

October 2, 2024

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
200 Independence Avenue SW
Washington, D.C. 20201

RE: Home Reporting of Telehealth Practitioners

Dear Administrator Brooks-LaSure,

On behalf of the undersigned organizations, we thank the Centers for Medicare and Medicaid Services (CMS) for indicating that is working on permanent policy related to telehealth practitioners and requirements related to the reporting of their location at the time of service. We urge CMS to expedite this process, as the lack of clarity on location reporting is preventing many Medicare beneficiaries from receiving care from fully virtual practitioners.

We appreciate the extension through 2025 of regulatory flexibility for telehealth practitioners who offer a telehealth service from their home or another location to report their currently enrolled location. This continuity in the billing of services while offering more flexible care has enabled telehealth to expand provider capacity, supported patient access to after-hours care from their existing clinicians, and has been a determining factor in the decision of many health care practitioners to remain in the workforce. **Unfortunately, the ability to bill a currently enrolled location does not alleviate barriers for virtual-only practitioners without a physical practice location to report other than their homes.** Additionally, there is widespread confusion around current requirements that is hindering access to care.

It is not practical, workable, or safe to require a provider to report their home address as their practice location. Medicare providers should not be compelled to share their personal information, especially when it relates to their home addresses. While we know CMS has made efforts not to release these addresses, they still create a chilling effect on the ability to deliver care from home. In an environment in which threats against healthcare professionals has markedly increased, the safety and privacy of providers must be paramount.

We request CMS leadership in ensuring that telehealth practitioners working from a home-based location do not need to report their private residence to the federal government for purposes of enrollment or billing. Rather, we believe that CMS should work with stakeholders to develop an alternate method of determining location for the purposes of payment that does not require the reporting of a home address. One potential option would be to allow a business address to be reported for purposes of enrollment, and a geographic indicator such as a zip code be reported for payment adjustment by geographic cost and wage index. We respectfully request that CMS, as part of its policymaking in this area, convene a roundtable or a similar effort ensure the experiences of virtual-only practitioners are considered.

Thank you for your consideration of this request. Please feel free to reach out to any signer of this letter for additional information and context.

Sincerely,

Access TeleCare
Acorn Health
Active Minds
Advocate Health
AGMP Telehealth
Alliance for Connected Care
American Academy of Neurology
American Academy of Physical Medicine and Rehabilitation
American Academy of Physician Associates
American Association of Nurse Practitioners
American College of Medical Genetics and Genomics
American Society of Hematology
American Telemedicine Association
Amwell
Anderson Medical Services LLC
Anderson Mental Health Services LLC
Apricity
ATA Action
Avel eCare
Avery's Hope
BBennettMD 1 on 1 Virtual Healthcare
Bird on a Wire, LLC
Black Pine Counseling Center
Blue Mountain Therapies, LLC.
Bold Path Counseling, PLLC
BRIAN CUNNINGHAM LLC (dba Winding Trails Therapy)
Brightline, Inc.
Brownlee Health
CareBridge Medical Group
Casel Mental Health
Center to Advance Palliative Care (CAPC)
Central Virginia Psychology PLLC
Chesapeake Psychological Associates
Children and Adults with Attention-Deficit/Hyperactivity Disorder
Clinical Squared
Compassion & Choices
Connected Health Initiative
Convenient Care Association
Creating Compassion. LLC
CSNK2A1 Foundation
CTNNB1 Connect and Cure
Curai, Inc.
Cure CMD
Diabetes & Endocrinology Consultants of Pennsylvania, LLC

Digital Medicine Society (DiMe)
Dup15q Alliance
Encounter Telehealth, Inc
Epilepsy Foundation
Epilepsy Leadership Council
ExamMed
Fairview Health Services
Flexhealth Teletherapy
Focus On You Counseling, LLC
Forbes Wellness, LLC
FORCE: Facing Our Risk of Cancer Empowered
GABA-A Alliance
GalenusRx
GenieMD, Inc.
Gerontological Advanced Practice Nurses Association (GAPNA)
Gezunt Health
Gordon Therapy Services LLC
GRIN2B Foundation
HCU Network America
Healing Branch Wellness Center, LLC
HealthFlow LLC
Heart Rhythm Society
Heartbeat Health
Heuplus
Homeward Health Inc.
Hope for HIE
Howerton Counseling, LLC
Illuminated Insights Counseling, LLC
IMPOWER
Indiana University Health, Inc.
Inova
Integrated Telehealth Partners
Intermountain Health
International Foundation for CDKL5 Research
Iye Collaborative LLC
KCNQ2 Cure Alliance
KeyCare Medical Group
KEYS 2 HEALTHY MINDS, PLLC
Kohnling, Inc
Language Strides LLC
Lighthouse Counseling
LMA MENTAL HEALTH SERVICES
Lotus Holistic Therapy Center PLLC
Love Psychological & Consulting Services

Mass General Brigham
Melanoma Research Foundation
Mend VIP, Inc.
Merrifield Therapeutic Counseling Services, LLC
Mindful oasis LLC
Multicultural Counseling & Consulting Ctr. LLC
National Association of Pediatric Nurse Practitioners
National League for Nursing
National Treatment and Recovery
Nest Collaborative
New Jersey Association of Mental Health and Addiction Agencies, Inc.
New Vision Counseling Center
NextGen Healthcare
NIM Longevity
Nixon Gwilt Law
Noma Therapy
Northern Neck Life Consultants, PLLC
Northside Medical Professionals
Northwell Health
NU Vision Counseling and Consulting Services
Path of Life Counseling, LLC
Peace of Mind Inc
Pediatric Epilepsy Research Consortium
Pediatric Gastroenterology of Northern Virginia
Pelorus Elder & Behavioral Health
Policy Center for Maternal Mental Health
Primary Care Development Corporation
Psychiatric Medical Care
Quartet Health, Inc.
QuickVisit Urgent Care
Rare Epilepsy Network (Ren) Coordinating Committee
Re-architect Health LLC
Restorative Rehab Therapy Services
Revive Mental Health Solutions LLC
Rewild PLLC
Richmond Therapeutic Health Services
Rockfish Gap Mental Health PLLC
Sage Wellness, LLC
Senior Care Clinic House Calls
Shameka Clark-Savage
Small Business & Entrepreneurship Council
Society for Participatory Medicine
Soul Guided Healing & Wellness
Souther Comfort Psych Services

Spectrum: The Other Clinic
Spina Bifida Association
Spindle Health
Sunrise Mental Health
Synchronous Mental Health
Talkiatry
TECHMEDO
TeleMed2U
The Speech and Language Center
The Sturge-Weber Foundation
Therapy Thursdays PLLC
TheraTec, Inc
Transcarent
Treatment Communities of America
TruPath Counseling LLC
TSC Alliance
University of Pittsburgh Medical Center (UPMC) Health System
URAC
Virginia Counseling Services
Virginia Pediatric Group
Virginia Therapeutic Network
ViTel Net
WeKonnnect, LLC.
Welliti