

Official Letterhead

The Honorable **[full name]**  
Governor of **[state name]**  
**[street address]**  
**[City, State ZIP code]**

Dear Governor **[last name]**,

On behalf of more than **[estimated number]** members and supporters statewide, the **[state or branch name]** Counseling Association respectfully requests an extension of telehealth provisions as outlined in the recent telehealth waiver issued during the height of the COVID-19 pandemic. We ask that this continued telehealth expansion be inclusive of behavioral health providers and insurance parity.

The **[state or branch name]** Counseling Association would like to thank you for your rapid response to the COVID-19 crisis. Your leadership during this public health emergency has been critical in keeping our families and communities safe. We request that the lifting of restrictions on telehealth for individuals regardless of insurance plan<sup>1</sup> is continued to ensure minimal disruption as families begin integrating back to in-person services during this period of transition. Additionally, telehealth language is still necessary for those who still struggle with [long-COVID](#), post-acute COVID-19, disabilities, financial limitations resulting from the COVID emergency, and geographic isolation in rural areas. A large-scale disruption in mental health services would result in yet another public health crisis that is avoidable.

Given the presidential and congressional directives to states on the need for continued caution as vaccination rates improve, it is expected that the U.S. public health emergency (PHE) will last through the end of the year and most federal emergency flexibilities will remain in place through 2021. During the course of the federal PHE, most telehealth flexibilities should remain active and, as indicated in a [letter](#) from the Secretary of Health and Human Services, the PHE will likely remain in place for all of 2021 and states should be given 60 days' notice prior to termination.

Additionally, the Biden administration [announced](#) it will invest \$10.7 million in American Rescue Plan funding to expand the [Pediatric Mental Health Care Access \(PMHCA\) program](#). The administration's recent expansion of the PMHCA program will promote the integration of behavioral health care, including telehealth, into pediatric primary care in 40 states. We applaud this decision to expand telehealth coverage and strongly urge you to follow suit by continuing the waiver for telehealth inclusive of public and private providers, networks, insurers, organizations, and independent practitioners.

Nearly one in five Americans has a mental health condition<sup>2</sup> and we are now in an unprecedented time in our nation's history. The increased social isolation, chronic stress, uncertainty, and economic instability of the past two years 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, show that children experience high levels of stress, anxiety, and confusion as a

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

<sup>2</sup> 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 additional support, please contact Dominique N. Marsalek, M.A. at [dmarsalek@counseling.org](mailto:dmarsalek@counseling.org).*

**[LOGO & LETTERHEAD]**

direct result of community mitigation strategies designed to address public health pandemics.<sup>3</sup> 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.<sup>4</sup>

In **[state]**, mental health care is particularly important to our communities as **[insert state or local data on unmet mental health needs]** shows that in **[state]** mental health care services are in great demand. With over **[number of counties]** counties classified as a mental health professional shortage area in **[state]**, it is critical that services are readily available and accessible throughout the state. 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. Now more than ever, our community members need 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:

- 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 online or by phone at the same rate as services provided face-to-face

Your quick action will help avert a mental health emergency in our state.

We applaud your rapid response to COVID-19 and hope that you will extend telehealth waivers and guidance to ensure families and individuals are able to transition from COVID-19 restrictions with ease and without disruption.

Thank you for your consideration and your leadership. Please contact us if you have questions or concerns, or if we can be of service during this difficult time.

Signed,

**[Name], [State]** Counseling Association Director

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<sup>3</sup> 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.

<sup>4</sup> *Ibid.*