



August 14, 2020

Dawn Stehle
Deputy Director for Health and Medicaid Director
State of Arkansas
Department of Human Services
112 West 8th Street, Slot S401
Little Rock, AR 72201-4608

Dear Ms. Stehle,

On behalf of the nearly 300 people in Arkansas living with cystic fibrosis (CF), we write to thank you for expanding access to telehealth services during the COVID-19 crisis and ask you to extend many of these flexibilities while COVID-19 remains a threat for people with CF. Continuing these flexibilities past the current expiration date of August 17, 2020 will help ensure those at high-risk of complications related to COVID-19—including people with cystic fibrosis—have continued access to care without putting themselves at greater risk of infection.

About cystic fibrosis and COVID-19

Cystic fibrosis is a life-threatening genetic disease that affects more than 30,000 children and adults in the United States. CF is a complex, multi-system disease that causes the body to produce thick, sticky mucus that clogs the lungs and digestive system, which can lead to life-threatening infections. Cystic fibrosis is both serious and progressive; lung damage caused by infection is irreversible and can have a lasting impact on length and quality of life. While great strides have been made in the treatment of the disease, CF continues to be a severe condition for which COVID-19 can pose serious health risks.

Access to telehealth services is especially important for those with CF and other underlying health conditions who, according to the Centers for Disease Control and Prevention (CDC), may be at increased risk of developing serious illness if they become infected with the coronavirus.¹ Recognizing the need for strict adherence to social distancing guidelines and taking into account special considerations for their patient population, CF care teams have responded rapidly to changes in care delivery and are embracing telehealth in their clinics. Today, nearly all of the 130 CF care centers in the U.S., including two centers in Arkansas, are providing some form of telehealth services to their patients.

COVID-19 continues to present serious risk to Arkansas residents, including those with CF. As of August 14, 2020, more than 165,000 people in the United States have died as a result of COVID-19, including 573 in Arkansas.² Furthermore, over the last seven days, nearly 5,000 cases in Arkansas have been reported to the CDC. The CDC has recommended Americans continue to reduce the risk of transmission of COVID-19 and protect those who are most vulnerable to infection.³

¹ https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fneed-extra-precautions%2Fgroups-at-higher-risk.html

² <https://www.cdc.gov/covid-data-tracker/>

³ <https://www.cdc.gov/media/releases/2020/s0528-coronavirus-death-toll.html>

Extend telehealth flexibilities

The CF Foundation commends Arkansas and the Department of Human Services for recognizing the critical role of telehealth even prior to the COVID-19 outbreak by instituting payment parity with in-person services. We thank you for providing additional temporary flexibilities during the COVID-19 pandemic and providing temporary flexibilities to increase access to remote care. These flexibilities have helped mitigate the effects of the coronavirus pandemic by removing barriers to telehealth services and reducing unnecessary exposure to the virus for both patients and providers. We appreciate your efforts to ensure patients' access to telehealth services through expanding eligible originating sites and provider types and ask that Arkansas Medicaid extend the following flexibilities for as long as COVID-19 remains a threat to people with CF:

1. Permitting a patient's home to serve as the originating site for care; and
2. Expanding the range of providers eligible for telehealth reimbursement.

Permitting a patient's home to serve as the originating site for care

Continuing to ease originating site restrictions will help ensure patients can access telehealth from their home. This enables infected patients to receive care without spreading the virus and allows other patients—including those with underlying conditions like CF—to receive care without putting themselves at increased risk of coronavirus infection. This flexibility also reduces unnecessary exposure for CF providers. If originating site restrictions were to go back into effect, it would undermine the real value of telehealth in this pandemic—which has been allowing patients to receive health care while continuing to practice social distancing.

Expanding the range of providers eligible for telehealth reimbursement

Continuing to reimburse additional providers for telehealth services is also critical. Cystic fibrosis is a complex disease that requires multidisciplinary, patient-centered care; each care team has a pulmonologist, nurse, respiratory therapist, dietician, and social worker, and often includes additional staff such as a mental health coordinator or pharmacist. In order for patients with CF to continue to receive the highest quality of care from their homes, they must be able to access their entire care team. Therefore, it is critical that each discipline remain eligible for reimbursement for telehealth services beyond the current public health emergency. Therefore, we encourage Arkansas to continue to allow flexibility as to which providers are eligible for reimbursement for telehealth services, including at least those added during your initial response to COVID-19 in March.

Cover remote monitoring devices and services

To experience the full benefits of Arkansas's telehealth expansions, people with CF also need access to remote monitoring devices, including home spirometers, pulse oximeters, and scales. As a complex, chronic disease, cystic fibrosis requires regular physiologic monitoring. CF clinicians monitor patient wellbeing through key health indicators, most notably lung function and weight. Studies show that home spirometry use, for example, can help detect pulmonary exacerbations in adults and may improve medication adherence in adolescents.^{4,5} Additionally, people with cystic fibrosis can experience complications that lead to malnutrition and other digestive issues that hinder their ability to maintain a healthy weight. Infant and adult scales are critical for people with CF to monitor their weight and body mass index (BMI) in consultation with their care team. Coverage of these devices, in addition to provider

⁴ Shakkottai A, Kaciroti N, Kasmikha L, Nasr SZ. Impact of home spirometry on medication adherence among adolescents with cystic fibrosis. *Pediatric Pulmonology*. 2018;53:431–436. <https://doi.org/10.1002/ppul.23950>

⁵ Lechtzin, Noah et al. "Home Monitoring of Patients with Cystic Fibrosis to Identify and Treat Acute Pulmonary Exacerbations. eICE Study Results." *American journal of respiratory and critical care medicine* vol. 196,9 (2017): 1144-1151. doi:10.1164/rccm.201610-2172OC

time spent on remote patient monitoring, is vital for CF patients to maintain their health while remaining at home.

We urge you to extend the flexibilities detailed in this letter beyond August 17, 2020 and to provide coverage of remote monitoring devices and related services. The coronavirus is still very much a threat for people with cystic fibrosis and ongoing access to telehealth care is imperative for avoiding unnecessary exposure to the virus.

We stand ready to serve as a resource to Arkansas as you consider coverage and reimbursement changes during and beyond the current public health emergency. Please contact Lauren Ryan, Sr. Policy Specialist, at lryan@cff.org or (301) 841-2632 if you would like to discuss this issue further.

Thank you for your attention to this important issue.

Sincerely

A handwritten signature in black ink, appearing to read 'Mary B. Dwight', with a stylized flourish at the end.

Mary B. Dwight
Chief Policy & Advocacy Officer
Senior Vice President of Policy and Advocacy

Cc: Asa Hutchinson, Governor, State of Arkansas