September 30, 2015

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 11-42; WC Docket No. 09-197; WC Docket No. 10-90

Dear Chairman Wheeler:

The National Health IT Collaborative for the Underserved (NHIT Collaborative) is a public/private community partnership that was launched in 2008 with support of the Department of Health and Human Services (HHS), Office of Minority Health (OMH), with funding from the National Institute of Health (NIH), National Institute on Minority Health and Health Disparities (NIHMD), and over 100 organizations and individuals. We represent national, regional, and local organizations focused on addressing health disparities through the use of new technology, particularly those that are Internet-enabled.

In response to the Comments submitted to the Commission’s Second Further Notice of Proposed Rulemaking, NHIT Collaborative urges the Commission to include high-speed broadband in the modernization of the Lifeline program. NHIT Collaborative members also encourage the Commission to institute “patient-centric” rule changes as part of Lifeline reform that enable eligible consumers to leverage broadband and text-based digital health tools that improve patient outcomes and allow individuals to participate fully in the President’s Precision Medicine Initiative (PMI).

Historically, the Lifeline program has been perceived as just a telecommunications service and its voice-only services provided through the program have been instrumental in connecting people with their doctors and other caregivers. While the Commission has solicited feedback on how the program can bolster educational access, NHIT Collaborative urges the agency to extend the program’s benefits to health care, especially as broadband access has contributed to positive health outcomes and worked towards narrowing the health disparities that exist for racial and ethnic minorities and low-income Americans. Leveraging technology and the Internet, health disparities, especially those that are chronic, can be prevented or adequately managed as patient-provider communications improve and patients have at their fingertips more resources that can improve their quality of life.

NHIT Collaborative Members also believe that a 21st century Lifeline program can also influence service delivery for patients and potentially, address wellness disparities that disproportionately impact the life span of people of color.

On September 10, 2015, NHIT Collaborative hosted a roundtable discussion, involving more than 30 attendees on the intersection between Lifeline reform and the expansion of health IT to low-income consumers. Congressman G.K. Butterfield, the Chair of the Congressional Black Caucus and early champion for health IT, also addressed
participants. The key themes from the roundtable inform our input on the program’s reform. They are presented below.

1. **The Lifeline program should provide both voice and broadband services for eligible consumers.**

   NHIT Collaborative recognizes that the importance of having informed broadband use that advances quality of life outcomes for low-income consumers. Broadband access offers a benefit to individuals in need of online resources and tools to manage their health outcomes, and serves to address information gaps that often contribute to disparities. Voice-only services enables patients, particularly those from low-income communities, to regularly communicate with their doctors and other practitioners to check on diagnostics and schedule appointments. For NHIT Collaborative, the Commission should offer comparable and reasonable voice and broadband services to facilitate these interactions in the updating of the Lifeline rules.

2. **The Commission should consider coordination with the Medicare program, in addition to SNAP.**

   While many Commenters share their support for the SNAP program as the first “test and learn” for the federal coordination of Lifeline with other government programs, we encourage the Commission to also consider federal coordination with Medicare and Medicaid. Improving coordination with Medicare and Medicaid can have positive net effects on the elevated costs often associated with health care, i.e., excessive emergency room visits, appropriate prescription drug administration, etc. TracFone, one of the national Lifeline providers, has facilitated improved patient outcomes through their current health initiative that has resulted in healthier individuals and communities. Extending the benefit to eligible Medicaid and Medicare subscribers, in addition to those involved in the SNAP program, can be beneficial in addressing the nation’s health disparities. We encourage the Commission to also consider this program.

3. **Allowances on text messaging should be incorporated into the program’s revamp.**

   Over the years, medical practitioners and the private sector have created tools that rest upon SMS platforms, including Text4Babies that connects pregnant mothers with pre-natal providers. The Commission should ensure that allowances are made for text messaging on Lifeline phones to maintain advances in this area, particularly for eligible subscribers that opt for voice-only services. While NHIT Collaborative acknowledges that unlimited texting can burdensome for Lifeline service providers, the Commission should work with industry to determine a threshold that will allow patients to cultivate and preserve real-time communications with their providers, and vice versa.

4. **Improve coordination with medical practitioners and health care providers to determine how Lifeline can be beneficial to their wellness and disease management plans.**

   The Commission has initiated a discussion of how Lifeline can bridge the “homework gap.” NHIT Collaborative encourages the Commission to contextualize program reforms around the “wellness gap” where access to high-speed broadband and technology facilitates positive health outcomes for historically under-served citizens. Generally, information technology is a tool – not the panacea. Therefore, it’s imperative that the Commission engage multiple stakeholders to determine how bolster the impact of Lifeline reforms on those issues that affect citizens. NHIT Collaborative is available to the Commission to bolster this conversation among those in the health care community committed to addressing health disparities.

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NHIT Collaborative applauds the Commission for working to modernize the Lifeline program and support efforts to ensure that reforms meet the increasing needs of under-served communities, particularly the medically disadvantaged.

We look forward to working with the Commission on these efforts.

Sincerely,

Luis Belen
Chief Executive Officer

Cc: Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O’Rielly