



**CONNECT  
ENRICH  
ACHIEVE**

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July 10, 2019

Bernard J. Tyson, Chairman and CEO  
1 Kaiser Plaza  
Kaiser Permanente  
Oakland, CA 94612

RE: C.C.R. § 1300.67.2.2—Access to Care Concerns

Dear Mr. Tyson,

On behalf of the 32,000 members of the California Association of Marriage and Family Therapists (CAMFT), we wish to reiterate our previously conveyed concerns sent to you in December 2018 and 2011. On both occasions we expressed concerns about the allegations on Title 28 C.C.R. § 1300.67.2.2 (Timely Access to Care) violations.

CAMFT is concerned about the allegations related to timely access to mental health services through Kaiser.<sup>i</sup> Our mental health therapists report that many clinics are vastly understaffed and that patients with conditions such as depression and bipolar disorder often wait one and two months between treatment appointments. If these allegations are true, CAMFT is very alarmed about the patients on a consumer protection level and that patient care is being compromised.

It is CAMFT's understanding that Kaiser recently ceased negotiations with the National Union of Healthcare Workers (NUHW) related to possible resolutions on access to treatment for patients as well as recruitment and retention of therapists at Kaiser. CAMFT encourages Kaiser to resume negotiations to find effective solutions to the staffing and clinical problems that remain.

Thank you for your attention to these concerns and we welcome any dialogue on these issues.

Sincerely,

Nabil El-Ghoroury, PhD, CAE  
Executive Director

Cathy Atkins, JD  
Deputy Executive Director

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<sup>i</sup> § 1300.67.2.2 specifies that plans shall provide health care services in a timely manner appropriate for the nature of the enrollee's condition consistent with good professional practice. Moreover, non-urgent appointments (and return appointments) with mental health care providers must be provided with ten business days of the request for appointment, unless the treating provider, consistent with professionally recognized standards of practice, has determined that a longer waiting time will not have a detrimental impact on the health of the enrollee.