



**Association of
American Medical Colleges**
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November 1, 2017

submitted at <http://www.regulations.gov>

Kevin Galpin, MD
Executive Director, Telehealth Services
Veterans Health Administration Office of Connected Care
810 Vermont Avenue, NW
Washington, DC 20420

RE: Authority of Health Care Providers to Practice Telehealth, RIN 2900-AQ06

Dear Dr. Galpin:

The Association of American Medical Colleges (AAMC) welcomes this opportunity to comment on the Department of Veterans Affairs (VA) proposed rule entitled *Authority of Health Care Providers to Practice Telehealth*, 82 *Fed.Reg* 45756 (October 2, 2017).

The AAMC is a not-for-profit association dedicated to transforming health care through innovative medical education, cutting-edge patient care, and groundbreaking medical research. Its members comprise all 149 accredited U.S. and 17 accredited Canadian medical schools; nearly 400 major teaching hospitals and health systems, including 51 Department of Veterans Affairs medical centers; and more than 80 academic societies. Through these institutions and organizations, the AAMC serves the leaders of America's medical schools and teaching hospitals and their nearly 167,000 full-time faculty members, 88,000 medical students, and 124,000 resident physicians.

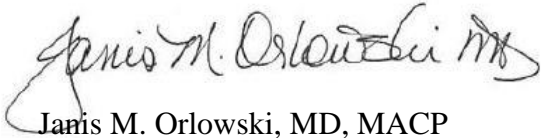
The AAMC and our teaching hospitals and medical schools have a long-standing and unique relationship with the VA. Today, the VA has over 500 academic affiliations, and 127 VA facilities have affiliation agreements for physician education training with 135 U.S. medical schools. Each year, the VA helps train more than 20,000 individual medical students and more than 40,000 individual medical residents within its walls. As a system, the VA represents the largest training site for physicians, and funds approximately 10 percent of national graduate medical education (GME) costs annually.

The AAMC strongly supports the proposed rule to expand the use of telehealth within the VA system. Telehealth has long been recognized as an important way to expand access to health care for those in underserved communities, or for patients who need care at home. The VA is fortunate to have a system that allows the practice of telehealth across state lines to become a reality. The rule proposed by the VA will make high-quality mental health and other services more widely available to veterans. It will also provide opportunities for the many medical students and residents who train at VA sites to become familiar with telehealth and be exposed to its optimal uses. At a time when the VA is grappling with workforce shortages, as is the rest of

the health care system, this rule will assist in making care more widely and conveniently available to veterans.

If you have any questions, please contact Ivy Baer, ibaer@aamc.org, 202-828-0499.

Sincerely,

A handwritten signature in black ink that reads "Janis M. Orlowski MD". The signature is written in a cursive style with a large initial "J" and "M".

Janis M. Orlowski, MD, MACP
Chief Health Care Officer

cc: John Prescott, MD, AAMC
Ivy Baer, AAMC