



July 23, 2019

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

RE: WC Docket No. 17-310 Rural Health Care Program

Dear Commission:

We appreciate this opportunity to submit comments in your proceeding to consider how to calculate support for services that are made possible through the Rural Health Care (RHC) program. The Rural Health Care (RHC) program is critical to the future of a technological field that is growing leaps and bounds and could dramatically transform health care access and improve health care outcomes for rural residents.

The Alaska State Hospital and Nursing Home Association (ASHNHA) represents more than 65 hospitals, skilled nursing facilities, and other health care organizations. Our membership spans geographically from PeaceHealth Ketchikan Medical Center to Samuel Simmonds Memorial Hospital in Utqiagvik. Our diverse association unites every small rural hospital and large hospital system in the state around common goals. For over 60 years, ASHNHA members have worked to improve health care in Alaska.

Especially because of our unique geography and rural nature, telehealth is a critical component of the health care system in Alaska. Growing evidence indicates that access to telehealth services also lowers health care costs in rural communities, saving money at the local, state and national levels. As one example, the Alaska Native Tribal Health Consortium estimates that access to telehealth services saves rural Alaskans \$10 million annually in travel costs alone. At the national level, the Veterans Health Administration (VHA) estimated that the annual cost in 2012 to deploy its telehealth program was \$1,600 per patient per year, compared to over \$13,000 for traditional home-based care and \$77,000 for nursing home care. Telehealth was also associated with a 25 percent reduction in the number of bed days of care, and a 19 percent reduction in hospital admissions, across all VHA patients utilizing telehealth services.

Given the importance of the program and the critical nature of the services being provided to thousands of Alaskans and millions of rural Americans, it is imperative that changes to the system, and the implications of those changes are clearly communicated. The data and tools used for estimating impacts through the proposed changes must be made available to stakeholders to ensure the accuracy and transparency that will support informed decision making.

The short timeframe that has been allotted between the unveiling of the comprehensive overhaul of the Rural Health Care Program on July 11, 2019, and the scheduled vote to adopt the changes for August 1, 2019 does not allow for time to assess and address potential impacts of the proposed changes. ASHNHA requests that the FCC allow additional time to develop the information necessary to evaluate this proposal.

We thank you for this opportunity to submit our comments on this important issue to many rural Americans. If you would like additional information, please contact Elizabeth King, Director for Behavioral Health and Workforce at elizabeth@ashnha.com or (907) 270-6447.

Sincerely,

Becky Hultburg
President / CEO