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The Honorable Mia Bonta, Chair

California State Assembly Committee on Health
Capitol Office, 1020 N Street, Suite 390 Sacramento, CA 95814

Position Letter: AB 688 (González) - Support if Amended

Dear Chairwoman Bonta and Members of the California State Assembly Committee on Health,

Students for Patient Advocacy Nationwide (SPAN) supports the spirit of AB 688, which aims to advance and expand equitable access to telehealth services across California. We recognize the importance of legislation that addresses current gaps in telehealth utilization data and access. According to the **UCLA Center for Health Policy Research**, about **49% of California adults** used telehealth in 2021, and **46.7%** reported using it in 2022, a dramatic increase from roughly **12% in 2018**. **AB 688 reflects a critical step forward for telehealth related policy within California.**

However, after careful review of the bill's text in its current form, we respectfully request a specific amendment that would strengthen the bill's impact and ensure it fully serves the communities it intends to protect.

We are particularly concerned about the **lack of a definition** for the term **“modality mix”** as referenced in **Sections 14132.726(b)(8) and 14132.726(b)(9) of AB 688**, which mandate reporting on telehealth use by new and established patients. These reports must be broken down by “Modality Mix”. **The bill does not explicitly define what the term “modality mix” means.** Without this definition, data could be skewed to include or exclude certain parameters.

To address these concerns, we propose the following addition:

Insert a new subdivision (a)(4) as follows:

(a)(4) For purposes of this bill, “modality mix” shall mean the categories of telehealth service delivery including, at a minimum:

(A) Interactive audio-video communication (video visits);

(B) Audio-only telephone visits;

(C) Asynchronous store-and-forward communications; and

(D) Remote patient monitoring services.

Why this placement? The **definition appears immediately before** subdivision (b), which lists the specific data elements to be reported, including “modality mix,” readers understand what that term means. This approach minimizes confusion and ensures that throughout the bill, “modality mix” is clearly defined.

This amendment is important because **telehealth access varies dramatically by modality**, with many underserved populations such as: low-income, elderly, and rural patients, **relying heavily on audio-only visits**. Without a clear definition of “modality mix,” these visits could be underreported or excluded, **masking disparities and leading to flawed data that misguide policy decisions**. A precise definition ensures that California can craft **equitable, evidence-based telehealth policies** that reflect how patients actually receive care. Without clear language, **the bill risks harming underserved populations**.

We believe these changes will ensure that future telehealth policy remains reflective of the evolving landscape of California. SPAN is proud to Support AB 688 **IF** it is amended to ensure data is correctly and effectively recorded to protect the true spirit of the sections affected. We respectfully urge the committee to consider this addition before moving the bill forward. We are happy to provide additional input or support as needed.

Sincerely,



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HS Ambassador, SPAN



Vishank Panchbhavi
Collegiate Ambassador, SPAN



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