

FOR MEDICARE ADVANTAGE PLAN COMPLIANCE AND QUALITY TEAMS

Medicare Advantage Behavioral Health Network Adequacy Brief

Reference: 42 CFR §422.116 - Network Adequacy Requirements (CY2025+)

THE REGULATORY MANDATE

CMS requires Medicare Advantage plans to meet time-and-distance and appointment-wait-time standards for behavioral health providers serving enrollees 65+. Outpatient mental health and substance use disorder services are explicitly included in network adequacy reviews.

The compliance requirement

Beginning CY2025, CMS significantly strengthened MA network adequacy standards under 42 CFR §422.116. Plans that fail to meet behavioral health network adequacy thresholds face corrective action, contract termination, and enrollment freezes.

The access gap

The Health Resources and Services Administration (HRSA) designates more than 6,500 Mental Health Professional Shortage Areas across the U.S. Older adults face compounded barriers: limited transportation, co-occurring chronic conditions, and a shortage of geriatric-trained providers.

Telehealth as the solution

CMS explicitly permits telehealth-delivered behavioral health services to count toward network adequacy. A national telehealth provider with same-week appointment availability addresses both access gaps and regulatory exposure simultaneously.

How Total Life supplements your network

Total Life's licensed therapists see Medicare-enrolled members by phone and video in all 50 states with typical first-appointment wait times under 5 days. Services are billed to Medicare - no additional cost to your plan for covered members.

Ready to close this compliance gap?

Total Life supplements MA behavioral health networks with licensed therapists available nationwide, reducing access gaps and supporting CMS network adequacy compliance.

Book a partnership discovery call: totallife.com/partners/ma-network-adequacy

Email: partners@totallife.com

Total Life is a Medicare-covered behavioral health telehealth provider. Licensed therapists provide individual therapy by phone and video for adults 65+ in all 50 states. Services are billed under the patient's own Medicare benefits - no cost to partner organizations.