



Maryland  
Hospital Association

November 13, 2017

Ms. Michele Phinney, Director  
Office of Regulation and Policy Coordination  
Department of Health and Mental Hygiene  
201 W. Preston Street, Room 512  
Baltimore, Maryland 21201

**Re: Comments on proposal to adopt new regulations under a new chapter, COMAR 10.09.96 Remote Patient Monitoring**

Dear Ms. Phinney:

On behalf of the Maryland Hospital Association's (MHA) 64 member hospitals and health systems, we appreciate the opportunity to submit comments on the new regulations to COMAR 10.09.96-Remote Patient Monitoring. MHA appreciates the state's work to expand telehealth services by removing current restrictions.

We support the plan to expand coverage to remote patient monitoring for certain chronic conditions, a positive step toward improved access to remote monitoring for Maryland Medical Assistance Program participants. However, we are concerned that participants would only be provided remote monitoring coverage for two months per episode and two episodes per year. This may be sufficient for some patients with conditions that can be managed short term, but for those with conditions requiring ongoing monitoring and attention, these restrictions may cause a disruption in their progress. MHA therefore urges the Department to amend these proposed regulations so that remote monitoring services may be extended beyond the proposed time period, subject to review by the Medical Assistance Program, if the treating provider determines that additional coverage is necessary to control the participant's condition and avoid hospitalization. While ongoing remote monitoring may be more costly initially, it will lead to better health outcomes and produce savings in avoided hospitalizations.

Maryland hospitals are investing in innovative telehealth and remote patient monitoring programs to meet utilization goals under the state's current All Payer Model. As this current model changes to an Enhanced Total Cost of Care Model, hospitals and their partners will strive to achieve population health improvements with a focus on chronic diseases. We believe remote monitoring will help manage high-risk patients and help us more quickly identify issues with care plans.

Getting Marylanders the right care, at the right time, in the right setting is critical to hospitals' and the state's work to transform care; broad use of telehealth services is key to knocking down barriers to that care.

Respectfully,

Jennifer Witten, MBA  
Director of Government Relations