



Policy Priorities to Unleash Virtual Care

The Alliance seeks to ensure that the choice of care modality is a core component of a modern, patient-centered health care system. Short-term, year-to-year extensions of access are not a sustainable approach for virtual care, which is now a core component of how health care is delivered in the United States.

Stabilize the Virtual Care Foundation

- Eliminate Medicare geographic and originating site limitations to enable patients to communicate remotely with their providers regardless of location.
- Eliminate burdensome Medicare distant site practitioner list restrictions to allow all Medicare providers who deliver clinically appropriate telehealth services to do so.
- Permanently remove in-person care requirements under Medicare for mental health services furnished through telehealth.
- Ensure Federally Qualified Health Centers (FQHCs), Critical Access Hospitals (CAHs), and Rural Health Clinics (RHCs) can furnish telehealth in Medicare and be reimbursed fairly for those services, despite unique payment characteristics and challenges for each.
- Make permanent the Medicare Acute Hospital at Home (AHCaH) Waiver that allows care to be provided in the patient home, building on evidence collection during the temporary program.
- Limit regulatory overreach on telehealth prescribing by the Drug Enforcement Administration (DEA) by advocating for a regulation that prevents diversion without interfering in medicine.

Strengthen Tech-enabled Care Capabilities

- Drive better and more coordinated care by supporting remote patient monitoring (RPM) technology and reimbursement tied to the value these services provide.
- Reinforce the healthcare workforce by lessening burdensome location (home address) reporting constraints on Medicare practitioners offering fully remote care.
- Address duplicative state licensing regulations that limit patient access to care while reducing health care competition and exacerbating provider shortages.
- Modernize health plan network adequacy requirements by replacing telehealth time and distance credits with outcome-based measures of patient access.

Shape the Evolution of AI-enabled Care

- Facilitate AI-enabled care as an extension of existing care delivery and avoid repeating mistakes made in other digital health areas, where narrow allowances later hampered patient access.
- Pursue regulatory and reimbursement changes that allow for modality-agnostic care delivery to facilitate the expansion of AI-enabled care and circumvent existing barriers like time-based reimbursement.
- Further the growth of AI-enabled care delivery through models based on outcomes, where these changes can be made most easily.
- Adopt a regulatory framework that is proportional to the potential for patient harm, with greater oversight for high-risk applications and faster adoption for lower-risk tools while exploring "regulatory sandboxes" subject to rigorous due diligence, safety constraints, and narrowly scoped use cases at the state and federal level.