Teladoc
HEALTH

June 16, 2025

The Honorable Robert F. Kennedy, Jr.
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Submitted electronically via regulations.gov

Re: Teladoc Health Comments on the HHS Request for Information: Health Technology Ecosystem
(RIN 0938-AV68)

Dear Secretary Kennedy,

Thank you for the opportunity to respond to the Request for Information on the Health Technology Ecosystem. We appreciate your ongoing commitment to health tech modernization and expanding access to high-quality virtual care services. As you know, virtual care has long been leveraged by health care providers across the country to enhance patient experiences, improve health outcomes, and reduce costs. Now, more than ever, virtual care is providing Americans with access to critical healthcare services, and we encourage the Department to continue to lead with focused policy that supports the appropriate expansion of digital health tools across the ecosystem.

A mission-driven organization, Teladoc Health is successfully transforming how people access and experience healthcare, with a focus on improving quality and outcomes while lowering costs. As the largest virtual healthcare company in the world, Teladoc Health is creating a unified care experience that focuses on the whole person, connecting care from hospital to home, across the full breadth of services including primary, acute, chronic, and mental healthcare. With more than 5,000 employees, our organization partners with employers, hospitals, health systems, and health plans to transform care delivery. Notably, more than 100 million people have access to a Teladoc Health product or service.

Acknowledging the vital role virtual care will continue to play in expanding access to care in the U.S., Teladoc Health applauds CMS and ASTP/ONC for the focus and prioritization of health data interoperability. Aligning incentives with technical requirements for developers is critical to fully leveraging technology to address some of our health care system's biggest challenges.

Currently, Teladoc Health is deploying digital health tools to detect, prevent, manage, and combat chronic disease and ensure patients can match with a provider most suited to their needs. Early detection and management are key to bending the health care cost curve. We leverage various tools and AI-based technologies to address complex health issues and ensure efficient clinical and administration operations. Some examples include:

- **Delivering Virtual Care at Scale:** Our proprietary virtual care queuing system allows us to facilitate tens of thousands of visits every day, connecting patients with the right providers in

real-time. It's a complex problem to solve at scale and one that requires taking into account provider licensing, availability, geography, specialty, and patient preferences.

- **Optimizing and Scaling High-Quality Mental Health:** In terms of mental health, finding the right provider can make a significant difference in quality and patient experience. We use AI to optimize member-therapist matching based on more than 100 different criteria. On average, we're matching a patient with a provider every 30 seconds.

- **Personalizing Chronic Care Management:** Teladoc Health's programs aggregate information from across the health care ecosystem such as claims, lab, Rx, and device data in addition to member reported information on diet, activity, and conditions; while interpreting that information to understand what it means to members and applying personalized insights. This approach has delivered meaningful improvement in clinical outcomes for members and cost savings for clients, while creating differentiated experiences and better quality of life for people living with chronic conditions.

- **Improving Clinical Documentation and Reducing Clinician Burden:** We've begun using AI to automate, where appropriate, clinical documentation, making visits more efficient, improving the quality of medical data, and letting providers focus on caring for patients. We're also exploring ways to use generative AI to improve the overall user experience of our members.
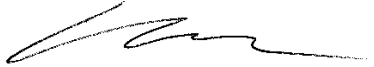
PR-1. What can CMS and its partners do to encourage providers, including those in rural areas, to leverage approved (see description in PC-5) digital health products for their patients? a. What are the current obstacles?

Interoperability, information blocking, and the seamless exchange and integration of health data are important issues that must be addressed. We applaud HHS/CMS/ONC/ASTP's attention and focus on modernizing the nation's health care system. However, coverage, payment, and benefit design policies will continue to play an outsized and critical role in incentivizing providers to deploy new technologies. Given the current challenges with respect to payment, Medicare beneficiaries are faced with a patchwork of different digital environments depending on where specific providers and health delivery organizations are in terms of maturity. Uncertainty and regulatory barriers continue to discourage investment in not only technology, but the clinical models and administrative support needed to seamlessly connect patients. To better support innovation, we recommend HHS:

- Continue to support Medicare reimbursement of telehealth and remote monitoring without arbitrary restrictions.
- Remove the regulatory cap on "non-standard" plan design to encourage innovation and the expansion of virtual-first plan offerings on Federally-facilitated Exchanges (FFEs) and State-based Exchanges on the Federal platform (SBE-FPs).
- Ensure coverage of payment codes that allow for reimbursement of remote monitoring if a device is used for less than 16 days in a calendar month.
- Align with the CDC National DPP and allow virtual suppliers to participate in the Medicare Diabetes Prevention Program.

Thank you for the opportunity to provide feedback on these important issues. If you have any questions or would like to further discuss our comments, please contact Kevin Harper, Vice President, Government Affairs at kevin.harper@teladochealth.com

Sincerely,

Kevin Harper
Vice President & Head of Government Affairs
Teladoc Health