

April 13, 2020

The Honorable Mitch McConnell  
Senate Majority Leader  
United States Senate  
Washington, D.C. 20510

The Honorable Charles Schumer  
Senate Democratic Leader  
United States Senate  
Washington, D.C. 20510

The Honorable Nancy Pelosi  
Speaker of the House  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Kevin McCarthy  
House Republican Leader  
U.S. House of Representatives  
Washington, D.C. 20515

Re: Measures to Support Physician Practices During the COVID-19 Pandemic

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

On behalf of the Healthcare Financial Management Association's (HFMA's) 53,000 members, I would like to thank you and your colleagues for the bold action you've taken to-date to help businesses, health care providers, and average Americans. However, we believe there are additional steps that Congress should take to protect Americans' health by expanding the types of telehealth services Medicare will offer. HFMA's members believe the changes below will support physician practices as they continue providing high quality care to all Americans while responding to the COVID-19 pandemic:

- 1) Allow all forms of telehealth visits (including audio-only) to be eligible for disease burden capture (e.g. identification and reconfirmation of Hierarchical Condition Categories (HCCs)), the same as in-person visits during the crisis.**

Risk adjustment calculations depend on an annual face-to-face visit of Medicare patients to capture diagnoses present in the patient. Bringing in healthy seniors for an annual assessment (such as an Annual Wellness Visit), into the clinics where there may be risk of community infection, would not serve in the best interests of community health. Patients are increasingly moving to virtual visits, which do not risk adjust today.

- 2) **Allow for virtual health after the Coronavirus outbreak (because we believe patients will embrace telehealth and expect this type of virtual engagement with their physicians in the future).**

In the last few weeks, telehealth has become a nearly fully accepted standard model of care, compared with in-person visits. We believe that this new model of care should continue in the future.

- 3) **Allow providers to virtually capture quality metrics that impact Stars and other programs.**

Patients will be delaying and foregoing care, especially preventive care. They may also forgo fulfilling necessary prescriptions in fear of exposing them to risk to COVID-19. Quality programs must become more flexible to allow for documentation and closure of measures, regardless of care setting.

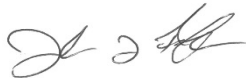
- 4) **Increase the fee-for-service rate for additional virtual services that support the care of chronic patients, including Chronic Care Management (CCM), Principal Care Management (PCM), Collaborative Care Management (CoCM), and Remote Patient Monitoring (RPM) while waiving coinsurance for patients to ensure maximum access to these essential resources.**

Maintaining the health of our most at-risk patients matters more than ever. At-risk patients are not only at higher risk directly due to COVID-19, but they are also often forgoing necessary care and prescriptions in order to avoid medical settings. This will only result in worse exacerbations of their health in the medium and long-term, which will happen at a time when the healthcare system is the most vulnerable.

Removing barriers and increasing incentives for virtual care management of our highest risk patients will help our patients better manage care in this time of need.

HFMA looks forward to any opportunity to provide additional assistance or comments to support Congress's response to the COVID-19 pandemic. As an organization, we take pride in our long history of providing balanced, objective financial technical expertise to Congress, federal agencies and advisory groups. If you have additional questions, you may reach me or Richard Gundling, Senior Vice President of HFMA's Washington, DC, office, at (202) 296-2920. The Association and I look forward to working with you.

Sincerely,



Joseph J. Fifer, FHFMA, CPA  
President and Chief Executive Officer  
Healthcare Financial Management Association

cc:

Alexander Azar, Secretary of Health and Human Services  
Seema Verma, Administrator, Centers for Medicare & Medicaid Services

## **About HFMA**

HFMA is the nation's leading membership organization for more than 53,000 healthcare financial management professionals. Our members are widely diverse, employed by hospitals, integrated delivery systems, managed care organizations, ambulatory and long-term care facilities, physician practices, accounting and consulting firms and insurance companies. Members' positions include chief executive officer, chief financial officer, controller, patient accounts manager, accountant and consultant.

HFMA is a nonpartisan professional practice organization. As part of its education, information and professional development services, HFMA develops and promotes ethical, high-quality healthcare finance practices. HFMA works with a broad cross-section of stakeholders to improve the healthcare industry by identifying and bridging gaps in knowledge, best practices and standards.