



# Texas Psychological Association

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Dear Governor Abbott,

The Texas Psychological Association represents the voices of over 4,500 psychologists. To date, we have heard nothing but support for the swift actions taken by your office and state agencies under your direction in response to the COVID-19 pandemic. The emergency rulemaking by the Texas Department of Insurance (TDI) and the expanded coverage for tele-therapy services by Texas Medicaid has been an unprecedented step in the right direction. However, we suggest additional ways that the state can prepare itself for long-term quarantines.

This week, the federal government announced expanded telehealth access to Medicare recipients. The new waiver allows psychologists to bill for CPT codes related to psychological and neuropsychological testing (96130-96133; 96136-96139) when those services are provided through telehealth. Additionally, Medicare has historically covered neurobehavioral status exams (96116) through telehealth when provided to patients in rural Health Professional Shortage Areas, but recent waivers expanded that authority to any practice site. We hope that Texas Medicaid will reimburse for this code and the associated add-on code (96121) when provided through telehealth as well.

It would also be helpful to clarify whether these codes are included in TDI's emergency rulemaking. Our members report they are receiving inconsistent responses from within the same insurance company, which complicates billing practices and exposes providers to claw backs, further compounding the financial strain small businesses now face.

Historically, it was necessary for psychological and neuropsychological testing to be provided in an in-person setting. However, since the pandemic, test publishers have responded by making most of their services accessible through telehealth. Specifically, three of the largest assessment providers, Pearson, Psychological Assessment Resources, and WPS, have provided tools and guidance on tele-assessment. Due to the recent waiver, Medicare beneficiaries now have access to these new tools. We encourage Texas Medicaid to allow reimbursement for tele-assessment as well. To date, Medicaid beneficiaries must either seek assessment in person or delay their care. As predictions for extending social distancing guidelines and Stay Safe/Work Home orders make headlines, the need for this coverage grows with each passing day.

We appreciate your attention to this matter. If you have any questions or concerns, please contact our Executive Director, Jessica Magee, at [Jessica@TexasPsyc.org](mailto:Jessica@TexasPsyc.org).

Sincerely,

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