



August 29, 2019

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: WC Docket No. 18-213

Dear Chairman Pai:

The Healthcare Leadership Council (HLC) applauds the Federal Communications Commission's (the Commission) Notice of Proposed Rulemaking to establish the Connected Care Pilot (the Pilot) to promote connected care services for medically underserved populations by empowering healthcare providers to directly connect to their patients.

HLC is a coalition of chief executives from all disciplines within American healthcare. It is the exclusive forum for the nation's healthcare leaders to jointly develop policies, plans, and programs to achieve their vision of a 21st century healthcare system that makes affordable high-quality care accessible to all Americans. Members of HLC – hospitals, academic health centers, health plans, pharmaceutical companies, medical device manufacturers, laboratories, biotech firms, health product distributors, post-acute care providers, home care providers, and information technology companies – advocate for measures to increase the quality and efficiency of healthcare through a patient-centered approach.

HLC members have seen firsthand the value of innovative connected health technologies, such as telehealth and remote patient monitoring, to reduce healthcare costs and improve health outcomes for various acute and chronic health conditions by making it easier for providers to treat patients and through improved care coordination and continuity of care. Additionally, telehealth can help to address workforce shortages, especially in rural areas or areas that have received the Health Resources and Services Administration's Medically Underserved Areas and Healthcare Provider Shortage Areas designations. HLC supports the Pilot's goals to improve health outcomes through connected care; reduce healthcare costs for patients, facilities, and the healthcare system; support the trend toward connected care everywhere; and determine how Universal Service Funds can positively impact existing telehealth initiatives.

Despite the promise of connected health technology, a significant barrier to broader adoption, especially among low-income and rural communities, is lack of access to broadband in the home. Low income and rural Americans are more likely to lack the necessary broadband

capabilities to utilize connected health technology.^{1,2} The Connected Care Pilot represents a significant step toward facilitating broadband connectivity not currently available to these medically underserved patients. By subsidizing the cost of broadband access for low-income and rural Americans, healthcare providers can provide access to healthcare outside of the hospital, doctors' office, and other healthcare facilities to improve health outcomes and reduce healthcare costs.

HLC supports the Pilot's proposed flexibility which would give healthcare providers latitude to determine the choice of broadband service provider and the specific health conditions and geographic areas to be the focus of proposed projects. We also agree with the Commission's proposal to focus Pilot projects on health conditions that typically require at least several months or more to treat, including behavioral health, opioid dependency, and chronic health conditions as this would provide more meaningful, statistically significant data to track health outcomes and costs. Furthermore, to allow program participants to fully utilize innovations in connected care to achieve the best health outcomes, we recommend that the Commission take a "technology-neutral" approach that ties the connected health technology to the type of service needed.

We believe data generated from the Pilot should be shared with other federal agencies, including the Centers for Medicare and Medicaid Services (CMS) and the Congressional Budget Office (CBO), to help project how expanding telehealth services in federal programs could reduce healthcare costs and improve outcomes. Because of the effect the Pilot's outcomes will have on federal agencies and policymakers considering the efficacy of connected health technologies, we recommend the Commission select pilot participants that have experience and have demonstrated value in providing medical care outside of hospitals, doctors' offices, and other healthcare facilities. To encourage the broadest range of proposals and data collection, we agree with the Commission's proposal to open the Pilot to both rural and urban eligible healthcare providers. Finally, the proposed rule offers several metrics and methodologies for measuring progress. We recommend the Commission collaborate with stakeholders and measure developers, such as the National Quality Forum, to identify appropriate measures of success.

HLC supports the Commission's efforts to promote connected care for medically underserved populations by empowering healthcare providers to directly connect to their patients. We believe that data generated from the Pilot will further demonstrate the true value of connected health technologies to improve health outcomes and reduce healthcare costs. Should you have any questions, please do not hesitate to contact Devon Adams at (202) 449-3445 or dadams@hlc.org.

Sincerely,



Mary R. Greal
President

¹ Anderson, M., & Kumar, M. (2019, May 07). Digital divide persists even as lower-income Americans make gains in tech adoption. Retrieved from <https://www.pewresearch.org/fact-tank/2019/05/07/digital-divide-persists-even-as-lower-income-americans-make-gains-in-tech-adoption/>

² National Telecommunications and Information Administration. The State of the Urban/Rural Digital Divide. Retrieved from <https://www.ntia.doc.gov/blog/2016/state-urbanrural-digital-divide>