



March 3, 2026

Shevaun L. Harris  
Secretary, Florida Agency for Healthcare Administration  
2727 Mahan Drive  
Tallahassee, Florida, 32308

**RE: ATA ACTION CONCERNS WITH PROPOSED AMENDMENTS TO FLORIDA  
MEDICAID PROVIDER ENROLLMENT POLICY**

Dear Secretary Harris,

On behalf of ATA Action, I am writing to you to express our concerns regarding proposed amendments to the Florida Medicaid Provider Enrollment Policy. If the new policy is implemented as drafted our organization is concerned that it will make it more difficult for out-of-state telehealth providers to enroll in Medicaid and provide care to Florida patients. This will reduce care options for Florida patients, run counter to Florida's otherwise strong telehealth policy and exacerbate provider shortages.

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.

Our organization believes that it is in the best interests of Florida Medicaid beneficiaries to have access to as many providers as possible when in need of care, with telehealth providers offering a crucial option for patients. We are concerned that, as currently drafted, the updates to the Florida Medicaid Provider Enrollment Policy will make it very difficult for Florida licensed providers located outside of the state to enroll as Medicaid providers. Specifically, Section 2.3 Practice Locations states that “Enrolled providers who provide telemedicine must be in the state of Florida when services are rendered or be enrolled as an out-of-state provider in accordance with this policy.” The provisions of Section 2.2.4 Out-of-State Providers offer very limited avenues for out-of-state providers to enroll such as exceptions for DME entities, interpretation of diagnostic testing and through prior authorization by Florida Medicaid in certain circumstances. These narrow circumstances will preclude out-of-state Florida licensed providers from enrolling in Medicaid and potentially disrupt ongoing care to Medicaid patients by out-of-state providers.

Furthermore, if this restrictive policy is adopted, it would run counter to Florida's otherwise strong track record in telehealth policy. Florida Statute 456.47, the Use of telehealth to provide services, includes no in-state location requirements and specifically includes providers “licensed under a multistate health care licensure compact of which Florida is a member state” in the definition of telehealth provider.<sup>1</sup> This compact point is extremely pertinent as Florida is a member of six licensure compacts, including the

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<sup>1</sup> The 2025 Florida Statutes, Title XXXII Chapter 456 Section 456.47.  
[https://www.leg.state.fl.us/Statutes/index.cfm?App\\_mode=Display\\_Statute&Search\\_String=&URL=0400-0499/0456/Sections/0456.47.html](https://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=0400-0499/0456/Sections/0456.47.html)

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Interstate Medical Licensure Compact (IMLC). ATA Action is concerned that these proposed changes to Florida's Medicaid Manual would exclude out-of-state physicians who have obtained Florida licensure through the IMLC, or other providers who have obtained Florida licensure through other compacts, disrupting care and reducing incentives for telehealth providers from obtaining Florida licensure.

Finally, out-of-state telehealth providers are a crucial resource to addressing provider shortages. This is relevant in Florida as January 2026 data from the Health Resources & Services Administration has identified 31 Florida counties as health professional shortage areas for mental health and 20 counties as primary care health professional shortage areas.<sup>2</sup> With many Florida counties facing provider shortages we believe the Agency for Health Care Administration should seek to make it easier for out-of-state providers to help fill this gap, instead of making it more difficult for them to enroll and serve Medicaid patients.

Thank you for your consideration of our comments. We encourage you to reconsider the proposed changes to the Provider Enrollment Policy in the interest of protecting and expanding Florida Medicaid patients' access to affordable, high-quality care. Please let us know if there is anything that we can do to assist you in your efforts to adopt practical telehealth policy in Florida. If you have any questions or would like to engage in additional discussion regarding the telemedicine industry's perspective, please contact me at [hyoung@ataaction.org](mailto:hyoung@ataaction.org).

Kind regards,

Hunter Young  
Head of State Government Relations  
ATA Action

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<sup>2</sup> Rural Health Information Hub, Florida Chart Gallery. <https://www.ruralhealthinfo.org/states/florida/charts>