



Top Accomplishments in 2020

Since its formation in December 2013, the Alliance for Connected Care (“the Alliance”) has made significant progress in raising the profile of telehealth and remote patient monitoring among policy makers in Washington, and creating urgency around the need to reduce legal and regulatory barriers. We have helped energize Congress and the Executive Branch to break down barriers to increased telehealth and remote monitoring adoption.

As you know, 2020 has been a breakthrough year for telehealth and the Alliance has been involved in nearly every development. We are excited to continue this push forward in 2021 and hold on to important expansions in patient access to telehealth. Following is a summary of some of our top accomplishments in 2020.

Maximizing Visibility and Recognition of Issues around Telehealth

Strategic Partnerships

- The Alliance for Connected Care gained four new Board Members – Ascension, Walmart, CVS Health, CirrusMD. The Alliance also added many new Advisory Board Members – including the American Academy of Neurology, American Association of Suicidology, American Psychological Association, American Urological Association, Coalition for Headache and Migraine Patients, Headache and Migraine Policy Forum.
- The Alliance has regularly leveraged partnerships with trusted third parties to advance advocacy tactics and messages related to the value of telehealth. With more than 35 patient and provider groups actively participating as part of the Alliance Advisory Board, the Alliance is growing its influence and expanding its reach. In 2020, we held monthly advisory board meetings, and ongoing dialogue about policies that Administration and Capitol Hill officials can advance.
- Our most notable partnership was the conceptualization and creation of the [Task Force on Telehealth](#) – bringing together diverse healthcare leaders for one of the first major reports calling for telehealth permanency. This significant effort helped set the narrative for following work – which often reacted to or endorsed our recommendations.

Ongoing Relationships with Congress & Administration Officials

- The Alliance has maintained strong relationships with House and Senate telehealth champions, and has served a primary role in helping these offices strategize and implement telehealth legislation, telehealth events, and plan for telehealth hearings.
- The Alliance also maintains ongoing relationships with key individuals at the White House and in HHS leadership – ensuring key connected care priorities are considered in major Executive Orders and Rulemakings. The Alliance was regularly consulted on policy development – particularly during the spring when a strained HHS made many telehealth changes in rapid succession.
- The Alliance has held targeted meetings with the HHS Secretary’s office, CMS, MedPAC, OIG staff, and others as needed to cultivate the landscape for telehealth and remote patient monitoring.



Leading the Conversation on Connected Care

- In 2020, the Alliance was regularly quoted in major DC publications – often leading the conversation during key moments for legislation or regulation. Publications included regular mentions in POLITICO as well as Modern Healthcare, Healthcare Dive, mHealthIntelligence, Inside Health Policy, Fierce Healthcare, Becker’s Hospital Review, Health Data Management, Bloomberg Law and Health Leaders Media (there were far too many stories to list). The Alliance also successfully elevated member voices in the ongoing press dialogue on connected care through quotes and op-eds.
- To our knowledge, the Alliance was the first organization to [call on Congress to expand access to telehealth](#) in February in response to COVID-19. The Alliance also played a critical role in educating states around opportunities to allow telehealth across state lines.

Providing Important Resources for Members, Patients, and Policymakers

- The Alliance has been a leader in [collecting and sharing](#) information about telehealth utilization during COVID-19 and helping telehealth advocates understand what information and data policymakers will need in order to continue expanded telehealth access.
- The Alliance has maintained in 2020 a [comprehensive page](#) tracking all telehealth regulatory developments during COVID-19. This page included trackers of state flexibility, Medicare changes, Medicaid changes, commercial market changes, changes for large employers, for fraud anti-kickback and privacy regulations and much more. The Alliance has also tracked and shared information on funding announcements for telehealth, broadband, and research related to COVID.

Key Engagements and Events Hosted by the Alliance in 2020:

- Taskforce on Telehealth Policy – In June 2020, the Alliance, the National Committee for Quality Assurance (NCQA), and the American Telemedicine Association (ATA) convened twenty of the nation’s leading healthcare voices to form a Taskforce on Telehealth Policy.
 - In September 2020, the Taskforce issued its final report during a webinar with several thousand participants and widespread news coverage.
 - The Taskforce report was featured in many media articles including from Fierce Healthcare, Becker’s Hospital Review, Healthcare IT News and mHealthIntelligence, POLITICO, Inside Health Policy, Bloomberg, Managed Healthcare Executive, and others.
- Health IT Leadership Roundtable – The Alliance joined a dozen other organizations representing patients, health plans, hospitals, clinicians and tech companies to host the Health IT Leadership Roundtable on, “Virtual Care as the New Normal.”
 - In July 2020, the Host Committee released a White Paper on “The New Normal of Care Delivery. How COVID-19 Accelerated the Adoption and Use of Virtual Care and What’s Next.”
- In April 2020, the Alliance hosted two virtual events.
 - The first was a “Virtual Hill Briefing – Using Telehealth to Address the Coronavirus Public Health Emergency.” Telehealth leaders from Stanford, Intermountain, and Medstar Health on what their systems are doing and how they are delivering dramatically more care via telehealth during the COVID-19 pandemic.
 - The Alliance also hosted a “Lunch and Learn – Telehealth Policy Development COVID-19 and Beyond.” The Alliance reviewed the multitude of legislative and regulatory



changes for telehealth and remote patient monitoring over the past month and discussed new opportunities beyond COVID-19.

- In 2020 the Alliance regularly spoke on webinars, describing the role of telehealth during the pandemic, the regulatory and legislative changes during COVID-19, and guiding individuals on expanding telehealth. These included events by America’s Health Insurance Plans (AHIP), Fierce Healthcare, NCQA, the Progressive Policy Institute (PPI), CNET Now What series, “CHET Talks, Milken Institute, URAC, the Alliance of Community Health Plans and others.

State Advocacy

In 2020, the Alliance for Connected Care significantly expanded its work at the state level, including through the hiring of new staff.

- [Consensus Principles on Telehealth Across State Lines](#) (November – Ongoing) – The Alliance launched an effort to gain support on an open letter to U.S. State and Federal Policymakers calling for care across state lines to support patients and empower healthcare professionals. Thus far, the Alliance has thirty-three cosigners. The high-level statement is intended to call attention to the need for telehealth care across state lines, through solutions that allow for mutual recognition of health professional licensure.
- Launch of Medical Excellence Zone initiative to facilitate telehealth across state lines (September - Ongoing) - The Alliance launched an effort to establish Medical Excellence Zones in three regions of the United States. A Medical Excellence Zone is an area defined by multiple state borders where health care practitioners licensed and in good standing in one state in the Zone may practice telehealth across state lines. The regions include the DMV area (DC/MD/VA), the New York tri-state area (CT/NY/NJ), and a Western region of states (CO/WA/OR/NV). Thus far, the Alliance has convened stakeholders within each region, to include large health systems, academic medical centers, large employers, and patient advocacy groups. The Alliance has also held state-level organizing calls to launch the initiative and strategize about the impending introduction of legislation in each target state during the 2021 and/or 2022 legislative sessions. The Alliance has also been working directly with legislators and stakeholders in Florida to expand this effort and improve telehealth access and facilitation for patients and providers.
- Throughout the early pandemic, the Alliance was an expert voice supporting the use of telehealth across state lines in response to COVID-19 surges. We worked with the National Governors Association on guidance to state executives, drafted memos on the use of emergency authorities, and maintained an ongoing tracker of state actions taken.
- In February 2020, Alliance Executive Director Krista Drobac testified before the Maryland legislature in support of Maryland Senate Bill 402, an Act authorizing certain health care practitioners to establish a practitioner-patient relationship through telehealth and requiring a health care practitioner providing telehealth services to be held to the same standards of practice as in-person settings.

Top Accomplishments and Achievements

Legislative

- **End-of-Year 2020 Advocacy**



- **Digital Health Groups Call on Congress to Extend Telehealth Access** (December 11) The Alliance for Connected Care, American Telemedicine Association, College of Healthcare Information Management Executives, Connected Health Initiative, eHealth Initiative, Health Innovation Alliance, HIMSS and the PCHAlliance called on Congressional leaders to act to preserve access to telehealth as part of an end of year package.
- **Alliance Joins Letter to Hill in Support of Temporary Extension of DEA Waiver in COVID Relief Package** (December 15) – The Alliance joined a letter urging Congress to extend the Drug Enforcement Administration (DEA) waiver of the prior in-person requirement before telemedicine is allowed for prescribing of controlled substances under the Ryan Haight Act through the end of 2021. This provision is included in the \$908 billion Bipartisan Emergency COVID Relief Act of 2020.
- **Alliance Support for the Protecting Access to Post-COVID-19 Telehealth Act of 2020** (July 16) – The Alliance worked on the bipartisan Protecting Access to Post-Covid-19 Telehealth Act with Representatives Thompson (D-CA), Welch (D-VT), Schweikert (R-AZ) Johnson (R-OH) and Matsui (D-CA).
 - In June, the Alliance helped convene 340 organizations on a letter calling for Congress to make several meaningful and permanent action to address statutory barriers to telehealth. Several were included in the final legislation.
 - Virtual Rally (July 23) – The Alliance joined several organizations to host a virtual rally with House Telehealth Caucus Representatives and bill introducers Thompson, Welch, Schweikert, Johnson and Matsui.
 - Endorsement Letter (August 3) – The Alliance joined a letter with over 200 other organizations to House Telehealth Caucus Representatives Thompson, Welch, Schweikert, Johnson and Matsui endorsing the Protecting Access to Post-COVID-19 Telehealth Act of 2020 (HR 7663).
- **Group Letter Supporting the Increasing Rural Health Access During the COVID-19 PHE Act** (July 14) – The Alliance joined a group of organizations in a letter to Representatives Small, McSally and Newhouse and Senators McSally and Jones supporting the Increasing Rural Health Access During the COVID–19 Public Health Emergency Act of 2020. The legislation would improve access to virtual care tools for Americans with chronic conditions in rural America, on tribal lands, or in medically underserved areas.
- **Alliance Co-led Letter with 340 Organizations Urging Action on Telehealth** (June 29) – The Alliance co-led a letter which garnered 340 national and regional organizations representing a full range of health care stakeholders and all 50 states, the District of Columbia, and Puerto Rico to Congress outlining the immediate actions necessary to ensure CMS has the authority to continue to make telehealth services available once the national health emergency is rescinded:
 - Remove obsolete restrictions on the location of the patient to ensure that all patients can access care at home, and other appropriate locations;
 - Maintain and enhance HHS authority to determine appropriate providers and services for telehealth;



- Ensure Federally Qualified Health Centers and Rural Health Clinics can furnish telehealth services after the public health emergency;
 - Make permanent Health and Human Services (HHS) temporary waiver authority for future emergencies.

- **Letter to Senate HELP Committee Chairman Alexander RE: Preparing for the Next Pandemic (June 26)** – The Alliance sent a letter to Senate HELP Committee Chairman Alexander (R-TN) on preparing for the next pandemic. The letters focus on three actions Congress can take to improve public health capabilities at both the state and local level including:
 - Make permanent HHS temporary telehealth waiver authority during emergencies
 - Facilitate telehealth care across state borders
 - Expand broadband access to ensure access to care

- **Endorsement Letter for the Healthcare Broadband Expansion During COVID-19 Act (April 22)** – The Alliance sent a letter to Representatives Eshoo and Young endorsing the Healthcare Broadband Expansion During COVID-19 Act (H.R. 6474). The legislation would expand funding for the Federal Communications Commission to support healthcare broadband deployment in response to COVID-19.

- **Group Letter – Telehealth for People with High-Deductible Health Plans (March 20)** – The Alliance joined a group of leading organizations calling on Congress to pass legislation that would amend the Internal Revenue Code of 1986 to allow employers and health plans to cover telehealth services pre-deductible in Health Savings Account-eligible high deductible health plans during this health care crisis.
 - This legislation would build on efforts by Congress to ensure access to telehealth during the COVID-19 public health emergency.

- **Group Letter – Follow-up Tweak to the First Coronavirus Package (February 26)** – The Alliance joined a group of leading telehealth, provider, and expert groups to leaders in the House and Senate to strike the “Qualified Provider” limitations from the statute and enable healthcare providers to better use the Medicare telehealth provision from the Coronavirus Preparedness and Response Supplemental Appropriations Act, 2020.

- **Letter to Congressional Leaders – Telehealth for COVID-19 (February 26)** – The Alliance sent a letter to eight Congressional leaders to include Section 9 of the bipartisan, bicameral CONNECT for Health Act of 2019 (S. 2741 & HR 4932) which would empower the Secretary of Health and Human Services to waive restrictions on the use of telehealth for Medicare beneficiaries during national emergencies.

Top Regulatory

- **DEA Special Registration for Telemedicine (October 26)** – The Alliance worked to convene over 80 organizations in a letter to the Drug Enforcement Administration (DEA) calling on the DEA to finalize the special registration for telemedicine. The anticipated registration



would enable a practitioner to deliver, distribute, dispense, or prescribe via telemedicine a controlled substance to a patient who has not been medically examined in-person by the prescribing practitioner. Special registration to prescribe controlled substances through telemedicine was originally called for in the *Ryan Haight Act of 2008*.

- **CY 2021 Physician Fee Schedule** (October 1) – The Alliance submitted comments on the CY 2021 Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment Policies. The Alliance emphasized four overarching priorities:
 - CMS to continue clearly communicating to Congress and stakeholders that there are statutory limitations curtailing CMS’s ability to allow continued access to telehealth for Medicare beneficiaries. Additionally, we urge you to continue collecting and publicly sharing data about telehealth utilization.
 - CMS should be making additional permanent changes within its authority, even if those changes may require revision at a future date. CMS should also aggressively leverage a much wider set of category 3 codes.
 - The Alliance does not agree with CMS’s interpretation of codes 99457 and 99458 and the proposed requirement that “interactive communication” consist of real-time synchronous two-way audio.
 - CMS should immediately leverage its full authority to permanently expand the use of telehealth flexibility within outcome-based alternative payment models.

- **COVID-19 Interim Final Rule** (April 14) – In response to the COVID-19 public health emergency and broad Congressional and regulatory action, the Alliance submitted comments to CMS in response to the COVID-19 Interim Final Rule. The Alliance emphasized the importance of the many changes that were made, and requested several next steps for CMS, leveraging new authorities that it has received under the Coronavirus Aid, Relief, and Economic Security Act. Alliance priorities included:
 - Expanded flexibility for audio-only telehealth to a broader set of services
 - Technical fixes to ensure telehealth can be delivered by more clinicians, including changes to distant site provider rules.
 - Additional flexibility for E-Visits and Virtual Check-ins
 - Ensure robust data collection during this time period so that the nation may learn from its experience with telehealth and remote patient monitoring
 - Expand efforts to educate Medicare beneficiaries about utilizing telehealth.

- **Medicare Advantage Regulation** (April 6) – The Alliance commented on the CMS proposed rule on “Medicare and Medicaid Programs; Contract Year 2021 and 2022 Policy and Technical Changes to the Medicare Advantage Program, Medicare Prescription Drug Benefit Program, Medicaid Program, Medicare Cost Plan Program, and Programs of All-Inclusive Care for the Elderly.” The comments address four key areas for telehealth and remote patient monitoring:
 - Telehealth for Medicare Advantage network adequacy
 - Telehealth for Special Needs Plans
 - Additional telehealth benefit requirements
 - Telehealth changes to the medical loss ratio