

January 3, 2022

Allison Ivie, M.P.P., M.A.  
Vice President  
Center Road Solutions, L.L.C.  
660 North Capitol Street, NW  
7th Floor  
Washington, DC 20001

**Kim A. Keck**  
President and  
Chief Executive Officer

225 North Michigan Avenue  
Chicago, Illinois 60601-7680  
312.297.6050  
kim.keck@bcbsa.com

Dear Ms. Ivie,

On behalf of the Blue Cross Blue Shield Association (BCBSA), I write to express our deepest gratitude for all you and your advocacy organizations do to care for patients with mental health and substance use disorders and advocate on their behalf. These are difficult times, and we understand the major challenges and sacrifices they and their patients have faced since the COVID-19 pandemic exacerbated America's mental and behavioral health crisis. The Blue system is dedicated to addressing the urgent needs of all patients as we collectively work to tackle COVID-19 and adjust to a new normal.

BCBSA is a national federation of 35 independent, community-based and locally operated Blue Cross and Blue Shield (BCBS) companies (Plans) and the Federal Employee Program<sup>®</sup>. Collectively they provide healthcare coverage for one in three Americans in all 50 states, Washington, D.C. and Puerto Rico. For 90 years, Blue Cross and Blue Shield companies have offered quality healthcare coverage in all markets across America – serving those who purchase coverage on their own as well as those who obtain coverage through an employer, Medicare, and Medicaid. We recognize, and take seriously, the challenges uniquely facing patients during this global crisis and will continue working toward our mission of bettering the health of all Americans.

BCBSA strongly supports the use of innovative technologies including telehealth, to expand consumer access to care when and where they need it. BCBS Plans are leading the efforts to realize the promise of telehealth to improve healthcare access<sup>1</sup>, bend the cost curve<sup>2</sup> and promote positive health outcomes.<sup>3</sup> From the beginning of the pandemic, our Plans made commitments to expand access for telehealth services to enable social distancing and promote public health during the public health emergency. The Blue system collectively has provided over \$7 billion to assist during this pandemic.

BCBSA and BCBS Plans are committed to a thoughtful expansion of telehealth access especially for rural, mental and behavioral health, and the removal of administrative burdens that limit access and efficiency such as site restrictions. To facilitate such access, it is important for each Plan to have the flexibility to provide telehealth services according to the needs of their communities including coverage determinations and deadlines. Throughout the public health emergency, BCBS companies have been reviewing and adapting their policies to ensure continued support for their members.

In considering the post-PHE environment, BCBSA supports a meaningful principle-based approach to expanding telehealth access focused on flexibility in coverage and payment to provide for the care needs of each community, improved access to care for patients and increased efficiency for providers and health plans, and enhancing trust and consumer protection against fraud and abuse through HIPAA-

---

<sup>1</sup> <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.2018.05089>

<sup>2</sup> [https://www.ajemjournal.com/article/S0735-6757\(18\)30653-3/fulltext](https://www.ajemjournal.com/article/S0735-6757(18)30653-3/fulltext)

<sup>3</sup> <https://effectivehealthcare.ahrq.gov/sites/default/files/pdf/cer-216-telehealth-final-report.pdf>

aligned privacy protections. We will continue to work with federal and state policymakers to ensure telehealth remains a robust source of care well into the future.

Thank you again for all you do to advance the health of patients. My team and I look forward to working with you to keep our communities safe and healthy. If you have additional questions, or would like to discuss this topic in greater detail, please contact Justine Handelman, Senior Vice President, Office of Policy and Representation at [Justine.Handelman@bcbsa.com](mailto:Justine.Handelman@bcbsa.com). More information about how Blue Cross and Blue Shield companies are addressing the COVID-19 pandemic is available at [bcbsprogresshealth.com](http://bcbsprogresshealth.com).

Sincerely,

A handwritten signature in black ink that reads "Kim A. Keck". The signature is written in a cursive, flowing style.

Kim A. Keck  
President and CEO