



October 30, 2020

Chairwoman Pamala Hunter  
National Council of Insurance Legislatures  
2317 Route 34 S., Suite 2B  
Manasquan, New Jersey 08736

**RE: The ATA Applauds the National Council of Insurance Legislators for Pursuing Telehealth Legislation**

Chairwoman Pamala Hunter and Council Members,

The American Telemedicine Association (ATA) was honored to speak at the National Council of Insurance Legislators (NCOIL) last month. The ATA, along with the over 400 organizations we represent, applauds the Council's leadership on bringing telehealth to the forefront and advocating for critical policies to expand telehealth utilization. Implementing telehealth legislation, such as the Telemedicine Authorization and Reimbursement Act, is extremely important for states to enhance and expand telehealth resources throughout their communities.

Telehealth provides a pathway to improve access to healthcare for many individuals including:

- People who live in rural areas who often do not have access to transportation or work schedules that allow them to travel long distances for quality healthcare, particularly if they require care from a specialist.
- Families with challenging work schedules where care for parents or children make it difficult or impossible for them to visit a doctor or healthcare center in person.
- People who are homebound or have limited mobility or other health challenges that make it difficult to access in-person care.
- Patients who may be intimidated or anxious about seeking care for sensitive health issues including family planning, behavioral health, and many women's and men's health services.

As the Council considers telehealth legislation, we note that the ATA believes that a practitioner that delivers services via telehealth should be compensated, by either public or private insurance, at a fair payment rate that reflects the ongoing investment necessary to ensure virtual care platforms are continuously maintained and seamlessly updated and that services can continue to expand as needed.



Additionally, providers are increasingly relying on asynchronous (or “store and forward”) telehealth technologies to establish patient relationships, perform patient evaluations, and appropriately prescribe medication in many fields. Asynchronous (or “store and forward”) technologies are critical to the industry as they are used to quickly and conveniently transmit a patient’s health data, vital signs, digital diagnostic images, and other physiologic data. The Council should develop a regulatory framework that empowers providers to use their clinical judgment to determine the appropriate telehealth modality --whether real-time or non-real time-- to uphold the standard of care and serve the best interest of their patients.

To help guide the Council, we have attached to this letter our suggested edits to the Telemedicine Authorization and Reimbursement Act. In addition, we attached our Standardized Telehealth Terminology and Policy Language for States on Coverage and Reimbursement and Medical Practice, both documents serving as a toolkits for state policymakers throughout the country as they grapple with crafting telehealth laws that work in the best interest of their constituents.

Again, we thank the Council for your commitment and dedication to promoting telehealth adoption. Increasing access to appropriate telehealth services will require the support of policymakers across the country. Therefore, we appreciate the Council taking the lead and creating telehealth language for states to utilize. We look forward to working together in the months ahead to develop flexible, forward thinking, and pro-innovative telehealth policies.

Kind regards,

A handwritten signature in black ink, appearing to read "Ann Mond Johnson", followed by a period.

Ann Mond Johnson  
CEO  
American Telemedicine Association

CC: William Melofchik, NCOIL General Counsel