

## Rules coordinator (policy)

<b>Reference #</b>	11869938
<b>Status</b>	Complete
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<b>Rule number/topic</b>	R 2021-06 Telemedicine and Audio-only Telemedicine Services

**Comment(s) or question(s)**

Dear Rules Coordinator –

Thank you for the opportunity to comment. 98point6 offers virtual primary care through our platform which pairs artificial intelligence (AI) and machine learning technology with board-certified physicians through a private, HIPAA compliant mobile application. We also provide cognitive behavioral therapy and psychotherapy by licensed clinical social workers (LCSW), as well as behavioral coaching from coaches certified by the National Board for Health and Wellness Coaching (NBHWC) and International Coach Federation (ICF). While primary care services are primarily text-based, all behavioral and mental health services are offered via video and/or audio-only. Our work is motivated by increasing overall access to care.

We appreciate this area of law and technology is ever evolving, as is patient and provider preference. As such, we want to be sensitive to the risk of limiting the use of these technologies. This is especially important with mental and behavioral health services where audio-only is often the only available option and there is no opportunity for an in-person visit. We recognize that the Office of the Insurance Commissioner may not be in a position to redefine the statutory requirement for an 'established relationship' for the use of 'covered' audio-only services. However, while this rule does not currently directly impact 98point6, we wish to raise this important issue for future consideration.

The challenges of access to healthcare must be met with increased opportunities for providers to meet patients where they are - in location and modality. As a virtual care provider, we...

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... do not provide in-person services. Audio-only care can be essential to areas of the state with poor broadband infrastructure and among patient populations that do not wish to use, do not have access to, and/or are unable to use devices that permit a two-way, audio/video interaction. The data suggests that an in-person visit is not necessary and not always preferred by the patient. We hope that you will consider these important factors as you move further along in your study of telemedicine.

Thank you for your work and attention to these important issues.

<b>Last Update</b>	2021-08-31 12:20:42
<b>Start Time</b>	2021-08-31 10:14:54
<b>Finish Time</b>	2021-08-31 12:20:42
<b>IP</b>	74.96.140.210
<b>Browser</b>	Chrome
<b>Device</b>	Desktop
<b>Referrer</b>	<a href="https://www.insurance.wa.gov/">https://www.insurance.wa.gov/</a>