
Letter Number 2023-15

Date: July 26, 2023

Fee-for-service [13]

Experience-rated HMO [13]

Community-rated HMO [14]

Subject: Network Adequacy for Behavioral Health Services

FEHB Carriers must have adequate provider networks to deliver mental health and substance use disorder services (collectively, behavioral health services) to FEHB-covered individuals. OPM has placed continued emphasis on the importance of access and availability of behavioral health provider networks in view of recent public health crises including the coronavirus disease 2019 (COVID-19) pandemic, youth mental health, and the opioid epidemic. As the focus of behavioral health services evolves, so will OPM's commitment to ensuring access and availability of treatment. In response to ongoing concerns, OPM is requiring FEHB Carriers to submit information through the attached template, as explained below.

Background

Through the 2019-2023 Call Letters and Technical Guidance, OPM has identified several strategies that FEHB Carriers must use to ensure network adequacy for behavioral health:

- In the 2019 Call Letter ([Carrier Letter 2019-01](#)) and Technical Guidance ([Carrier Letter 2019-05\(a\)](#)), OPM strongly encouraged Carriers to monitor and improve provider access and availability that included the integration of mental health and primary care and that Carriers consider leveraging telehealth services to address provider shortages.

- The 2020 Call Letter ([Carrier Letter 2020-01](#)) and Technical Guidance ([Carrier Letter 2020-03](#)) reiterated efforts to improve access to behavioral health services including telehealth services for Opioid Use Disorder (OUD) and other substance use disorders, with a focus on high-risk populations such as pregnant women and youth.
- The theme of addressing behavioral health provider networks continued in the 2021 Call Letter ([Carrier Letter 2021-03](#)) and Technical Guidance ([Carrier Letter 2021-05](#)), with more urgency as the number of people diagnosed with behavioral health conditions increased throughout the coronavirus disease 2019 (COVID-19) pandemic. Plan proposals were to include a summary of the requested action to evaluate provider shortage areas and mental health provider network adequacy, with a description of what changes have been made to improve availability and access to behavioral health services.
- To better serve FEHB members residing in limited-service areas the 2022 Call Letter ([Carrier Letter 2022-03](#)) and Technical Guidance ([Carrier Letter 2022-04](#)) continued to emphasize the use of telehealth to support behavioral health needs.
- The 2023 Call Letter ([Carrier Letter 2023-04](#)) and Technical Guidance ([Carrier Letter 2023-06](#)) set forth OPM's most recent expectations to strengthen network adequacy for behavioral health.

This Carrier Letter will aid OPM in supplementing the 2019-2023 Call Letters and Technical Guidance's network adequacy expectations for behavioral health.

Information Requested

A reporting request on FEHB plan behavioral health network adequacy will be forthcoming from OPM. The reporting request will include, but is not limited to, accreditation status, network adequacy standards, and provider directories. Carriers will be expected to respond to that request **within 30 days** of receipt. OPM reserves the right to request reviews of specific network adequacy or behavioral health modules by accrediting

organizations, state departments of insurance, or similar reports by other entities.

We will review your responses and may schedule calls to discuss with you. Future guidance will be forthcoming once we assess the current state of network adequacy for behavioral health. Our goal is to ensure that FEHB Carriers enable access to behavioral health networks that reflect industry best practices. This assessment is our first step in that process. We will follow up with a roadmap that takes us from the current state to one where all FEHB Carriers are facilitating access to behavioral health networks based on a common set of standards.

If you have any questions, please contact FEHBData@opm.gov with a copy to your Health Insurance Specialist.

Sincerely,

Laurie Bodenheimer
Associate Director
Healthcare and Insurance