

April 25, 2020

The Honorable Alex Azar
Secretary, Department of Health & Human
Services
Hubert H. Humphrey Building
200 Independence Ave., S.W.
Washington, D.C. 20201

The Honorable Seema Verma
Administrator, Centers for Medicare &
Medicaid Services
Hubert H. Humphrey Building
200 Independence Ave., S.W.
Washington, DC 20201

Re: Audio-only encounters as a vital source of health care services during COVID-19

Dear Secretary Azar and Administrator Verma:

On behalf of 101 medical groups and independent practice associations, we ask that you clarify that audio-only visits satisfy the face-to-face requirement for the purpose of gathering diagnosis information for risk adjustment and care coordination purposes.

On April 10, 2020, the Centers for Medicare & Medicaid Services released long-awaited guidance clarifying that diagnoses from audio-video visits can be counted for risk adjustment purposes. We applaud the agency for providing this information and note that it satisfies a significant need for certainty in the marketplace. However, the agency must go further to respond to the needs of coordinated, accountable physician practices.

During the COVID-19 pandemic, our physician practices have moved significant portions of care into virtual settings. This includes video visits in a number of cases. However, for many patients, accessing care via video is simply not an option. Patients may not have access to the technology or broadband service necessary to receive care through video-based modalities. We also must account for patient preferences, particularly with a senior or frail population that may not be comfortable using video services or may have physical limitations that prevent them from doing so. For these patients, the choice is not between a video visit and a phone visit – it is the choice between an audio visit or no visit. If they are not able to communicate with their physician, the risks are significant.

Further, diagnosis information serves important purposes beyond just payment. Accurate patient diagnoses provide the coordinated care team the information that they need to assess and develop care plans, to deploy necessary resources at the medical group level, and to inform our approaches to managing patient care.

Social distancing practices exist to protect our patients and communities – reducing the transmission of COVID-19 and ensuring we provide care in the safest possible way. Even as restrictions ease and patients begin to slowly return to in-person care settings, our medical groups will face tremendous backlogs of unmet medical needs. For these reasons, we will continue to rely on both audio and video-based technologies to enhance access and safely care for our patients throughout this extended COVID-19 pandemic and recovery period. Therefore, we ask that you expand your recent memo to clarify that services provided by audio-only will count for risk adjustment purposes.

Sincerely,

AMGA

Colorado Permanente Medical Group

Hawaii Permanente Medical Group

Mid-Atlantic Permanente Medical Group

Northwest Permanente

The Permanente Medical Group

The Southeast Permanente Medical Group

Southern California Permanente Medical Group

Washington Permanente Medical Group

Acclaim Physician Group, Inc.

agilon health

Arizona Community Physicians

Austin Regional Clinic

AtlantiCare Physician Group

Atrius Health

Benefits Health System

Bryan Physician Network

Catalyst Medical Group

Cleveland Clinic

Coastal Carolina Health Care, P.A.

CommonSpirit Health

Covenant Medical Group

Crystal Run Healthcare

DuPage Medical Group

El Camino Hospital System

Eventus WholeHealth

Facey Medical Foundation

Gould Medical Group

Grace Medical Group

Graves Gilbert Clinic

Greater Newport Physicians IPA

HealthCare Partners

HealthCare Partners Nevada

HealthPartners

Heritage Medical Associates

Hoag Medical Group
HSHS Medical Group
Inova Health System
Intermountain Medical Group, Intermountain Healthcare
Iowa Clinic
Johns Hopkins Medicine
Kadlec Clinics
Kaweah Delta Medical Foundations
Kettering Physician Network
Lee Health
Lehigh Valley Health Network
Marshfield Clinic Health System
Matthews-Vu Medical Group
Maui Medical Group
Maury Regional Medical Group
Mayo Clinic
MedChi, the Maryland State Medical Society
Medical Society of the District of Columbia
MemorialCare Medical Center Foundation
MemorialCare Medical Group
Mercy Medical Group
Methodist Medical Group
Mission Heritage Medical Group
North Mississippi Medical Clinics, Inc.
North Shore Medical Group
Northeast Georgia Physicians Group
Oregon Medical Group
Pacific Medical Centers
Palo Alto Medical Foundation
Parkview Physicians Group
Pennsylvania State Medical Society (PAMED)
The Portland Clinic
Premier Family Physicians
Prevea Health
Providence Medical Institute
Providence Medical Group
Providence St. John's Medical Foundation
Quincy Medical Group
Revere Health in Utah
Scripps Coastal Medical Group
Sharp Rees-Stealy Medical Group
Silicon Valley Medical Development, LLC
SIMEDHealth, L.L.C.
St. Joseph Health Medical Group
St. Mary High Desert Medical Group
St. Peter's Health

St. Joseph Heritage Medical Group
St. Jude Heritage Medical Group
Summit Medical Group
Sutter East Bay Medical Group
Sutter Health
Sutter Independent Physician Association
Sutter Medical Group
Sutter Medical Group of the Redwoods
Sutter North Medical Groups
Sutter West Bay Medical Group
Swedish Medical Group
Union Medical Group
USF Health
Utica Park Clinic
Valley Organized Physicians
Vancouver Clinic
Wellstar Medical Group
Western Montana Clinic in Missoula, MT
Western Washington Medical Group
Wilmington Health