



Health. Virtually. Everywhere.



October 19, 2022

Kevin Galpin, MD
Office of Connected Care
Veterans Health Administration
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

RE: RIN 2900-AQ59—Health Care Professionals Practicing Via Telehealth

Submitted electronically on regulations.gov

Dear Dr. Galpin:

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 the Department's ongoing commitment to improving access to each veteran's full care team when receiving telehealth services and are pleased to strongly support this proposed rule.

The Department of Veterans Affairs (VA) has greatly expanded access to telehealth services for veterans in recent years, implementing a rule in 2018 that created the highest possible level of license portability for VA health care professionals and allowing them to use telehealth to reach the veteran patient population anywhere regardless of their geographic location. The implementation of this rule allowed VA to expand its "anywhere to anywhere" practice and provide approximately 2.3 million telehealth visits in 2018 and 2.6 million visits in 2019, a significant increase from 700,000 visits in 2017.¹

In this proposed rule, VA seeks to implement further changes to the definition of health care professional by including post graduate health care employees and health professions trainees. This change, which was mandated by Congress through the passage into law of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (2021 NDAA), would allow members of each veteran's care team to participate in telehealth interactions regardless of the veteran's location. This rule will not only improve patient care, but also offer a critical training opportunity for health profession trainees and post graduate VA health care professionals.

Thank you very much for the opportunity to provide our detailed feedback on this important proposed rule. If you have any questions or would like to discuss further, please contact kzebley@ataaction.org, Executive Director of ATA Action.

Kind regards,

Kyle Zebley
Executive Director
ATA Action

¹ <https://www.hsrd.research.va.gov/news/feature/telehealth-0720.cfm>