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October 27, 2017

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

Dear Secretary Shulkin:

The College of Healthcare Information Management Executives (CHIME) is pleased to offer our comments on the Department of Veteran's Affairs (VA) proposed rule, "Authority of Health Care Providers to Practice Telehealth," published in the *Federal Register* on October 2, 2017. Under this rule the VA calls for amending its medical regulations by standardizing the delivery of care by VA healthcare providers through telehealth and by pre-empting state law as it applies to healthcare providers who practice telehealth while acting within the scope of their VA employment.

As an executive organization serving more than 2,400 chief information officers (CIOs) and other senior health information technology leaders at hospitals and clinics across the nation, CHIME members are responsible for the selection and implementation of clinical and business technology systems that are facilitating healthcare transformation. As such, our members are strong proponents of leveraging technology to effectuate better health outcomes and greater efficiencies. Advancing the use of telehealth is a top priority for our members. CHIME strongly supports the VA's proposal to expand the use of telehealth by permitting VA healthcare providers to use this technology for all their patients, irrespective of the state or location in a state, where VA provides healthcare.

A benchmarking report released in October by CHIME and KLAS Research, an industry leader in healthcare IT and insights, points to the challenges and barriers faced by providers and patients concerning more ubiquitous adoption of telehealth services. The report, "Telehealth Virtual Care Platforms 2017: An Early Look at the State of Telehealth," recounted one CIO's thoughts that embody many of the concerns we hear from the provider community:

Telehealth becomes cost effective once providers are able to scale it, and in many cases, we can't scale it unless we can cross state lines. There are challenges around licensing, credentialing, and getting a network of insurance plans.

Speaking specifically about state-licensing issues, another CIO reflected:

There are state-licensing barriers. I can't easily have one of our doctors see one of our patients that travels here from another state and has been doing so for the last five years. I can't have our doctor see that patient through a telehealth program unless the physician has a license to practice medicine in the state that patient lives in. The doctor has already done an unbelievable, ridiculous amount of paperwork to get licensed in our state, but the doctor would have to redo that paperwork to get a license for the other state.

CHIME members recognize that healthcare resources are not endless and that maximizing technology can result in flexibility for patients, healthcare providers and the federal government. We agree with the VA that the changes facilitated by greater access to more telehealth proposed in the rule will:

- Afford better access to care;
- Facilitate modern, beneficiary- and family-centered healthcare delivery;
- Enhance VA's capacity to deliver essential and critical healthcare services to beneficiaries located in areas where healthcare providers may be unavailable or to beneficiaries who may be unable to travel to the nearest VA medical facility for care because of their medical conditions.
- Increase the accessibility of VA healthcare, bringing VA medical services to locations convenient for beneficiaries, including clinics in remote communities and beneficiaries' homes; and
- Allow the Department to use its limited healthcare resources most efficiently.

We appreciate the VA taking this important step to further access to care and lever technology to achieve better outcomes for our nation's veterans. Please don't hesitate to contact my staff, Mari Savickis, vice president, federal affairs at msavickis@chimecentral.org on ways CHIME can better support this initiative.

Sincerely,



Russell P. Branzell, CHCIO, LCHIME
President and CEO
CHIME



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