

# Addressing Tele-behavioral Health Policy Barriers through Strategic Facilitation:

## CMS Behavioral Health & Telehealth Learning Collaborative

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### Major Barriers to Accessing Behavioral Health Services & Their Impact on Telehealth Equity in Marketplace Health Plans

The Learning Collaborative identified overall barriers to advancing tele-behavioral health for Marketplace Health Plans in light of the vast uptake of telehealth services during the COVID-19 Pandemic, such as:

- Shortage of behavioral health providers and related provider network limitations hamper patients' ability to access behavioral health providers in-network. States observe high out-of-network utilization for behavioral health services. These challenges may motivate states to consider professional licensure reciprocity policies to ensure an adequate provider network and encourage [tele-behavioral health best practices](#).
- Barriers remain for equitable access to tele-behavioral health technology. States observe wide variation in the need for increased broadband coverage and are researching ways to increase access. For example, audio-only telehealth policies may promote equitable access, particularly in rural areas and for populations with limited technology access or low digital literacy.
- Using telehealth to meet behavioral health needs adds a layer of complexity, especially in emergency and crisis situations. Providers may need to take additional measures in telehealth settings to ensure patient privacy, especially considering the importance of patient confidentiality in behavioral healthcare. Emerging approaches to tele-behavioral health coverage require navigating new challenges related to patient privacy, confidentiality, and continuity of care.

### Background

- The [White House Unity Agenda](#) announced on March 1, 2022 that the Department of Health and Human Services would create a learning collaborative with state insurance departments on tele-behavioral health.
- CMS also aims to strengthen equity and quality in behavioral health care through an established [Behavioral Health Strategy](#), which supports expanding access to behavioral health services, including through telehealth.

### Overview & Purpose

- In October 2022, CMS launched the Behavioral Health & Telehealth Learning Collaborative (Learning Collaborative) with seven state Departments of Insurance to examine state barriers to tele-behavioral health access. CMS's role is to facilitate state-to-state sharing of best practices and experiences for troubleshooting tele-behavioral health issues.
- The Learning Collaborative supports information sharing and seeks greater adoption of tele-behavioral health services for privately-insured consumers.
- CMS hosted three virtual Learning Collaborative sessions and is focusing in 2023 on the impact of state legislation regarding tele-behavioral health services in the participating states.

### Conclusion

- The Learning Collaborative is an innovative approach in addressing tele-behavioral health challenges across states.
- Barriers of equitable access to tele-behavioral health services are complex and diverse. Although each state faces unique challenges, facilitating dialogue through the Learning Collaborative provides a meaningful opportunity for collective sharing of experiences with other states encountering similar challenges.

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