April 1, 2020

Commissioner David Altmaier
Florida Office of Insurance Regulation
200 E. Gaines Street
Tallahassee, FL 32399

Dear Commissioner Altmaier:

While you have yet to respond to our letter dated March 19, 2020, the federal government has continued to implement changes to the Medicare program to expand telehealth services. In order to protect patients and health care workers from the coronavirus, the Centers for Medicare and Medicaid Services on Monday issued new rules that will allow for more than 80 additional services to be provided via telehealth. In addition, health care providers will be able to evaluate Medicare patients who do not have access to interactive apps with audio and video capabilities, but who do have audio only phone access.

The new rules allow for emergency department visits, initial nursing facility and discharge visits, home visits, and therapy services. New as well as established patients now may stay at home and have a telehealth visit with their provider – not just a random provider assigned to them through a “teledoc” service established by their health insurance company.

Clinicians will be able to provide remote patient monitoring services to patients with acute and chronic conditions, and these remote services can be provided for patients with only one disease.

As noted by CMS, “these temporary changes will ensure that patients have access to physicians and other providers while remaining safely at home.”

We are asking you to provide the patients in Florida who have health insurance regulated by your department with the same protections the federal government has extended to Medicare patients. While some health insurers in Florida, notably Florida Blue, have extended significant telehealth benefits, there is major confusion regarding telehealth coverage among the numerous health insurers in Florida.

We are asking you to clear up this confusion by issuing an order requiring all health insurers in Florida to provide telehealth coverage consistent with the coverage afforded by CMS through the Medicare program.

The FMA is doing all we can to promote telehealth use by our physician members, and thus limit unnecessary face-to-face contact to the greatest extent possible. We ask your help in providing our members with the tools they need to do safely and economically.

Sincerely,
Ronald F. Giffler, MD
President, Florida Medical Association

cc: Honorable Ron DeSantis, Governor
    Honorable Jimmy Patronis, Chief Financial Officer
    Scott Rivkees, M.D., Surgeon General
    Ms. Mary Mayhew, Secretary, Agency for Healthcare Administration

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