

The American Academy of Pediatrics (the AAP) appreciates the opportunity to provide comment on the Notice of Proposed Rulemaking on the matter of Protecting and Promoting the Open Internet. The AAP is committed to the optimal physical, mental, and social health and well-being of all infants, children, adolescents, and young adults. It is the AAP's position that an Open Internet is a vital component in assuring access to healthcare for children and their families. As such, AAP is opposed to the implementation of paid prioritization because of its detrimental effects on the elimination of health disparities, efficiency of healthcare, and access to health information by parents and caregivers.

Health Disparities

Health disparities have been noted for centuries among populations based on socio-economic class and environmental exposure. Children and adolescents are one of the priority populations where health disparities have been documented. Eliminating health disparities is one of the four overarching goals of Healthy People 2020 and one of the four foundation health measures that will serve as an indicator of progress towards achieving the goals. An Open Internet is essential to decreasing health disparities among priority populations across the United States.

The Open Internet is necessary to many aspects of Health Information Technology (HIT), including Electronic Health Records, Clinical Decision Support, Consumer E-Health Tools, Telemedicine, Population Health Information Systems, Electronic Registries, and Health Information Exchanges. In their briefing paper, Understanding the Impact of Health IT in Underserved Communities and Those With Health Disparities, the National Opinion Research Center discussed the impact of HIT on current disparities in healthcare with regard to Quality of Care, Access to Care, Health Outcomes, Patient Engagement, and Chronic Disease Management. Patient and provider access to the Open Internet is key to decreasing health disparities in these areas and improving quality of care for children.

Efficiency of Care

Protecting the Open Internet is important to maximize efficiency for healthcare providers, who may use web-based systems for billing, making specialist referrals, and managing other aspects of patient care. If healthcare providers do not have the financial resources necessary to purchase priority Internet access, they may not be able to provide the efficacious, patient-centered, cost effective care recommended as part of the ongoing transformation and reform of our nation's healthcare system.

Access to Health Information

The general public, including parents and caregivers of children, uses web-based platforms to access children's medical records, make appointment, and find health information. Having slower access to these tools could potentially result in delays in care and seeking information, and place an undue burden on ready access to quality healthcare and health information.

For all of the reasons outlined above, the American Academy of Pediatrics believes that establishing a system of paid prioritization is contrary to the health and well-being of infants, children, adolescents, and young adults.