



July 9, 2020

The Honorable Steve Sisolak  
Governor of Nevada  
State Capitol Building  
101 N. Carson Street  
Carson City, NV 89701

Dear Governor Sisolak,

The Nevada Primary Care Association is comprised of the state's Federally Qualified Health Centers (FQHCs). Nevada's FQHCs have been contributing to the response to COVID-19, with 88 percent offering testing. We have also gone to great lengths to modify our operations to keep patients and staff safe in pandemic conditions. Guidance to avoid unnecessary medical visits took a toll, with visit volumes falling to 41 percent of normal in early April. Health centers responded by quickly adopting telehealth technology, allowing us to reach patients in their homes on their own devices. By early May, 64 percent of visits were delivered virtually. This number has fallen as the state has opened back up and guidance has changed, but 37 percent of patients were still receiving care via telehealth by mid-June.

Congress included a provision in the CARES Act to allow telehealth services to be delivered over the phone without video and for providers to be reimbursed for these services by Medicare and Medicaid. This has allowed FQHCs to maintain care of our existing patients and to bring on additional patients whose providers may not have had the capacity to implement telehealth.

We are concerned that health centers are in danger of losing this benefit, which expires with the end of the Public Health Emergency currently declared through July 25, 2020. We respectfully ask that you direct your Division of Health Care Financing and Policy to seek a waiver to allow FQHCs to continue to be reimbursed for audio-only telehealth after the emergency declaration expires.

Health centers delivered care to nearly 100,000 residents in 2018, including more than 44,000 Medicaid beneficiaries. We serve the most vulnerable Nevadans, with 96 percent living under 200 percent of the Federal Poverty Level and 69 percent racial or ethnic minorities. Some sites serve as the only source of care in towns like West Wendover, Jackpot, and Austin. We also served 7,400 homeless Nevadans in 2018.

Health centers have found that not every Nevadan has the resources available to receive video telehealth. They may not have a smartphone, tablet, or computer. They may not be able to afford broadband data plans for these devices. In rural areas, broadband may not be available at all. Many simply lack the experience with technology necessary to connect to services.

The emergency provision allowing audio-only telehealth has been critical to sustaining care for our patients. In one major FQHC, 95 percent of telehealth visits were audio-only in recent weeks, accounting for two thirds of total visits. These visits represent care that patients could not have received otherwise, or which would have been delivered at increased risk to the patient and higher costs to the providers. In-person visits still require additional screening protocols, physical separation of patients, and staff PPE.

We believe that audio-only telehealth has been a benefit to Nevadans during this emergency. This service also has great potential to expand the ability of FQHCs to deliver high quality care, improve health outcomes, and reduce disparities into the future. Nevada's FQHCs remain committed to doing everything we can for our patients during this unprecedented time. We thank you for your continued leadership and consideration of this request.

Sincerely,



Nancy J. Bowen  
Executive Director  
Nevada Primary Care Association



Sharon Chamberlain  
Chief Executive Officer,  
Northern Nevada HOPES  
Board President, Nevada Primary Care Association



Walter B. Davis  
Chief Executive Officer  
Nevada Health Centers



Oscar Delgado  
Chief Executive Officer  
Community Health Alliance



Steve Flores  
Chief Executive Officer  
Hope Christian Health Center



Christopher J. Hansen  
Chief Executive Officer  
Canyonlands Health Center



Ryan Linden  
Chief Executive Officer  
Silver State Health Services



Roxana Valetton  
Chief Executive Officer  
First Person Care Clinic

Cc: Richard Whitley, Director, Department of Health and Human Services,  
Suzanne Bierman, Administrator, Division of Health Care Financing and Policy