

July 28, 2020

The Honorable Kevin Brady  
Ranking Member  
House Committee on Ways and Means  
1139 Longworth House Office Building  
Washington, DC 20515

Dear Ranking Member Brady,

We, the undersigned organizations, write to express our sincere appreciation for your leadership and commitment to expanding access to telehealth services for all Americans. Our group consists of Leading Health Systems—integrated delivery networks that pursue innovative care efforts throughout our communities—serving more than 33 million patients annually in 29 states across the country. We commend the work the Committee has put into the legislative draft, *Keeping Medicare Patients' Improved Access to Care through Telehealth* and we are grateful for your efforts.

We would like to share strong support for several specific provisions in your draft:

**Sec. 2. Removing Certain Geographic and Originating Site Restrictions on the Furnishing of Telehealth Services Under the Medicare Program**

Permitting Medicare beneficiaries to receive telehealth services in any location, including their homes, gives patients access to services when they previously may not have had the ability to access care, and also addresses safety concerns for patients and caregivers when they do not need to visit common clinical spaces. Telehealth services provided at the home can reduce or eliminate the need to travel, which is beneficial for patients in rural and remote areas far from a physician's office and for patients in urban or other areas without reliable transportation, in addition to providing convenient patient access to specialists in fields that have high demand (such as behavioral health). For patients with limited resources, telehealth also eliminates the additional cost of travel time and the time away from work that is required to receive an in-person visit. Finally, for institution-based patients, such as those in skilled nursing facilities (SNFs), telehealth offers the ability to remain in their care setting, minimizing both health risk and burden.

**Sec. 4. Expanding the List of Practitioners Eligible to Furnish Telehealth Services**

The significant expansion in the types of providers that can offer services delivered via telehealth has given Leading Health Systems an opportunity to connect with patients that was previously not possible. For example, delivering occupational, speech/language, and physical therapy services via telehealth to patients in their homes or in nursing facilities has given patients new or increased access to care that improves both quality of life and health outcomes. We also appreciate the opportunity for the Secretary of Health and Human Services to expand the list to additional providers as deemed appropriate by individual professional medical and health care associations.

**Sec. 5 Allowing for the Provision of Telehealth Services via Audio-only Telecommunications Systems**

Expanding the list of telehealth modalities accepted by Medicare allows Leading Health systems to connect with more patients in more ways. This expansion is especially beneficial for patients in areas without broadband coverage: audio-only phone calls may be the only way for them to connect virtually

with their provider. Similarly, permitting audio-only calls helps bridge the ‘digital divide;’ some patients do not have the funds to purchase digital devices necessary for virtual face-to-face visits, and other patients may not have the necessary digital literacy to utilize face-to-face technology. In either case, permitting audio-only services helps to eliminate these disparities and ensures all patients can connect with their care teams via telehealth.

Our group also requests that the Committee consider two additional policies for inclusion in your legislation:

**Elimination of the Established Relationship Rule:** CMS removed the pre-existing relationship requirement for the duration of the current public health emergency (PHE) period and is allowing providers to offer telehealth services to both new and established patients. Without the requirement of an established relationship between the patient and provider, Leading Health Systems can immediately serve a broader population of patients. Many patients living in rural and underserved communities do not have a regular source of healthcare and therefore do not have an established relationship with a provider. Making this waiver permanent will remove a significant barrier in access to treatment, and will eliminate any current healthcare disparities that exist due to a patient’s previous ability to seek care.

**Fair Reimbursement for Telehealth Services:** For the duration of the PHE, CMS will reimburse providers for virtual telehealth services, both face-to-face and audio-only, at the same rate as they would be paid if the services were offered in-person. Leading Health Systems believe telehealth services offer an excellent opportunity for more providers to connect with more patients, and have responded to the dramatic increase in telehealth utilization by investing millions of dollars to expand their telehealth platforms. Reimbursing providers at a fair payment rate reflects the ongoing investment necessary to ensure these telehealth platforms are continuously maintained, seamlessly updated, and services can expand as patient and provider need expand. We also believe that telehealth will generate long-term savings for payors because it allows providers greater opportunities to connect with patients (especially patients who previously did not routinely seek care), which will lead to early interventions, better case management overall, and decreased emergency department utilization.

Finally, our group requests that you and your committee members support efforts to improve and expand broadband access across the country. Our organizations are committed to reducing health disparities in our communities, and recognize that the expansion of broadband services would allow more Americans to experience all of the benefits of telehealth services outlined above. Again, we want to thank you for your leadership on this important issue, and commend the discussion draft, *Keeping Medicare Patients’ Improved Access to Care through Telehealth*. Our organizations support your efforts to improve access to telehealth services, and would be happy to share additional information about our investments in expanded telehealth services, patient utilization numbers, or other data, at your request. Please consider our organizations as a resource and willing partner in your telehealth expansion efforts.

Sincerely,

AdventHealth  
Adventist Health  
Advocate Aurora Health  
ChristianaCare  
Duke Health  
Inova Health System

Intermountain Healthcare  
Novant Health  
Ochsner Health  
Sutter Health  
UnityPoint Health  
Yale New Haven Health