



July 31, 2023

Kim Causey  
Chief of Staff, Mississippi Insurance Department  
P.O. Box 79  
Jackson, MS 39205  
Submitted via email: [Kim.causey@mid.ms.gov](mailto:Kim.causey@mid.ms.gov)

**RE: ATA ACTION SUPPORT OF PROPOSED AMENDMENTS TO MISSISSIPPI  
ADMIN. CODE, PART 3, CHAPTER 14: MANAGED CARE PLAN NETWORK  
ADEQUACY**

Dear Ms. Causey and Mississippi Insurance Department Staff,

On behalf of ATA Action, I am writing you to express our support for proposed regulation 19 Miss. Admin. Code, Part 3, Chapter 14: Managed Care Plan Network Adequacy.

ATA Action, the American Telemedicine Association's affiliated trade association focused on advocacy, advances policy to ensure all individuals have permanent access to telehealth services across the care continuum. ATA Action supports the enactment of state and federal telehealth policies to secure telehealth access for all Americans, including those in rural and underserved communities. ATA Action recognizes that telehealth and virtual care have the potential to truly transform the health care delivery system – by improving patient outcomes, enhancing safety and effectiveness of care, addressing health disparities, and reducing costs – if only allowed to flourish.

Telehealth has proven to be a safe and effective tool to deliver care and allows patients to access care when they need it, regardless of their location. Telehealth care can be effectively utilized to meet the standard of care for a wide variety of patient needs, specialist treatment, mental healthcare, and primary care visits. The use of telehealth has grown tremendously in recent years with patients being overwhelmingly happy with their telehealth treatment.<sup>1</sup> ATA Action believes states should continue to take actions that promote patient choice and flexibility in their healthcare decisions, including making healthcare as accessible as possible through policies that support telehealth and telemedicine.

The proposed regulation serves as a rational step forward for Mississippi insurance and telehealth policy by allowing the delivery of services by telemedicine, under the discretion of the Commissioner of Insurance, in evaluating compliance with network adequacy requirements for managed care plans. Including telemedicine providers in network adequacy requirements will

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<sup>1</sup> Telehealth Emerges as Preferred Channel for Routine Care While Increasing Access to Mental Health Treatment, J.D. Power Finds, September 29, 2022, <https://www.jdpower.com/business/press-releases/2022-us-telehealth-satisfaction-study>.



make it easier for Mississippi patients to get the care that they need and promote increased patient flexibility in choice or insurance coverage and care options. Ensuring increased access to telemedicine providers for Mississippi patients will also be a crucial tool in addressing Mississippi's shortage of health professionals. As of May 2023, data from the Health Resources & Services Administration, found all of Mississippi's counties to be experiencing some form of a health professional shortage area for primary care with 12 of the 82 counties facing a partial shortage area in the county and the remaining 70 counties experiencing shortage areas in the whole county.<sup>2</sup> By providing the Commissioner the ability to breakdown geographic barriers to care, these shortages will become easier to address, especially in rural areas.

Thank you for your support of telehealth. We encourage you to enact this proposed regulation. Please let us know if there is anything that we can do to assist you in your efforts to adopt practical telehealth policy in Mississippi. If you have any questions or would like to engage in additional discussion regarding the telehealth industry's perspective, please contact me at [kzebley@ataaction.org](mailto:kzebley@ataaction.org).

Sincerely,

Kind regards,

A handwritten signature in black ink, appearing to read "Kyle Zebley", written over a light grey circular watermark.

Kyle Zebley  
Executive Director  
ATA Action

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<sup>2</sup> Health Professional Shortage Areas: Primary Care, by County, 2023 – Mississippi, Rural Health Information Hub, accessed July 26, 2023, <https://www.ruralhealthinfo.org/charts/5?state=MS>.