DEPARTMENT OF HEALTH & HUMAN SERVICES Centers for Medicare & Medicaid Services 7500 Security Boulevard, Mail Stop C5-15-12 Baltimore, Maryland 21244-1850



Center for Medicare

December 06, 2023

Christopher Adamec Alliance for Connected Care cadamec@connectwithcare.org

Dear Christopher Adamec:

Thank you for your letter to Administrator Brooks-LaSure requesting that the Centers for Medicare & Medicaid Service (CMS) continue to allow physicians and other healthcare providers to offer telehealth services from their homes without requiring the disclosure of their home address on their Medicare enrollment form. I am responding on her behalf. CMS recognizes that telehealth plays a growing role in supporting beneficiary access to the care they need, and I appreciate your bringing these concerns to our attention.

As you noted in your letter, during the Public Health Emergency (PHE) for COVID-19, CMS allowed practitioners to render telehealth services from their homes without reporting their home address on their Medicare enrollment while continuing to bill from their currently enrolled location. CMS also allowed practitioners to report the place of service (POS) where they would have furnished the service had it been in person rather than the telehealth-specific POS code. This flexibility was extended at the conclusion of the COVID-19 PHE through December 31, 2023.

As discussed in the Calendar Year (CY) 2024 Physician Fee Schedule (PFS) final rule, we received comments similar to yours regarding the expiring flexibility for telehealth practitioners to use their currently enrolled location instead of their home address when providing services from their home. As discussed in the final rule, through CY 2024, we will continue to permit the distant site practitioner to use their currently enrolled practice location instead of their home address when providing telehealth services from their home. Additionally in the CY 2024 PFS final rule, we requested further information from interested parties to better understand the scope of considerations involved with including a practitioner's home address as an enrolled practice location when that address is the distant site location where they furnish Medicare telehealth services. The requested information will inform future enrollment and payment policy development as we consider this issue further for future rulemaking.

CMS acknowledges your concerns about privacy and safety related to provider's home addresses being shared. We are aware that some provider enrollment data may be shared publicly through the CMS Care Compare website as a tool for Medicare beneficiaries to find and compare different Medicare providers. Providers who appropriately identify their practice location as a home address on the Medicare enrollment application will not have their home address published on Care Compare. Moreover, providers who did not appropriately identify their practice location as a home address can contact the CMS Quality Payment Program (QPP) helpdesk at: <u>QPP@cms.hhs.gov</u> to provide an alternate address or have their home address suppressed on Care Compare.

Thank you again for your letter. We welcome your feedback, as your input is important to us. I appreciate you sharing your comments and concerns, which CMS will consider as we move forward on these critical issues.

Sincerely,

Meena Seshamani, M.D., Ph.D

Meena Seshamani, MD, PhD Director, Center for Medicare