



April 8, 2020

The Honorable Seema Verma
Administrator, Centers for Medicare and Medicaid Services
200 Independence Avenue, SW
Washington, DC 20201

Re: Urgent Request for Telehealth Allowance under Physician Fee Schedule Due to COVID-19

Dear Administrator Verma:

We write to follow up on our March request for telehealth waivers that, we believe, are even more pressing during this health pandemic. We thank you for the work CMS has done in this arena, as the ability to conduct telehealth visits for home dialysis patients is so important right now. We are hopeful that one additional time-sensitive waiver can also be secured.

We were pleased that, when President Trump signed the third emergency COVID-19 supplemental, the Secretary was authorized to provide relief from the home dialysis telemedicine requirement requiring a face-to-face MCP visit every three months¹. We now seek an additional waiver to better equip providers and patients to initiate and sustain home dialysis care while maintaining appropriate social distancing.

Waiver Request: *The Alliance for Home Dialysis requests that home dialysis training codes 90989 and 90993 be included on the list of services allowed via telehealth during the period deemed by the Secretary to be a “public health emergency” due to the COVID-19 pandemic. This change would allow physicians to initiate and conduct home dialysis training for patients from home, thereby protecting them from potential exposure, while the national emergency persists.*

Thank you for your consideration. If you need any more information, please feel free to reach out to Michelle Seger at michelle@homedialysisalliance.org or 202-733-7326. We can also make our clinicians and/or facility members available to you for consultation.

Sincerely,

Stephanie Silverman
Executive Director

¹ CARES Act of 2020, Pub. L. No. 116-136, page 138. See Section 3705.

Cc: Jean D. Moody-Williams, Acting Director, Center for Clinical Standards and Quality
Demetrios Kouzoukas, Principal Deputy Administrator and Director of the Center for Medicare