



May 11, 2022

The Honorable Xavier Becerra  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

**Re: COVID-19 Public Health Emergency Renewal**

Dear Secretary Becerra,

On behalf of our member medical group practices, the Medical Group Management Association (MGMA) urges you to renew the COVID-19 public health emergency (PHE) declaration for at least another 90 days.

With a membership of more than 60,000 medical practice administrators, executives, and leaders, MGMA represents more than 15,000 medical groups in which more than 350,000 physicians practice. These groups range from small private practices in rural areas to large regional and national health systems and cover the full spectrum of physician specialties and organizational forms – most of which have utilized the regulatory flexibilities afforded under the waivers in effect through the duration of the COVID-19 PHE.

Medical groups acted quickly in 2020 to pivot from in-person appointments to virtual ones, once the telehealth waivers went into effect. This involved significant investments in infrastructure as well as changes in workflows. We appreciate that Congress acted recently to provide a temporary fix regarding a handful of the Medicare telehealth waivers. However, the 151-day extension does not address telehealth payment parity, interstate licensure, or HIPAA compliant platforms. These are all flexibilities that still currently hinge of the PHE remaining in place. As workforce shortages<sup>1</sup> and inflation continue to strain medical groups, any disruptions to the flexibilities afforded by the PHE could further exacerbate an already precarious situation.

Further, if you intend not to renew the PHE, we are concerned that a 60-day notice before ending it is not enough time to sufficiently wind down flexibilities that have been in effect for over two years. Before the COVID-19 PHE ends, we encourage the Administration to carefully evaluate best practices for ending these waivers and solicit stakeholder input where necessary as to avoid unintended consequences that could affect access to care.

As the voice for the country's medical group practices, MGMA remains committed to promoting policies that enhance the ability of our members to provide high-quality, cost-effective care to the millions of patients they serve routinely, and to the emergency cases they are called upon to serve during this pandemic. We urge you to renew the COVID-19 PHE before it expires to ensure medical groups continue

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<sup>1</sup> MGMA [Stat](#), Feb. 2, 2022



to have access to the flexibilities necessary to ensure patient access and care. Should you have any questions, please contact Claire Ernst at [cernst@mgma.org](mailto:cernst@mgma.org) or 202-293-3450.

Sincerely,

/s/

Anders Gilberg

Senior Vice President, Government Affairs