

# FCC Telehealth Funding Opportunities

Judy Triano – Operations Director Blue Cirrus Consulting  
Tammy Cress RN, MSN – Sr. Telehealth Consultant



# FCC Funding Opportunities

April 2, 2020 the Federal Communications Commission released a Report and Order establishing the COVID-19 Telehealth Program

## COVID-19 Telehealth Program

- Improve Telehealth Program capabilities related to COVID-19 pandemic by taking steps to provide immediate support for caring for patients at home or mobile locations in response to the Covid-19 pandemic.

## Connected Care Pilot Program

- Select projects to study how universal service funding can support Telehealth / Connected Care longer-term

[www.fcc.gov](http://www.fcc.gov)

# COVID-19 TELEHEALTH PROGRAM



# Pre-Considerations

- Services and budget planning
- Filing Status – Individual health care entities, corporate entity or consortium
- Individual health care entities: If funding needs > \$1 M
- Corporate Entity: If funding needs < \$1M
- Consortium: If funding needs < \$1M and/or provider composition meets consortium guidelines (individual physician offices)

# COVID-19 Telehealth Program Details

***\$200M***

- CARES Act
- Funding < \$1M per applicant
- Exception: monthly recurring charges (broadband connectivity, RPM services) through 9/30/2020

***Timeline***

- Applications opened 4/13/2020
- Funding awards are on a rolling basis until exhausted, or until pandemic is declared ended by the US Government
- Retroactive funding for purchased eligible infrastructure after 03/13/2020

# Eligible Entities

- **Non-profit and Public Eligible Health Care Providers**
  - Post-secondary educational institutions offering health care instruction, teaching hospitals, and medical schools
  - Community health centers or health centers providing health care to migrants
  - Local health departments or agencies
  - Community mental health centers
  - Not-for-profit hospitals
  - Rural health clinics
  - Skilled nursing facilities
  - Consortia of health care providers consisting of one or more entities above

# Non-Eligible Entities

- Any entities planning on utilizing funding for non-direct patient care
- Vendors
- For-Profit entities
- Physician practices outside of a consortium or RHC.

# Eligible Services and Devices



- ***Telecommunications Services and Broadband Connectivity Services***
  - For Providers or their patients
  - Voice Services and Internet connectivity services
- ***Information Services:***
  - Remote patient monitoring platforms and services
  - Patient reported outcome platforms
  - Store and forward services - Asynchronous
  - Platforms and services for synchronous video consultation
- ***Internet Connected Devices/Equipment:***
  - Tablets
  - Smart phones
  - Connected devices to receive connected care services at home for patient or health care provider use
  - Telemedicine kiosks/carts for health care provider site.

# Ineligible Services and Structures



Provider  
Staffing/Administrative  
Costs – including  
training



Unconnected  
Monitoring Devices  
- Patients use and  
share results



Marketing



Doctor/Staff Time

# Application Process: WC Docket No. 20-89

## Three External Application Components

Component	Details	Contact
FCC Registration Number (FRN) CORES	<ul style="list-style-type: none"> <li>• May use existing FRN</li> <li>• Each provider site requires an FRN</li> <li>• Must provide TIN</li> <li>• Required prior to application</li> </ul>	<p><u>FRN Search:</u>  <a href="https://apps.fcc.gov/cores/simpleSearch.do">https://apps.fcc.gov/cores/simpleSearch.do</a></p> <p><u>Application:</u>  <a href="https://apps.fcc.gov/cores/userLogin.do">https://apps.fcc.gov/cores/userLogin.do</a></p>
Eligibility Determination - USAC	<ul style="list-style-type: none"> <li>• Required for each provider site</li> <li>• Existing RHC Programs utilize current eligibility</li> <li>• File FCC Form 460</li> <li>• Not required prior to application filing.</li> </ul>	<p><u>Form 460:</u>  <a href="https://www.usac.org/rural-health-care/resources/forms/">https://www.usac.org/rural-health-care/resources/forms/</a></p> <p><u>Questions:</u>            (800) 453-1546            Email: <a href="mailto:RHC-Assist@usac.org">RHC-Assist@usac.org</a></p>
System for Award Management Registration (SAM)	<ul style="list-style-type: none"> <li>• Required to receive payment</li> <li>• All providers receiving payment</li> <li>• Approx. 10 days to process</li> <li>• Not required prior to application</li> </ul>	<p><u>Application:</u>  <a href="https://www.sam.gov/SAM/">https://www.sam.gov/SAM/</a></p>



# Application Process

## Application Requirements

- Applicant/contact Info
- Health Care Provider Information
- Medical Services to be Provided
- Conditions Treated
- Detailed Narrative
- Funding Items Description
- Supporting Documentation

## Filing Requirements

- FCC Electronic Comment Filing System (ECFS)
- Also email copy of application:
  - [EmergencyTelehealthSupport@fcc.gov](mailto:EmergencyTelehealthSupport@fcc.gov).
- For questions contact (1) Rashann Duvall at (202) 418-1438, [Rashann.Duvall@fcc.gov](mailto:Rashann.Duvall@fcc.gov) or (2) Hayley Steffen at (202) 418-1586, [Hayley.Steffen@fcc.gov](mailto:Hayley.Steffen@fcc.gov).

# Application Section Detail

## Applicant Information

- “Numbers”
  - FRN
  - NPI
  - EIN/Tax ID
  - DUNS
  - Business Type (DATA)\*
  - Service Area (DATA)\*

\* DATA = Data Accountability and Transparency Act  
Business Type/Service Area

## Health Care Provider Information

- Lead Provider Name (Consortium)
- FRN
- Healthcare provider number (USAC)

# Application Section Detail

## Conditions to be Treated

- Narrative Section
  - Direct Care COVID-19 Patients
  - Direct Care Non-Covid-19 Patients
    - How does this free up resources to be used for COVID-19 Patients
    - Add to support documents

## Additional Information

- Goals and objectives
- Timeline
- Factors/metrics to measure service/device impact
- Affect on health care providers
- Geographic area and population

# Application Section Detail

## Funding Items and Supporting Documentation

- Total Amount Requested
  - Quotes
  - Invoices
  - Devices
- Documents to support
  - Costs
  - Specific via line items
  - Support swift review

# Positioning Your Application for Success

## *Link Efforts to COVID-19 Pandemic*

- Funding is not restricted to direct COVID-19 treatment
- Articulate level of impact to your community

## *Explain Pre-existing Strain*

- Large underserved or low-income patient population
- Health care provider shortages
- Rural hospital closures
- Limited broadband access and/or Internet adoption

## *Target Activities to High-risk Groups*

- Try to focus funding request at helping high-risk and vulnerable patients

# Additional Considerations

## *Regulatory*

- Certify Compliance with HIPAA, Privacy, Reimbursement and medical licensing laws and regulations
- COVID-19 Legal and Regulatory modification and waivers apply

## *Record Retention*

- Demonstrate compliance with requirements and procedures
- Retain 3 years following last date of service
- Post-Program Feedback – 6 months after conclusion
- TBD on Format
- Metrics/Data: Health Outcomes, Pt. Treatment, Facility Administration, Application/Invoicing Process, Innovation

# Blue Cirrus Research

*Will funding cover 3<sup>rd</sup> party monitoring and management services (RPM)?*

- Yes

*What if our application involves numerous locations?*

- Submit as a single health care provider organization, or as a consortium

# Blue Cirrus Research

*Can we apply for funds from numerous entities?*

- You may apply for multiple funding sources provided the funding amounts do not overlap
- Other Possible Funding Sources:
  - FEMA
  - HRSA

Example:

\$500,000 Total Need  
\$250,000 FEMA (50%)  
\$250,000 FCC



\$500,000 Total Need  
\$250,000 FEMA (50%)  
\$500,000 FCC



# Funding Approved



## FOR QUOTED ITEMS:

Receive disbursements by submitting monthly invoicing form and supporting documentation



## ELECTRONIC PAYMENT



## REGULATORY/REPORTING

Applicants who receive funding will be required to comply with all program rules and requirements, including applicable reporting requirements, and may be subject to compliance audits

# Additional Funding Requests

- Additional funding requests will be considered only if there are additional funds available after all first-time requests are processed.



# CONNECTED CARE PILOT PROGRAM



# Overview

Issue	Details
Target beneficiary	Underserved populations: low-income, veterans
Funding	\$100M total, 85% of eligible costs
Number of projects	TBD
Duration	3 years
Application timing	Applications due 45 days from effective date of the Pilot Program rules, or 120 days from the release date of report – whichever is later

# Call to Action



## Evaluate Experience vs. Partnership

Consider: health care providers with telehealth or connected care services experience beyond EHR usage

Consider: partnerships with consultants or other to assist with execution



## Pilot ideas

Draft ideas to support goals:

- Improve health outcomes through connected care
- Reduce health care costs for patients, facilities and the health care system
- Support the trend towards connected care everywhere

**Obtain technology bids**

# How Can We Help?

- Regulation analysis and clarification
- Application data gathering and completion
- Create and manage post program feedback Process
  - Metrics
  - Factors
- Eligibility of services and providers
- Product selection and contracting
- Process, billing and workflow information

# Questions?



# Blue Cirrus Consulting

- Judy Triano, Operations Director  
[Judy.Triano@blue-cirrus.com](mailto:Judy.Triano@blue-cirrus.com)
- Tammy Cress, Sr. Telehealth Consultant  
[Tammy.cress@blue-cirrus.com](mailto:Tammy.cress@blue-cirrus.com)
- Michelle Hager, Managing Partner  
[Michelle.hager@blue-cirrus.com](mailto:Michelle.hager@blue-cirrus.com)

Website: [www.blue-cirrus.com](http://www.blue-cirrus.com)

