



April 27, 2020

U.S. Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**RE: COVID-19 Telehealth Program (WC Docket No. 20-89)**

Dear Commissioners,

HCA Healthcare appreciates the Federal Communications Commission's (the Commission's) timely implementation of the COVID-19 Telehealth Program, authorized pursuant to the Coronavirus Aid, Relief, and Economic Security (CARES) Act. However, we write in support of the American Hospital Association's April 9, 2020 petition for partial reconsideration and urge the Commission to revise its decision to limit participation in the COVID-19 Telehealth Program to the categories of health care providers set forth in section 254(h)(7)(B) of the Communications Act of 1934, as amended,<sup>1</sup> as hospital challenges associated with the COVID-19 pandemic are not limited by geographic location, size, or tax status.

HCA Healthcare provides comprehensive care to patients, covering broad rural and metropolitan communities across 21 states and the UK. In an effort to continue to provide clinical excellence at scale, HCA Healthcare has taken great strides to provide innovative care delivery models through telehealth capabilities across all of our 2,000+ sites of care and has scaled up telehealth capabilities at an exponential rate in response to COVID-19. To date, HCA Healthcare's approximate telehealth spending to support COVID-19 response exceeds \$5 million.

We have developed and deployed enterprise solutions to support emergency department surges, reduce exposure, maintain continuity of care for chronically ill patient populations, and protect our health care workers all while providing clinical care at or above the same level as an in-person encounter.

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<sup>1</sup> COVID-19 Telehealth Program. WC Docket No. 20-89. FCC 20-44 at para. 20 (rel. April 2, 2020); 47 U.S.C. § 254(h)(7)(B).

Examples of our growth to innovatively support our communities include:

- Implementation of a **high-touch, app-based** solution to screen and monitor patients and HCA Healthcare colleagues for symptoms related to COVID-19 through our remote monitoring partner, Vivify Health. Our teams scaled this technology across all 180+ of our hospitals in less than 7 days and currently **monitor over 20,000 patients and colleagues**.
- Enabled telehealth capabilities for **over 6,000 physicians** to provide continuity of care for our primary and specialty care practices by leveraging internal IT and operational support teams to launch, train, and support our providers in less than 30 days. We scaled from an average of **50 telehealth visits per day** in our physician practices in January of this year to an average of **more than 10,000 per day** in April.
- More than **tripled our hospital-based telehealth solutions** to reduce exposure between our patients and health care workers. These additional telehealth endpoints, using InTouch Health software on iPads, laptops and tablets, enabled our clinical teams to expand **inpatient rounding, support clinical consults to our isolated patients, provide neonatal intensive care unit and other specialty consults**, and continue to provide excellent clinical care while preserving critical PPE.
- Developed and deployed a web-based telehealth solution to **expand urgent care virtual visits** in all of the communities we serve. This capability supports the need to preserve social distance requirements while providing excellent care to our patients. We have accelerated the deployment of a virtual urgent care solution that will continue to transform how we connect with patients beyond COVID-19 response.

As we remain committed to identifying innovative ways to support patients via telehealth, we join other health care stakeholders in requesting reconsideration of eligibility criteria for the COVID-19 Telehealth Program. HCA Healthcare appreciates the Commission's leadership on this matter and the opportunity to submit comments. If you have questions or would like to discuss further, please contact Kara Townsend at [kara.townsend@hcahealthcare.com](mailto:kara.townsend@hcahealthcare.com) or 615-344-4942.

Sincerely,



Marty Paslick  
Chief Information Officer

Electronically Submitted at <https://www.fcc.gov/ecfs/filings>