



Federation of
Naturopathic Medicine
Regulatory Authorities

March 24, 2020

TO:

The Honorable Nancy Pelosi; The Honorable Mitch McConnell;
The Honorable Ron Wyden; The Honorable Jeff Merkley

**RE: Expand Access to Vital Telehealth Services in COVID-19
Supplemental Appropriation**

The mission of the Federation of Naturopathic Medicine Regulatory Authorities (FNMRA) is to protect the public by facilitating communication between naturopathic regulatory authorities, and by promoting standards of excellence in the regulation of naturopathic medicine. The members of the FNMRA are the state naturopathic licensing boards and committees.

The FNMRA appreciates the recent reforms that Medicare has already made for telehealth services (*Coronavirus Preparedness and Response Supplemental Appropriations Act*), but we believe that additional reforms are still needed. The country's naturopathic doctors (NDs) are still limited by the current telehealth reforms. To meet the demands of Americans during this COVID-19 pandemic, the **Federation is asking that additional changes be made to include NDs in the telehealth services supplemental appropriation. This change will enable NDs (who are primary care providers) to better serve Americans during this crisis.**

We ask for your support to expand access to vital telehealth services in the COVID-19 supplemental appropriation, and we urge you to include a provision that would provide the Secretary of Health and Human Services (HHS) the authority to waive existing Medicare restrictions on telehealth visits during a public health emergency.

Specifically, the FNMRA urges Congress to:

- Provide the Administration with as many tools as possible, including the ability to waive Medicare restrictions on telehealth, which will give healthcare professionals the support they need to effectively meet the urgent health needs of their communities. The telehealth restrictions currently in place for Medicare run the risk of slowing access to care for seniors in this critical time.
- Legislate to provide consistency of access to telehealth, as well as meaningful reimbursement mechanisms and values, across the insurance industry. Currently telehealth availability and reimbursement are inconsistent and unusable by many consumers and providers.
- Remove restrictions on the practice of telehealth across state lines, removing the requirement that telehealth services be tied to the provider location and licensure rather than to the location of the patient.

To facilitate access to this already available licensed workforce, we ask that naturopathic doctors be empowered to access telehealth, and that effective and sufficient reimbursements be implemented. To fast track access, we ask that a directive be given to the National Association of Insurance Commissioners to implement [U.S. Code Sec. 2706](#).

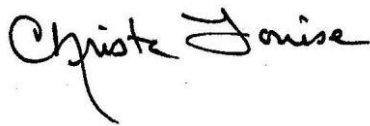
To address the barriers to telemedicine, we urge you to consider Sec. 9 of the [CONNECT for Health Act of 2019 \(S.2741/H.R. 4932\)](#) in the upcoming COVID-19 supplemental legislation. This section would empower the Secretary of Health and Human Services to waive telehealth restrictions for Medicare beneficiaries during national emergencies. This provision would give the naturopathic doctors the support they need to fully address this public health emergency and ensure that the government is leveraging all available resources to provide safe and efficient care to Americans in need. When mainstream clinics become overwhelmed, naturopathic doctors, as primary care providers, can support the medical system by triaging the most critically ill as well as supporting the dissemination of public health messaging and encouraging the public to act collectively to decrease spread of the virus.

Additionally, we ask Congress **to establish a Commission on the National Integrative Healthcare Workforce** that will provide advice to both Congress and the Administration. As a new era of insurance coverage, care delivery, and payment reforms unfold, a commission is needed to recommend policies that would help the nation achieve increased access to high-quality care and better preparation, configuration, and distribution of the nation's health workforce. In a climate where fiscal policy is dominated by spending on healthcare, the commission can also stimulate innovations aimed at reducing the cost of healthcare and achieving greater value and transparency.

Thank you for the opportunity to share our concerns. We hope this letter, and any future dialogue between the Federation of Naturopathic Medicine Regulatory Authorities and Congressional leaders, will contribute to the health all Americans.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Christa Louise". The signature is written in a cursive, flowing style.

Christa Louise
Executive Director of Federation of Naturopathic Medicine Regulatory Authorities