

DATE

RECIPIENT/ADDRESS

Re: Providing Telehealth Services to Insureds during COVID-19 Public Health Emergency

Dear NAME:

We are contacting you on behalf of American Psychological Association Services, Inc.[[1]](#footnote-1) and the [insert SPTA name here] about steps that can be taken to ensure minimal disruption in the provision of health care services to your state citizens, particularly mental health services provided by licensed psychologists.

As you are aware, on March 6th, the President signed into law an $8 billion emergency funding bill that includes $500 million towards Medicare telehealth services, allowing the HHS Secretary to waive current Medicare telehealth restrictions (i.e., originating/geographic sites) during the COVID-19 public health emergency so that care can be provided regardless of where a patient is located, including in the home. Additionally, CMS has continued to expand telehealth coverage to reduce barriers to care during this public health crisis.

By extension, we ask you to commit to supporting continuity of care for citizens in your state by encouraging insurers in your state to allow their insureds and providers to utilize telehealth services during the current COVID-19 public health emergency. It is critically important that psychologists are able to meet the needs of their patients, including experiences of heightened anxiety about the spread of this virus, without further increasing the risk of contagion.

[Since you are in a jurisdiction that has either enacted a state law requiring coverage for telehealth services (including telemental health services) or your governor has issued an emergency executive order requiring telehealth coverage during this public health crisis], we strongly urge you to alert your insureds of the availability of telehealth services as part of their coverage. Also, we request that you require insurers in your state to notify the provider community at large about their ability to provide telehealth services to patients, to detail what kinds of technology may be used, to remind providers of the need to ensure HIPAA compliance, and to provide guidance on how those services ought to be billed for reimbursement. We want to work with you to ensure that there is minimal disruption in services provided by psychologists to their patients during this stressful and challenging period.

Additionally, to maximize access to available psychological resources, we encourage you to waive any existing state policies/limitations including those established and disseminated by Managed Care Organizations (MCOs) or their equivalents, third-party authorization entities, and waiver program administrators for Medicaid, that would prevent insurers from permitting the following:

* Provision of all Psychotherapy services (CPT codes 90785, 90791, 90832, 90834, 90837, 90853, 90845, 90839, 90840, and 90875) via telehealth **(as Medicare does).**
* Provision of all Health Behavior Assessment and Intervention services (CPT codes 96156, 96158, 96159, 96164, 96165, 96167, 96178, 96170, and 96171) via telehealth (**as Medicare does**).
* Provision of all Psychological and Neuropsychological evaluation services (CPT codes 96130, 96131, 96132, and 96133) and Psychological and Neuropsychological testing services (CPT codes 96136, 96137, 96138, and 96139) via telehealth (**as Medicare does**).
* Provision of the Neurobehavioral Status Exam services (CPT code 96116, **as Medicare does** and code 96121) via telehealth.
* Provision of all Developmental / Behavioral Screening and Testing services (CPT codes 96110, 96112, 96113, and 96127) T via telehealth.
* Provision of all Adaptive Behavior Assessment services (CPT codes 97151, 97152, and 0362T) and all Adaptive Behavior Treatment services (CPT codes 97153, 97154, 97155, 97156, 97157, 97158, and 0373T) T via telehealth.
* Provision of family therapy services with or without the patient present (CPT codes 90846 and 90847)
* Audio-only telephone services when traditional telehealth services cannot be provided.
  + This is a critical access issue for many patients who do not have access to the technology necessary for videoconferencing.
  + This would apply to all Psychotherapy CPT codes and all Health Behavior Assessment and Intervention CPT codes.
  + We encourage you to mitigate the need for telephone-only services by making available to providers an online audiovisual system (e.g., the professional version of Zoom or Doxy.me)
* Provision of clinical services via telehealth from the psychologist’s home.
* Delivery of services to patients in their homes or wherever the patients may be located during this crisis.
* Access to services via telehealth and telephone for both new and existing patients.
* Waiver of co-pays, deductibles and other cost-sharing for telehealth in cases where the patient does not have the financial means to pay them.
* Reimbursement of telehealth services at the same amount as face to face services (as Medicare does).
* Waiver of any restrictions that only allow telehealth through a telehealth carve out network (such as MDLive, Teladoc) so that any psychologist in your regular network can provide telehealth services, and for plans that provide out-of-network coverage, allow such services to be provided by out-of-network psychologists.

During times of crisis, psychologists are increasingly called upon to provide vital clinical services in flexible but effective ways. Therefore, APA also requests that you allow for the following additional coverage:

* Reimbursement for psychologists for specific non-face-to-face services conducted through electronic health record (EHR) portal messages or other HIPAA-compliant, secure platforms using online assessment services [CPT codes G2061 – G2063]. **\*CMS now reimburses for these codes.**
* Reimbursement for psychologists’ use of telephone assessment and management services [CPT codes 98966 – 98968]. **\*CMS now reimburses for these codes.**
* Reimbursement for psychologists’ time spent in consultation with interdisciplinary health care teams using interprofessional telephone/Internet/electronic health record assessment and management service [CPT codes 99446 – 99449].

If there are any statutory limitations on where a patient must be located to receive telehealth services, we ask that you immediately waive those requirements during this public health crisis. If any health insurance company providing coverage in your state has any such requirements as part of its plan coverage, we urge you to require the insurer to suspend those requirements until the public health emergency is lifted.

Please let us know how we can best partner with you to ensure any such communications are disseminated widely and quickly to your state citizens and providers. We are happy to share information about your state policies with our members to ensure that psychologists have the most up-to-date, accurate information about how they can continue to effectively serve your state citizens during this public health emergency.

Regards,

Jared L. Skillings, PhD, ABPP

Chief of Professional Practice

APA Services, Inc.

[www.apaservices.org](http://www.apaservices.org)

Signature of

President

XYZ Psychological Association

1. American Psychological Association Services, Inc. is the companion professional organization to the American Psychological Association (APA) serving all members and advocating for psychology. APA represents more than 121,000 members and associates engaged in the practice, research, and teaching of psychology. [↑](#footnote-ref-1)