

September 9, 2024

The Honorable Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare and Medicaid Services  
200 Independence Avenue, S.W.  
Washington, DC 20201

RE: RIN 0938-AV33

Dear Administrator Brooks-LaSure:

On behalf of the undersigned stakeholder organizations, I write to you in support of the Centers for Medicare and Medicaid Services' (CMS) proposal to cover digital mental health treatment in the Calendar Year 2025 Physician Fee Schedule (CY2025 PFS) proposed rule. This is an important first step and we appreciate your work to allow Medicare beneficiaries to access these innovative treatments. Importantly, this proposal sets an important precedent towards coverage of these services in other programs. We encourage you to finalize this proposal.

Prescription digital therapeutics are evidence-based, FDA-cleared software products that treat various mental and physical health diseases and disorders. They can help to address the mental health crisis in United States by eliminating logistical challenges patients may face in traveling to in-person appointments, extending the limited workforce of mental health professionals, and giving patients the freedom to access necessary mental health services from the comfort of their own homes, increasing both access to and engagement with these essential services.

Prescription digital therapeutics would expand access to mental healthcare to underserved communities that have long experienced an insufficient workforce of providers. The integration of prescription digital therapeutics into Medicare coverage also alleviates the burden on traditional healthcare systems by providing flexible treatment options in line with broader efforts to modernize healthcare delivery and embrace innovative solutions that meet the evolving needs of patients today.

These digital tools also offer a personalized and adaptive approach to treatment, which can be tailored to individual needs and preferences, ultimately leading to better health outcomes. By covering digital therapeutics, CMS would support a more inclusive approach to mental health care, ensuring that all Medicare beneficiaries, regardless of their geographic location or economic status, can receive the support they need.

We strongly support CMS coverage and payment for digital therapeutics when they are furnished incident to a provider service, as the CY2025 PFS proposes. We urge you to finalize these

proposals and look forward to continuing to work with you to expand access to mental health services.

Sincerely,

American Psychological Association Services  
International OCD Foundation  
National Council for Mental Wellbeing  
Centerstone  
National Association of Pediatric Nurse Practitioners  
American Mental Health Counselors Association  
Anxiety and Depression Association of America  
Maternal Mental Health Leadership Alliance  
The Kennedy Forum  
National Alliance on Mental Illness  
Mental Health America  
American Association of Psychiatric Pharmacists  
Employee Assistance Professionals Association  
Meadows Mental Health Policy Institute  
National Association of Social Workers  
Clinical Social Work Association  
American Foundation for Suicide Prevention  
International Society of Psychiatric-Mental Health Nurses