

May 7, 2020

Ajit Pai  
Chairman  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Re: COVID-19 Telehealth Program, WC Docket No. 20-89, Ex Parte Submission**

Dear Chairman Pai:

I am writing to update the record on and urge expedited approval of the American Hospital Association's pending Petition for Partial Reconsideration in the *COVID-19 Telehealth Program, WC Docket No. 20-89, Ex Parte Submission* proceeding, in which AHA asked the Commission to extend eligibility for participation in the COVID-19 Telehealth Program to all types of hospitals and other direct patient care facilities regardless of their size, location or for-profit or not-for-profit status, including but not limited to rural and urban short-term acute-care, long-term acute care, critical access hospitals and skilled nursing facilities.

AHA appreciates recent statements by Commissioners O'Rielly and Carr indicating that the Commission is open to AHA's request. Commissioner O'Rielly tweeted on April 29 that "[the] [r]eality is many patients use for-profit facilities [and] could miss out on benefits of FCC telehealth funding under [the] CARES Act with exclusion of certain for-profit hospitals." In a similar vein, Commissioner Carr stated the same day that for-profit eligibility is "a live issue," and that interested parties should let the Commission know if it has "made the right cut."

Members of the health care community have already responded to Commissioner Carr's request for input and have strongly supported AHA's Petition. Communities across the nation rely on *all* of America's health care providers (HCPs) to be there for them in times of emergencies. Whether that emergency develops in the form of a natural disaster, like a hurricane or tornado, or as a virus, like COVID-19, HCPs and their doctors, nurses and other front-line personnel must be prepared to fulfill their commitment to their patients. While the health care community is doing everything it can under extremely difficult circumstances, more financial support must be provided to HCPs across the board if they are to fully leverage telehealth in their efforts to stem the staggering toll of the virus while maintaining access to care for non-COVID patients.



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Making CARES Act funding available to *all* HCPs now would be a critical step in responding to the COVID emergency.

AHA appreciates your continued leadership in the face of the COVID crisis, including your efforts to secure CARES Act funding for telehealth and streamlining the process to ensure that funds are distributed to the health care community as quickly as possible. In that spirit of proactivity, we request expedited grant of AHA's Petition. Please contact me if you have any questions, or feel free to have a member of your team contact Samantha Burch, director of health information technology policy, at 202-626-2313 or [sburch@aha.org](mailto:sburch@aha.org).

Sincerely,

/s/

Thomas P. Nickels  
Executive Vice President

cc: Commissioner Michael O'Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
Commissioner Geoffrey Starks  
Trent Harkrader, Deputy Chief, WCB  
Ryan Palmer, Chief, TAPD