



November 13, 2024

The Honorable Rhonda Boe
Executive Director, Behavior Analyst Board
4334 S. Sherwood Forest Boulevard
Suite C-150
Baton Rouge, LA 70816

RE: ATA ACTION SUPPORT FOR TITLE 46 PART VIII PROPOSED CHAPTER 2 §204

Dear Executive Director Boe and Members of the Behavior Analyst Board,

On behalf of ATA Action, I am writing you to offer our support on the proposed Title 46 Part VIII Chapter 2 §204, Telehealth Standards.

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 applauds this board's revisions of their initially proposed changes to Title 46 Part VIII Chapter 2 §204, Telehealth Standards. ATA Action submitted comments in March of 2024 offering concerns on the proposed changes, and our organization is pleased to see this iteration of the proposed regulation to be more in line with our policy principles of supporting the adoption of practical telehealth policy.

ATA Action appreciates the inclusion of asynchronous modalities in the State's Telehealth Standards. ATA Action believes that so long as the standard of care is maintained, a provider obtains the patient's consent for the use of telehealth services, verifies the patient's identity, and discloses his or her own identity and credentials he or she should be able to use any appropriate telehealth modality that is sufficient to evaluate and treat the patient for the condition presented – whether it be a synchronous or asynchronous modality.

Thank you for your support for telehealth. We encourage you and your colleagues consider our comments and offer revisions to the proposed rule. Please let us know if there is anything that we can do to assist you in your efforts to adopt practical telehealth policy in Louisiana.



Telehealth Policy to Transform Healthcare

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".

Kyle Zebley
Executive Director
ATA Action