May 23, 2016

The Honorable Keith Hall Director, Congressional Budget Office Ford House Office Building Washington, DC 20515-6925

Mark Miller, PhD Executive Director, Medicare Payment Advisory Commission 425 I Street NW, Suite 701 Washington, DC 20001

Dear Director Hall and Executive Director Miller,

On behalf of institutions utilizing telemedicine, researchers who study telemedicine and practitioners of medical care using telemedicine, we urge the Congressional Budget Office (CBO) and the Medicare Payment Advisory Commission (MedPAC) to look to evidence of telemedicine's effectiveness from the commercial sector, the Department of Veterans Affairs (VA), Medicaid, and other programs when producing future cost estimates and analyses of telemedicine utilization in the Medicare program. We recognize the difficulty of finding sufficient Medicare data on telemedicine given that it is virtually unused in the Medicare program. However, alternative data sources can and should be used to inform and produce an analysis of providing Medicare beneficiaries access to telemedicine, including telehealth and remote patient monitoring.

The lack of Medicare data is understandable given the outdated statutory restrictions on telemedicine: since federal law prevents many providers from being paid when they use telemedicine to serve Medicare beneficiaries, obviously, little data is available. We have been encouraged by the Centers for Medicare & Medicaid Services' increasing—but limited—allowance of telemedicine as part of new demonstration projects, but we are concerned that it will be too difficult to isolate telemedicine's impact, as it is one of many variables measured.

There is, however, substantial experience utilizing telemedicine outside Medicare. Combined, we have authored many studies showing its quality and cost-effectiveness in fee-for-service as well as managed care environments.

We hope CBO and MedPAC will consider these alternative sources of evidence in producing future cost estimates and analyses of telemedicine utilization in Medicare. Thank you for your consideration of our views.

Sincerely,

Ascension Health

CHRISTUS Health

The Evangelical Lutheran Good Samaritan Society

Scripps Translational Science Institute

Stanford Health Care

University of Mississippi Medical Center (UMMC) Center for Telehealth

University of Virginia Medical Center

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