



March 12, 2024

The Honorable Jason Smith
Chairman
Committee on Ways and Means
U.S. House of Representatives
1139 Longworth HOB
Washington, DC 20215

The Honorable Richard Neal
Ranking Member
Committee on Ways and Means
U.S. House of Representatives
1129 Longworth HOB
Washington, DC 20215

**Re: MGMA Statement for the Record – House Committee on Ways and Means’ Hearing,
“Enhancing Access to Care at Home in Rural and Underserved Communities”**

Dear Chairman Smith and Ranking Member Neal:

The Medical Group Management Association (MGMA) thanks you for holding this important hearing examining ways to enhance access to home care for patients in rural and underserved communities. Telehealth services provide a vital lifeline to patients in their homes across the nation and ensure continuity of care no matter where they may be located. We appreciate your leadership in holding this important hearing to discuss ways to bolster home care — permanently instituting many of the telehealth policies currently in place would help accomplish this goal.

With a membership of more than 60,000 medical practice administrators, executives, and leaders, MGMA represents more than 15,000 group medical practices ranging from small private medical practices to large national health systems, representing more than 350,000 physicians. MGMA’s diverse membership uniquely situates us to offer the following policy recommendations.

Patients in rural and underserved areas have been able to receive high-quality care in their home through the expansion of telehealth services over the past few years. Maintaining access to these vital services is essential to augment in-person care and ensure patients do not face unnecessary barriers such as having to travel significant distances to receive necessary medical care. The Centers for Medicare and Medicaid Services (CMS) instituted numerous temporary telehealth policies in response to the COVID-19 pandemic. Prior to these policies, telehealth services in Medicare were rarely used given geographic, originating site, and other restrictions. This expansion has been a demonstrable success and allowed medical groups to continue serving their communities through the appropriate utilization of telehealth services.

Congress thankfully passed the *Consolidated Appropriations Act of 2023* to extend many of these flexibilities through the end of calendar year 2024. It is imperative to build on this legislation, not allow these flexibilities to expire, and make permanent these policies as the utility of telehealth to patients has been widely established.

MGMA’s 2024 priorities for telehealth are as follows:

- Expand access to telehealth services under the Medicare program by permanently removing current geographic and originating site restrictions.
- Permanently cover and reimburse audio-only visits at a rate that adequately covers the cost of delivering that care.
- Appropriately reimburse medical practices for telehealth services to allow them to provide cost-effective, high-quality care.
- Support improving coverage of telehealth by removing administratively burdensome billing requirements, such as collecting patient co-pays for virtual check-ins.
- Ensure continuity of care between a practice and its patients through telehealth.
- Allow practitioners offering telehealth services from their home to continue reporting their work address on their Medicare enrollment to avoid privacy and security concerns.

The *CONNECT for Health Act of 2023* (H.R. 4189) would accomplish many of these priorities such as permanently removing geographic and originating site restrictions, eliminating the six-month in-person requirement for telehealth services, and more. Enacting this bipartisan legislation would be a great step to advancing patients' access to care at home in rural and underserved communities.

During COVID-19, CMS allowed practitioners to offer telehealth services from their homes while maintaining Medicare enrollment from their work addresses. This policy was extended through the end of this year in the 2024 Medicare Physician Fee Schedule. MGMA believes that home reporting requirements for practitioners offering telehealth services from home should be eliminated so that they may continue to report from their work address. This mitigates significant privacy and security concerns as this information may be available to the public. It also alleviates the undue administrative burden of having to update Medicare enrollments for every practitioner that would divert critical medical group resources away from clinical care.

The *Medicare Telehealth Privacy Act of 2023* (H.R. 6364) would direct the Secretary of Health and Human Services to make sure that practitioners' home addresses are not made publicly available. This is a good first step, but allowing practitioners to continue reporting their work addresses would alleviate all the difficulties associated with home address reporting.

MGMA looks forward to working with the Committee to ensure medical groups can continue offering telehealth services to patients in their homes across this country. If you have any questions, please contact James Haynes, Associate Director of Government Affairs, at jhaynes@mgma.org or 202-293-3450.

Sincerely,

/s/

Anders Gilberg
Senior Vice President, Government Affairs