



March 18, 2020

The Honorable Nancy Pelosi  
Speaker  
United States House of Representatives  
Washington, DC 20515

The Honorable Mitch McConnell  
Majority Leader  
United States Senate  
Washington, DC 20510

The Honorable Kevin McCarthy  
Minority Leader  
United States House of Representatives  
Washington, DC 20515

The Honorable Charles Schumer  
Minority Leader  
United States Senate  
Washington, DC 20510

**Subject: Economic Stimulus Bill**

Dear Speaker Pelosi, Minority Leader McCarthy, Majority Leader McConnell, and Minority Leader Schumer:

On behalf of our member medical group practices, healthcare executives, and other healthcare leaders, the Medical Group Management Association (MGMA) is writing to urge you to expeditiously enact an economic stimulus bill (“Phase 3”) to address the national threat of the Coronavirus Disease 2019 (COVID-19). MGMA has specific recommendations that we strongly urge you to include in any legislative package that Congress passes. Group practices and clinicians on the front lines of the COVID-19 public health crisis need swift congressional action in order to continue treating their patients. We appreciate your leadership on this critical issue and consideration of these recommendations.

With a membership of more than 55,000 medical practice administrators, executives, and leaders, MGMA represents more than 15,500 organizations of all sizes, types, structures, and specialties that deliver almost half of the healthcare in the United States.

There is an urgent need for the federal government to provide direct and increased payments to physicians and their practices, without budget neutral offsets, to allow them to maintain the financial viability of their practices. The rapidly evolving situation is creating financial uncertainty for physician practices, who are expending extra resources to make the clinical and operational changes necessary to address the current public health crisis. At the same time, practices are facing reduced revenue due to decreased in-person patient volume, which is replaced by virtual visits that are often uncompensated due to coverage limitations and/or complex and inconsistent payer billing requirements for such services. Expenses are increasing while revenue is decreasing, creating an unstable trajectory that must be addressed to ensure patient access to care.

MGMA makes the following specific recommendations:

1. Identify ways to secure and distribute personal protective equipment (PPE) to frontline physicians and staff. There is an urgent and increasing need across group practices for PPE. MGMA has heard directly from group practice leaders across the country that they are facing

difficulties obtaining PPE, which puts patients, clinicians, and staff at risk. This must be a top priority to stop the transmission of COVID-19 and protect our nation's healthcare workers.

- To this end, we also recommend that Congress increase the \$500 million in funding for PPE that was provided in the Public Health and Social Services Emergency Fund by the Coronavirus Preparedness and Response Supplemental Appropriations Act of 2020 (H.R. 6074). We urge Congress to provide immediate and direct federal financial support to physician practices so that they may obtain the PPE required to ensure the safety of clinicians, support staff, and the patients they treat.
2. Call on the Administration and all commercial insurers to ensure parity in coverage, payment, and billing guidelines for telemedicine. To the extent possible, we strongly urge Congress to use any and all available authorities to ensure commercial payers adopt consistent policies to streamline billing complexities that result from a patchwork of administrative requirements that currently apply under each commercial plan.
    - MGMA is greatly appreciative that Congress expanded telemedicine opportunities within Medicare by granting Department of Health & Human Services Secretary Alex Azar waiver authority regarding certain prohibitive Medicare billing rules and is pleased to see that the Secretary issued waiver guidance under this authority on March 17. We are encouraged that these waivers will allow greater access to care, however we recommend Congress provide Medicare the authority to cover telemedicine services furnished via audio-only devices to avoid restricting access to virtual care for beneficiaries that do not own smart phones or technology that has video capabilities.
  3. Suspend Medicare sequestration cuts to physicians and hospitals.
  4. Direct use of national disaster relief funding or other funding to reimburse physicians at 110 percent of 2020 Medicare rates for uninsured patients' COVID-19-related care.
  5. Increase the 2020 Medicare Physician Fee Schedule conversion factor by an amount sufficient to offset increased costs and lost revenue incurred by physician practices as a result of COVID-19.
  6. Institute payroll tax relief, advance tax credits, and other changes to tax policy directed specifically at physician practices to support practice viability for the duration of the national emergency.
  7. Provide the Centers for Medicare & Medicaid Services with regulatory authority to make changes to how the Quality Payment Program is implemented during the national emergency, to include extending data submission deadlines for quality reporting programs such as the Merit-based Incentive Payment System.
  8. Expand paid family, medical, and sick leave with federal funding and ensure physician practices have immediate access to funding or tax relief to offset the costs of such expanded paid leave for employees. MGMA appreciates the employee protection provisions in the Families First Coronavirus Response Act that expand paid medical and family leave, however we are concerned this could result in substantial financial burden on small- and medium-sized physician practices. We encourage Congress to provide a mechanism for these practices to obtain financial relief at the same time that they are incurring additional costs.

9. Fund an increase in Medicaid payments to physicians to set reimbursement rates at no less than Medicare rates.

We commend Congress for acting quickly during this public health crisis. We believe these recommendations would significantly benefit the patients being treated by physician practices and request that such suggestions be included in any economic stimulus package contemplated by Congress. We stand ready to work with you as you continue to develop legislation to respond to COVID-19.

### **Conclusion**

As the voice for the country's medical group practices, MGMA remains committed to promoting policies that enhance the ability of our members to provide high-quality, cost-effective care to the millions of patients they serve. Should you have any questions, please contact Mollie Gelburd at [mgelburd@mgma.org](mailto:mgelburd@mgma.org) or 202-293-3450.

Sincerely,

/s/

Anders Gilberg, MGA  
Senior Vice President, Government Affairs