



ALLIANCE *for*
CONNECTED CARE

June 9, 2014

The Honorable Sylvia Burwell
Secretary
U.S. Department of Health & Human Services
Hubert H. Humphrey Building
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Secretary Burwell:

Congratulations on your confirmation as Secretary of Health and Human Services. We are writing to respectfully request that the forthcoming Medicare Shared Savings Program Notice of Proposed Rulemaking (“NPRM”) explore the coverage and reimbursement of telehealth services for accountable care organizations (“ACOs”). The Medicare fee-for-service limitations placed on telehealth services are precluding ACOs from using telehealth technologies to improve patient outcomes and generate greater cost savings for the Medicare program. We request that you include a request for comment on telehealth and ACOs in the Medicare Shared Savings Program NPRM.

The Alliance for Connected Care (the “Alliance”) is a 501(c)(6) organization formed to create a statutory and regulatory environment in which every provider in America is permitted to deliver safe, high-quality care to patients using telehealth or “Connected Care,” regardless of care delivery location or technological modality. Our members are leading health care companies from across the health care spectrum, representing insurers, retail pharmacies, technology companies, telecommunications companies, and health care entrepreneurs. The Alliance works in partnership with an Advisory Board that includes over 20 patient and provider groups, including the Parkinson’s Action Network, the American Heart Association, and the American Academy of Family Physicians.

Given the promise of telehealth technologies in improving health care access and quality, as well as reducing costs for the Medicare program, the Alliance and the Advisory Board seek that the current barriers to the provision of telehealth services be removed for new care delivery models, such as ACOs. As you know, the Medicare program covers and reimburses for a limited number of Medicare Part B services furnished through particular telecommunications systems to only those beneficiaries able to reach an “originating site” located in a rural Health Professional Shortage area or a county outside of a Metropolitan Statistical Area (“MSA”).¹ As a result,

¹ See 42 USC § 1395m(m).

underserved Medicare beneficiaries living outside of rural areas have limited access to providers and are unable to benefit from telehealth services.

For ACOs, the existing statutory and regulatory frameworks hinders their ability to better manage care and treat their beneficiary population in less costly care settings. These barriers are also counter to the Medicare Shared Savings Program's goal of ACOs having the ability to coordinate care using telehealth, remote patient monitoring, and other such enabling technologies.² The Medicare Shared Savings Program intended to give ACOs the tools needed to best furnish care for their beneficiaries and providers, including telehealth.

As the Centers for Medicare & Medicaid Services ("CMS") looks to implement the next round of the Medicare Shared Savings Program, we strongly urge you to use the authority under Section 1899(f) of the Social Security Act to waive the restrictions on the coverage and reimbursement of telehealth services for ACOs to enable the success of these new models of care delivery. At the very least, we request that you include a request for comment on this issue in the upcoming NPRM to ensure that beneficiaries and the ACO community can comment on the importance of telehealth.

We look forward to the opportunity to working with you and CMS to achieve the success of new care delivery models. If you have any questions, please do not hesitate to contact Krista Drobac at 202-799-4299.

Sincerely,

Alliance for Connected Care Members

WellPoint
Verizon
Teladoc, Inc.
CVS Caremark
Walgreens
HealthSpot
Specialists on Call
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Alliance for Connected Care Advisory Board Members

Alzheimer's Foundation of America
American Academy of Physician Assistants
American Heart Association
American Osteopathic Association
American Speech-Language-Hearing Association

² See 42 USC § 1395jjj(b)(2)(G).

Association for Behavioral Health and Wellness
Digestive Disease National Coalition
The Evangelical Lutheran Good Samaritan Society
National Alliance for Caregiving
National Association of ACOs
National Association of Homecare & Hospice
National Alliance on Mental Illness
National Council for Behavioral Health
National Multiple Sclerosis Society
Parkinson's Action Network
Stanford Hospitals & Clinics
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