

Subject: CLIENT ADVISORY: Continuing to Allow for Telehealth with Directly Contracted Mental Health Care Providers

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Dear Clients and Other Interested Parties,

The emergency authorizations allowing for telehealth have expired for many state jurisdictions. Several of our clients have benefited, both from cost and access to care, by directly contracting with mental health care providers for their self-funded student health plans. In many instances, these contracts have been developed with providers who either do not participate with commercial insurance plans and/or they are not accepting new patients with commercial insurance. Please refer to page 13 of our 2019 position paper, "[Considering Insurance Billing for College Health Programs](#)," for a discussion of the trend for mental health care providers to not participate with commercial insurance plans.

For self-funded student health plans that wish to continue providing telehealth services by their directly contracted mental health care providers, we recommend, in addition to appropriate plan document modifications to permit telehealth services, the following components be included in an amendment to the provider agreements:

- The provider confirms that the student/covered person is/are physically located where telehealth is permissible relative to the geographic area where the provider is licensed to provide care.
- The provider collects all required copayments or other cost sharing that is the responsibility of the student/covered person.
- The provider's client informed consent document addresses the use of telehealth (see [APA guidelines](#)).
- The provider uses a telehealth system that meets all state and federal standards under the Health Insurance Portability and Accountability Act of 1996 and other applicable federal requirements.
- The provider is responsible for assuring that all telehealth services are provided in a manner that complies with all regulatory requirements of the applicable state jurisdiction.
- The provider's liability insurance includes coverage for providing telehealth services.
- The provider complies with standards/guidelines for best practices from applicable professional associations and governmental entities (e.g., [US Department of Health and Human Services](#) and the [American Psychological Association](#)).

Please contact us if you have any questions regarding this advisory.

Sincerely yours,

Stephen Beckley, CEBS
Valerie Lyon, MHA

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