



# Overcoming the Challenges of Reimbursement Policy: Federal/State Regulation in the New Telehealth Era

# A (Very) Brief Introduction to Public Payers

- ❖ What is AHCCCS?
- ❖ What is CMS?
- ❖ What do they do?

# Challenges Pre-PHE and Generally

- ❖ Payer agency not always free to choose
  - Legal authority and limitations
  - Process of obtaining authority
- ❖ Government slow to adopt change
  - Medical efficacy
  - Operational complexity
- ❖ Budgets/Fiscal Impact Considerations
  - Spending authority and limitations
  - Zero-sum budgets

# Challenges During PHE Response

- ❖ Rapid policy change rapidly implemented
  - Complex array of legal authorities
  - Limited opportunity for provider input
  - Billing rules for future accounting
- ❖ Provider expectation vs agency action
  - Reimbursement decisions default vs analysis
  - Payment system implementation
  - Responding to provider input

# Challenges Going Forward

- ❖ Have events proved need or desire for permanent change?
  - Agency priorities and responsibilities
  - Provider priorities and experience
  - Bringing the two perspectives together
- ❖ Legal authority after PHE declaration ends
  - Payer agency not always free to choose
  - Money always has last word