



January 20, 2026

Texas Health and Human Services Commission

Via Email: MCDMedicalBenefitsPolicyComment@hhs.texas.gov

Re: Comments on Proposed Teledentistry and Telecommunications Services Policy Changes

Dear Texas Health and Human Services Commission,

The **Texas Women's Healthcare Coalition (TWHC)** is a partnership of 75+ healthcare, faith, and community-based member organizations dedicated to improving the health and well-being of Texas women, babies, and families by ensuring all Texas women have access to preventive healthcare. Access to preventive and preconception care – including health screenings and contraception – means healthy, planned pregnancies and the early detection of cancers and other treatable conditions.

We thank the Texas Health and Human Services Commission (HHSC) for this opportunity to provide feedback on the proposed teledentistry and telecommunications services policies drafted in accordance with the provisions of House Bill 1700 from the 89th Legislative Session. We appreciate all the work and commitment that go into implementing the various Medicaid policy changes enacted by legislation.

As you know, the proposed changes would affect the Services, Benefits, Limitations, and Prior Authorization section of the Texas Medicaid Telecommunication Services Handbook, and the Teledentistry Services section of the Texas Medicaid Children Services Handbook. They incorporate policies enacted by various clinician licensing boards into Medicaid's reimbursement requirements - specifying that professionals delivering telemedicine, telehealth, and teledentistry services must follow "requirements for obtaining and documenting informed consent for treatment, data collection, and data sharing, while ensuring the privacy and security of patient data in compliance with all record retention requirements".

TWHC enthusiastically supports the incorporation of these teledentistry and telecommunications services policies into the Medicaid handbooks, as they would require that healthcare providers document patient consent to treatment, data sharing, and data collection in a standardized way. This promotes consistency in the administration of telemedicine and telehealth services to patients, eases regulatory burdens by giving providers clear guidance on documentation expectations, and allows Texans to continue accessing telemedicine services, which is vital given the current healthcare provider shortage facing our state.

Texas is facing a growing physician shortage, with rural and underserved areas experiencing the most severe gaps in healthcare access. 88% of Texas' 254 counties are considered Health Professional Shortage Areas (HPSAs), and 71 of the counties do not have a hospital. A 2020 report by the Department

of State Health Services estimates that the provider shortage will increase through at least 2032.¹ The consequences of this statewide provider shortage have had dramatic impacts on the field of women's health. 46.5% of Texas counties are defined as maternity care deserts, areas without access to birthing facilities or maternity care providers. 4.6% of Texas women have no birthing hospital within 30 minutes of their homes.²

Telemedicine plays a significant role in mitigating the effects of these provider shortages, as it allows healthcare providers to take care of many people without physically being there. The additional benefits of telemedicine include promoting continuity of care, managing chronic health conditions, reducing travel, and improving healthcare accessibility for vulnerable patients and those living in rural areas.³ The growth of telemedicine has taken hold in Texas, as a January 2023 Texas Medical Association survey found that 75% of Texas doctors use telemedicine for about one in 10 visits. This growth is prevalent among both Medicaid-enrolled providers and patients. December 2022 data from the Texas Health and Human Services Commission shows the number of telehealth services in Texas Medicaid increased by more than 500% between 2019 and 2021.⁴

We need healthcare providers to continue offering access to telehealth and teledentistry services in Texas. And to keep these providers and services, we must reduce administrative confusion and burdens so they can deliver the care patients need. A standardized, well-documented, and consistent approach to obtaining patient consent is vital for meeting regulatory requirements, supporting providers, and building patient trust.

By incorporating these teledentistry and telecommunications services policies into the Texas Medicaid Telecommunication Services Handbook and the Texas Medicaid Children Services Handbook, HHSC will mitigate the confusion health professionals previously felt around which requirements they should or should not follow for collecting consent to share, consent to treat, records retention, and other documentation when performing a virtual service.

If these policies are incorporated into Texas's Medicaid Handbooks, TWHC believes a helpful next step for HHSC or the various clinician licensing boards would be to create a checklist or flowchart of Texas' telehealth patient consent collection and documentation requirements to promote consistency and reduce provider errors.

Thank you again to HHSC staff for their strong collaboration and support. We appreciate your time and attention on these matters and are happy to answer any questions you may have.

¹ Davis, Alirma, et al. "The Texas Healthcare Crisis: Millions Uninsured, Physician Shortages, and the Fight for Women's Care." Texas Legislative Study Group, 18 Feb. 2025.

² Where You Live Matters: Maternity Care in Texas, March of Dimes, 2023.

³ Pang Yuen, Anny. "The Rise in the Use of Telehealth and Associated Documentation Challenges." Journal of AHIMA, American Health Information Management Association, 28 Nov. 2022.

⁴ Telemedicine Continues to Connect Patients with Their Physicians, Texas Medical Association, 12 June 2024.

Sincerely,

Rachel Wolleben

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