

PROTECTING SENIORS' ACCESS TO TELEHEALTH

Telehealth provides a safe, convenient, affordable option for consumers to access care when and where they choose. During the COVID-19 crisis, telehealth enabled millions of Americans to receive critical care and manage chronic conditions while minimizing exposure to the deadly virus.

Unfortunately, CMS does not allow health plans to include the interactions between clinicians and patients conducted over the telephone to count toward risk adjustment in Medicare Advantage. Allowing MA plans to submit diagnoses from telehealth services for risk adjustment in 2020 and 2021, during the height of the pandemic, will ensure that health costs are adequately covered and captured for use in calculating the next year's benefit offerings and payment.

Audio-Only Telehealth is a Lifeline for Seniors

During the height of the pandemic, nearly half—43 percent—of Medicare primary care visits were conducted virtually. And providers rely on audio-only calls to deliver essential care coordination for high-risk patient populations, including individuals with multiple chronic conditions or low socioeconomic status. In fact, audio-only visits are often the only option for needed care, especially for seniors in rural, minority, impoverished and other underserved communities.

But CMS prohibits the use of audio-only telehealth visits in Medicare Advantage risk adjustment; only video calls are counted.

Unfortunately, seniors often lack access to broadband and the equipment necessary for video calls. About 40 percent of MA enrollees earn less than \$25,000 a year. Of those, 35% do not have access to broadband internet in their homes according to CMS data. And without action, future benefits, such as non-emergency medical transportation, food delivery, dental care and hearing aids could be at risk.

Congress can help ensure all telehealth encounters are included in Medicare Advantage risk-adjustment for 2020 and 2021.

Action Needed

To protect seniors' Medicare Advantage benefits, Congress should:

- **Support the Ensuring Parity in Medicare Advantage and PACE for Audio-Only Telehealth Act (S. 150/H.R. 2166).** This bipartisan, bicameral legislation would protect seniors' access to high-value care and critical supplemental benefits.
- **Urge CMS to allow diagnoses from MA audio-only telehealth encounters to be included in risk adjustment calculations for 2020 and 2021,** consistent with CMS' treatment of risk adjustment in the ACA Marketplaces. Alternatively, CMS could allow for a 24 month lookup to capture diagnosis for 2020 and 2021 for a defined set of diagnoses or diseases. CMS has the authority; no legislation is needed.

These important actions will increase access to high-quality care for tens of millions of seniors in rural and disadvantaged communities.

With MA bids due in June, the time to secure future benefits for seniors is NOW.



The Alliance of Community Health Plans (ACHP) represents the nation's top-performing non-profit health plans to improve affordability and outcomes in the health care system. ACHP member companies provide high-quality coverage and care to nearly 24 million Americans across 36 states and D.C.



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