



September 1, 2022

The Honorable Karen Timberlake
Secretary-designee, Wisconsin Department of Health Services
1 W. Wilson Street, Room 650
Madison, WI 53703

**RE: ATA ACTION SUPPORT AND COMMENTS ON CLEARINGHOUSE RULE
NUMBER CR 22-043**

Dear Secretary-designee Timberlake,

On behalf of ATA Action, I am writing you to express support for CR 22-043.

ATA Action, the American Telemedicine Association's affiliated trade association focused on advocacy, advances policy to ensure all individuals have permanent access to telehealth services across the care continuum. ATA Action supports the enactment of state and federal telehealth policies to secure telehealth access for all Americans, including those in rural and underserved communities. ATA Action recognizes that telehealth and virtual care have the potential to truly transform the health care delivery system – by improving patient outcomes, enhancing safety and effectiveness of care, addressing health disparities, and reducing costs – if only allowed to flourish.

ATA Action believes that several of the telehealth-related provisions in the proposed rules would serve as steps forward for Wisconsin's Medical Assistance Program's telehealth policy.

First, the proposed rules would conform Department rules to Medical Assistance statute. This provides further clarity on the telehealth services currently available to patients enrolled in the program and is a commendable step forward for telehealth policy in Wisconsin. ATA Action supports the Department of Health working to guarantee that patients have their telehealth services covered permanently. Additionally, ATA Action is excited to see that the rules will enable Medical Assistance patients to access telehealth care for psychotherapy and alcohol and other drug abuse treatment services through synchronous technology modalities. Such a policy will make it substantially easier for these patients to access the high-quality care they want and need with less worry about the cost of that care.

ATA Action supports the adoption of technology-neutral telemedicine policies that enable practitioners to utilize synchronous (real-time) and asynchronous (non-real-time) technologies in the delivery of care. ATA Action maintains that policy makers should not restrict the modalities which practitioners may use when providing care to patients, permitting licensed health care professionals to determine which technologies are sufficient to meet the standard of care for the condition presented by the patient. ATA Action urges the Department to expand the modalities permitted for reimbursement from the Medical Assistance Program to be technology neutral to best serve the needs of patients.

Thank you for your support for telehealth. We encourage you to consider changes to these rules to address the concerns we raised above. These rules remain a positive step in the right direction for Wisconsin patients in the Medical Assistance Program. Please let us know if there is anything that we can do to

ATA ACTION

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assist you in your efforts to adopt practical telehealth policy in Wisconsin. If you have any questions or would like to engage in additional discussion regarding the telehealth industry's perspective, please contact me at kzebley@ataaction.org.

Kind regards,

A handwritten signature in black ink, appearing to read "Kyle Zebley", is written over a light gray rectangular background.

Kyle Zebley
Executive Director
ATA Action