

January 22, 2016

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *Notice of Ex Parte Presentation – Voxiva  
Lifeline and Link Up Reform and Modernization (WC Docket No. 11-42);  
Lifeline and Link Up, (WC Docket No. 03-109)*

Dear Ms. Dortch:

Voxiva, Inc. (“Voxiva”) hereby provides a summary of a teleconference that took place on January 12, 2016 between Paul Meyer, Chairman and Co-CEO of Voxiva Inc. and staff from the Connect2health Task Force. Staff participating in the call included Michele Ellison, Karen Onyeije, Dr. Yahya Shaikh, Deborah Klein, Katie Gorscak, and Rachel Engle

During the meeting Voxiva Inc. made the following comments:

1. The Commission has indicated that the purpose of the Lifeline services is to help eligible low-income households “connect to the nation's communications networks, find jobs, access health care services, connect with family and their children's schools, and call for help in an emergency.”
2. Voxiva’s area of expertise is in providing mobile health services to Medicaid beneficiaries. We work closely with the Center for Medicare and Medicaid Services (“CMS”), state Medicaid agencies and Medicaid managed care organizations (“MCOs”).
3. We believe that a modernized Lifeline service can be implemented in collaboration with the nation’s Medicaid program in a way that ensures Lifeline service provided to Medicaid beneficiaries supports the important benefits for consumers that Lifeline enables and the Commission has acknowledged, including the ability to access health care services.
4. However there must be a benefit for Medicaid (and other qualifying programs) in order for Medicaid to support the Lifeline eligibility process and promote the availability of Lifeline to Medicaid beneficiaries.
5. There must also be justification, in accordance with HIPAA, for Medicaid organizations to share their beneficiaries’ Protected Health Information (“PHI”) for the purpose of validating Lifeline eligibility.

6. Today Medicaid agencies and Medicaid MCOs struggle to engage with Medicaid recipients. This is bad for their health and people routinely go without the preventive care they need. Medicaid organizations can't engage with the people they serve at scale without a phone number and consent to communicate with individuals through that device. Lifeline can help solve this problem.
7. Already a number of Medicaid MCOs work with certain Lifeline service providers to promote Lifeline to their beneficiaries. However, they do this not because they are interested in promoting Lifeline per se, but because Lifeline, when bundled together with health messaging services (i.e. a "Health Phone") is able to support their health goals. At the end of December 2015, over 390k Lifeline subscribers were receiving health messages from their Medicaid MCO.
8. There is now a rich body of evidence showing the impact of this model. For example a Medicaid health plan serving Indiana supported the distribution of 21,425 "Health Phones" (Lifeline service bundled with Voxiva health messaging services) to their Medicaid recipients. A review of health claims data demonstrated that there was a 57% increase in physical exam attendance compared to those that did not use a Health Phone and a 77% cost reduction for those visits.
9. Other health outcomes from text messaging programs delivered through mobile phones (including but not limited to Lifeline subscribers) service include:
  - A doubling of flu shot utilization by pregnant women<sup>1</sup>
  - A tripling of annual wellness visit attendance<sup>2</sup>
  - A reduction in reported alcohol consumption among pregnant women<sup>3</sup>
  - Improvement in blood glucose levels amongst diabetics<sup>4</sup>
  - Significantly higher levels of health knowledge<sup>5</sup>
  - An eleven times increase on accessing telephone based health line services<sup>6</sup>

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<sup>1</sup> Jordan, E.T., Bushar, J., Kendrick, J., Johnson, P., Wang, J. (2015). Encouraging Influenza Vaccination among Text4baby Pregnant Women and Mothers. *American Journal of Preventive Medicine*, available at <http://dx.doi.org/10.1016/j.amepre.2015.04.029>.

<sup>2</sup>

<http://www.businesswire.com/news/home/20150521005325/en/3500-Amerigroup-Washington-Members-Improve-Health-Outcomes#.VddAkk1zPIV>; see also

<http://voxiva.com/index.php/about/news/121-over-36-000-healthplus-amerigroup-members-improve-health-outcomes-through-voxiva-s-connect4health-mobile-phone-messages-text-reminders-have-increased-members-annual-physical-visits-by-two-times-in-new-york>

<sup>3</sup> Evans, W. D., Wallace, J. L., & Snider, J. (2012). Pilot Evaluation of the Text4baby Mobile Health Program. *BMC public health*, 12(1), 1031.

<sup>4</sup> Grabosch, S., Gavard, J. A., & Mostello, D. (2014). 151: Text4baby Improves Glycemic Control In Pregnant Women with Diabetes. *American Journal of Obstetrics and Gynecology*, (210)1:88.

<sup>5</sup> Evans, W. D., Wallace, J. L., & Snider, J. (2012). Pilot Evaluation of the Text4baby Mobile Health Program. *BMC public health*, 12(1), 1031.

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<http://voxiva.com/index.php/about/news/121-over-36-000-healthplus-amerigroup-members-improve-health-outcomes-through-voxiva-s-connect4health-mobile-phone-messages-text-reminders-have-increased-members-annual-physical-visits-by-two-times-in-new-york>

10. If implemented effectively, we believe that the Lifeline program can provide strong support to the programmatic goals of the qualifying programs. To that end, if the Commission establishes a third party Lifeline eligibility verifier, we recommend that the entity(ies) responsible for developing and administering the verifier develop models and work with partners to ensure that Lifeline can be leveraged to support the programmatic goals of the qualifying programs to ensure those who administer such programs have the proper incentives to cooperate with those responsible for the verifier. The eligibility processes established should allow the qualifying programs the flexibility to promote Lifeline services to their beneficiaries as a part of their broader beneficiary outreach and engagement efforts.

Respectfully submitted,

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Voxiva Inc.

cc:

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