversion factor. Lower reimbursement rates could place additional pressure on behavioral health practices and make it more difficult to recruit and retain qualified professionals.

NBCC encouraged CMS to continue evaluating whether Medicare reimbursement is sufficient to sustain a diverse behavioral health workforce and ensure timely access to care.

Next Steps

NBCC looks forward to continued engagement with CMS as CY 2027 policies are finalized and implemented. The Final Physician Fee Schedule Rule is expected to be released in mid-November.

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