



**JOINT STATEMENT OF INTEREST
THE AMERICAN TELEMEDICINE ASSOCIATION
AND
THE NATIONAL RURAL HEALTH ASSOCIATION
September 10, 2018**

The American Telemedicine Association (ATA) and the National Rural Health Association (NRHA) respectfully submit this joint statement of interest to serve as the primary evaluators for pilot programs funded in response to the “Promoting Telehealth for Low-Income Consumers” Notice of Inquiry-WC Docket No. 18-213 that released on July 12, 2018. Specifically, the ATA and NRHA would look to assist with developing the evaluation criteria and identifying experts for helping to assess the programs selected through the experimental “Connected Care Pilot Program” as proposed in the notice.

The ATA and the NRHA believe the work of the Federal Communications Commission (FCC) is vital for maintaining and enhancing access to care in underserved areas of the country. Through the FCC’s proposed pilot program, the ATA and the NRHA feel it would serve as an unprecedented collaboration to help lead the evaluation component of the program as a means for positively impacting the very communities this endeavor aims to serve.

The unique collaboration between ATA and NRHA brings to the “Connected Care Pilot Program” a culmination of expert insight that is coordinated and focused on yielding program results. Moreover, ATA and NRHA are known commodities within the communities served by the Connected Care Pilot Programs facilitating acceptance and implementation. We believe that the proposed partnership is the best approach for delivering on the promise of cost savings and improved patient outcomes.

1. Background

ATA

As the only organization completely focused on telehealth, the ATA is working to change the way the world thinks about telemedicine and virtual care. We are committed to ensuring that everyone has access to safe, affordable, and effective care when and where they need it, and that providers are able to do more good for more people. We represent a broad and inclusive member network of technology solution providers, healthcare delivery systems, and payers, as well as partner organizations and alliances. Together, we are working to enhance the visibility of telehealth, promote responsible policy, and provide education and resources to help integrate virtual care into emerging value-based delivery models.

NRHA

The National Rural Health Association is a national nonprofit membership organization with a mission to provide leadership on rural health issues through advocacy, communication,

education, and research. In carrying out its mission, the NRHA is the unified national voice for rural health issues and represents over 21,000 individuals working together to improve the health of rural Americans. The membership represents a diverse group of individuals including researchers, providers, federal partners, other health care organizations, rural medical educators and State Rural Health Associations (SRHAs). The NRHA wishes to utilize the telehealth and provider expertise within the membership to collaborate with ATA in spearheading the evaluation component for pilot programs to ensure successful implementation in reaching rural health providers and stakeholders in its mission and activities.

Rural populations, on average, have relatively more elderly and children, unemployment and underemployment, and poor, uninsured and underinsured residents. They are more vulnerable to economic downturns because of their economic specialization than their urban counterparts.¹ Barriers unique to rural health care delivery systems include low population densities, lack of economies of scale and high rates of fixed overhead per patient revenue and long travel distances to obtain health care². Telemedicine can overcome many barriers related to healthcare access in these rural areas. Telemedicine incorporates technology into the equation for delivering access to a greater number of people at a lower per capita cost. Many of the goals of various healthcare reforms over the past 5-10 years have been to streamline healthcare processes and procedures, and reduce the growing cost of healthcare delivery in the United States.³ To this end, the ATA and the NRHA believe the work of the FCC combined with this proposed evaluation component can help to improve access to care for communities in need.

COLLABORATION

The ATA and NRHA propose to spearhead the evaluation component of the proposed “Connected Care Pilot Program.”

Task 1 – Advisory Board: ATA and NRHA membership is comprised of the nation’s leading telemedicine and rural health care experts. Both organizations will identify and select key experts from our respective memberships to create criteria for evaluating the demonstrations.

Task 2 – Develop Criteria: The selected Advisory Committee would work to identify specific criteria for evaluating funded pilot programs.

Task 3 - Assess Programs: Monitor and provide technical assistance as needed to programs as they look to meet the criteria through the evaluation.

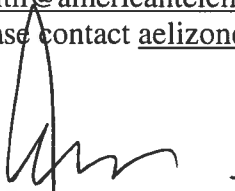
Task 4 - Evaluation Report: Complete the assessment of programs through a final evaluation report to help inform future funding and sustainability.

¹ Ricketts, T.C. III., Johnson-Webb, K.D., & Taylor, R.K., (1999) *Populations and places in rural America*. In: Ricketts, T.C. III., (ed.) *Rural health in the United States* (pp.7-24) New York: Oxford University Press.

² Hassinger, E.W. & Hobbs, D.J., (1992) *Rural society-The environment of rural health care*, In: Straub, L.A. and Walser, N. (eds.), *Rural health care: Innovation in a changing environment* (pp.178-190) Westport, E.T., Praeger.

³ Sanders, R., Allen, Z., Maurer, G., (2017) *Telemedicine Reimbursement Policy Brief*. Retrieved from https://www.ruralhealthweb.org/NRHA/media/Emerge_NRHA/Advocacy/Policy%20documents/05-11-18-NRHA-Policy-Telehealth.pdf

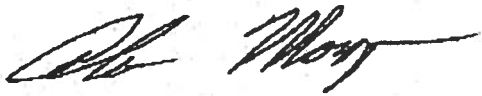
Together, the ATA and the NRHA endeavor to provide a collaboration rooted in improving and maintaining access to care for those living in underserved areas of the country. The opportunity to submit this statement of interest is appreciated. For follow-up inquiries to the ATA, please contact ssmith@americantelemed.org or 703-373-9600 ext. 1012. For follow-up inquiries to the NRHA, please contact aelizondo@nrharural.org or (202) 639-0550.



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9/6/18

Date



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