



COVID-19 STATE RESOURCES

TEMPLATE FOR LETTERS TO STATE GOVERNORS

SUMMARY

The following resource is a template for members interested in engaging their Governor on telebehavioral health guidance during a declared state of emergency.

[LOGO & LETTERHEAD]

[DATE]

The Honorable _____
Office of the Governor
Full Street Address
City, State Zip code

Dear Governor _____,

On behalf of more than _____ members and supporters statewide, __ (state) __ Counseling Association (_CA), respectfully requests for emergency rulemaking to include telehealth provisions inclusive of behavioral health and insurance parity. We would like to thank Governor _____ for his/her rapid response to the COVID-19 outbreak. We strongly believe that his/her leadership in declaring a state of emergency in __ (state) __ on March ____ is critical in keeping our families and communities safe.

Given the Presidential and Congressional directives to states on the need for sheltering-in-place, the Centers for Medicare and Medicaid Services have broadened access to telehealth services and established payment parity on an emergency basis under the 1135 waiver authority and Coronavirus Preparedness and Response Supplemental Appropriations Act. We applaud this decision to expand telehealth coverage and strongly urge the state to follow suit by including telebehavioral health language in emergency rulemaking that incorporates public and private providers, networks, insurers, organizations, and independent practitioners. The federal directives focus particular attention on Medicare, which Licensed Professional Counselors are not able to utilize at this time. The state should expand the directives to include Medicaid and telebehavioral health. We request an order to temporarily lift restrictions on telebehavioral health by telephone or video for individuals regardless of insurance plan and ensure payment parity¹ until the conclusion of this national emergency.

Nearly 1 in 5 Americans have a mental health condition² and we are now in an unprecedented time in our nation's history. The increased isolation, chronic stress, uncertainty, and economic instability as businesses shut down temporarily, exacerbates these mental health conditions, which underscores the urgent need for greater flexibility in mental health care. Studies of past pandemics, such as Severe Acute Respiratory Syndrome (SARS), show that children experience high levels of stress, anxiety, and confusion as a direct result of community mitigation strategies designed to address public health pandemics.³ While it is essential that we as a nation engage in community mitigation strategies to address COVID-19, public health experts recommend employing an organized mental health response to address the needs of children, adolescents, and adults during and after a pandemic.⁴

In ____ (state) ____, mental health care is particularly important to our communities as ____ (insert state data on unmet mental health needs or data on a local mental health concern of great importance, such

¹ Reimbursement amount for telehealth is the same as payment for a face-to-face visit.

² Trica, Sienna & Bradford, Kate. (February 2019). Telebehavioral Health Care. National Conference of State Legislatures. Retrieved from <https://www.ncsl.org/research/health/telebehavioral-health-care.aspx>

³ Center for the Study of Traumatic Stress. Mental health and behavioral guidelines for response to a pandemic flu outbreak. Retrieved from <http://www.usuhs.mil/psy/CSTSPandemicAvianInfluenza.pdf>. Accessed July 28, 2009.

⁴ *Ibid.*

[LOGO & LETTERHEAD]

as opioid use disorder) _____ shows that in _____ (state) _____ mental health care services are in great demand. With over _____ (number of counties) _____ classified as a mental health professional shortage area in _____ (state) _____, it is critical that services are readily available and accessible throughout the state. Many of our members are experiencing barriers as they prepare to provide telehealth services to their clients and those in need of counseling services during this health crisis. Unfortunately, some insurance companies and managed care organizations make this more difficult than it should be.

Our members report that coverage varies significantly by plan and plans that cover telehealth services have unnecessarily complicated and time-consuming approval processes. Licensed Professional Counselors are responding quickly to the need to adjust their practices to adhere to social distancing directives. Now more than ever, our community needs access to professional counseling services without delay and unnecessary regulatory burdens.

We encourage you to act and to direct all insurance companies and managed care organizations to do the following while we are in a state of emergency:

- Reimburse telebehavioral health services provided by Licensed Professional Counselors;
- Waive any additional certification, training requirements, or lengthy procedures for mental health professionals to receive reimbursement;
- Reimburse providers for services provided on-line or by phone at the same rate as services provided face-to-face;

Your quick action will help avert a mental health emergency in _____ (state)_____.

We applaud the Governor for his/her rapid response to COVID-19 and hope that he/she extends guidance for the state in order to ensure families and individuals can remain safely at home without disrupting access to necessary mental health services. We are here to support your work on these issues and aid in any necessary mental health response to the evolving crisis. Mental health providers across _____state_____ want to support our communities across the state during this time of increased stress and social isolation. Thank you for your consideration in this urgent matter.

Please contact us if you have questions, concerns, or if we can be of service during this difficult time.

Signed,

_____, _____ Counseling Association Director

You can choose to include more than one signature if you want to have Board Members and staff leadership on the letter. You can choose to also CC members of the Governor's cabinet, including the head of your local health department. For any questions or additional support in reaching out to your Governor, please contact: Dominique Marsalek at dmarsalek@counseling.org.