

January 20, 2026
The Honorable Dr. Mehmet Oz
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

Dear Administrator Oz,

On behalf of the undersigned organizations, we would like to thank the Centers for Medicare & Medicaid Services (CMS) for permanently allowing Medicare-enrolled practitioners to report and bill using their enrolled physical practice location, even when offering telehealth services from another location such as their home. We request that CMS consider location reporting flexibilities for fully virtual practitioners and the agency work with stakeholders on future policy to support the remote healthcare workforce.

We are grateful for the [subregulatory guidance](#) confirming that provider location reporting for telehealth providers will not change in the years to come, thus ensuring patient access to care and reduced administrative burden for both providers and CMS. We believe that there is room to build on this movement by creating a path for providers without a physical practice location.

As providers, we are encouraged by CMS' vision of empowering clinicians to provide the care their patients need how, when, and where they need it. CMS' goals of [continued](#) digital health innovation allows clinicians to do so, but the home reporting requirement for virtual-only providers contradicts the agency's mission.

We request CMS leadership in ensuring that telehealth practitioners working from a home-based location do not need to report their private residence to the federal government for purposes of enrollment or billing. Rather, we believe that CMS should work with stakeholders to develop an alternate method of determining location for the purposes of payment that does not require the reporting of a home address. One potential option would be to allow a business address to be reported for purposes of enrollment, and a geographic indicator such as a zip code be reported for payment adjustment by geographic cost and wage index. We respectfully request that CMS, as part of its policymaking in this area, convene a roundtable or a similar effort ensure the experiences of virtual-only practitioners are considered.

Additionally, we request that CMS work with the Drug Enforcement Administration (DEA) to encourage a complementary solution for medical practitioners who report a practice location while prescribing a controlled substance. The DEA also requires a physical billing location for some telehealth visits; greater alignment across these program requirements would reduce administrative burden.

We greatly appreciate CMS's partnership in advancing policies that expand access, reduce burden, and modernize care delivery. We urge the agency to build on that progress by maintaining provider location flexibilities for virtual-only providers and ensuring that administrative processes do not inadvertently limit patient access to telehealth.

Thank you for your continued leadership and consideration of this important issue.

Sincerely,

AdventHealth
Adventist Health
Alliance for Connected Care

Adventist Health Policy Association (AHPA)
AGMP Telehealth
Alliance for Headache Disorders Advocacy
Alliance Mental Health
Alliance to Fight for Health Care
American Academy of Neurology
American Academy of Physical Medicine and Rehabilitation (AAPM&R)
American Academy of Sleep Medicine
American Association of Nurse Practitioners
American Association of Psychiatric Pharmacists
American College of Medical Genetics and Genomics
American Epilepsy Society
American Gastroenterological Association
American Health Care Association
American Nurses Association
American Occupational Therapy Association
American Psychiatric Association
American Telemedicine Association
American Urological Association (AUA)
Amwell
Anderson Mental Health LLC
Access TeleCare
Advanced Care Basic, LLC
Anderson Mental Health Services LLC
A New Perspective Counseling Services LLC
ATA Action
Avel eCare
BBennettMD Virtual Healthcare
Behavioral Health Strategy
Bird on a Wire, LLC
Brownlee Health PLLC
Center to Advance Palliative Care
Chesapeake Psychological Associates
Child Neurology Foundation
CirrusMD
Clay Pot Counseling, Inc.
Coalition for Headache and Migraine Patients (CHAMP)
Coalition to Cure CHD2
Compassion & Choices
Connected Health Initiative
Connected Home Living, Inc.
Corstrata, Inc.
Creating Compassion LLC
Curai, Inc.
CurePSP
Current Mind Care, LLC
Deerbrook Counseling Services
Different MHP, PC

Dogtown Media LLC
DreamCloud Psychiatry
Dup15q Alliance
Emplify Health
Encounter Telehealth
Epilepsy Alliance America
Essentia Health
Etica ID (Infectious Disease)
Facial Pain Association
FamilieSCN2A Foundation
Forbes Wellness, LLC
FORCE: Facing Our Risk of Cancer Empowered
Geste Health
GO2 for Lung Cancer
Gordon Therapy Services LLC
Harmony & Unity Mental Health
Hazel Health
Healing Moments, LLC
Healthcare Information and Management Systems Society
Healthcare Leadership Council
HealthTexting, Inc.
Heartbeat Health
Holland and Associates Counseling, PLLC
Howerton Counseling, LLC
IMPOWER
In-Tuitt Behavioral Health Services
Integrated Telehealth Partners
Intentional Practice Counseling & Wellness
Johns Hopkins University and Medicine
KeyCare
KMA Services LLC
KMG Medical Group | Remedy Meds
Language S T R I D E S LLC
Laurel Health Advisors, LLC
Layh & Associates, Inc.
LifeMD, Inc.
Lifepoint Health
LifeStance Health Group, Inc.
LMA Mental Health Services
Mae Mental Wellness LLC
Maine Primary Care Association
Massachusetts Health Data Consortium
MedWand Solutions, Inc.
Michigan Medicine
Motivate And Elevate Counseling LLC
National Association of Pediatric Nurse Practitioners
National Association of Social Workers
National Center for Assisted Living

National Headache Foundation
National League for Nursing
Network of Jewish Human Service Agencies
New Jersey Association of Mental Health and Addiction Agencies, Inc.
NIM LONGEVITY
Obesity Medicine Association
Orion Behavioral Health Network
Oshi Health
Ovum Health
PAN Foundation
Parrish Healthcare
Partnership to Advance Virtual Care (PAVC)
Peace of Mind Inc
PMPITeleMed
Policy Center for Maternal Mental Health
Premier Inc.
PROVAIL
Psychiatric Medical Care
Psychiatric Medical Practitioners, Inc
Re-architect Health LLC
Recora
Resolve Psychiatric Services
Rewild PLLC
Ritual Wellness ATX
Robotic Critical Care Services
Rockfish Gap Mental Health PLLC
Sacred Space Psychiatry
Satori Mental Health LLC
Shadow Mountain Mental Health
Shock Therapy Group, LLC
Social Innovation Ventures
Spectrum Psychological Services
SSM Health
Stanford Health Care
Sunrise Mental Health
Survivor Healthcare
Talkiatry
TapestryHealth
Teledentistry.com
Telehealth Advisory Group, LLC
Telehealth.org
TeleHealthcare Network LLC
TeleMed2U
The Taylor-Austin Group, LLC
THEMINDFULLCUP, LLC
Therapy Thursdays PLLC
Tidemark Therapy PLLC
Transcendental Wellness, PLLC

Transformative Healthcare
UnityPoint Health
URAC
VIRTUMEDEX LLC
ViTel Net
Williamsburg Endocrinology, Inc