April 9, 2020

The Honorable Kaye Ivey  
Governor, State of Alabama  
600 Dexter Avenue  
Montgomery, AL 36130

Stephanie M. Azar  
Commissioner  
Alabama Medicaid Agency  
501 Dexter Ave.  
P.O. Box 5624  
Montgomery, AL 36103-5624

RE: COVID-19 Financial Assistance for Medicaid primary care providers

Dear Governor Ivey and Commissioner Azar:

The Medical Association of the State of Alabama, the largest physician organization in the State, along with the Alabama Chapter of the American Academy of Pediatrics (AL-AAP) and the Alabama Academy of Family Physicians, applauds all that our State is doing during this time of unprecedented crisis so that our health care system can dynamically respond to the needs of patients. However, we write today to request specific relief for the physician community, specifically the independent community primary care practices, many of whom serve the pediatric population as they struggle to stay economically viable.

Not only are community-based primary care practices addressing COVID-19, they are doing their best to continue both sick and well care for children and adolescents including critical vaccination services that will prevent other outbreaks during this vulnerable time. While these practices have worked to quickly pivot to a mostly virtual visit platform with the institution of new payment models for telehealth and virtual visits, these new platforms do not relieve the very real financial challenges faced by these practices. An up-to-the-minute survey of Alabama pediatricians has shown an average loss in patient volume of at least 57 percent.

Independent primary care practices need to be open and have staff available to do vaccinations and provide other essential services through the duration of this crisis or our hospitals will truly be overwhelmed. Absent additional economic relief, these financial challenges are threatening their ability to continue to maintain their operations through this crisis.

To that end, the Medical Association, AL-AAP and AAFP are requesting that the State provide several forms of relief to Medicaid primary care providers:

- Financial assistance in the form of prospective payments to Alabama physicians through Medicaid similar to the relief provided by the federal government through Medicare. The Centers for Medicare & Medicaid Services (CMS) has expanded their Accelerated and Advance Payment Program to a broader group of Medicare providers for the duration of the public health emergency to help ensure that Medicare providers have the resources they need to maintain their focus on patient care (CMS fact sheet attached).

Continued
Unfortunately, many of Alabama’s primary care physicians, specifically the pediatric and adolescent medicine community, serve very few if any Medicare patients. Consequently, these practices will not receive any relief as a result of the federal action. These practices do, however, serve the majority of Alabama’s Medicaid population. For these reasons, we are requesting prospective payments to physicians serving the Medicaid population during this pandemic.

Other measures:

- Allow payment of well visits through telehealth (on par with Medicaid’s current telehealth emergency policy for 99211-3), knowing the exam will be performed at a later date. These include 99381-EP - 99385-EP Initial EPSDT periodic screening, 99391-EP - 99395-EP Subsequent EPSDT periodic screening.

- Allow payment of Level 4 (99214) and Level 5 (99215) office visits via telehealth

- Allow payment for well check-ups and E/M at the same time

- Relax the 14-visit limit with the understanding that many patients may have telehealth visits that exceed the allowance

- Allow Bright Futures screening codes to be paid via telehealth on par with face-to-face visits

- Allow primary care providers flexibility and creativity when determining how to deliver vaccines in a timely manner

- Allow coverage of CPT codes for nurse phone care and case management services provided by office staff (covered by other state Medicaid programs), provided this doesn’t count toward 14-visit limit.

Our organizations welcome the opportunity to work with the State on the details of the requested relief and are available to provide further information on the challenges currently faced by Alabama’s community-based physicians as they work to address COVID-19 while maintaining access to other important health care services.

Sincerely,

Colleen Donahue, DO
President
Alabama Academy of Family Physicians

Wes Stubblefield, MD, MPH, FAAP
President
Alabama Chapter of the American Academy of Pediatrics

John Meigs, MD, FAAFP
President
Medical Association of the State of Alabama