

August 16, 2022

Administrator Chiquita Brooks-LaSure
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1766-P, P.O. Box 8013, Baltimore, MD 21244-8013

RE: Comments on the Calendar Year (CY) 2023 Home Health Prospective Payment System Rate Update; Home Health Quality Reporting Program Requirements; Home Health Value-Based Purchasing Expanded Model Requirements; and Home Infusion Therapy Services Requirements (CMS-1766-P)

Submitted electronically on regulations.gov

Dear Administrator Brooks-LaSure:

On behalf of the American Telemedicine Association (ATA), the only organization exclusively devoted to advancing telehealth, and ATA Action, the ATA's affiliated trade association focused on advocacy, we appreciate CMS's work to expand access to telehealth, both during and after the current COVID-19 public health emergency (PHE) and are pleased to submit the following comments in response to the CY 2023 Home Health Prospective Payment System proposed rule (CMS-1766-P).

In the proposed rule, CMS explains how the use of telecommunications technology in home healthcare has increased in recent years, particularly with the declaration of the COVID-19 PHE, and the steps that CMS has taken to support its use, particularly pertaining to remote patient monitoring. Because of this, CMS is seeking to increase data collection on the use of telecommunications technology among Medicare Home Health beneficiaries. Specifically, CMS is, "soliciting comments on the use of three new G-codes identifying when home health services are furnished using synchronous telemedicine rendered via a real-time two-way audio and video telecommunications system; synchronous telemedicine rendered via telephone or other real-time interactive audio-only telecommunications system; and the collection of physiologic data digitally stored and/or transmitted by the patient to the home health agency, that is, remote patient monitoring."

The ATA and ATA Action support CMS's efforts to collect telemedicine and remote patient monitoring data through the use of the three new G-codes and encourages CMS to differentiate by clinician and service when the data is collected. Expanding access to home healthcare using telehealth, including increasing coverage of remote patient monitoring, is a key priority for the ATA and ATA Action. We look forward to reviewing and sharing the new program instructions with our members when they are put in place on January 1, 2023.



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Again, thank you for the opportunity to provide detailed feedback on this year's Home Health Prospective Payment System proposed rule. If you have any questions or would like to discuss our recommendations further, please contact Kyle Zebley at kzebley@ataaction.org.

Kind regards,

A handwritten signature in black ink that reads 'Kyle Zebley'.

Kyle Zebley
Executive Director
ATA Action