



800 Maine Avenue, S.W.
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Washington, D.C. 20024

March 20, 2020

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Centers for Medicare and Medicaid Services (CMS)
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

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Dear Administrator Verma,

On behalf of the American Psychiatric Association (APA), the national medical specialty society representing 38,500 physicians specializing in psychiatry, we are writing to request that CMS waive the requirement for a video element specifically for telemedicine provided for mental health and substance use diagnoses when that option is not available. This action would ensure that beneficiaries would have access to necessary care without risk of exposure to the COVID-19 virus.

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We greatly appreciate the accommodations CMS has made during this nationwide medical crisis through the 1135 waivers that lifted restrictions on telemedicine, thereby enabling patients to receive the medical care they need through telemedicine without having to risk venturing out to have face-to-face interactions with their physicians.

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Unfortunately, it seems one more accommodation may be necessary if doctors are to be able to serve some of their more fragile patients. **Many of our members have been reporting that a high percentage of their Medicare patients do not have access to phones that permit a video component.** These are sometimes patients in more rural areas, and patients who are very old with serious health conditions that make them more vulnerable to COVID-19 beyond the mental health issues our members are treating them for. In this time when everyone is experiencing increased anxiety, it is especially important for all patients to be able to access the mental health treatment they depend on.

Administration

Saul Levin, M.D., M.P.A.
CEO and Medical Director

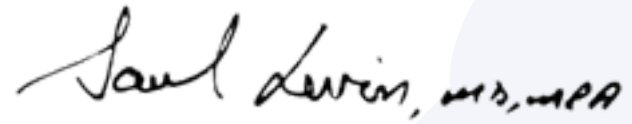
For this reason, we respectfully request that **CMS waive the requirement for a video element specifically for telemedicine provided for mental health and substance use diagnoses when that option is not available.** While we agree it is optimal to be able to see our patients when providing care, we do not think necessary care should be denied because that is not a possibility.

We understand CMS is doing everything it can to ensure Medicare patients continue to receive necessary medical care and ask that you make this accommodation so that patients will not be denied important psychiatric care because they fail to have the necessary technology available in their home.

Thank you for your consideration. If you have any questions or would like to

discuss this please contact Becky Yowell (byowell@psych.org) Director, Reimbursement Policy and Quality.

Sincerely,

A handwritten signature in black ink that reads "Saul Levin, M.D., M.P.A." in a cursive style.

Saul M. Levin, M.D., M.P.A., FRCP-E, FRCPsych
CEO and Medical Director