



October 2, 2023

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Laura Goodman
Maryland Department of Health
201 W. Preston Street
Baltimore, MD 21201
Email: mdh.healthchoicere renewal@maryland.gov

Dear Ms. Goodman:

The Community Behavioral Health Association of Maryland (CBH) is the leading voice for community-based providers serving the mental health and addiction needs of vulnerable Marylanders. Our 89 member organizations serve the majority of those accessing care through the public behavioral health system. CBH members provide outpatient and residential treatment for mental health and addiction-related disorders, day programs, case management, Assertive Community Treatment (ACT), employment supports, and crisis intervention.

CBH strongly supports the Maryland Department of Health's (MDH) request for 1115 waiver authority to adopt on a permanent basis the temporary 1135 waiver granted during the national public health emergency, regarding the Four Walls Requirement for clinics authorized under C.F.R. § 440.90.

During the pandemic, the use of telehealth was one of the only ways to ensure that adults and children with serious behavioral health disorders continued to receive their needed treatment and support services. The inclusion of audio-only telehealth provided a way to reach those in rural communities lacking adequate broadband connectivity and those who lacked the financial resources to connect via audio-visual means.

Now that the public health emergency (PHE) has ended, we find that telehealth – both audio-visual and audio-only - continues to be a preferred modality to receive treatment and support services for those who face challenges – such as transportation, child care, and inflexible work schedules – in accessing in-person services. The data we have collected from our members indicates that services rendered through telehealth are at least as efficacious as those rendered in-person. And while we believe that in-person services should always be available for those who prefer it or when it is clinically indicated, having the ability to continue to provide services through telehealth not only helps those we serve, but also

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helps our member organizations meet rising demand while faced with severe workforce challenges.

Maryland has taken assertive steps to continue the telehealth flexibilities granted during the PHE. We strongly support MDH's efforts to keep telehealth available for Medicaid recipients needing access to behavioral health services and supports.

Sincerely,

Shannon Hall
Executive Director