



December 3, 2010

The Honorable Donald M. Berwick
Administrator
Centers for Medicare and Medicaid Services
200 Independence Avenue, SW
Washington, D.C. 20201

RE: FR Doc. 2010-28006

Dear Administrator Berwick:

On behalf of Continua, I am writing to respond to the agency's request for information concerning Accountable Care Organizations.

The Continua Health Alliance (www.continuaalliance.org) is a non-profit, open industry coalition of over 230 healthcare, technology and medical device companies who have joined together in collaboration to improve the quality of health through the use of remote patient monitoring and independent living technologies for what we call "e-Care."

e-Care, as defined by the Federal Communications Commission National Broadband Plan, is the electronic exchange of information that includes data, images and video to aid in the practice of medicine and advanced analytics. e-Care encompasses technologies that enable remote monitoring and "store-and-forward" of information over wireline, wireless or mobile broadband networks. e-Care is a subset of Health Information Technology (HIT), which all are intended to augment – not replace – the delivery of health care by doctors, clinicians and hospitals.

Continua is dedicated to establishing interoperable personal health solutions based on remote monitoring devices with the knowledge that by extending those solutions into alternate and less expensive locations of care fosters independence, empowers individuals, and provides the opportunity for personalized health and wellness. Continua believes that e-Care is critical to augment health care services and improve the efficiency and quality of care.

In the request for information, the agency asks three specific questions we believe relate to e-Care.

1) *The Affordable Care Act requires us to develop patient-centeredness criteria for assessment of ACOs participating in the Medicare Shared Savings Program. What aspects of patient-centeredness are particularly important for us to consider and how should we evaluate them?*

The Institute of Medicine has defined patient-centered care as "care that is respectful of and responsive to individual patient preferences, needs and values." The Affordable Care Act (ACA § 3024) requires that Accountable Care Organizations participating in shared savings programs under ACA are required to "define processes to promote evidence-based medicine and patient

engagement, report on quality and cost measures, and coordinate care, such as through the use of telehealth, remote patient monitoring, and other such enabling technologies.” Therefore, it is logical to include in patient-centered criteria the use of e-Care devices and technologies. Continua believes that e-Care can provide important elements of patient centered care including:

1. Empowerment of patients with tools that help them make sense of—and to manage—their own care;
2. Collection of real-time biological and behavioral data and trends on a daily basis with alerts for abnormal or inconsistent findings;
3. Facilitate virtual visits with providers, when appropriate, via a range of electronic media and mobile personal computing devices such as laptops, netbooks and smart phones;
4. Enablement of social networking, awareness, and care support from family and friends who are nearby or distant;
5. Personalized care plans and educational content for each patient based on their needs, preferences, data, and capabilities; and
6. Triaging precious medical resources to enable the right amount of physician care to occur in the right place and time.

By including these technologies as part of the patient centered criteria, e-Care can become integrated in a meaningful way into ACOs and patient care. If not included in the criteria, there is a risk that these devices, will not necessarily be integrated into the ACO’s system of care. We believe once providers become accustomed to integrating this form of care which includes the meaningful use of health information technologies into their practices, they will see improved quality for their patients and improved patient and caregiver satisfaction.

2. In order for an ACO to share in savings under the Medicare shared Savings Program, it must meet a quality performance standard determined by the Secretary. What quality measures should the Secretary use to determine performance in the Shared Savings Program?

Continua urges the inclusion of the use of e-Care to assess quality measures. The extensive deployment and use of innovative e-Care technologies can bring a wealth of measurable data to assist in calculating cost savings that result from the outcomes of improved health care for issues like chronic disease management. ACOs should be encouraged to use remote patient monitoring, telehealth and other health information technologies like e-Care, to improve service delivery, better their coordination and management of care.


3. What additional payment models should CMS consider in addition to the model laid out in § 1899(d), either under the authority provided in 1899(i) or the authority under the CMMI? What are the relative advantages and disadvantages of such alternative payment models?

Continua believes bundled payments should include payment for the use of e-Care devices. For example, if a physician is treating a cardiac patient, the bundled payment could include an add-on payment within the bundle to account for the capital expenses related to the purchase of equipment and training. Over time, this add-on could be removed to make the proposal budget neutral. Initially, providers will need an incentive to begin to use and train their staff and patients on how to . deliver care differently integrating technology into the care plan to augment

the clinician face-to-face care. The add-on payment will facilitate compliance with the ACO provision which specifically calls out remote patient monitoring and it would be in keeping with ACA §3024 states: “ Primary care physician, specialist and hospital form affiliates to promote patient engagement, report on quality and cost and coordinate care through **the use of telehealth, remote patient monitoring and other such enabling technologies.**”

We look forward to working with you in the development of ACOs and how to incorporate e-Care technologies into their care models. If you have additional questions please contact Chuck Parker, Executive Director, Continua Health Alliance at chuck.parker@continuaalliance.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Parker".

Charles Parker

Executive Director

chuck.parker@continuaalliance.org

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