

September 10, 2018

Ajit Pai
Chairman
Federal Communications Commission (FCC)
445 12th St SW
Washington, DC 20554

Re: FCC Connected Care Pilot Program; WC Docket No. 18-213

Dear Chairman Pai,

The American Association of Nurse Practitioners (AANP), representing more than 248,000 nurse practitioners (NPs) in the United States, appreciates the opportunity to provide comment on the proposed Connected Care Pilot Program. The FCC has requested comment on how to maximize the ability of the Connected Care Pilot Program to promote telehealth for low-income families and veterans.

As the FCC noted in this notice of inquiry, telehealth is an important tool to increase access to medically necessary care in rural and underserved communities. Nurse practitioners are essential health care providers who utilize and provide telehealth/telemedicine services, particularly in rural and underserved communities and for our nation's veterans. NPs need to be full participants in this pilot program in order to best serve their patients. We look forward to working with the FCC to ensure that NPs and their patients are included in the Connected Care Pilot Program.

NPs are advanced practice registered nurses (APRNs) who are prepared at the masters or doctoral level to provide primary, acute, chronic and specialty care to patients of all ages and walks of life. Daily practice includes: assessment; ordering, performing, supervising and interpreting diagnostic and laboratory tests; making diagnoses; initiating and managing treatment including prescribing medication and non-pharmacologic treatments; coordinating care; counseling; and educating patients and their families and communities. NPs practice in nearly every health care setting found in rural America including clinics, hospitals, Veterans Affairs and Indian Health Care facilities, emergency rooms, urgent care sites, private physician or NP practices (both managed and owned by NPs), nursing homes, schools, colleges, retail clinics, public health departments, nurse managed clinics, homeless clinics, and home health. NPs hold prescriptive authority in all 50 states and the District of Columbia. It is important to note that 86.6% of NPs are certified in primary care, the majority of whom see Medicare and Medicaid patients.

Eligible Health Care Providers

The FCC requested feedback on eligible health care providers for the Connected Care Pilot Program. One of the questions raised by the FCC was prioritizing participation based on rurality or remoteness. While remote areas need telehealth services, they also have lower patient populations. Many Health Professional Shortage Areas (HPSAs) are located near metropolitan areas. They are also in great need of telehealth services, and may not receive the necessary funding to treat their larger patient populations if prioritization is based solely on rurality or remoteness. We would suggest that the FCC also consider the number of patients that could be treated via telehealth when considering the prioritization of funding for services.

We particularly stress the importance of ensuring that all providers, including practices and clinics owned and run by nurse practitioners, have equal access to this pilot program. We want to ensure that the FCC is aware of the vital role that nurse practitioners play in providing health care, including telehealth/telemedicine, for rural and underserved communities as well as for our nation's veterans. Nurse practitioner growth is significantly outpacing other health care disciplines¹, NPs complete more than one billion visits annually²; 86.6% are certified in an area of primary care,³ comprising approximately 25% of the primary care workforce⁴. NPs are more likely than other disciplines to work in rural communities,⁵ and more than 5,000⁶ NPs serve our veterans in Veterans Health Administration (VHA) facilities. To increase the use of telehealth in the most efficient manner, the FCC must ensure that nurse practitioners are full participants in this pilot program.

We thank you for the opportunity to comment on this notice of inquiry and look forward to working with the FCC on increasing access to telehealth services. Should you have comments or questions, please direct them to MaryAnne Sapio, V.P. Federal Government Affairs, msapio@aanp.org, 703-740-2529.

Sincerely,

David Hebert
Chief Executive Officer

¹ <https://www.bls.gov/ooh/healthcare/nurse-anesthetists-nurse-midwives-and-nurse-practitioners.htm>.

² <https://aanp.org/192-press-room/2017-press-releases/2098-more-than-234-000-licensed-nurse-practitioners-in-the-united-states>

³ <https://www.aanp.org/images/documents/about-nps/npfacts.pdf>

⁴ [Rural And Nonrural Primary Care Physician Practices Increasingly Rely On Nurse Practitioners](#), Hilary Barnes, Michael R. Richards, Matthew D. McHugh, and Grant Martsof, *Health Affairs* 2018 37:6, 908-914.

⁵ <https://www.ahrq.gov/research/findings/factsheets/primary/pcwork3/index.html>.

⁶ 81 Fed. Reg. 90198, 90200. (Based on VHA payroll data from August 31, 2016 the VHA employees 5,444 NPs).