

March 8, 2021

SUBMITTED ELECTRONICALLY VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Promoting Telehealth in Rural America, WC Docket No. 17-310

Dear Ms. Dortch:

On March 4, 2021, the undersigned counsel for the Schools, Health & Libraries Broadband (SHLB) Coalition, spoke via telephone with Ramesh Nagarajan, wireline legal advisor for Acting Chairwoman Jessica Rosenworcel, regarding SHLB's Rural Health Care (RHC) program waiver request filed in the above-referenced docket.¹

Given the anomalies in the Rural Health Care Telecom Program rate database, as detailed by SHLB and other commenters, I explained the need for urgent Commission action on SHLB's request that the Commission postpone implementation and use of the rate database until all the anomalies can be identified and corrected.

Rural health care providers that would receive reduced or no support under the Telecom Program need time to switch to the Healthcare Connect Fund (HCF). Even though such a switch would, on average, triple their out-of-pocket costs, switching to HCF would be better than receiving zero support.

Switching to HCF involves several steps requiring USAC approval, and USAC recommends that HCPs start that process by March 4 or 8 to be sure they could submit their applications by the June 1 deadline.² HCPs have to submit new eligibility forms, post a request for services, conduct

¹ Letter from John Windhausen, Jr., Executive Director, Schools, Health & Libraries Broadband (SHLB) Coalition to Chairwoman Jessica Rosenworcel, Commissioner Brendan Carr, Commissioner Geoffrey Starks, Commissioner Nathan Simington, Federal Communications Commission (dated Jan. 25, 2021) (RHC Waiver Request).

² <https://www.usac.org/wp-content/uploads/rural-health-care/documents/handouts/RHC-Program-FY2021-Recommended-Form-Submission-Dates-Extended-Window.pdf>. See attached.

a competitive bidding process, and select a vendor before the application deadline. If applicants stay in the Telecom Program and need to post a request for services, USAC recommends they submit their FCC Form 465 no later than March 10.

If the Commission declines to take action, HCPs need to know that as soon as possible, so they can plan to reduce services, pay increased costs, or cut other patient services, among other possible actions.

Please let us know if you have any questions.

Respectfully submitted,

A handwritten signature in cursive script that reads "Gina Spade".

Gina Spade
Counsel for Schools, Health & Libraries Broadband Coalition

cc: Ramesh Nagarajan
John Windhausen, Jr.

When to Submit Your FY2021 RHC Program Forms – Telecom Program

To ensure that you stay on track with your forms, USAC has developed recommended submission milestones for both the HCF and Telecom programs. These milestones account for both the minimum competitive bidding time allowed under RHC program rules and time for USAC review.

Please note that these dates (with the exception of the FCC Form 466 filing window deadline of June 1*) are not mandatory deadlines, but rather recommended milestones to meet the close of the filing window.

Telecom Program Earliest and Last Dates to Submit Request for Services & Funding Requests		
Telecom Program Form	First Day to Submit	Last Day to Submit
FCC Form 465 (Eligibility and Request for Services)	July 1, 2020 Earliest Date to Request Services	March 10, 2021 Recommended Date
FCC Form 466 (Funding Request)	January 4, 2021	June 1, 2021 <i>*Deadline to Submit</i>

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When to Submit Your FY2021 RHC Program Forms – HCF Program

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Please note that these dates (with the exception of the FCC Form 462 filing window deadline of June 1*) are not mandatory deadlines, but rather recommended milestones to meet the close of the filing window.

HCF Program Recommended <u>Last Day</u> to Submit for Individual HCPS & Consortia <u>NOT</u> using a Request for Proposal (RFP)		
HCF Program Form	First Day to Submit	Last Day to Submit
FCC Form 460 (Eligibility)	Anytime	March 8, 2021 Recommended Date
FCC Form 461 (Request for Services)	July 1, 2020	April 10, 2021 Recommended Date
FCC Form 462 (Funding Request)	January 4, 2021	June 1, 2021 *Deadline to Submit

HCF Program Recommended <u>Last Day</u> to Submit for Individual HCPS & Consortia <u>USING</u> a Request for Proposal (RFP)		
HCF Program Form	First Day to Submit	Last Day to Submit
FCC Form 460 (Eligibility)	Anytime	March 4, 2021 Recommended Date
FCC Form 461 (Request for Services)	July 1, 2020	April 1, 2021 Recommended Date
FCC Form 462 (Funding Request)	January 4, 2021	June 1, 2021 *Deadline to Submit