



**CHRISTUS Health Supports
the Permanent Extension
of Telehealth Flexibilities
Beyond the COVID-19
Pandemic**

CHRISTUS Health is a Catholic health ministry that strives to be a leader, partner, and advocate in the creation of innovative health and wellness solutions. CHRISTUS continues its commitment to investing and utilizing new care modalities, including telehealth and information technologies, to continually improve care quality and patient outcomes while strengthening patient-provider communication and supporting vital outreach to marginalized populations.

With the emergence of COVID-19, the health care industry was required to quickly adapt to methods that allowed patients to receive care remotely. Emergency policies, at both the federal and state level, have supported this transition, allowing for the expansion of telehealth services, which has become an integral part of our ability to provide coordinated, timely, and effective care.

As such, **CHRISTUS urges lawmakers to safeguard telehealth access for patients and providers beyond the pandemic.** Without necessary statutory and policy changes, most waivers and flexibilities that support expanded virtual care delivery are set to expire upon the conclusion of the public health emergency (PHE).

Removal of Restrictive Geographic Site Requirements

Prior to the PHE, geographic site requirements, identifying where a provider and a patient were located at the time of service, placed significant restrictions on the coverage of telehealth services. These geographic barriers were lifted during the pandemic to allow telehealth services to be provided and received from any location, including a person's home. By removing geographic restrictions, it has become clear that telehealth should be available and accessible regardless of where an individual lives or how they access telehealth services.

CHRISTUS Health supports legal efforts to permanently eliminate geographic and originating site restrictions, including revisions to statutory definitions to ensure telehealth services can be provided and received anywhere a patient is located at the time of care, including a person's home.

Expansion of Permissible Providers and Services

The pandemic has allowed for the significant coverage expansion of telehealth services and eligible providers pursuant to several Centers for Medicare and Medicaid Services' (CMS) PHE waivers. Although the CMS 2021 physician fee schedule final rule made some new services eligible for Medicare coverage, workforce shortages and payment limitations on vital services impose significant limitations on ensuring quick access to quality care for vulnerable populations as well as for those individuals residing in the rural areas.

CHRISTUS approves of necessary legislative changes that will make permanent the reimbursement eligibility for the PHE extended services as well as the additional covered practitioners including, for example, physical and occupational therapists, nurse practitioners, and behavioral health providers, while granting the HHS Secretary the ability to expand on this list.

Commitment to Reimbursement Reform

The PHE has resulted in significant coverage expansions by both CMS and commercial payers, including the waiver of existing coverage restrictions to ensure payment parity and practitioner payment for telehealth services at the same rate as in-person visits for all diagnoses, not just services related to COVID-19. These reimbursement flexibilities have been instrumental in assuring care continuity that is essential to improving quality for patients as well as the appropriate management of care delivery by providers.

CHRISTUS supports payment parity and reimbursement coverage policies that protect care continuity by securing necessary funding and having state policymakers align telehealth coverage provisions with current Medicare policies. States must also take steps to eliminate insurer practices that create separate telehealth networks or incentivize patients to use a separate provider, which may not include contracted physicians who provide in-person care to patients.

Extending Audio-only Coverage to Enable Vital Access

Before the pandemic, interactive audio-video technology was required for telehealth visits and an audio visit was limited to an established patient. This generally restricted service availability for individuals who have limited access to the required technology. During the early stages of the pandemic, CMS took steps to eliminate this disparity by allowing and reimbursing clinicians for the provision of certain audio-only services.

CHRISTUS Health believes that audio-only telehealth services are essential for many rural patients who lack broadband internet access. Therefore, at a minimum, we urge the extension of audio-only coverage until such time that broadband access is expanded to allow for nationwide connectivity. Alternatively, we ask that coverage of these services becomes permanent.

Extending Coverage to Reach Crucial Populations

Before and during the pandemic, access to broadband services has remained instrumental in supporting telehealth and health information exchange. Many of the areas served by CHRISTUS Health are rural and do not have access to fast internet connections that are necessary to enable data to be transmitted efficiently and effectively. By investing in telehealth services and technologies, CHRISTUS remains committed to achieving health equity with a specific focus on improving the health and well-being of underserved populations, including children, and those living in areas that lack access to vital specialty care and education.

CHRISTUS Health urges lawmakers to provide needed funding for health care facilities, service providers, and local governmental entities, allowing for investment in opportunities that are aimed at creating and supporting the deployment of a comprehensive broadband platform across the care spectrum. Building and expanding broadband infrastructure will allow providers to reach vulnerable populations in rural and oftentimes overlooked areas.