August 29, 2019

Michael O'Rielly

Commissioner

Federal Communications Commission

445 12th St. SW, Room TW-A325

Washington, DC 20554

Submitted via https://www.fcc.gov/ecfs/

Dear Commissioner O’Reilly:

Thank you for the opportunity to comment on the Federal Communications Commission’s (FCC) Proposed Rule (WC Docket No. 18-213) entitled, “Promoting Telehealth for Low-Income Consumers.”

Partners HealthCare System, Inc. (“Partners”) is a Massachusetts-based, not-for-profit health care system that is committed to patient care, research, teaching, and service to the community locally and globally.  Founded in 1994 by Brigham and Women's Hospital and Massachusetts General Hospital, Partners includes community and specialty hospitals, a managed care organization, a physician network, community health centers, home care and other health-related entities. Several of our hospitals are teaching affiliates of Harvard Medical School, and Partners is a national leader in biomedical research.  We have a robust digital health program, including telehealth, and we are committed to supporting new programs and public policy reforms in that area.

We are very supportive of the FCC efforts to expand telehealth services to underserved and vulnerable populations. We look forward to a time when telehealth payment and coverage is on par with in-person visits. Regarding the proposed rule, we offer the following comments.

* Access to broadband is largely limited for two reasons: 1) bandwidth availability and 2) cost. For rural residents both are factors, for suburban and urban it is usually only cost.
* Patients need reliable, high quality bandwidth to access virtual health services, especially those that use video. Providers also need fair reimbursement for providing care, so only providing access on the patient side of the equation via broadband dollar credits will only get solve half the problem. There also needs to be sustainable funding for the provider, ideally in the form of routine reimbursement.
* We would recommend that the FCC focus on distributing block grants via Request for Proposals to (1) improve infrastructure to support improved rural broadband, (2) fund the telehealth

resource centers to develop model legislation/policy for insurance coverage parity and payment parity, and (3) work with Federal Trade Commission to remove interstate restrictions on commerce that currently exist due to restrictive licensing and credentialing laws that discourage cross state care delivery. The Veteran’s Affairs, Armed Forces, and Indian Health Services have all found ways to create uniform licensing and credentialing that are not restricted by state laws.

In summary, we support the overall approach and intention of this program and appreciate the opportunity to comment. Should you have any questions, regarding these comments, please contact, feel free to contact us.

Sincerely,



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