



601 13th St. NW, Suite 430N
Washington, DC 20005
thepcc.org

November 16, 2021

The Honorable Brad Schneider
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Brad Wenstrup
U.S. House of Representatives
Washington, D.C. 20515

Dear Representatives Schneider and Wenstrup:

The Primary Care Collaborative (PCC), a multi-stakeholder coalition of 60+ organizational members ranging from clinicians and patient advocates to employer groups and health plans, is pleased to support H.R. 5541, the Primary and Virtual Care Affordability Act of 2021. Given the ongoing uncertainty and risk associated with COVID-19 and the underlying health challenges American communities continue to confront, this legislation is an essential and important step toward removing cost barriers to high-value primary care.

PCC's members share a commitment to a high value health care system with primary care at its base: care that emphasizes comprehensiveness, longitudinal relationships, and "upstream" determinants for better patient experience and better health outcomes. (See the [Shared Principles of Primary Care](#).) Primary care is foundational for population health and more equitable, thriving communities.^{1,2,3} No patient should have to worry about delaying or foregoing primary or preventive care due to cost or affordability concerns.

According to the 2021 Kaiser Family Foundation Employer Health Benefits Survey of private and non-federal employers, approximately 28% depended on a High-Deductible Health Plan with a savings options such as a Health Savings Account (HSA/HDHPs). With the growing share of coverage from high deductible plans, financial factors can act as a barrier to accessing primary care, especially for individuals with high deductible plans that are not accompanied with a health savings account.⁴ According to the Centers for Disease Control and Prevention

¹ Starfield, B., Shi, L., & Macinko, J. (2005). Contribution of primary care to health systems and health. *The Milbank quarterly*, 83(3), 457–502. <https://doi.org/10.1111/j.1468-0009.2005.00409.x>

² Gotler, R.S., Green, L.A., Etz, R. (2020) What 1966 Can Teach Us About the Future of Primary Care: The Case for Communities of Solution. *Milbank Quarterly* Opinion. <https://doi.org/10.1599/mqop.2020.0610>

³ Shi L. (2012). The impact of primary care: a focused review. *Scientifica*, 2012, 432892. <https://doi.org/10.6064/2012/432892>

⁴ Jetty A, Petterson S, Rabin DL, Liaw W. Privately insured adults in HDHP with higher deductibles reduce rates of primary care and preventive services. *Transl Behav Med*. 2018;8(3):375-385. doi:10.1093/tbm/ibx076

(CDC), in 2017 nearly a quarter of individuals with employer sponsored insurance were enrolled in high deductible plans without a health savings account.⁵ Additionally, over 50 percent of individuals with an HSA live in zip codes where the median income is below \$75,000 annually.⁶ Yet HSA/HDHPs are barred from covering many primary care services until a patient meets their full deductible, and patients may not even be aware of the services that are covered pre-deductible.⁷

Your legislation would improve access to primary care by giving employers and health plan sponsors the flexibility to waive cost-sharing for primary care and extend the existing, pandemic-related waiver flexibility for telehealth services through 2023. Health plans and employers have embraced previous opportunities to expand coverage for high value care, pre-deductible. After the IRS issued new guidance on what chronic care management services may be covered pre-deductible, 29% of employers with over 200 employees and almost half of employers with over 5,000 employees chose to expand pre-deductible coverage, and those changes did not result in significant premium increases.⁸ The CARES Act of 2020 temporarily permitted HSA/HDHPs to cover telehealth services pre-deductible, increasing the reach of virtual primary care and behavioral health options during the COVID-19 pandemic. However, this CARES Act provision will expire December 31, 2021.

The Primary and Virtual Care Affordability Act ensures that patients can access primary care—both in-person and virtually—as the US continues to combat the long-term effects of COVID-19 and confront other pressing health challenges. PCC looks forward to working with you to enact this important and urgently needed legislation this year. Please contact PCC’s Director of Policy, Larry McNeely (lmcneely@thepcc.org) with any questions.

Sincerely,



Ann Greiner
President & CEO
Primary Care Collaborative

⁵ Cohen RA, Zammitti EP. High-deductible health plan enrollment among adults aged 18–64 with employment-based insurance coverage. NCHS Data Brief, no 317. Hyattsville, MD: National Center for Health Statistics. 2018.

⁶ Unpublished Employee Benefits Research Institute estimates

⁷ Reed, M. E., Graetz, I., Fung, V., Newhouse, J. P., & Hsu, J. (2012). In consumer-directed health plans, a majority of patients were unaware of free or low-cost preventive care. *Health affairs (Project Hope)*, 31(12), 2641–2648. <https://doi.org/10.1377/hlthaff.2012.0059>

⁸ <https://files.kff.org/attachment/Report-Employer-Health-Benefits-2020-Annual-Survey.pdf>

PCC Executive Members

Below is a list of the Primary Care Collaborative's executive members that pay dues to the organization and support its mission. Membership does not indicate explicit endorsement of this letter.

AARP
Accreditation Association for Ambulatory Health Care (AAAHC)
Alzheimer's Association
American Academy of Child and Adolescent Psychiatry (AACAP)
American Academy of Family Physicians (AAFP)
American Academy of Pediatrics (AAP)
American Academy of PAs (AAPA)
American Association of Nurse Practitioners (AANP)
American Board of Family Medicine Foundation (ABFM Foundation)
American Board of Internal Medicine Foundation (ABIM Foundation)
American Cancer Society
American College of Clinical Pharmacy (ACCP)
American College of Lifestyle Medicine (ACLM)
American College of Osteopathic Family Physicians (ACOFP)
American College of Osteopathic Internists (ACOI)
American College of Physicians (ACP)
American Psychiatric Association Foundation
American Psychological Association
America's Agenda
Anthem
Array Behavioral Care
Ascension Medical Group
Black Women's Health Imperative (BWHI)
Blue Cross Blue Shield Michigan
CareFirst BlueCross BlueShield
Catalyst Health Network
Community Care of North Carolina
CVS Health
Doctor on Demand
Geisinger Health
Harvard Medical School Center for Primary Care
HealthTeamWorks
Humana, Inc.
IBM
Innovaccer
Institute for Patient and Family-Centered Care (IPFCC)
Johns Hopkins Community Physicians, Inc.
Johnson & Johnson

Mathematica Policy Research
MedNetOne Health Solutions
Mental Health America
Merck & Co.
Morehouse School of Medicine - National Center for Primary Care
National Alliance of Healthcare Purchaser Coalitions
National Association of ACOs (NAACOS)
National Coalition on Health Care
National Interprofessional Initiative on Oral Health (NIIOH)
National PACE Association
National Partnership for Women and Families
NCQA
One Medical
Purchaser Business Group on Health (PBGH)
PCC EHR Solutions
Pediatric Innovation Center
Primary Care Development Corporation (PCDC)
Society of General Internal Medicine (SGIM)
Society of Teachers of Family Medicine (STFM)
St. Louis Area Business Health Coalition
Takeda Pharmaceuticals U.S.A.
UPMC Health Plan
URAC
