



October 2, 2024

Christina Mink
Staff Attorney
Connecticut Department of Social Services
christina.mink@ct.gov

RE: ATA ACTION SUPPORT OF AMENDMENTS TO 17b-262-995

Dear Ms. Mink,

On behalf of ATA Action, I am writing you to express support for the proposed amendments to Sec. 17b-262-995 of the Regulations of Connecticut State Agencies regarding the Requirements for Payment to Federally Qualified Health Centers.

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 coverage and fair payment 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.

Our organization believes that the amendments to Section 1, specifically the amendments to the definition of encounter in clause 24 and the addition of the definition of telehealth in clause 54, would be a rational step forward for telehealth policy in Connecticut. These amendments would expand the definition of “encounter” to include telehealth visits to Federally Qualified Health Centers (FQHCs) allowing for reimbursement for telehealth services and expanding patient access to telehealth services without additional financial stress. ATA Action is in strong support of policy change that eases access to high quality and affordable health care.

At the federal level, ATA Action continues to advocate to ensure that FQHCs are able to permanently furnish telehealth services. FQHCs provide critical health care services for underserved communities and populations across the United States. During the pandemic, FQHCs served as distant sites and could be reimbursed for telehealth services. Congress extended this flexibility through the end of calendar year 2024. ATA Action is urging Congress to ensure that the roughly 1,400 FQHCs can permanently offer telehealth services even after CY2024 while receiving fair reimbursement. Adoption of these regulatory amendments will further those goals in Connecticut and ensure that telehealth services are still able to be delivered to patients in need.

ATA ACTION

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As far as the rate of reimbursement for telehealth services is concerned, ATA Action maintains that state policymakers should set rational guidelines that are both fair to the provider of such services and reflect the cost savings offered to the health care system by the effective use of telehealth technologies.

Thank you for your support of telehealth in Connecticut. We urge you and your colleagues to adopt the amendments proposed in this regulation in the interest of expanding easy and efficient access to affordable, high-quality health care across the state. Please do not hesitate to let us know how we can be helpful in your efforts to advance common-sense telehealth policy in Connecticut. If you have any questions or would like to discuss further 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