



**Association for Behavioral
Health and Wellness**

*Advancing benefits and services
in mental health, substance use
and behavior change.*

June 16, 2014

The Honorable Fred Upton
Chairman
Energy & Commerce Committee
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Henry Waxman
Ranking Member
Energy & Commerce Committee
U.S. House of Representatives
2322A Rayburn House Office Building
Washington, DC 20515

The Honorable Joe Pitts
Chairman
Subcommittee on Health
Energy & Commerce Committee
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone, Jr.
Ranking Member
Subcommittee on Health
Energy & Commerce Committee
U.S. House of Representatives
2322A Rayburn House Office Building
Washington, DC 20515

Dear Chairmen and Ranking Members:

The Association for Behavioral Health and Wellness (ABHW) welcomes the opportunity to respond to your request for input regarding the advancement of technology in order to improve our nation's health care system and help more patients. ABHW has made it a legislative priority to increase telehealth access to patients.

ABHW is the national voice for companies that manage behavioral health and wellness services. ABHW member companies provide specialty services to treat mental health, substance use, and other behaviors that impact health and wellness to approximately 125 million people in both the public and private sectors. ABHW and its member companies use their behavioral health expertise to improve health care outcomes for individuals and families across the health care spectrum.

Telehealth/telepsychiatry has been proven to drive important advancements for our patients, expanding access to care, improving health outcomes, reducing the inappropriate use of psychotropic medications in skilled nursing and other settings, and reducing costs. Telepsychiatry has the ability to reach a broader range of behavioral health consumers, including children and adolescents who appreciate the use of technology when communicating with their behavioral health care providers, and patients who reside in areas where there is a shortage of behavioral health providers. It also helps provide access to elderly patients who may have difficulty leaving their homes to travel to an appointment. However, the fact that each state has its own eligibility guidelines, combined with confusion around licensure requirements, prevents Medicare and Medicaid recipients from obtaining the care they need. At least 40 states provide Medicaid reimbursement for telepsychiatry. Medicare reimburses for telepsychiatry at

the same rate as a face-to-face visit and reimburses a set amount per session for the staff person presenting with the patient. However, Medicare imposes three major restrictions on the use of telepsychiatry. These restrictions are geography-based (the consumer must be located in a non-metropolitan statistical area), facility-based (the consumer must be located in a qualifying facility and accompanied by a qualified staff person), and procedure-based (it must be an approved procedure for telehealth). Reforming these barriers, particularly allowing all Skilled Nursing Facilities and emergency departments – regardless of location – to be defined as shortage areas for the purposes of telepsychiatry, would improve access to and quality of care for people with behavioral health needs.

Thank you for directing your attention toward this very important issue. We appreciate the opportunity to provide feedback and look forward to working together to increase patients' access to telehealth services. If you have any questions, please contact Rebecca Murow Klein at (202) 449-7658 or klein@abhw.org.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Greenberg".

Pamela Greenberg
President and CEO, ABHW