

October 2, 2024

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

**RE: Home Reporting of Telehealth Practitioners**

Dear Administrator Brooks-LaSure,

On behalf of the undersigned organizations, we thank the Centers for Medicare and Medicaid Services (CMS) for indicating that is working on permanent policy related to telehealth practitioners and requirements related to the reporting of their location at the time of service. We urge CMS to expedite this process, as the lack of clarity on location reporting is preventing many Medicare beneficiaries from receiving care from fully virtual practitioners.

We appreciate the extension through 2025 of regulatory flexibility for telehealth practitioners who offer a telehealth service from their home or another location to report their currently enrolled location. This continuity in the billing of services while offering more flexible care has enabled telehealth to expand provider capacity, supported patient access to after-hours care from their existing clinicians, and has been a determining factor in the decision of many health care practitioners to remain in the workforce. **Unfortunately, the ability to bill a currently enrolled location does not alleviate barriers for virtual-only practitioners without a physical practice location to report other than their homes.** Additionally, there is widespread confusion around current requirements that is hindering access to care.

It is not practical, workable, or safe to require a provider to report their home address as their practice location. Medicare providers should not be compelled to share their personal information, especially when it relates to their home addresses. While we know CMS has made efforts not to release these addresses, they still create a chilling effect on the ability to deliver care from home. In an environment in which threats against healthcare professionals has markedly increased, the safety and privacy of providers must be paramount.

We request CMS leadership in ensuring that telehealth practitioners working from a home-based location do not need to report their private residence to the federal government for purposes of enrollment or billing. Rather, we believe that CMS should work with stakeholders to develop an alternate method of determining location for the purposes of payment that does not require the reporting of a home address. One potential option would be to allow a business address to be reported for purposes of enrollment, and a geographic indicator such as a zip code be reported for payment adjustment by geographic cost and wage index. We respectfully request that CMS, as part of its policymaking in this area, convene a roundtable or a similar effort ensure the experiences of virtual-only practitioners are considered.

Thank you for your consideration of this request. Please feel free to reach out to any signer of this letter for additional information and context.

Sincerely,

Access TeleCare  
Acorn Health  
Active Minds  
Advocate Health  
AGMP Telehealth  
Alliance for Connected Care  
American Academy of Neurology  
American Academy of Physical Medicine and Rehabilitation  
American Academy of Physician Associates  
American Association of Nurse Practitioners  
American College of Medical Genetics and Genomics  
American Society of Hematology  
American Telemedicine Association  
Amwell  
Anderson Medical Services LLC  
Anderson Mental Health Services LLC  
Apricity  
ATA Action  
Avel eCare  
Avery's Hope  
BBennettMD 1 on 1 Virtual Healthcare  
Bird on a Wire, LLC  
Black Pine Counseling Center  
Blue Mountain Therapies, LLC.  
Bold Path Counseling, PLLC  
BRIAN CUNNINGHAM LLC (dba Winding Trails Therapy)  
Brightline, Inc.  
Brownlee Health  
CareBridge Medical Group  
Casel Mental Health  
Center to Advance Palliative Care (CAPC)  
Central Virginia Psychology PLLC  
Chesapeake Psychological Associates  
Children and Adults with Attention-Deficit/Hyperactivity Disorder  
Clinical Squared  
Compassion & Choices  
Connected Health Initiative  
Convenient Care Association  
Creating Compassion. LLC  
CSNK2A1 Foundation  
CTNNB1 Connect and Cure  
Curai, Inc.  
Cure CMD  
Diabetes & Endocrinology Consultants of Pennsylvania, LLC

Digital Medicine Society (DiMe)  
Dup15q Alliance  
Encounter Telehealth, Inc  
Epilepsy Foundation  
Epilepsy Leadership Council  
ExamMed  
Fairview Health Services  
Flexhealth Teletherapy  
Focus On You Counseling, LLC  
Forbes Wellness, LLC  
FORCE: Facing Our Risk of Cancer Empowered  
GABA-A Alliance  
GalenusRx  
GenieMD, Inc.  
Gerontological Advanced Practice Nurses Association (GAPNA)  
Gezunt Health  
Gordon Therapy Services LLC  
GRIN2B Foundation  
HCU Network America  
Healing Branch Wellness Center, LLC  
HealthFlow LLC  
Heart Rhythm Society  
Heartbeat Health  
Heuplus  
Homeward Health Inc.  
Hope for HIE  
Howerton Counseling, LLC  
Illuminated Insights Counseling, LLC  
IMPOWER  
Indiana University Health, Inc.  
Inova  
Integrated Telehealth Partners  
Intermountain Health  
International Foundation for CDKL5 Research  
Iye Collaborative LLC  
KCNQ2 Cure Alliance  
KeyCare Medical Group  
KEYS 2 HEALTHY MINDS, PLLC  
Kohnling, Inc  
Language Strides LLC  
Lighthouse Counseling  
LMA MENTAL HEALTH SERVICES  
Lotus Holistic Therapy Center PLLC  
Love Psychological & Consulting Services

Mass General Brigham  
Melanoma Research Foundation  
Mend VIP, Inc.  
Merrifield Therapeutic Counseling Services, LLC  
Mindful oasis LLC  
Multicultural Counseling & Consulting Ctr. LLC  
National Association of Pediatric Nurse Practitioners  
National League for Nursing  
National Treatment and Recovery  
Nest Collaborative  
New Jersey Association of Mental Health and Addiction Agencies, Inc.  
New Vision Counseling Center  
NextGen Healthcare  
NIM Longevity  
Nixon Gwilt Law  
Noma Therapy  
Northern Neck Life Consultants, PLLC  
Northside Medical Professionals  
Northwell Health  
NU Vision Counseling and Consulting Services  
Path of Life Counseling, LLC  
Peace of Mind Inc  
Pediatric Epilepsy Research Consortium  
Pediatric Gastroenterology of Northern Virginia  
Pelorus Elder & Behavioral Health  
Policy Center for Maternal Mental Health  
Primary Care Development Corporation  
Psychiatric Medical Care  
Quartet Health, Inc.  
QuickVisit Urgent Care  
Rare Epilepsy Network (Ren) Coordinating Committee  
Re-architect Health LLC  
Restorative Rehab Therapy Services  
Revive Mental Health Solutions LLC  
Rewild PLLC  
Richmond Therapeutic Health Services  
Rockfish Gap Mental Health PLLC  
Sage Wellness, LLC  
Senior Care Clinic House Calls  
Shameka Clark-Savage  
Small Business & Entrepreneurship Council  
Society for Participatory Medicine  
Soul Guided Healing & Wellness  
Souther Comfort Psych Services

Spectrum: The Other Clinic  
Spina Bifida Association  
Spindle Health  
Sunrise Mental Health  
Synchronous Mental Health  
Talkiatry  
TECHMEDO  
TeleMed2U  
The Speech and Language Center  
The Sturge-Weber Foundation  
Therapy Thursdays PLLC  
TheraTec, Inc  
Transcarent  
Treatment Communities of America  
TruPath Counseling LLC  
TSC Alliance  
University of Pittsburgh Medical Center (UPMC) Health System  
URAC  
Virginia Counseling Services  
Virginia Pediatric Group  
Virginia Therapeutic Network  
ViTel Net  
WeKonnnect, LLC.  
Welliti