**Pennsylvania Telehealth: Equitable Planes of Access**

**February 25, 2021**

As the public health emergency continues in the face of the COVID 19 pandemic, access to care remains at a critical level for Pennsylvanians and citizens throughout the US. In a short period, it has been well documented the COVID 19 pandemic’s impact on our Country’s existing behavioral health crisis in areas such as opioid use and suicide prevention and has highlighted gaps in mental health services especially as new cases enter into an already overburdened system. Throughout this time frame, the utilization of telehealth across the physical and behavioral health landscape has been a lifeline to a wide demographic of those in need of care.

In response to this crisis, the Centers for Medicare, and Medicaid Services (CMS) quickly created revised allowances in telehealth delivery standards for state licensing entities and practitioners. As the Public Health Emergency nationwide and in PA has been extended so too have the telehealth flexibilities in the public sector (e.g., Medicaid) to remove any limits to access. Unfortunately, the same cannot be said for Pennsylvanians whose health needs are covered by commercial insurance. As the need for services grow~~s~~, the private insurance companies have reduced, eliminated, or created uncertainties to ongoing access to telehealth services. In the past few months, several Pennsylvania commercial insurers have:

* Ended telehealth service coverage;
* Reduced or eliminated previous co-pay waivers;
* Enacted month to month changes in coverage inclusions;
* Required the use (in certain cases) of proprietary systems for coverage, and
* Some are even requiring a change in doctor or therapist for continued coverage.

These actions specifically limit access to care for those with commercial insurance coverage and/or have dual coverage with Medicaid. This lack of parity and fairness in coverage puts thousands of Pennsylvanians at risk for reduced access to care at a time when services are most in need. The landscape to provide services is further exacerbated by vaccine shortages, broadband and technology access issues, and guidance from the Commonwealth around personal mitigation responsibilities. With all these complicating factors, why would we reduce access to commercial health care insurance coverage for telehealth during a time when the governor has extended the emergency declaration?

On behalf of our members, who serve thousands of consumers and their families, we request the following.

* All telehealth services be covered by commercial insurers operating in Pennsylvania based upon the Department of Health and Human Services (DHS) intention to keep the public health emergency (PHE) declaration throughout 2021.
* Co-Pay waivers be extended for the duration of the PHE; and
* All current telehealth flexibilities as outlined in the CMS telehealth standards remain in effect for commercial insurers as outlined in the HHS PHE Guidance.

Thank you for your time and consideration in this endeavor and we offer our full support in efforts to ensure parity and equity in telehealth services for our most vulnerable Pennsylvania citizens.