



To: Ms. Letitia James
New York Attorney General

Mr. Rob Bonta
California Attorney General

Mr. Kwame Raoul
Illinois Attorney General

Federal Trade Commission

We are writing on behalf of the memberships of the Psychotherapy Action Network, nearly 5,000 mental health therapists of all disciplines and other stakeholders, the American Psychoanalytic Association, the American Association for Psychoanalysis in Clinical Social Work, the Clinical Social Work Association, and the Confederation of Independent Psychoanalytic Societies to object to the misleading business practices of CareDash.com, an online directory of medical and mental health practitioners.

CareDash states that it acts as a healthcare directory and review website for a wide variety of providers, offering information on patient reviews, disciplinary actions and other issues. According to its website, CareDash “is a solution for patients looking for transparent and trustworthy information about healthcare providers, practices and hospitals in their area.”

In our view, CareDash is neither transparent nor trustworthy. Far from its nicely worded mission, CareDash functions to drive potential referrals only to CareDash and BetterHelp.com affiliated clinicians. CareDash receives commissions from BetterHelp, uses the names and information about therapists without their knowledge or consent for the purposes of CareDash’s and BetterHelp’s profits. None of this is clearly stated up front on its website.

The CareDash process works as follows: A prospective client starts a search and then selects a specific therapist on CareDash.com. After clicking on “check availability” for that therapist, the website automatically displays the following message for a non-participating provider: “[The selected therapist] has not provided a way to schedule

online through CareDash. However, you could get connected with an online therapist or chat with our virtual assistant to get help finding a therapist.” The prospective client is then offered the option to select from one or more alternative therapists who participate with either CareDash or with BetterHelp. If the individual chooses the virtual assistant option, they are automatically directed to a page where only BetterHelp’s participating providers are listed.

It is only in the fine print about Partner and Affiliate Relationships that CareDash reveals that it is in business with BetterHelp.com and its sub-brands, such as ReGain.us and PrideCounseling.com, and receives a commission for all patients referred to these companies. This process also looks as though an independent, neutral source is effectively endorsing BetterHelp’s therapists.

Not only does CareDash list therapists without their knowledge or permission, it also does not allow therapists to remove themselves from the directory. Nor can therapists correct the multiple inaccuracies in their listings unless they engage with CareDash to "claim" their profile, which forces the therapist who wants accurate information listed to participate in their business. In these ways CareDash falsely markets the services of non-participating providers to drive traffic and potential clients to BetterHelp and to itself.

As mental health practitioners and stakeholders, we are concerned not only about the damage to our trade, but also to the impact of this duplicitous practice on prospective patients. Therapists take very seriously the need to have accurate, reliable information available about their services as part of the ethical conduct of their therapeutic practice. For people in need, obtaining accurate, trustworthy, and reliable information about therapists and engaging with a trusted therapist is the first and very important step to getting help.

CareDash is claiming to offer a service for the public good. However, for the public, prospective patients and therapists, this claim masks the extent to which they are carrying out a marketing strategy. We believe it goes against the imperatives for transparency, clarity and trust in healthcare decision-making, and we, the undersigned, request the following:

- The for-profit nature of CareDash be clearly stated on its website (not buried in the fine print), including its function as a paid intermediary for other for-profit businesses
- The business practice of culling mental health professionals from data sources be ended, and instead only those mental health professionals who choose to join the CareDash website shall be included in its directory
- Therapists be able to delete their profiles

Sincerely,

Psychotherapy Action Network (PsiAN)

Linda L. Michaels, PsyD MBA
Chair, Co-Founder

Janice Muhr, PhD
Treasurer, Co-Founder

Erika Schmidt, MSW
Vice Chair

American Psychoanalytic Association (APsaA)

Kerry J. Sulkowicz, M.D.
President

Daniel W. Prezant, Ph.D.
President Elect

American Association for Psychoanalysis in Clinical Social Work (AAPCSW)

Brian Ngo-Smith, MSW, LCSW, BCD-P
President

Janice Berry-Edwards, MSW, PhD,
LICSW, LCSW-C, ACSW, BCD
President Elect

Clinical Social Work Association (CSWA)

Kendra Roberson, PhD, LICSW
President

Laura Groshong, LICSW
Director, Policy and Practice

Confederation of Independent Psychoanalytic Societies (CIPS)