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From: **Ann Geddes** <ageddes@mdcoalition.org>

Date: Mon, Aug 17, 2020 at 9:24 AM

Subject: Comments on Network Adequacy Standards

To: networkadequacy.mia@maryland.gov <networkadequacy.mia@maryland.gov>

To Whom it May Concern:

Thank you for this opportunity to provide comments on network adequacy standards.

The Maryland Coalition of Families provides family peer support and navigation services to families who care for a child with mental health needs, and to any loved one caring for someone with substance use or problem gambling issues. All of our staff have lived experience caring for a child or other loved one with behavioral health problems. We are a statewide organization and have been in existence since 2000.

We are writing to strongly oppose the allowance of telehealth to meet network adequacy standards for insurance carriers. While telehealth meets the needs of some clients, there are access issues, and many people are uncomfortable with telehealth or do not find it sufficient to meet their needs.

In June 2020, the Behavioral Health Administration commissioned the University of Baltimore Systems Evaluation Center to survey a diverse group of stakeholders about access to behavioral health care during COVID-19, including the use of telehealth. When those surveyed were asked about the reasons individuals were leaving treatment prematurely, 36% said that the consumer could not use telehealth, and 40% said that the consumer would not use telehealth. When those surveyed were asked about the reasons individuals were keeping their treatment appointments less often, 58% said that the consumer could not use telehealth, and 50% said that the consumer would not use telehealth. When asked about the problems with telehealth, those surveyed noted lack of access, lack of privacy and client comfort levels.

We have observed these problems firsthand in our work with families. While the lack of access can be a significant problem for some individuals (they lack the technology or broadband access), others simply do not feel comfortable with a remote connection and are unable to engage in treatment. They may lack a private space in which to have conversations with a provider, or they may simply refuse to open up owing to unease with sharing personal information remotely. The families that we work with have reported that especially young children have trouble engaging with a provider via telehealth, but the difficulty exists across the lifespan.

For these reasons, consumers of behavioral health services must have access to an in-person provider who meets the time and distance requirements that have been established in Maryland for insurance carriers. Telehealth simply is not a good option for many.

Thank you for your consideration.

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