RE: Notice of Proposed Changes to the Telemedicine Business Registry – 12 AAC 02

Dear Ms. Maiquis:

The American Telemedicine Association appreciates the opportunity to comment on the Alaska Department of Commerce, Community and Economic Development’s Notice of Proposed Changes to the Telemedicine Business Registry.

A government-managed telemedicine business registry is without precedent. Our first recommendation is “Do no harm,” such as creating cost and other disincentives to the use of telehealth by Alaska licensed patients and providers. Second, we urge the Department to create a consumer-friendly registry for residents wanting convenient and quality health care services offered through telemedicine.

Accordingly, we make the following specific recommendations:

1) Remove all references to a “telemedicine business”, and limit the regulation’s scope of coverage to apply only to licensed and certified health care providers and entities as defined under AS 08 and AS 47.32.900. Additionally, exempt licensed health care providers such as, but not limited to, those defined under AS 09.64.370; and

2) Do no more than what the statute, AS 44.33.381, specifies which is to “adopt regulations for establishing and maintaining a registry of business performing telemedicine services in the state”. The Department should not create a disincentive for those providing or seeking healthcare services in Alaska, nor should you disrupt existing telemedicine practice within the state by nullifying the telemedicine improvements enacted in CHAPTER 25 SLA 16.

It is important that statutes and regulations not hinder patients from getting the best care that can be done under extenuating circumstances. We look forward to the Department’s careful consideration of our comments and thoughtful development of this regulation.

Sincerely,

Jonathan D. Linkous
Chief Executive Officer