



August 11, 2022

The Honorable Xavier Becerra
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Re: COVID-19 Public Health Emergency Renewal

Dear Secretary Becerra,

On behalf of our member medical group practices, the Medical Group Management Association (MGMA) urges you to renew the COVID-19 public health emergency (PHE) declaration for at least another 90 days following the current October 2022 expiration date.

With a membership of more than 60,000 medical practice administrators, executives, and leaders, MGMA represents more than 15,000 medical groups in which more than 350,000 physicians practice. These groups range from small private practices in rural areas to large regional and national health systems and cover the full spectrum of physician specialties and organizational forms – most of which have utilized the regulatory flexibilities afforded under the waivers in effect through the duration of the COVID-19 PHE.

Medical groups acted quickly in 2020 to pivot from in-person appointments to virtual ones, once the telehealth waivers went into effect. This involved significant investments in infrastructure as well as changes in workflows. As workforce shortages¹ and inflation continue to strain medical groups, any disruptions to the flexibilities afforded by the PHE could further exacerbate an already precarious situation.

Further, if you intend not to renew the PHE, we are concerned that a 60-day notice before ending it, is not enough time to sufficiently wind down flexibilities that have been in effect for over two and a half years. MGMA recommends you provide at least 90-days' notice prior to terminating the COVID-19 PHE to provide practices with the appropriate time to evaluate changes in policy as a result of the expiration of pandemic-related flexibilities. Further, we encourage the Administration to carefully evaluate best practices for ending these waivers and solicit stakeholder input where necessary as to avoid unintended consequences that could affect access to care.

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 routinely, and to the emergency cases they are called upon to serve during this pandemic. We urge you to renew the PHE before it expires to ensure medical groups continue to have

¹ MGMA [Stat](#), Feb. 2, 2022



access to the flexibilities necessary to ensure patient access and care. Should you have any questions, please contact Claire Ernst at cernst@mgma.org or 202-293-3450.

Sincerely,

/s/

Anders Gilberg

Senior Vice President, Government Affairs