

OFFICERS

Ilene M. Rosen, MD, MS
President

Douglas Kirsch, MD
President-Elect

Ronald D. Chervin, MD, MS
Immediate Past President

Kelly A. Carden, MD, MBA
Secretary/Treasurer

DIRECTORS

R. Nisha Aurora, MD

David Kristo, MD

Raman Malhotra, MD

Jennifer Martin, PhD

Eric Olson, MD

Kannan Ramar, MD

Carol Rosen, MD

James Rowley, MD

Steve Van Hout
Executive Director

October 26, 2017

Director, Regulation Policy and Management (00REG)
Department of Veterans Affairs
810 Vermont Ave. NW.
Room 1063B
Washington, DC 20420

Re: RIN 2900-AQ06-Authority of Health Care Providers to Practice
Telehealth

To whom it may concern,

On behalf of the board of directors of the American Academy of Sleep Medicine (AASM), I am submitting comments in support of the proposed rule concerning the [Authority of Health Care Providers to Practice Telehealth](#). The AASM is a professional membership association representing more than 10,000 sleep medicine physicians, allied health professionals and accredited sleep centers. We appreciate the opportunity to provide comments on the proposed rule, which contains many encouraging components that will expand veterans' access to high quality health care via telemedicine.

Telemedicine Access

The AASM strongly supports relaxing the regulations that inhibit patient access to care via telemedicine due to the physical location of the VA patient and provider. The AASM has demonstrated its commitment to the ready access and use of telemedicine by developing AASM Sleep™, a HIPAA compliant telemedicine system designed specifically for the needs of sleep specialists and their patients. We recognize telemedicine as an innovative medium that facilitates convenient health care visits for a wide range of patients regardless of their physical proximity to a board-certified sleep medicine physician or accredited sleep center.

As is often observed among other medical specialists, sleep physicians and the members of their team are often concentrated in large population centers, leaving many rural and small-state Americans without immediate access to a sleep specialist. Allowing VA patients to use telemedicine to access care from an available physician outside of their state will certainly encourage patients to seek an evaluation for ongoing sleep problems and will promote greater treatment adherence for chronic sleep disorders such as obstructive sleep apnea (OSA).

Center-to-Home Telemedicine Connections

The AASM commends the Department for its allowance of center-to-home telemedicine connections for VA patients. A task force commissioned by the AASM developed the [Sleep Telemedicine Implementation Guide](#), which notes that the benefits of establishing a center-to-home telemedicine model include:

- Lowered implementation costs for health care providers;
- Expanded patient access to physician services; and
- Increased patient familiarity by using personal household laptop, mobile device or desktop.

Mental Health Focus

The AASM applauds the proposed rule's focus on veterans' mental health. The 2015 RAND report "[Sleep in the Military](#)" noted that sleep disturbances are a core feature of many psychological disorders, including post-traumatic stress disorder (PTSD), depression, and traumatic brain injury (TBI), which are the three most common mental health diagnoses among both active-duty service members and veterans. Data also suggest that veterans with PTSD have a [higher risk of OSA](#) than the general population. The AASM has shown its commitment to veterans' health by staunchly advocating for [H. Res. 46](#) – "Recognizing the increased risk of sleep apnea among soldiers returning from active duty and the benefits of continuous positive airway pressure (CPAP) therapy on treating OSA in soldiers suffering from PTSD." This measure, most recently introduced into the 115th Congress by Rep. Sam Graves (R-MO), emphasizes the importance of ensuring access to care for veterans with OSA and PTSD.

Telemedicine is an effective tool that can assist physicians in the treatment and long-term management of veterans who have sleep disorders such as OSA and chronic insomnia. The AASM believes that expanding the use of telemedicine will ensure that all veterans have access to high quality, patient centered care from a sleep specialist, which will lead to improved health outcomes. The proposed rule provides common-sense solutions to some of the earliest and most pressing barriers to telemedicine; we consider this proposed rule a significant step forward for VA physicians, who will be able to provide more timely, efficient and convenient care for veterans.

To discuss this issue further, please contact AASM Executive Director Steve Van Hout at 630-737-9700.

I thank you in advance for considering the AASM's comments in support of the proposed rule concerning the Authority of Health Care Providers to Practice Telehealth.

Sincerely,
Ilene Rosen, MD, MS
President

cc: Steve Van Hout