



January 13, 2026

The Honorable Meena Seshamani, MD, PhD
Secretary of Health
Maryland Department of Health
201 West Preston Street
Baltimore, MD 21201

**RE: ATA ACTION SUPPORT FOR PROPOSED AMENDMENTS TO COMAR 10.09.49
TELEHEALTH SERVICES**

Dear Secretary Seshamani:

On behalf of ATA Action, I am writing to express our strong support for the proposed amendments to COMAR 10.09.49, Telehealth Services. This regulation represents an important and timely step in permanently expanding access to telehealth services in Maryland.

ATA Action is the American Telemedicine Association's affiliated trade association focused on advocacy. Our organization advances policy to ensure all individuals have permanent access to telehealth services across the care continuum. ATA Action supports state and federal telehealth coverage and fair payment policies to secure telehealth access for all Americans, including those in rural and underserved communities. We believe telehealth and virtual care can meaningfully improve patient outcomes, enhance safety and effectiveness of care, address health disparities, and reduce overall health system costs when supported by practical and durable policy frameworks.

We strongly support the Department's proposal to permanently expand telehealth services in accordance with the Preserve Telehealth Access Act of 2025 and to remove prior sunset provisions associated with temporary Public Health Emergency-era policies. Making these coverage policies permanent provides much-needed regulatory certainty for providers and patients alike, ensuring continuity of care and sustained access to virtual services that Marylanders have come to rely on.

ATA Action is also supportive of the proposal to formally include audio-only communication within the definition of telehealth. Audio-only services play a critical role in expanding access for patients who may lack reliable broadband, appropriate devices, or digital literacy, particularly seniors, individuals with disabilities, and residents of rural or underserved communities. Recognizing audio-only telehealth as a covered modality is essential to promoting health equity and ensuring that telehealth remains inclusive and patient-centered.

We commend the Maryland Department of Health for its leadership in advancing permanent, equitable telehealth policy and for continuing to build on lessons learned during and after the

ATA ACTION

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Public Health Emergency. ATA Action strongly encourages the Department to finalize the amendments to COMAR 10.09.49 as proposed.

Thank you for your continued commitment to expanding access to high-quality, technology-enabled care. Please do not hesitate to contact us if we can be of assistance or provide additional perspective on telehealth policy considerations. If you have any questions or would like to engage in further discussion regarding the telehealth industry's perspective, please feel free to contact me at hyoung@ataaction.org.

Kind regards,

A handwritten signature in black ink that reads "Hunter Young".

Hunter Young
Head of State Government Relations
ATA Action