

## Statement for the Record

Submitted by

**The Premier Inc. healthcare alliance**

***"Charting the Path of Telehealth"***

**House Ways and Means Subcommittee on Health**

**April 28, 2021**

The Premier healthcare alliance appreciates the opportunity to submit a statement for the record on the House Ways and Means Health Subcommittee's hearing titled "Charting the Path of Telehealth" on April 28, 2021. We applaud the leadership of Chairs Neal and Doggett, Ranking Members Brady and Nunes and members of the Subcommittee for holding this hearing to evaluate the important role telehealth has played in safely expanding access to care during the pandemic and options to extend telehealth capabilities into the future.

Premier greatly appreciates Congress acting to broadly expand permitted uses of telemedicine and telehealth during the public health emergency in the *Coronavirus Preparedness and Response Supplemental Appropriations Act* and the *Coronavirus Aid, Relief, and Economic Security (CARES) Act*. These provisions have allowed beneficiaries beyond just those in rural areas to receive telehealth services in their home from an expanded set of providers, including through audio-only communications, and provided payments to match in-office rate for clinicians who typically provide care in an office. As such, telehealth has provided a lifeline during the pandemic for individuals in all geographic areas who still need access to healthcare when traditional care delivery approaches are interrupted.

Premier data<sup>1</sup> for more than 30,000 ambulatory providers nationwide shows that the use of ambulatory virtual visits during the third quarter (Q3) of 2020 increased 30x year over year with a 32 percent better no-show rate than in-person visits. With this concentrated experience over the past year, providers have learned how to best deploy telehealth and patients are overwhelmingly reporting high satisfaction with their virtual care visits. As a result, it is now seen as a valuable and potentially cost-effective addition to healthcare delivery.

As health systems and providers continue to support their communities and navigate a new normal after the pandemic, they are concerned that a retreat to prior rules will limit provider care delivery innovation for Medicare beneficiaries. A permanent expansion of telehealth policies will require appropriate guardrails. Recognizing more time is needed to determine the best approaches for permanent telehealth expansion in fee-for-service, **Premier urges Congress to permanently extend to all alternative payment models (APMs) the telehealth coverage and payment policies that were operationalized under the public health emergency.** Providers in APMs are incented to use telehealth only when it is most appropriate as they are responsible for the cost of care and improving quality. A survey<sup>2</sup> conducted by Premier found that providers participating in accountable care organizations (ACOs) drew heavily on their population health capabilities to manage COVID-19 cases and keep people staying at home healthy, including by quickly ramping up the use of telehealth.

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<sup>1</sup> [http://offers.premierinc.com/TelehealthWhitepaper\\_LandingPage](http://offers.premierinc.com/TelehealthWhitepaper_LandingPage)

<sup>2</sup> <https://www.premierinc.com/newsroom/press-releases/premier-inc-survey-clinically-integrated-networks-in-alternative-payment-models-expanded-value-based-care-capabilities-to-manage-covid-19-surge>

We believe Congress should immediately start with allowing greater flexibility around the types of technology that can be used, adopting additional services, and exploring additional telehealth flexibilities through Center for Medicare & Medicaid Innovation (CMMI) models and other Medicare APMs. While telehealth waivers are available for APMs, they are far more limited than the waivers provided during the public health emergency. The greatest flexibility should be awarded in models in which providers bear downside risk, such as in global budgets and capitated payments. Providing greater telehealth flexibility in models will be a tremendous incentive for providers to transition from fee-for-service to value and total-cost-of-care and other risk-based models.

As Congress considers how to make expanded telehealth a permanent part of our healthcare system, we also encourage lawmakers to explore increasing telehealth access across all of Medicare fee-for-service and Medicare Advantage by granting Centers for Medicare & Medicaid (CMS) greater authority to set regulation on allowable health services and payment for telehealth services.

With appropriate guardrails, Congress should also take action to:

- Provide temporary state licensing reciprocity for telehealth during the pandemic by passing the Temporary Reciprocity to Ensure Access to Treatment (TREAT) Act ([S. 168](#) / [H.R. 708](#)).
- Ensure audio-only telehealth continues to be an effective source of healthcare for all seniors during the course of the COVID-19 public health emergency by passing the [Ensuring Parity in MA for Audio Only-Telehealth Act \(S. 150\)](#). This bill would count diagnoses obtained from audio-only telehealth services for risk adjustment purposes under the Medicare Advantage program to ensure that health costs are adequately covered while providing the information care teams need to manage patient care.

## Conclusion

In closing, the COVID-19 public health emergency has illuminated the need to allow more flexibility in Medicare payment and delivery system models so that providers can tailor care to the specific needs of beneficiaries and their communities. This is especially true for providers serving rural and underserved communities. Congress and the Administration can build on the limited telehealth flexibilities granted during the public health emergency and make other key changes to open doors to providers who are seeking to better serve their Medicare populations through accountable delivery system models that focus on care coordination, improved outcomes and value

The Premier healthcare alliance appreciates the opportunity to submit a statement for the record on the House Ways and Means Health Subcommittee hearing on telehealth. Premier is available as a resource and looks forward to working with Congress as it considers policy options to continue to address this very important issue.

If you have any questions regarding our comments or need more information, please contact Blair Childs, Senior Vice President of Public Affairs, at [blair\\_childs@premierinc.com](mailto:blair_childs@premierinc.com).