



August 19, 2026

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1850-P
P.O. Box 8013
Baltimore, MD 21244-8013

Re: Medicare Program; Hospital Outpatient Prospective Payment System and Ambulatory Surgical Center Payment System; CY 2027 Proposed Rule

Dear Administrator:

On behalf of American Association of Psychiatric Pharmacists (AAPP), thank you for the opportunity to comment on the Calendar Year 2027 Hospital Outpatient Prospective Payment System (OPPS) proposed rule. Our comments focus on payment for Intensive Outpatient Program (IOP) and Partial Hospitalization Program (PHP) services and the recalibration of Ambulatory Payment Classifications affecting behavioral health services.

About AAPP

AAPP is a professional association of nearly 3,000 members who envision a world where all individuals living with mental illness, including those with substance use and neurologic disorders, receive safe, appropriate, and effective treatment. Members are specialty pharmacists, and most are Board-Certified Psychiatric Pharmacists (BCPPs) who specialize in psychiatry, substance use disorders (SUDs), and psychopharmacology. With a significant shortage of mental health care professionals, psychiatric pharmacists offer another resource to improve outcomes for patients with psychiatric conditions and SUDs.

Role of Psychiatric Pharmacists

Pharmacists graduate with a Doctor of Pharmacy degree, requiring six to eight years of higher education to complete, and have more training specific to medication use than any other health care professional. Psychiatric pharmacists, a specialty within clinical pharmacy, are primarily board certified and residency-trained mental health care practitioners who have specialized training in providing direct patient care and medication management for the complete range of psychiatric disorders and SUDs. Psychiatric pharmacists work as treatment team members but also in decision-making and leadership roles in state and federal organizations, academia, and industry.

Psychiatric pharmacists are important members of the health care team working in collaboration with the patient and other health care providers including, but not limited to, psychiatrists, other physicians, therapists, social workers, and nurses (including advanced practice nurses). Psychiatric pharmacists provide expert, evidence-based Comprehensive Medication Management (CMM) services for the most complex patients with mental health disorders and SUDs. Psychiatric pharmacists increase capacity of

the health care team to provide care and psychopharmacology expertise, as well as improve patient outcomes and reduce overall health care costs.

Psychiatric pharmacists have a deep understanding of Medications for Opioid Use Disorder (MOUD) that extends beyond that of most other health care providers. When included in the provision of MOUD services through a collaborative practice arrangement, psychiatric pharmacists' involvement has been demonstrated to improve patient adherence and success with buprenorphine treatment for opioid use disorders; reduce per patient dosage of buprenorphine through improved medication management, monitoring and titration; and reduce overall costs for treating patients with SUDs by relieving providers from delivering services including medication management, counseling, monitoring and follow-ups.

AAPP Comments to Proposed Rule

Intensive Outpatient Program (IOP) and Partial Hospitalization Program (PHP) Payment Updates

IOPs and PHPs are essential components of the behavioral health continuum, providing intensive, structured treatment for individuals with acute mental illness and substance use disorders. We appreciate CMS's commitment to maintaining a consistent payment methodology while ensuring rates reflect the most recent available utilization and cost data. As such, we support CMS's proposal to update CY 2027 IOP and PHP payment rates using CY 2025 claims data and the most recent available cost report information while maintaining the payment methodology finalized for CY 2026. Using the most current available data helps ensure that payment rates more accurately reflect the resources required to furnish IOP services and promotes payment stability for providers.

Psychiatric pharmacists possess specialized expertise in comprehensive medication management (CMM) and routinely work with physicians, psychologists, nurses, social workers, and other behavioral health professionals to optimize medication therapy and improve patient outcomes. Although Medicare does not currently recognize or directly reimburse psychiatric pharmacists for these services, they remain an important part of many interdisciplinary behavioral health teams.

As CMS continues to update payment for IOP and PHP services, we encourage the agency to ensure that future payment analyses and policy development recognize the resources required to provide comprehensive medication management as part of high-quality behavioral health care and that such services be reimbursed appropriately.

AAPP looks forward to working with CMS to identify opportunities to strengthen access to integrated behavioral health services and improve outcomes for Medicare beneficiaries.

Conclusion

Thank you for considering these comments. AAPP appreciates CMS's attention to the needs of Medicare beneficiaries receiving outpatient behavioral health care. We would welcome opportunities to provide additional clinical and practice-based information regarding the role of psychiatric pharmacists in IOP, PHP, and other hospital outpatient behavioral health settings. If you have any questions, please do not hesitate to contact me at bschimenti@aapp.org or our Health Policy Consultant, Laura Hanen at lahanen@venable.com.

Sincerely,

A handwritten signature in black ink, reading "Brenda Schimenti". The script is fluid and cursive, with the first name "Brenda" and last name "Schimenti" written in a single continuous line.

Brenda K. Schimenti
Executive Director