



Texas Association of Health Plans
1001 Congress Ave., Suite 300
Austin, Texas 78701
P: 512.476.2091
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April 11, 2023

Dear Chairman Oliverson and Members of the House Insurance Committee,

Re: Oppose HB 134

The Texas Association of Health Plans (TAHP) is the statewide trade association representing health insurers, health maintenance organizations, and other related health care entities operating in Texas. Our members provide health and supplemental benefits to Texans through employer-sponsored coverage, the individual insurance market, and public programs such as Medicare and Medicaid.

Texas health plans and Texas Medicaid already cover cranial molding orthosis when they are medically necessary in congruence with recommended medical guidelines. Mandating coverage based on current medical guidelines will restrict flexibility for health plan coverage to adapt to changes in future medical guidelines.

Further, we oppose mandates that restrict benefit design. Texas employers and families should be able to choose coverage that fits their needs. As filed, HB 134 would require coverage for cranial remodeling orthotics to be covered “in the same manner” and “no less favorable” than other orthotics. We are unclear on the impacts of this requirement.

While health plans routinely cover cranial helmets today, these orthotics vary greatly in price (upwards of \$3,000) from other orthotics like foot orthotics (often less than \$100). We are concerned that creating a payment benefit level mandate for these devices would have a negative overall impact on coverage for orthotics. For example, while health plans may not require a prior authorization for low cost orthotics, more expensive orthotics like cranial helmets may require prior authorization. We are unclear if this would be considered “less favorable” coverage and would result in requiring prior authorizations for any orthotic of any type and at any price.

Texas Medicaid only covers a cranial molding orthosis for clients with a diagnosis of synostotic plagiocephaly (one or more of the sutures that allow the skull to grow as the brain grows closes early) when it can be documented as medically necessary. Medicaid does not cover cranial molding orthosis to improve the quality of life or for the treatment of positional plagiocephaly (the head is flattened on one side due to pressure) or brachycephaly (the back of the head



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becomes flattened due to pressure) because these conditions are considered cosmetic, do not impact brain growth or development, and there is no clear evidence [or data to support a helmet being effective](#). Texas health plans also do not typically cover these devices for positional plagiocephaly. Helmets [generally are not recommended](#) for these conditions, because in addition to there being no clear evidence to suggest they work, [they can cause adverse effects and can be uncomfortable and distressing to the baby](#).

TAHP has offered language to address our concerns with HB 134. While we do not believe it is good policy to create mandates based on medical guidelines that may change, thus requiring the mandate to also change, we would be neutral on HB 134 if the benefit level payment mandate requirement was removed.

Sincerely,

M. Blake Hutson

Blake Hutson
Texas Association of Health Plans