

January 23, 2023

Novitas Solutions - Office of the Medical Director  
Attn: Leslie Stevens, MD  
2020 Technology Parkway Suite 100  
Mechanicsburg, Pennsylvania 17050

RE: *February 28, 2023 Multi-Jurisdictional Contractor Advisory Committee Meeting on Remote Physiologic Monitoring and Remote Therapeutic Monitoring for Non-implantable Devices*

We represent a diverse coalition of stakeholders that span the healthcare and technology sectors, all of whom support the expanded use of digital medical and health technologies. We write regarding the planned multi-jurisdictional Contractor Advisory Committee (CAC) meeting, to be led by Novitas Solutions, taking place on February 28, 2023, with the stated purpose of “obtain[ing] advice from a select panel regarding the strength of published evidence on remote physiologic monitoring (RPM) and remote therapeutic monitoring (RTM) for non-implantable devices and any compelling clinical data to assist in defining meaningful and measurable patient outcomes (e.g., decreases in emergency room visit and hospitalizations) for...Medicare beneficiaries,” and to permit panelists to “opine on pre-distributed questions during the meeting.”<sup>1</sup>

Evidence demonstrates that digital health innovations, specifically non-implantable RPM and RTM devices, improve patient care, reduce hospitalizations, help avoid complications, improve patient engagement, and augment the caregiver experience. We therefore share the Centers for Medicare & Medicaid Services’ (CMS) priority for the efficacious and equitable provision of digital health innovations to augment care for every patient.<sup>2</sup>

The planned February 28, 2023, CAC meeting is a timely and critical opportunity for harmonizing public understanding of Medicare Administrative Contractors’ (MACs’) approaches to RPM and RTM, as well as digital medicine writ large. It should serve as an invaluable opportunity where Medicare stakeholders can finally assemble in a public forum to discuss coding, valuation, coverage, and payment of this growing and exciting area of healthcare. However, as of the writing of this letter we are concerned by the lack of transparency surrounding this meeting – including the agenda, guests/subject matter experts, topics, types of evidence being assessed, process (prior to/during/after the meeting), and the possible outcomes. As a forum established to discuss matters of public importance regarding federal expenditures, the meeting should be conducted in a way to maximize the broadest possible engagement by the most appropriate stakeholders. We openly question why the meeting will only be limited to the opinions of formal discussants/panelists via pre-distributed questions. Because this is a relatively new and growing field, the public should be invited not only to attend as observers but to also proactively participate and offer views and experiences that speak to the efficacy and value of remote monitoring.

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<sup>1</sup> <https://www.novitas-solutions.com/webcenter/portal/MedicareJH/pagebyid?contentId=00202714>.

<sup>2</sup> E.g., Medicare Program; CY 2022 Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment Policies; Medicare Shared Savings Program Requirements; Provider Enrollment Regulation Updates; and Provider and Supplier Prepayment and Post-Payment Medical Review Requirements, 86 FR 65114-65117 (Nov 19, 2021).

As a leading voice for common interests and views that span across the digital medical community, we pledge our full support to assist the MACs in understanding the landscape of digital medicine. The February CAC meeting, and all MACs, will widely benefit from an open and transparent discussion that incorporates the range of RPM and RTM-related perspectives that our community has to offer.

We appreciate your consideration of our input and look forward to contributing to the CAC's discussion, ultimately advancing a harmonized approach across MACs to RPM and RTM as well as the public's understanding of how RPM and RTM are viewed and supported in Medicare.

We appreciate your efforts to examine the role of RPM and RTM tools in improving beneficiary outcomes and welcome any opportunity to assist you moving forward.

Sincerely,

**100Plus**

**Accuhealth**

**Adhere2care, Inc.**

**Adherium**

**AdvaMed**

**Affinity Expert**

**Akili, Inc.**

**Alliance for Connected Care**

**Alliance Tele-Med, LLC**

**AMC Health**

**American Association for Homecare**

**American Association for Respiratory Care**

**American Board of Quality Assurance & Utilization Review Physicians, Inc.**

**American Medical Association**

**American Society of Nephrology**

**American Telemedicine Association**

**ATA Action**

**ATLASense Biomed Ltd.**

**Augment Therapy, Inc.**

**Bluedrop Medical**

**BlueSleep**

**BlueStar Telehealth**

**Bright Cloud International Corp.**

**Brightree**

**Brilliant Care, Inc**

**Brooke & Associates**

**Cardiac RMS**

**Cardium RPM, Inc.**

**Care Connection Networks**

**CarePICS**

**CareSimple**

**ChroniSense Medical**

**CircleLink Health**

**CitusHealth**

**Click Therapeutics**

**CoachCare**

**Coala Life**

**Connect America**

**Connected Caregiver, Inc.**

**Connected Health Initiative**

**Consumer Technology Association**

**CopilotIQ Health**

**CYBX.io**

**Datos Health**

**DayaMed**

**Diasyst**

**Digital Healthcare Solutions**

**Digital Therapeutics Alliance**

**Dogtown Media**

**EmPowerYu, Inc.**

**Fresco Capital**

**Gateway Rehab**

**GatewayMD**

**GlobalForce Tech Consulting, LLC**

**Good Parents Inc.**

**Health Management Expert, Inc.**

**Health Tech Strategies, Inc.**

**HEALTHCAREfirst**

**HealthFlow LLC**

**HealthSnap, Inc.**

**Helios Medical Partners**

**Hero Health, Inc**

**Hygieia, Inc.**

**Intel Corporation**

**KCI Technology Solutions LLC**

**KEEP Labs**

**Kencor Health, Inc**

**Lief Therapeutics**

**Limbix**

**Luminoah**

**Magnolia RCM, Inc.**

**Masimo Corporation**

**MatrixCare**

**MD Revolution, Inc.**

**MedSign International Corporation**

**MiCare Path**

**Nova Insights**

**OdessaConnect**

**Omron Healthcare, Inc.**

**Optimize Health**

**OPUM Technologies**

**ORAH, LLC**

**Orma Health**

**Otsuka America Pharmaceutical Inc.**

**Patient Premier**

**Pear Therapeutics, Inc.**

**PharmD Live**

**PN Medical, Inc**

**Propeller Health**  
**Qorum Partners**  
**Qualcomm Incorporated**  
**React Health, Inc.**  
**Remote Care Partners**  
**ResMed Corp.**  
**Rhythm Management Group**  
**Rimidi, Inc.**  
**Roche Diagnostics Corporation**  
**RPMology**  
**Rubix LS**  
**S2N Health**  
**SaRA Health**  
**Scope Data**  
**Sleep 8, Inc.**  
**Stel Life, Inc.**  
**Tal Or**  
**Teladoc Health**  
**TelemedicineHealth Inc.**  
**Telemetrix**  
**The Omega Concern, LLC**  
**Theranica**  
**TimeDoc Health**  
**TracPatch Health, Inc.**  
**UnaliWear, Inc.**  
**Upside Health**

**Validic, Inc.**  
**VeeOne Health**  
**Verustat, Inc.**  
**VHH Visual Health**  
**Videra Health**  
**Vitrics RPM, Inc.**  
**Welby Health, Inc**  
**Zemplex**