

May 18, 2020

Phil Wilson
Acting Executive Commissioner
Texas Health and Human Services Commission
4900 N. Lamar Blvd.
Austin, TX 78751-2316

Delivered via Email

Dear Commissioner Wilson,

We are contacting you regarding the next steps necessary to ensure minimal disruption in the provision of mental health and substance use services to Texans, as current Medicaid telehealth and telemedicine changes are set to expire on May 31, 2020. The collective group represents mental health and substance use stakeholders across the state. We ask you to consider an extension of this policy until a vaccine is available. However, if that is not possible, a 120-day extension would allow providers time to further evaluate the current situation and make the best decision for themselves and their patients.

We applaud your rapid response to date to ensure that mental health and substance use services are available and safe for all Medicaid enrollees. Accessing services via telehealth and telemedicine is a vital strategy to mitigate the spread of COVID-19, allowing people to maintain treatment and support from their mental health providers. Until a vaccine can be found, the risks of transmission between mental health providers and clients, or among clients, will remain high. Both mental health providers and consumers of mental health services can have compromised immune conditions that place them at greater risk of exposure. Many clients are also struggling with higher levels of anxiety that make travel outside their homes a trigger. But these risks can be greatly minimized by allowing the continuation of current telehealth policies in both Medicaid managed care and fee-for-service plans.

Providing services via telehealth and telemedicine alleviates mental healthcare professional shortages by making services more accessible to individuals in need, including those in rural and underserved areas. Further, continuing reimbursement for audio-only telephone services ensures that mental health and substance use providers can continue treatment for individuals who have no access to other technology. Any rollback of telehealth and telemedicine reimbursement will compromise the ability of Medicaid recipients to safely seek mental health and substance use treatment.

We ask that you support continuity of care by extending current telehealth and telemedicine regulations that encourage the utilization of teleservices, including services by audio-only telephone.

COVID-19 will have a lasting impact on the state's healthcare system, which includes the delivery of mental health and substance use services to individuals in crisis. Please let us know if there are ways we can partner with you going forward.

Sincerely,

Association of Substance Abuse Programs
Autism Society of Texas
Center for Public Policy Priorities
Clarity Child Guidance Center
Coalition of Texans with Disabilities
Doctors for Change
Hogg Foundation for Mental Health
Mental Health America of Greater Dallas
National Alliance on Mental Illness (NAMI) Texas
National Association of Social Workers – Texas Chapter
Policy Rx

Texas Association for Marriage and Family Therapy
Texas Council of Community Centers
Texas Counseling Association
Texans Care for Children
Texas Hospital Association
Texas Impact
Texas Psychological Association
Texas Society for Clinical Social Work
The Pregnancy and Postpartum Health Alliance of Texas
United Ways of Texas
Young Invincibles

CC:

HHSC Chief Program and Services Officer Michelle Alletto
HHSC Deputy Executive Commissioner for Access and Eligibility Services Wayne Salter
HHSC Medicaid Director Stephanie Stephens
HHSC Chief Policy & Regulatory Officer Victoria Ford
HHSC Executive Commissioner of Health, Developmental, and Independence Services Dee Adams Budgewater