



Alaska Psychological Association

Advancing psychology as a science, a profession, and a means of promoting health and welfare

February 25, 2016

Senator Pete Kelly, Co-Chair
Senator Anna MacKinnon, Co-Chair
Senate Finance Committee
Alaska State Capitol Building
Juneau, AK 99801-1120

RE: Proposed Medicaid Reform Legislation- Sec. 17. AS 47.05, Defining Sec. 47.05.270. (e)

Dear Senate Finance Co-Chairs and Members of the Committee:

The Alaska Psychological Association (AK-PA) was formed, as a member based entity to advance psychology as science, profession and as a means for promoting human welfare in Alaska. Psychology as a profession recognizes and welcomes the expanding role of technology in the provision of needed psychological services and the continuous development of new technologies that may be useful in the practice of psychology. These practices represent both new opportunities as well as very real challenges to the provision of services that recognize the geographical and cultural richness in a state such as Alaska.

Telemedicine practice is a highly complex service, and guidance to professionals is in a continual state of change. As is the case with other professional healthcare disciplines, the American Psychological Association has published a set of practice guidelines for the practice of telepsychological services, the Guidelines for the Practice of Telepsychology. These highlight the complexity inherent in telehealth: "The practice of telepsychology involves consideration of legal requirements, ethical standards, telecommunication technologies, intra- and interagency policies, and other external constraints, as well as the demands of the particular professional context."

Issues related to the provision of psychological services across jurisdictional boundaries have not been resolved. Again, as noted by the American Psychological Association, "Psychological service delivery systems within such institutions as the U.S. Department of Defense and the Department of Veterans Affairs have already established internal policies and procedures for providing services within their systems that cross jurisdictional and international borders. However, the laws and regulations that govern service delivery by psychologists outside of those systems vary by state, province, territory, and country (APAPO, 2010)." AK-PA believes that these issues will require additional deliberate review so that telehealth services are provided in a competent and ethical manner that is responsive to the unique needs of the individuals being served. Protecting the welfare of the consumers of these services is a critical aspect of the implementation of telemedicine services.

Therefore, as the State of Alaska and the Alaska Legislature undertakes Medicaid Reform, we would like to take this opportunity to advocate for a specific statute change. The statute, **AS 47.05**, defines the practice of "telemedicine." Because of the inherent complexity of the issues relate to the ethical and competent delivery of telemedicine services and the need to ensure that Alaskans are provided high-quality care that is responsive to

the unique needs of Alaskans, and to protect the welfare of Alaskans being served through telemedicine services, **our association recommends adding the following requirement (in bold):**

Sec. 47.05.270. Medical assistance reform program.

(e) In this section, "telemedicine" means the practice of health care delivery, evaluation, diagnosis, consultation, or treatment, using the transfer of medical data through audio, visual, or data communications that are performed over two or more locations between providers **licensed in Alaska** who are physically separated from the recipient or from each other.

We believe that adequate regulatory oversight of telemedicine services in Alaska requires that the respective licensing boards be authorized to ensure that services provided meet the standard for professional practice established in Alaska, until such time as national guidelines and standards are in place that can guide the practice of this mode of service delivery.

Our association hopes that you strongly consider this revision. Please consider us as a resource.

Respectfully submitted,



Michael Sobocinski, PhD

President, Alaska Psychological Association

cc: Members of Senate Finance Committee
Valerie Davidson, Commissioner, DHSS
Randall Burns, Division of Behavior Health, DHSS
Jeff Jessee, Mental Health Trust