



American Mental Health Counselors Association

March 31, 2020

Michael Consedine
Chief Executive Officer
National Association of Insurance Commissioners
444 N. Capitol St, NW, Suite 700
Washington, DC 20001

Dear Mr. Consedine;

The American Mental Health Counselors Association (AMHCA), composed of 7000 Licensed Clinical Mental Health Counselors, are front-line Primary Mental Health Care Providers who provide behavioral health care services for the betterment of mental health and well-being. Clinical Mental Health Counselors are uniquely positioned to help address the behavioral health-related dimensions of health care issues. We stand ready to assist you in addressing the needs of all Americans as part of your challenge to deal with the coronavirus outbreak.

Given the orders from local, city, state, and national leaders for communities to shelter in place, the Centers for Medicare and Medicaid Services have broadened access to telehealth services and established payment parity under a temporary and emergency basis under the 1135 waiver authority and Coronavirus Preparedness and Response Supplemental Appropriations Act.¹ We applaud this decision to expand telehealth coverage for Medicaid beneficiaries and strongly urge states to follow suit. We request states to temporarily lift restrictions on telebehavioral health by telephone or video for individuals regardless of insurance plan and ensure payment parity² among all mental health professionals until the conclusion of this national emergency.

Nearly 1 in 5 Americans have a mental health condition³ and data from the National Institute on Drug Abuse (NIDA) states fewer than 10 percent of adults with co-occurring substance use disorders receive treatment for both disorders, and more than 50 percent do not receive treatment

¹ Centers for Medicare & Medicaid. (March 17, 2020). Medicare Telemedicine Health Care Provider Fact Sheet. Retrieved from <https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet>

² Reimbursement amount for telehealth is the same as payment for a face-to-face visit.

³ 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>

for either disorder.⁴ We are now in an unprecedented time in our nation's history with the increase in isolation and uncertainty of the future potentially exacerbating mental health conditions, which underscores the need more than ever for great flexibility in 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.⁵ 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 both during and after a pandemic.⁶

The importance of shielding individuals with health conditions that place them at higher risk for severe illness from COVID-19 and ensure the safety and continuity of care they're currently receiving is paramount. Although several states have acted in scaling telehealth services over the years, there are still far too many gaps in access and coverage for the 43.8 million Americans⁷ experiencing a mental illness. In order for providers and facilities to best serve the needs of their patients, we urge each of you to work together to allow for telebehavioral health coverage and parity reimbursement until the national emergency order is lifted.

Thank you for your hard work in ensuring Americans can access their behavioral health care needs during this national public health emergency.

Sincerely,

A handwritten signature in black ink that reads "Eric T Beeson". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Eric T. Beeson, Ph.D., President
American Mental Health Counselors Association

⁴ National Institute on Drug Abuse (October 13, 2017). Study highlights unmet treatment needs among adults with mental health and substance use disorders. Retrieved from <https://www.drugabuse.gov/news-events/news-releases/2017/10/study-highlights-unmet-treatment-needs-among-adults-mental-health-substance-use-disorders>

⁵ 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.

⁶ *Ibid.*

⁷ National Alliance on Mental Illness (n.d.) Mental Health Facts in America. Retrieved from <https://www.nami.org/nami/media/nami-media/infographics/generalmhfacts.pdf>