



Telehealth Policy to Transform Healthcare

March 3, 2023

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

Re: CMS-2023-0010, 2024 Medicare Advantage and Part D Advance Notice

Administrator Brooks-LaSure:

On behalf of ATA Action, we want to thank you for the opportunity to share our perspectives regarding the CY 2024 Advance Notice.

ATA Action, the American Telemedicine Association's affiliated trade association focused on advocacy, advances policy to ensure all individuals have permanent access to telehealth services across the care continuum. ATA Action supports the enactment of state and federal telehealth coverage and fair payment policies to secure telehealth access for all Americans, including those in rural and underserved communities. ATA Action recognizes that telehealth and virtual care have the potential to truly transform the health care delivery system – by improving patient outcomes, enhancing safety and effectiveness of care, addressing health disparities, and reducing costs – if only allowed to flourish.

We write today in support of Medicare Advantage for the program's strong history of delivering telehealth benefits, which enables the system to better care for more people. Notably, 97% of all Medicare Advantage plans include telehealth benefits,¹ bringing widespread access to the more than 30 million people who turn to the Medicare Advantage program for their care.²

The ATA has long maintained that telehealth can reduce disparities and advance health equity, in part by increasing access to affordable care.³ We believe that strengthening the program is an essential way to ensure that telehealth reaches communities who have been traditionally underserved.

For this reason, the ATA was concerned by several proposals in the Advance Notice that would create barriers for those who would otherwise choose Medicare Advantage for their care. According to a recent study, the Advance Notice would lead to an average cost of \$540 in increased premiums or reduced benefits per beneficiary per year.⁴ This significant impact would likely decrease access to supplemental benefits, including telehealth, on which many seniors have come to rely.

We urge the Centers for Medicare & Medicaid Services to assess the full impact of its proposals in the Advance Notice, to ensure that access to Medicare Advantage and telehealth remains strong for all who need it. Thank you for your consideration of these comments.

Kind regards,

A handwritten signature in black ink, appearing to read "Kyle Zebley".

Kyle Zebley
Executive Director
ATA Action

¹ Kaiser Family Foundation, Medicare Advantage 2023 Spotlight: First Look, November 2022. Available at: <https://www.kff.org/medicare/issue-brief/medicare-advantage-2023-spotlight-first-look/>

² Fierce Healthcare, CMS data: Medicare Advantage tops 30M, January 2023. Available at: <https://www.fiercehealthcare.com/payers/cms-data-medicare-advantage-tops-30m>

³ American Telemedicine Association, A Framework for Eliminating Health Disparities Using Telehealth, October 2021. Available at: <https://www.americantelemed.org/resources/a-framework-for-eliminating-health-disparities-using-telehealth/>

⁴ Avalere Health, Proposed MA Plan Payment Changes May Impact Premiums and Benefits, February 2023. Available at: <https://avalere.com/insights/proposed-ma-plan-payment-changes-may-impact-premiums-and-benefits>