



February 3, 2023

Tyler Sadwith
Deputy Director, Behavioral Health
Department of Health Care Services

RE: DRAFT BHIN 23-XXX: Updated Telehealth Guidance for Specialty Mental Health Services and Substance Use Disorder Treatment Services in Medi-Cal

Sent via email to: countysupport@dhcs.ca.gov

Dear Deputy Director Sadwith,

The California Alliance of Child and Family Services represents over 160 community-based organizations serving children, youth and families through behavioral health, education, foster care, prevention and juvenile justice programs. On behalf of our member organizations, we respectfully submit the following comment on *DRAFT BHIN 23-XXX: Updated Telehealth Guidance for Specialty Mental Health Services and Substance Use Disorder Treatment Services in Medi-Cal*.

Provider Requirements

Page 3 of the draft notice states that providers furnishing telehealth services must offer the same services in-person or arrange for a referral to in-person care. While we acknowledge that beneficiaries have the right to access covered services in person, we are deeply concerned about this requirement as providers are experiencing numerous capacity challenges that may prevent them from being able to offer telehealth *and* in-person services. We recommend removing this requirement as long as the beneficiary has consented to telehealth services.

We appreciate any guidance the Department can provide around this requirement, and we thank you for considering our recommendation. Please let us know if you have any questions or comments. We can be reached at pclark@cacfs.org or 916-639-4688.

Sincerely,

A handwritten signature in black ink that reads "Paige Clark". The signature is written in a cursive style.

Paige Clark
Policy and Regulatory Analyst