



March 27, 2020

The Honorable Alex Azar
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Re: Expanded waiver authority under Sec. 3703 of the CARES Act

Dear Secretary Azar and Administrator Verma,

The Medical Group Management Association (MGMA) writes to urge you to take immediate action to implement expanded telehealth waiver authority provided under the *Coronavirus Aid, Relief and Economic Security* (“CARES”) Act. 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.

Telehealth is one of the most important tools medical groups have to expand healthcare access to vulnerable Medicare patients. MGMA greatly appreciates actions taken by the Administration thus far to implement telehealth waivers by authority granted in the first stimulus package (H.R. 6074) and has heard from members that these flexibilities are enabling them to provide safe, effective virtual care to their patients. To improve upon waiver guidance issues so far and assist those on the frontlines of medicine, we urge you to expeditiously further exercise your waiver authority to:

- Allow telehealth services to be conducted through audio-only telecommunications systems, including telephones, in order to account for beneficiaries who do not have access to audio-video technology or are receiving services in areas lacking adequate internet service to facilitate video functionalities; and
- Provide reimbursement at the non-facility rate to compensate practitioners the same for services rendered in-person. With many practices moving a significant portion, if not all, of their patient services to virtual care, practices are not receiving adequate payment for the practice expenses they continue to incur as a result of running their offices. Current reimbursement policy for telehealth services does not account for these expenses. In this unprecedented time, it is critical that payment policies cover these expenses.

MGMA stands ready to assist the Administration in helping medical groups respond to this rapidly evolving situation. We look forward to seeing further waiver authority implemented as it will prove to be an invaluable tool for our nation’s medical groups as they care for Medicare beneficiaries during this emergency. If you have any questions, please contact Claire Ernst at cernst@mgma.org or 202-293-3450.

Regards,

/s/

Anders Gilberg, MGA
Senior Vice President, Government Affairs