



# ERIC The ERISA Industry Committee

*The Only National Association Advocating Solely for the Employee Benefit and Compensation Interests of America's Largest Employers*

1400 L Street, NW, Suite 350, Washington, DC 20005 • (202) 789-1400 • [www.eric.org](http://www.eric.org)

*Annette Guarisco Fildes, President & CEO*

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Telemedicine Advisory Committee  
Arkansas State Medical Board  
1401 West Capitol Avenue, Suite 340  
Little Rock, AR 72201-2936

*Sent via email to [support@armedicalboard.org](mailto:support@armedicalboard.org)*

Dear Arkansas State Medical Board Telemedicine Advisory Committee,

On behalf of The ERISA Industry Committee (ERIC), thank you for inviting comments from interested stakeholders on your telemedicine rulemaking process. ERIC is the only national trade association advocating solely for the employee benefit and compensation interests of America's largest employers. ERIC speaks in one voice for large employers with workers in every state across the country on public policy issues relating to employee benefits.

ERIC's members are committed to, and known for, providing high-quality, affordable health care to millions of workers and their families. Our members operate all over the country, including a considerable presence in Arkansas. ERIC has a strong interest in proposals that affect its members' ability to deliver cost-effective benefits. ERIC's members devote considerable time and resources to their benefit plans. In order to provide these benefits, large employers must balance the provision of high-quality, affordable health care with the need to contain costs for these programs.

Our members need consistent telehealth policies around the country so that their workers and their families can enjoy the same company benefits regardless of the state in which they live or work. It is imperative that funds to pay benefits are maximized and not diverted to coping with administrative and legal challenges stemming from a myriad of disparate and potentially conflicting state rules and regulations.

As you note in your request for information, telemedicine offers unique benefits to rural populations and has the "great potential to improve patient access to health care" while ensuring the services provided protect the safety and welfare of the patient. We agree.

We would also add that, in addition to improved access to health care, telemedicine can offer:

- **Accessibility. Flexibility. Without barriers.** Telemedicine allows employees and their families to gain access to health care 24 hours a day, seven days a week, whether at home, in transit, or at work. With telemedicine, standard office hours and proximity to a doctor are no longer barriers to needed care.
- **Benefits for rural, urban, and working families.** Telemedicine has long been seen as a means for providing access to care for rural populations, but the impact of the virtual service doesn't stop there. Urban underserved populations, retirees, disabled employees, and those with language barriers also stand to benefit from increased access to care, as well as working parents and others struggling to balance work and family demands. Using telemedicine to remotely monitor health conditions is also an important benefit.

- **Increased workforce satisfaction.** The response from employees who have used telemedicine services is very positive. They like the service and want it to continue. Employees want to minimize the time spent attending to their health needs, or that of loved ones, and appreciate the opportunity to reach a health care professional at times and locations that are convenient to them.
- **Connection to workplace clinics, rural health centers and employer wellness initiatives.** Telemedicine services can be tied to employer workplace clinics as well as rural health centers. These services also support wellness initiatives that employers offer to further employee health and wellbeing.
- **Cost-effective care.** Employees, retirees, and their families need access to health care that they can utilize because it is provided at an affordable, cost-effective rate.

ERIC respects and supports the role of the Arkansas State Medical Board (ASMB) in protecting the health, safety, and welfare of the people of the State of Arkansas, and the goal of ensuring that the highest quality of health care is provided in the state. ERIC believes that the standards governing in-person visits should apply in the same manner to telemedicine visits. In other words, there should not be artificial barriers that unnecessarily limit access to medical services provided through telemedicine when there are existing requirements in place to hold providers to high standards of care.

To achieve a balanced regulatory environment for telemedicine, ERIC encourages the ASMB, to the extent permitted by law, to:

- ADOPT technology-neutral requirements, permitting use of different types of technology platforms that are designed for telemedicine;
- AVOID imposing additional requirements on providers that offer telemedicine services that are not imposed on in-person visits;
- AVOID originating site restrictions that require patients to visit certain locations in order to access telemedicine services; and,
- CONSIDER the needs of patients to have better access to care that can be provided via telemedicine, either through a telemedicine visit or remote monitoring of health conditions.

Thank you for soliciting input from interested stakeholders. ERIC is pleased to represent large employers with the goal of ensuring that telehealth benefits are accessible for millions of workers, retirees, and their families. We welcome additional questions and opportunities to contribute to your rulemaking process.

Sincerely,



Annette Guarisco Fildes  
President & CEO