

Federal Communications Commission

Promoting Telehealth for Low-Income Consumers

WC Docket No. 180213

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HNC Virtual Solutions is excited for the opportunity to provide insight for this project and potentially providing Telehealth solutions to rural and low-income United States citizens. We meet and exceed industry standards for Telehealth software functionality, encryption, and security so by illustrating what we offer, we hope to give further insight for the requirements of the Telehealth component of this suggested program.

HNC's is a Telemedicine software and hardware solutions company that offers remote vital capturing through medical device integration, web-based video, and our intuitive technology allows for patient/provider communication regardless of demographic – only requiring an Internet-capable device for most use-cases. HNC technology is able to be used anywhere with cellular connectivity regardless of carrier or with locally available Wi-Fi. For rural use cases where cellular broadband connectivity is inadequate, satellite internet may be utilized.

HNC focuses on remote vital capabilities that encompass most major morbidities and comorbidities, which include diabetes, CHF, and COPD through regular vital data, which is captured, encrypted, and then sent to our provider portal for review. This is accomplished with FDA-cleared Class II medical devices that integrate with our SIM-enabled tablet interface for the purpose of reducing readmission, flagging patients for real-time clinical interventions, and creating better outcomes through frequent vital monitoring.

The video element of our platform encompasses virtual urgent care, opioid addiction behavioral treatment and other behavioral health services, and remote high-risk pregnancy with integrated mobile ultrasound equipment. Through a collaboration with Melagro Technologies, HNC can offer DSM-5 disorder screening tools built into the platform that can be used to treat and diagnose 17 behavioral disorders in adults and 24 in children with a clinically tested 89% accuracy rate. Through a similar collaboration with Transition to Success, this same screening tool also identifies negative social determinants of health and recommends clinical pathways for those patients to receive appropriate care. Our affiliation with Alethia Complex Care Management would provide (boots on the ground face to face intervention for the 1-3 % of patients that would require hands on support.

All of the interactions on the HNC platform are logged for the purpose of security and billing auditing. Any technology-based entity in the healthcare sphere should be required to be certified, audited, or in-process to meet or exceed FedRAMP-ready status. Telemedicine visits are accurately billed because each visit or consultation is date and timed stamped for billable service accuracy. We are currently working with a company that will allow us to integrate a patient's ID system that would provide facial recognition, Iris retinal scanning and fingerprint technology to accurately know the patient's beings examined are the patient's identifiable with the payor provider.

While telehealth solutions come in many different configurations with different technical requirements, speedy adoption and the simpler the process is generally the best way to ensure success. This is why HNC utilizes a cloud-based solution for most of its functions, meaning there aren't any delays due to changing of individual hospital

security policies, upgrading of equipment to run locally-installed software, or any other issues surrounding configuring an in-hospital solution per hospital system. Cloud-based software solutions allows any participating hospital to connect without making any major changes to their current IT infrastructure, if any change at all. All of HNC's offerings from Remote Patient Monitoring to our encrypted video make use of our cloud-based portals.

Other suggestions for easy adoption and implementation include white labeling as many components of the program to the provider actually providing the service. HNC offers a white-labeled application that can appear to either be branded with the agency program title or have it appear to be directly provided by each individual provider network. Providers already have an established level of trust with their patient population that an outside agency or Telehealth company does not, so it makes sense to have the telehealth element be presented by individual providers or insurance networks. HNC also offers remote patient monitoring services that allow several dozen different vitals to be captured. This is for monitoring chronic illnesses to prevent readmission and emergencies while creating better outcomes with proactive involvement in the patient's health.

Program efficacy is a primary concern for any Telehealth program. Improving outcomes is easily measured with HNC's Remote Patient Monitoring program as it tracks patient vital data in real-time and allows for real-time clinical interventions when vitals trend dangerously. For other health outcome improvements, telehealth utilization surveys could provide insight to the efficacy of direct-to-consumer provider video applications – questions such as “How many times in the last 6 months would you have gone to urgent care if the telehealth app wasn't available” for example. Virtual urgent care consultations are less strain on the provider system as more can be performed in the same amount of time as in-person consultations, which allow a provider to see more patients per day and increase revenue. The patient, likewise, would be able to avoid missing work and reduced transportation costs involved with going to the doctor or urgent care.

While HNC Virtual Solutions offers turnkey Telehealth Solutions for providers, it also offers care management through its strategic business partnerships. Many times, hospitals do not have the resources to dedicate existing staff to a Telehealth program, so using licensed, 3rd party care organizations becomes necessary. HNC has existing relationships who are familiar with our platform, but we are more than willing to work with and train new care vendors at the client's request.

HNC is excited for this program to begin because if it is successful, most everybody stands to benefit. The patients will receive better access to care, Telehealth companies will have a government-funded pilot that will show more research-based evidence of how Telehealth saves money and creates better outcomes, and that information will, in turn, encourage cautiously late adopters of Telehealth to finally invest in a connected health environment.

We look forward to providing more comments before 9-30-2019.

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