

Mehmet Oz, MD  
Administrator  
Centers for Medicare & Medicaid Services  
(ASTP)

Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Steven Posnack  
Acting Assistant Secretary  
Office of the Assistant Secretary for Technology Policy

Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

**Re: CMS and ASTP Request for Information (RFI) on the Health Technology Ecosystem (CMS-0042-NC)**

Dear Administrator Oz and Acting Assistant Secretary Posnack:

MISTR is the nation's largest telehealth provider delivering seamless, technology-enabled HIV prevention (PrEP), DoxyPEP, STI testing, Hepatis C testing and treatment, and long-term HIV care to over 500,000 patients across all 50 states, Washington, D.C., and Puerto Rico through a fully digital model of care. In partnership with more than 65 community-based health organizations nationwide, MISTR extends care across communities and supports local health initiatives through a scalable, collaborative approach. Based on our experience, we offer insight into how the Centers for Medicare and Medicaid Services (CMS) and the Office of the Assistant Secretary for Technology Policy (ASTP) can modernize digital infrastructure and cultivate a thriving health technology ecosystem to expand access to primary and preventive health care while reducing administrative burden. We appreciate the opportunity to respond to this RFI and offer feedback relevant to the sections on patients and caregivers as well as providers.

**Patients and Caregivers**

MISTR delivers a truly seamless care experience, guiding patients through a simple digital intake process, providing at-home testing kits, enabling virtual consultations with licensed physicians, and ensuring discreet, automatic prescription fulfillment and refills all while improving health outcomes and public health standards. All of this is free to the patient, as MISTR leverages its relationships with community-based health organizations and patient assistance programs, including the 340B program.

Our digital platform empowers users to engage in routine preventive care while avoiding common barriers such as transportation challenges, scheduling conflicts, and administrative complexity, all by leveraging the availability of telehealth services. MISTR manages all insurance-related issues—including prior authorizations, denials and appeals — eliminating delays and frustration for patients and caregivers and ensuring timely access to preventive care and treatment. This approach could be replicated to address the primary and health care needs of Medicare, Medicaid, and Children's Health Insurance Program (CHIP) beneficiaries who face similar challenges, while also easing the burden on caregivers.

MISTR has demonstrated that the model works across diverse regions and among populations disproportionately impacted by HIV and STIs, with measurable improvements in health outcomes. For example, STI positivity dropped by 50% after patients started bundling DoxyPEP with PrEP, and today, more than 74% of our patients now choose bundled PrEP + DoxyPEP services. Notably, MISTR's platform is optimized for mobile use and designed to serve patients with lower health literacy.

**Providers**

MISTR streamlines operations for providers by coordinating insurance, managing prior authorizations, handling claims appeals, overseeing prescription fulfillment, and enrolling eligible patients in patient assistance programs. By automating these administrative tasks, MISTR enables providers to focus on care delivery, instead of paperwork, which improves efficiency and increases care access.

Since MISTR's platform combines eligibility screening, home lab testing or in-person testing, physician consultation, pharmacy coordination, and follow-up—all within a single, patient-centered interface (mistr.com and sistr.com) – delays in access are reduced, fragmentation is eliminated, and care continuity is enabled, challenges that frequently plague other care delivery models. MISTR's approach could be adopted across Medicare, Medicaid, and CHIP to improve access and the patient experience for beneficiaries managing chronic conditions, infectious diseases, or preventive care.

Importantly, MISTR provides real-time insights into treatment adherence, testing results, and care utilization to patients and providers, supporting timely interventions that improve health outcomes. By delivering care through a fully digital, patient-centered platform, our model enhances patient engagement, supports care continuity, and empowers patients to take a more active role in their care—a key priority of the Make America Healthy Again (MAHA) initiative and across Medicare, Medicaid, and CHIP programs. CMS could benefit from our experience as it looks to close feedback loops and support faster, data-informed policy responses to emerging population health trends.

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Thank you for the opportunity to share feedback on MISTR and our model of care. We urge CMS and ASTP to consider models like MISTR as blueprints for expanding digital health access within federal and state programs, and we welcome the opportunity to discuss this further. Should you have any questions or wish to schedule a time to speak with us, please contact Cal Neikirk at 757.831.2158 or via email at [cal@mistr.com](mailto:cal@mistr.com).

Sincerely,

Tristan Schukraft  
Founder & CEO, MISTR