



November 1, 2017

The Honorable David Shulkin, MD  
United States Secretary of Veterans Affairs  
Department of Veterans Affairs  
810 Vermont Ave, NW  
Washington, DC 20420

RE: RIN 2900-AQ06

Dear Secretary Shulkin:

Health IT Now (HITN) writes to express our support for the proposed rule entitled *Authority of Health Care Providers To Practice Telehealth*. HITN is a diverse coalition of health care providers, patient advocates, consumers, employers, and payers who support the adoption and use of health IT to improve health care and to lower costs. We believe this proposed rule is an important step forward in ensuring access to care for our nation's veterans.

The Department of Veterans Affairs (VA) has been a leader in telehealth. Through the use of technology, veterans can access the right care at the right time. Given the complex care needs of veterans and the growing strain on the resources of the Veterans Health Administration, telehealth has proven beneficial in alleviating stress on the VA system. In Fiscal Year (FY) 2016, approximately 12 percent of veterans received elements of their care via telehealth – and 45 percent of these veterans were located in rural areas. Veterans enrolled in home telehealth for non-institutional care needs and chronic care management had a 59 percent decrease in VA bed days of care and a 31 percent decrease in VA hospital admissions. Additionally, veteran satisfaction with telehealth is very high – 88 percent for home telehealth.

Despite these advances and outcomes, artificial geographical restrictions on the use of telehealth constrain its use within the VA. As noted in the proposed rule, currently, the VA can only waive state provider licensing requirements if both the physician and patient are located in a federally owned facility. Because a significant number of veterans live in rural areas, this requirement places a burden on veterans, who often must travel to federal facilities to receive care from a VA provider located in another state.

We applaud your efforts to remove these restrictions by allowing VA providers to treat veterans in their home, regardless of location. In a world of technology utilization, health care should not be restricted by state borders.

It is unacceptable that our veterans must overcome artificial barriers when attempting to access healthcare, and we commend you for your work to remove these restrictions. We believe your proposed action appropriately protects patient safety while also promoting access to care. We urge you to finalize this rule as proposed swiftly to provide clarity for VA providers and veterans.

Sincerely,

A handwritten signature in black ink, appearing to read "Joel White". The signature is fluid and cursive, with the first name "Joel" being more prominent than the last name "White".

Joel White  
Executive Director