

Re: Stakeholder Consensus on Benefits and Challenges of Using Telehealth to Improve Access to Health Services

Dear <<SALUTATION>>

The Puerto Rico Telehealth Working Group is a diverse group of stakeholders representing the healthcare sector in Puerto Rico that has been meeting consistently since 2020 to engage communities, providers, and health system stakeholders to recommend and implement telehealth adoption strategies, regulatory changes, and support for patients and providers that reduce health disparities and address healthcare professional shortages.

Since the beginning of the COVID-19 pandemic, there has been a notable increase in the usage of and interest in telehealth to provide access, timeliness, and quality of care to patients. In 2020, Impactivo produced a report, *Evaluating Telehealth as an Alternative to Support Patients in Times of Covid-19 in Puerto Rico*, that elicited important information about interest and readiness related to virtual care on the island. Among other findings, 66% of patients surveyed expressed that telehealth would be a useful means of communication with their health providers. An analysis by the Puerto Rico Public Health Trust demonstrated a sharp increase in telemedicine usage in Puerto Rico, with the share of Medicare and Medicaid claims for telemedicine services increasing from less than 1% of all claims in 2019 to 51% in 2021.

However, without adequate further planning, regulations, and supports, investments in telehealth and the gains made in access to care due to telehealth during the pandemic are at risk of being reversed. Telehealth is a tool that, with adequate support and planning, can ameliorate many of the access challenges currently faced by patients as well as reduce provider burdens in Puerto Rico. Furthermore, telemedicine has the potential to create major healthcare savings – Towers Watson estimates that telemedicine could potentially deliver more than \$6 billion a year in health care savings to U.S. companies. Telehealth is beneficial not only during the COVID-19 pandemic but represents an opportunity to overcome many of the other challenges faced in PR. Chief among these is workforce shortages particularly in certain specialties/subspecialties affecting both the outpatient and inpatient settings. Telehealth can also address service gaps in rural and isolated areas, and high costs of care, among others. It has solidified its standing as a critical health care delivery modality and has become a preferred method for health care providers to reach out to patients—especially those in remote or rural areas. However, following the end of the federal Public Health Emergency for COVID-19 on May 11th, 2023, which also ended many COVID-era supports for telehealth, many health care providers are concerned with the impact on patient care and health outcomes across the island. Our group agrees that formalized, comprehensive telemedicine efforts across the island are necessary to increase the reach, efficiency, and timeliness of health care services, reduce costs and improve healthcare outcomes for all Puerto Ricans.

In response to the COVID-19 emergency, the Centers for Medicare & Medicaid Services (CMS) initiated higher reimbursement for telehealth services at non-facilities such as a patient's home. This allowed Medicare to pay for telehealth services as if provided in person, meaning telehealth visits were reimbursed at the same rate as regular in-person office visits. Unless lawmakers and payers act to extend this policy, parity in reimbursement rates for telehealth services will end after the current transition period, with telehealth rates reverting to pre-pandemic levels, which severely limited access. This is a huge concern as many providers will discontinue virtual care without these provisions, with patients losing access to this care modality as a result. Hundreds if not thousands of bed-ridden patients who have been served by telehealth programs which local organizations developed over the course of the pandemic will no longer receive much-needed services that improve their lives at home.

Telehealth represents an opportunity to promote and support value-based care models as well as other efforts directed to improve health outcomes in patients, particularly those with chronic diseases. It also encourages patient and provider engagement towards remote patient monitoring, health information exchange, and other key health information technology efforts driven towards improving healthcare under a patient-centered care model, incentivizing the spectrum of care for patients, and acknowledging the practice level from a quality improvement standpoint. Telehealth has great potential to improve healthcare and strengthen health equity in Puerto Rico but there is a need for a clearer regulatory framework and greater support from relevant agencies to reduce barriers to its utilization by providers, payers, and patients alike. As stakeholders we are calling on [agencies] to take further action in the following areas:

1. Optimization of **broadband connectivity** island wide for healthcare providers and patients for telehealth as an area of priority in the local broadband planning process in rural areas with less access to affordable, high-speed broadband.
2. Optimize and standardize the **credentialing process** and allow for reciprocity to facilitate greater access to primary care physicians and specialists via telemedicine.
3. Promotion and **acknowledgement of synchronous/asynchronous technologies** to improve health outcomes and clinical and healthcare quality with interoperability and health information exchange.
4. **Formalized telehealth reimbursement** for Medicaid, Medicare (traditional & MA plans) and commercial payors with consistent and uniform guidance for allowable rates beyond the end of the PHE. Including **payment parity** to the extent of equivalency of reimbursement rates for high-quality telehealth encounters/virtual visits and on-site visits.
5. **Integration of telehealth** into new financial models with a focus on value-based care including, but not limited to medical, behavioral/mental, among other healthcare services.
6. Establishment of **best practices for e-prescribing and telemedicine**.
7. Investment in **education of patients and provider engagement** for telehealth.
8. Expansion of **telementoring opportunities for health care workforce** development.

Finally, we invite you to leverage the expertise of this Telehealth Working Group and our members as you work to create legislation, policy changes and implement programs around telehealth. We look forward

to the opportunity to meet with you and your team to discuss these topics of interest which are aligned with reducing health disparities and increasing health equity. It is of the utmost importance for our organizations to have actionable results driven towards implementation or modification of current policies that will allow our health system to better manage healthcare and empower provider and patients with care planning and quality of care.