

March 20, 2023

The Honorable Bernie Sanders
Chairman
Senate Committee on Health, Education, Labor
& Pensions
428 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Bill Cassidy, MD
Ranking Member
Senate Committee on Health, Education, Labor
& Pensions
428 Dirksen Senate Office Building
Washington, DC 20510

RE: Request for Information on Health Care Workforce Shortages

Dear Chairman Sanders and Ranking Member Cassidy:

As the association uniquely gathering many health care industry organizations focused on innovation, we offer suggestions on how digital health can help address health workforce issues. This is a 2023 priority issue for the Consumer Technology Association, and we look forward to engaging with the Committee.

As North America's largest technology trade association, CTA is the tech sector. Our members are the world's leading innovators – from startups to global brands – helping support more than 18 million American jobs. CTA owns and produces CES® – the most influential tech event in the world. CTA is the trade association representing more than 1500 companies in the U.S. consumer technology industry. Eighty percent of CTA companies are small businesses and startups; others are among the world's best-known brands. We provide members with policy advocacy, market research, technical education and standards development.

CTA's Health Division strives to increase the use of technology-enabled value-based health care to reduce health care costs and drive better health outcomes. The Division, which is made up of cutting edge small and large companies in the health care and technology sectors, including telehealth and personal health wearable companies, health care payers, health systems and biopharmaceutical innovators, provides policy advocacy, health care market research and standards initiatives that advance the appropriate use of consumer technologies in the health care context.

General Comments

CTA believes an important part of addressing workforce shortage issues is removing barriers to the use of innovative health technologies. In 2021, the first recommendation of the National Advisory Council on the National Health Services Corps to address the U.S. healthcare workforce shortage is to “[d]eploy telemedicine training, equipment, and technologies that facilitate continuity of care, address social

determinants of health, and otherwise support NHSC to reduce workforce distributional imbalances.”¹ Technology can also help train existing rural health workforce to treat more complex conditions. Project ECHO was founded in New Mexico by Dr. Sanjeev Arora out of his frustration that many patients in rural areas of the state were dying of Hepatitis C, a treatable disease, because they did not have access to specialists. Dr. Arora created a virtual provider community to share information and support rural providers that has since expanded into many different specialty areas. As the Committee considers policies to address workforce shortage issues, we urge you to support the use of digital health to expand the reach and knowledge of current providers.

Digital Therapeutics

While we are facing health workforce shortages across the board, the mental health workforce shortage is critical. Nearly half of Americans live in a mental health workforce shortage area.² This is exacerbated by the growing demand for mental health services. CTA believes digital therapeutics can help address these gaps. A digital therapeutic (DTx) is an evidence-based, standalone or combination software product intended for management, maintenance, prevention or treatment of a disease, disorder or condition acting directly as a medical intervention or guiding the delivery of a medical intervention.³ To date, CTA has published one DTx standard: Definitions & Characteristics of Digital Therapeutics (ANSI/CTA-2098), with another under development: Evidence Based Performance Criteria for Digital Therapeutics (ANSI/CTA-2109, Evidence Based Performance Criteria for Digital Therapeutics). CTA members are driving best practices and adoption of DTx to address the mental health needs of Americans and we look forward to working with the Committee to remove barriers and spur adoption of these important tools.

Artificial Intelligence

In addition, CTA believes that artificial intelligence (AI) is showing promise in reducing provider burden and burnout. Not only are advances in AI revolutionizing the way we detect and treat diseases, but it can also streamline administrative tasks such as scheduling and clinical documentation requirements.^{4,5} As a convener of leading technology and health organizations, CTA is committed to driving industry best practices and standards on the use of AI in healthcare. To date, CTA has published three AI in healthcare standards: Definitions and Characteristics of AI in Health Care (ANSI/CTA-2089.1); The Use of Artificial Intelligence in Health Care: Trustworthiness (ANSI/CTA-2090); and The Use of Artificial Intelligence in Health Care: Managing, Characterizing, and Safeguarding Data (ANSI/CTA-2107). Because it is essential to ensure quality and safety in these tools, we believe the Committee should recognize industry-led standards initiatives when considering federal regulation.

¹ <https://www.hrsa.gov/sites/default/files/hrsa/advisory-committees/national-health-service-corps/nhsc-healthcare-shortage-2021-2023.pdf>

² <https://www.kff.org/medicaid/issue-brief/a-look-at-strategies-to-address-behavioral-health-workforce-shortages-findings-from-a-survey-of-state-medicaid-programs/>

³ ANSI/CTA-2098, Definitions & Characteristics of Digital Therapeutics

⁴ Hazarika, I. (2020). Artificial intelligence: opportunities and implications for the health workforce. *International health*, 12(4), 241-245.

⁵ <https://www.fiercehealthcare.com/ai-and-machine-learning/finding-right-candidates-keeping-them-ai-aiding-healthcare-industry-meets>

Thank you for the opportunity to provide preliminary suggestions as the Committee considers policies to address health workforce issues. We look forward to continuing to work with you on policies to support the use of digital health to support, expand, and reduce burden on health care providers.

Sincerely,

Consumer Technology Association

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