



June 4, 2020

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

Re: Making Permanent Changes Made to Telehealth and Digital Healthcare Policy and Reimbursement in Response to the COVID-19 Pandemic

Administrator Verma,

Thank you for your leadership during these challenging times. This pandemic has profoundly changed many aspects of life for the foreseeable future, perhaps none more than the delivery of healthcare services. The quick action taken by CMS on temporary waivers allowed for increased access to healthcare through the use of telehealth and digital health tools, which helped reduce the additional spread of the novel coronavirus. Further, the aligned financial incentives provided by these temporary waivers has accelerated adoption of these tools by physicians and patients paving the way for continued innovation in remote care.

We were pleased to see your comments last week regarding making some of these temporary telehealth waivers CMS has provided in response to the COVID-19 pandemic permanent. Medical Alley has long been a center of innovation in healthcare technology and care, and has also become a growing, thriving hub of the telehealth and digital healthcare industries. The vibrant and healthy ecosystem present here provides a unique opportunity for this region to once again lead the way in the transformation of healthcare.

CMS should prioritize permanent waivers that provide the most potential for continued growth and success, as well as those that enable the most flexibility in the continued delivery of care plans to patients. Waivers focused on allowing people to receive healthcare services in their home regardless of where they live, be remotely monitored as part of an acute or chronic care plan, participate in physical or speech therapy from their home, or access mental health services when they need them most, are just a few examples that can be made permanent to achieve these goals.

We also encourage CMS to consider additional waivers or modifications, with appropriate safeguards in place, to allow for flexibility in the use of digital health tools and to incentivize innovation in health technology. This would empower physicians and patients to contemplate all safe and approved options as part of a care plan, rather than having a limited menu from which to choose.

Even with these changes, challenges remain in solidifying the gains made by telehealth and digital health solutions thanks to your temporary waivers. There needs to be robust opportunity to validate proper use of these tools and to weed out and prevent waste and fraud. Efforts will be needed to help assure patients that care they receive remotely is just as effective as in-person care. These and other barriers are not insignificant, but with cooperation between government, patient groups, and the healthcare industry, rapid progress can be made.

Early in 2019, the Medical Alley Association launched the Healthcare Transformation Initiative at Medical Alley (HTI-MA). Spearheaded by our board of directors, this effort was designed to use the collective expertise and experience present throughout Medical Alley to devise, pilot, and test meaningful improvements to healthcare. As these were taking shape, the COVID-19 pandemic galvanized the need to transform healthcare like nothing before and accentuated the importance of industry leadership in translating temporary gains into long-term benefits for patients who are able to use telehealth and digital health tools.

Medical Alley Association remains committed to leading the transformation of healthcare and welcomes the opportunity to partner with CMS in this effort.

Thank you.

Sincerely,



Bobby Patrick
Vice President, Strategic Growth and Policy
Medical Alley Association