

Criteria	Review (Vernehmlassung) of the Federal Council (Bundesrat)
Who is allowed to bill psychotherapeutic services via compulsory health insurance?	Psychiatrist and medically arranged psychotherapy at the psychologists
Who prescribes?	FMH General Internal Medicine, FMH Pediatrics, FMH Neurology, FMH Gynecology and Obstetrics, FMH Psychiatry and Psychotherapy, FMH Child and Adolescent Psychiatry, Physicians with Proficiency Certificate 'Delegierte Psychotherapie' (roughly translated Delegated Psychotherapy), Physicians with Proficiency Certificate 'Psychosomatic and Psychosocial Medicine' (SAPPM/ASMPP)
Demedanded requirements for psychologists settling via Compulsory health insurance	Postgraduate training 3 years in a psychiatric institution, whereby 1 year is sufficient in a medically supervised Category A-institution (remainder also possible under non-medical psychotherapeutic guidance)
Total number of sessions per medical prescription	15 sessions
Number of sessions until the insurance report	30 sessions
Session Duration in minutes	60 minutes/Session with individual therapy 90 minuten/Session with group therapy
Further requirements	Insurance benefits for crisis intervention or short-term therapy of a maximum of 10 sessions can be arranged by physicians with all specialist titles

Review responses to the Federal Council's review (Vernehmlassung) „Neuregelung der psychologischen Psychotherapie im Rahmen der obligatorischen Krankenpflegeversicherung (OKP)" (New regulation of psychological psychotherapy in the context of compulsory health insurance) in comparison

Criteria	SGPP/SSPP = Swiss Society of psychiatry	SMHC = Swiss Mental Health Care = swiss national association representing psychiatric clinics and services	Mfe = Family doctors and Pediatricians Switzerland	Psychology Associations (FSP, cantonal associations)
Who is allowed to bill psychotherapeutic services via compulsory health insurance?	Psychiatrists and psychiatric-arranged psychotherapy at the psychologists	Psychiatrist and medically arranged psychotherapy at the psychologists	Psychiatrist and medically arranged psychotherapy at the psychologists	Psychiatrist and medically arranged psychotherapy at the psychologists
Who prescribes?	FMH Psychiatry and Psychotherapy, FMH Child and Adolescent Psychiatry, Physicians with Proficiency Certificate 'Psychosomatic and Psychosocial Medicine' (SAPPM/ASMPP), Physicians with a newly created Proficiency Certificate 'Anordnung Psychotherapie' (roughly translated 'Delegation Psychotherapy')	<p>Full Prescription Competence: FMH Psychiatry, Physicians with Proficiency Certificate 'Delegierte Psychotherapie' (roughly translated Delegated Psychotherapy), Physicians with SAPPM/ASMPP, FMH Geriatrics, FMH with > = 1 year at SIWF-approved Psychiatry Training Center (Weiterbildungsstätte)</p> <p>Limited prescription Competence: Crisis intervention or short-term therapy of a maximum of 10 sessions may be ordered by physicians with all specialist titles.</p>	<p>FMH General Internal Medicine, FMH Pediatrics, FMH Neurology, FMH Gynecology and Obstetrics, FMH Psychiatry and Psychotherapy, FMH Child and Adolescent Psychiatry, Physicians with Proficiency Certificate 'Psychosomatic and Psychosocial Medicine' (SAPPM/ASMPP)</p>	<p>FMH General Internal Medicine, FMH Pediatrics, FMH Neurology, FMH Gynecology and Obstetrics, FMH Psychiatry and Psychotherapy, FMH Child and Adolescent Psychiatry, Physicians with Proficiency Certificate 'Psychosomatic and Psychosocial Medicine' (SAPPM/ASMPP)</p>

<p>Demanded requirements for psychologists settling via Compulsory health insurance</p>	<p>Required clinical training duration of 3 years, of which 2 years are in a psychiatric-psychotherapeutic SIWF-approved category A-clinic (= compulsory admission with a wide spectrum of illnesses).</p> <p>(Compared to assistant psychiatrist: 6 years necessary)</p>	<p>Required clinical training duration for psychologists= 5 years in a SIWF-approved clinic</p> <p>(Compared to assistant psychiatrist: 6 years necessary)</p>	<p>Required clinical training duration of 3 years in psychiatric institution, of which 1 year in a medically managed A-institution is sufficient (Remainder also non-medical psychotherapeutic guided possible)</p> <p>(Compared to assistant psychiatrist: 6 years necessary)</p>	<p>Required clinical training duration of 3 years in psychiatric institution, of which 1 year in a medically managed A-institution is sufficient (Remainder also non-medical psychotherapeutic guided possible)</p> <p>(Compared to assistant psychiatrist: 6 years necessary)</p>
<p>Total number of sessions per medical prescription</p>	<p>Until the admission of insurance report possible</p>	<p>Max 10 sessions with limited prescription competence, otherwise possible until admission of the insurance report</p>	<p>Until the admission of insurance report possible</p>	<p>Until the admission of insurance report possible</p>
<p>Number of sessions until the insurance report</p>	<p>40 Sessions</p>	<p>40 Sessions</p>	<p>40 Sessions</p>	<p>40 Sessions</p>
<p>Session Duration in minutes</p>	<p>Keep old limit of 75 minutes / individual therapy session</p>	<p>Keep old limit of 75 minutes / individual therapy session</p>	<p>Keep old limit of 75 minutes / individual therapy session</p>	<p>Keep old limit of 75 minutes / individual therapy session</p>
<p>Further requirements</p>	<p>Admission control / numerus clausus because of volume expansion due to up to 7000 new Compulsory health insurance-approved psychotherapists</p> <p>A result evaluation of these regulation changes is to be carried out for the first time at</p>	<p>In connection with the introduction of a new model, there is an urgent need for an evaluation of actual unmet needs in order to provide a qualitative and quantitative evidence of demand.</p>	<p>The Mfe demands that unjustified obstacles in the training of psychotherapists be reduced. Thus, practical further education contents should also be able to be acquired under the guidance of psychological psychotherapists.</p>	<p>Rejection of the introduction of an entry, process and success diagnosis. Instead: test the suitability and practicability of such a diagnosis on a model project</p>

the latest two years after the introduction, and then repeated annually. Also mandatory is the implementation of scientific accompanying research!			
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According to the SGPP/SSPP review answer, only one year of clinical experience and the possibility that every doctor may prescribe brings a great risk to the quality and effectiveness of the psychiatric-psychotherapeutic care of the population.

Comments on categories of further training centers (Weiterbildungsstätten): Category A (but not category B) offer compulsory admission and thus treat a wide range of patient disorders.

Note SVPA/ASMAP: Where the volume growth is based, cannot be predicted. It is therefore possible, that the under-provision of rural regions and the psychiatric emergency situation -used as arguments by some associations- will not be improved by these costly innovations of the Health Insurance Act (KVG/ LAMal).

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