



Maryland
Hospital Association

October 5, 2020

Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1734-P
P.O. Box 8016
Baltimore, MD 21244-8016

Dear Ms. Verma:

On behalf of the Maryland Hospital Association's (MHA) 61 member hospitals and health systems, we appreciate the opportunity to comment on the Centers for Medicare & Medicaid Services' (CMS) proposed rule changes to calendar year 2021 payment policies under the Physician Fee Schedule (PFS). MHA is grateful CMS solicited comments regarding the continuation of audio-only reimbursement after the federal public health emergency declaration expires. MHA urges CMS to make audio-only services permanently part of its PFS payment policy.

As CMS acknowledges in the preamble, the Medicare population may have trouble accessing interactive technologies permitting video or internet-based telehealth visits, especially when using their home as the originating site. Audio-only services allow patients to consistently access necessary care. For many vulnerable patients the choice is often between audio-only care or no care at all due to transportation, internet connectivity, access to technology, or mobility issues. The importance of audio-only services gained prominence during the COVID-19 pandemic, yet its expanded practice—even after the public health emergency—would ensure critical access to care for innumerable Medicare beneficiaries. We further suggest CMS consider reimbursement for telehealth visits, including audio-only visits, on par with in-person visits, as clinically appropriate.

MHA strongly encourages CMS to enact regulations and policy on meaningful coverage of clinically appropriate audio-only services. Maryland Medicaid indicated they are looking to CMS for guidance before covering audio-only services. Thus, the sooner CMS acts to cover this vital service modality, the sooner our hospitals can boost access to care for the most vulnerable Marylanders. Delaying action may jeopardize the use of tools consumers have been responsive to and that have allowed providers to continue to care for those most in need.

Sincerely,

Jennifer Witten
Vice President, Government Affairs