



**AMERICAN PSYCHOLOGICAL ASSOCIATION  
SERVICES, INC.**



March 18, 2020

Governor Gretchen Whitmer  
P.O. Box 30013  
Lansing, MI 48909

Anita G. Fox  
Director, Michigan Department of Insurance and Financial Services  
P.O. Box 30220  
Lansing, MI 48909

Re: Providing Telehealth Services to Patients during COVID-19 Public Health Emergency

Dear Gov. Whitmer and Ms. Fox:

We are contacting you on behalf of American Psychological Association Services, Inc.<sup>1</sup> and Michigan Psychological Association about the steps that can be taken to ensure minimal disruption in the provision of health care services to Michiganders, particularly mental health services provided by duly credentialed psychologists (Limited Licensed Psychologists and Licensed Psychologists).

As you are aware, on March 6<sup>th</sup>, the President signed into law an \$8 billion emergency funding bill that includes \$500 million towards Medicare telehealth services, allowing the HHS Secretary to waive current Medicare telehealth restrictions (i.e. originating/geographic sites) during the COVID-19 public health emergency so that care can be provided regardless of where a patient is located, including in the home.

By extension, we ask you to commit to supporting continuity of care for the residents of Michigan by encouraging insurers in your state to allow their insureds and providers to utilize telehealth services during the current COVID-19 public health emergency. It is critically important that psychologists are able to meet the needs of their patients, including experiences of heightened anxiety about the spread of this virus, without further increasing the risk of contagion.

Since we are one of the 37 jurisdictions that have enacted state coverage mandates for telehealth services, including tele-mental health services, we strongly urge you to require all insurers in Michigan to alert their insureds of the availability of telehealth services as part of their coverage. It is equally important that insurers be required to notify providers immediately about their ability to provide telehealth services to patients, to detail what kinds of technology may be used, to remind providers of the need to ensure HIPAA compliance, and to provide guidance on how those services ought to be

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<sup>1</sup> American Psychological Association Services, Inc. is the companion professional organization to the American Psychological Association (APA) serving all members and advocating for psychology. APA represents more than 121,000 members and associates engaged in the practice, research, and teaching of psychology.

billed for reimbursement. We want to work with you to ensure that there is minimal disruption in services provided by psychologists to their patients during this stressful and challenging period.

To maximize access to available psychological resources, we encourage you to waive any existing state policies including those established and disseminated by Managed Care Organizations (MCOs) or their equivalents, third-party authorization entities, and waiver program administrators for Medicaid, that would prevent insurers from permitting the following:

- Audio-only telephone services when traditional telehealth services cannot be provided. This would apply to current CPT codes for which psychologists receive reimbursement when providing face-to-face services. Agencies are encouraged to mitigate the need for telephone-only services by investing in an online audiovisual system (e.g., the professional version of Zoom or Doxy.me) that could be made available to registered Medicaid providers.
- Reimbursement for psychologists for specific non-face-to-face services conducted through electronic health record (EHR) portal messages or other HIPAA-compliant, secure platforms using online assessment services (G2061-G2063).
- Reimbursement for psychologists' time spent in consultation with interdisciplinary health care teams using interprofessional telephone/Internet/electronic health record assessment and management services (99446 – 99449).
- Reimbursement for psychologists' use of telephone assessment and management services (98956, 98967, and 98968).
- Delivery of clinical services by psychologists from their home.
- Access to services via telehealth and telephone for new patients as well as existing patients.

If there are any statutory limitations on where a patient must be located to receive telehealth services, we ask that you immediately waive those requirements during this public health crisis. If any health insurance company providing coverage in your state has any such requirements as part of its plan coverage, we urge you to require the insurer to suspend those requirements until the public health emergency is lifted.

Please let us know how we can best partner with you to ensure any such communications are disseminated widely and quickly to Michigan residents and providers. We are happy to share information about your state policies with our members to ensure that psychologists have the most up-to-date, accurate information about how they can continue to effectively serve Michiganders during this public health emergency.

Regards,

A handwritten signature in black ink, appearing to read "Jared L. Skillings". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Jared L. Skillings, PhD, ABPP  
Chief of Professional Practice  
APA Services, Inc.

Joy Wolfe Ensor, PhD

Joy Wolfe Ensor, PhD

President

Michigan Psychological Association

LaVone Swanson

LaVone Swanson

Executive Director

Michigan Psychological Association



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