

August 11, 2020

Seema Verma  
Administrator  
U.S. Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

**RE: CMS Should Make Virtual Supervision Flexibility Permanent**

Dear Administrator Verma:

On behalf of the undersigned health systems and professional organizations, we request that the Centers for Medicare & Medicaid Services (CMS) make permanent the current temporary regulatory flexibility allowing physicians to provide direct supervision of clinical staff virtually, using real-time audio/video technology.

During the COVID-19 public health emergency, in order to accommodate provision of telehealth services, CMS has relaxed its rule requiring physicians to provide “direct supervision” of auxiliary personnel. Pursuant to the temporary regulatory flexibility, physicians may provide “virtual supervision” of auxiliary personnel. Physicians should be empowered to supervise clinical staff virtually, at their discretion, regardless of whether there is a declared public health emergency.

By allowing physicians and auxiliary personnel to provide services from two separate locations, this flexibility supports the expansion of telehealth services and protects frontline workers by allowing appropriate social distancing.

The rapid shift to telehealth services during COVID-19 has illustrated the value of telehealth long-term, particularly for patients with mobility issues and those in rural and/or medically underserved areas. Therefore, we ask that CMS permanently allow direct supervision to be provided virtually in order to meet the growing demand for telehealth services, which will likely extend beyond the COVID-19 pandemic.

Thank you for your consideration. Please let me know if we can provide any additional information.

Sincerely,

ASHP (American Society of Health-System Pharmacists)  
American Academy of Family Physicians  
American Academy of Neurology  
American Association of Neurological Surgeons  
American College of Emergency Physicians  
American College of Physicians  
Association of Community Cancer Centers  
Association of Diabetes Care & Education Specialists

College of Neurological Surgeons  
Society of Interventional Radiology  
Advocate Aurora Health (Illinois and Wisconsin)  
Alps Pharmacy (Missouri)  
Arizona Pharmacy Association  
Arnold and Marie Schwartz College of Pharmacy (New York)  
Ascension (Missouri)  
Auburn University Harrison School of Pharmacy (Alabama)

Avera Health (South Dakota)  
Bronson Healthcare Group (Michigan)  
California Society of Health-System Pharmacists  
Centura Health (Colorado and Kansas)  
Colegio de Farmaceuticos of P.R. (Puerto Rico)  
Colorado Pharmacists Society  
Community Hospitals and Wellness Centers (Ohio)  
Cone Health (North Carolina)  
Connecticut Society of Health-System Pharmacy  
Desert Pharmacy (California)  
Florida Society of Health-System Pharmacy  
Georgia Society of Health-System Pharmacists  
Hawaii Pacific Health  
Hawaii Pharmacists' Association  
HonorHealth (Arizona)  
Howard University College of Pharmacy  
(Washington, DC)  
Idaho Society of Health-System Pharmacists  
Illinois Council of Health-System Pharmacists  
Indiana Society of Health-System Pharmacists  
Indiana University Health  
Inova Health System (Virginia)  
Intermountain Healthcare (Utah)  
Iowa Pharmacy Association  
The Johns Hopkins Health System (Maryland)  
Kansas Council of Health-System Pharmacy  
Kentucky Society of Health-Systems Pharmacists  
LifePoint Health (Tennessee)  
Long Island University Student Society of Health-  
System Pharmacists (New York)  
Louisiana Society of Health-System Pharmacists  
Madison Medical Center (Missouri)  
Maryland Society of Health-System Pharmacy  
Massachusetts Society of Health-System  
Pharmacists  
Memorial Hospital at Gulfport (Mississippi)  
Methodist Health System (Texas)  
Michigan Pharmacists Association  
Michigan Society of Health-System Pharmacists  
Minnesota Society of Health-System Pharmacists  
Missouri Society of Health-System Pharmacists  
Montana Pharmacy Association  
Mount Sinai Health System (New York)  
MUSC Health (South Carolina)

Nevada Society of Health-System Pharmacists  
New Hampshire Society of Health-System  
Pharmacists  
New Jersey Society of Health-System Pharmacists  
New Mexico Society of Health-System Pharmacists  
New York Presbyterian Hospital (New York)  
North Dakota Society of Health-System  
Pharmacists  
Ohio Society of Health-System Pharmacists  
OhioHealth  
Oregon Society of Health-System Pharmacists  
OSF Healthcare (Illinois)  
Pennsylvania Society of Health-System  
Pharmacists  
Pharmacy Society of Wisconsin  
Pioneers Memorial Healthcare District (California)  
Providence St. Joseph Health  
Purdue University Student Society of Health-  
System Pharmacists (Indiana)  
Rhode Island Society of Health-System  
Pharmacists  
Saint Luke's Health System (Kansas and Missouri)  
Sanford Health (South Dakota)  
South Dakota Society of Health-System  
Pharmacists  
Tampa General Medical Group (Florida)  
Tennessee Society of Health-System Pharmacists  
Texas Society of Health-System Pharmacists  
University of Maryland School of Pharmacy and  
the UMB eHealth Center  
University of North Carolina Eshelman School of  
Pharmacy Asheville Campus  
University of North Carolina Hospital  
University of Virginia Health System  
Utah Society of Health-System Pharmacists  
UW Health (Wisconsin)  
UW Medicine (Washington)  
Virginia Mason Medical Center (Washington)  
Virginia Society of Health-System Pharmacists  
Washington State Pharmacy Association  
Welia Health (Minnesota)  
Wyoming County Community Health System (New  
York)  
Yale New Haven Health (Connecticut)