



September 10, 2018

**Via Electronic Submission to www.regulations.gov
(Docket No. CMS-1693-P)**

Seema Verma
Administrator
Center for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Re: Modernizing Medicare Payment by Recognizing Communication Technology-Based Services

Administrator Verma,

The Medical Alley Association appreciates the opportunity to comment on proposed changes to the Medicare Program, including proposed revisions to payment policies under the physician pay schedule.

The Medical Alley Association is the only healthcare association in Minnesota with members from across the healthcare spectrum. Our members include medical device manufacturers, payors, providers, pharmaceutical manufacturers, diagnostics, and digital health companies. We are the collective voice and expertise of Medical Alley, and we deliver the influence, intelligence, and interactions that support Medical Alley's global leadership.

Healthcare delivery is rapidly changing and updating physician payments to fit these new care models is important and necessary. For that reason, we are glad to see CMS proposing to reform Medicare to allow for telehealth reimbursement in certain situations. This will make it easier for Medicare patients in remote and rural areas to receive the high-quality care they need, while minimizing the time, travel, and out-of-pocket expenses that come along with long trips to their physician.

Technology continues to develop and CMS ought to make it as easy as possible for physicians to provide the best, more convenient, care to patients without waiting for the federal government to catch up. Additionally, new regulations in this area should be future proof: Rather than naming or defining specific type of communication technology used for physician's services, any regulations should leave as much room as possible for technology to develop, while still preserving program integrity. This includes updates to 'store-and-forward' techniques. The most accurate and effective way to transmit pre-recorded patient information will continue to change, and new regulations need to be written recognizing this reality.

Physician reimbursement should reflect the reality of telehealth use. Video conferences still tie up the physician for a similar amount of time as an in-patient visit. All documentation requirements is still the same as a face-to-face visit. Further, physicians using telehealth have to commit to putting in the necessary resources on the front end and also maintaining all the requisite infrastructure. Ultimately, patients benefit from being able to utilize telehealth for certain physician services, and regulations should be written to increase and encourage its proper use.

Reimbursement for telehealth services should be confined to existing physician/patient relationships. This ensures the standard of care is being met and patient safety is being protected. It will also help protect patient data under HIPAA.

Thank you again for the opportunity to comment on these proposed changes. We look forward to continuing to work with CMS on additional changes in the future.

Sincerely,

A handwritten signature in blue ink, appearing to read "Shaye Mandle". The signature is fluid and cursive, with the first name "Shaye" being more prominent.

Shaye Mandle
President & CEO
Medical Alley Association