

FCC Wireline Competition Bureau Issues Application Guidance for COVID-19 Telehealth Program

On April 8, the Federal Communications Commission's (FCC's) Wireline Competition Bureau (Bureau) issued a [Public Notice](#) (Notice) providing guidance on "actions applicants can begin to take to ready themselves for filing an application for COVID-19 Telehealth Program funding." A prior [alert](#) provided a brief summary of the Report and Order that the FCC issued adopting the COVID-19 Telehealth Program (Program).

The Notice recommends that prospective applicants gather the necessary information and begin to complete other necessary steps now, so they are prepared to submit applications for program funding as soon as applications can be accepted for filing.

The Bureau announced that it will release a subsequent Notice announcing the application acceptance date immediately following the effective date of the COVID-19 Telehealth Program information collection requirements. These requirements entered into effect on April 9, 2020, when a summary of the Report and Order was published in the Federal Register.

Please note that this is not an exhaustive recitation of the contents of the Notice, and the text of the Notice itself should be consulted for all details.

I. Immediate Steps

There are three steps interested providers can take immediately to prepare to apply for program funding; details on each are set forth below:

- Obtain an eligibility determination from the Universal Service Administrative Company (USAC)
- Obtain an FCC Registration Number (FRN)
- Register with the System for Award Management

A. Eligibility Determination

Applicants previously deemed an eligible "health care provider" may rely on that determination. Interested health care providers that do not already have such a determination may obtain one by filing an [FCC Form 460](#) (Eligibility and Registration Form) with USAC.

Individual health care providers must provide:

- Address and contact information
- Health care provider type
- Brief explanation as to why the health care provider is eligible under the categories in section 254(h)(7)(B) of the Communications Act
- Health care provider identifying number, such as a National Provider Identifier (NPI) code and/or a taxonomy code
- Supporting documentation demonstrating the health care provider's eligibility

Consortium applicants may file an application on behalf of member health care providers if they have a Letter of Agency. The Form 460 will be used to supply basic information, including:

- Lead entity (consortium leader)
- Contact person within the lead entity (project coordinator)
- Health care provider sites that will participate in the consortium

B. Obtaining an FRN

Applicants can obtain an FRN through the FCC's [Commission Registration System](#). A taxpayer identification number is required.

C. Registering With the System for Award Management

Applicants must be registered with the federal System for Award Management (System) to receive payments through the Program. The System is a "web-based, government-wide application that collects, validates, stores, and disseminates business information about the federal government's partners in support of federal awards, grants, and electronic payment processes."

Registration with the System is effected through the System website at: <https://www.sam.gov/SAM/>. The following information is required: "(1) DUNS number; (2) Taxpayer Identification Number (TIN) or Employment Identification Number (EIN); and (3) Your bank's routing number, your bank account number, and your bank account type, i.e. checking or savings, to set up Electronic Funds Transfer (EFT)."

II. Additional Information on Eligible Services

The Notice provides the following additional information on services eligible for Program funding:

- Telecommunications services and broadband connectivity services – Voice services and internet connectivity services for the health care provider or their patients.
- Information services – Remote patient monitoring platforms and services; patient reported outcome platforms; store and forward services, such as asynchronous transfer of patient images and data for interpretation by a physician; and platforms and services to provide synchronous video consultation.
- Internet-connected devices/equipment – Tablets, smartphones or connected devices to receive connected care services at home (e.g., broadband-enabled blood pressure monitors and pulse-ox) for patient or health care provider use; and telemedicine kiosks/carts for the health care provider site.

III. Required Information for Application for COVID-19 Telehealth Program

The Notice indicates that applicants will be required to provide the following information on their application for the Program. It also warns that the actual wording on the electronic application may vary slightly from the wording in the Notice.

A. Applicant Information

- Applicant name
- Applicant FCC Registration Number (FRN)
- Applicant National Provider Identifier (NPI)
- Federal Employer Identification Number (EIN/Tax ID)
- Data Universal Number System Number (DUNS)
- Business Type (from Data Accountability and Transparency (DATA) Act Business Types) – applicants may provide up to three business types
- DATA Act Service Area – this information will be required for each line item for which funding is requested, and applicants must enter the name of the applicable state(s) or “nationwide”

B. Contact Information

- Contact name for the individual that will be responsible for the application
- Position title
- Phone number
- Mailing address
- Email address

C. Health Care Provider Information

- Lead health care provider name (if part of a consortium)
- Facility name
- Indicate whether the facility is a hospital
- Street address, city, state, county

- FCC Registration Number (FRN)
- Healthcare provider number
- Eligibility type
- National Provider Identifier (NPI)
- Total patient population
- Estimated number of patients to be served by the funding request (and supporting documentation)

D. Medical Services to Be Provided (applicants will check all that apply)

- Patient-based internet-connected remote monitoring
- Other monitoring
- Video consults
- Voice consults
- Imaging diagnostics
- Other diagnostics
- Remote treatment
- Other services

E. Conditions to Be Treated With COVID-19 Telehealth Funding

- Whether the applicant will treat COVID-19 patients directly
- Whether the applicant will treat patients without COVID-19 symptoms or conditions (applicants will check all that apply):
 - Other infectious diseases
 - Emergency/urgent care
 - Routine, non-urgent care
 - Mental health services (non-emergency)
 - Other conditions
- How using COVID-19 Telehealth Program funding to treat patients without COVID-19 symptoms or conditions would free up resources that will be used to treat COVID-19

F. Additional Information Concerning Requested Services and Devices

- Goals and objectives for use of the COVID-19 Telehealth Program funding.
- Timeline for deployment of the proposed service(s) or devices funded by the COVID-19 Telehealth Program.
- Factors/metrics the applicant will use to help measure the impact of the services and devices funded by the COVID-19 Telehealth Program.
- How COVID-19 has affected health care providers in your area.
- Any additional information about the geographic area and population served by the applicant. Indicate whether the geographic area you serve has been under any pre-existing strain (e.g., large underserved or low-income patient population; HCP shortages; rural hospital closures; limited broadband access; and/or internet adoption). If so, describe such factors.

- Whether the applicant plans to target the funding to high-risk and vulnerable patients. If so, describe how.
- Any additional information to support the application and request for funding.

G. Requested Funding Items

- Total amount of funding requested
- Whether funding for devices is being requested. If so:
 - How are the devices integral to patient care?
 - Are the devices for patient use?
 - Are the devices for the health care provider's use?

H. Supporting Documentation

- An applicant should provide supporting documentation for the costs indicated in its application. Such supporting documentation should summarize the expected costs of the eligible services and devices requested, and may include documentation such as an invoice or quote from a vendor or service provider (or similar information). Such information should be specific enough to identify line items to facilitate swift review of the application, and we encourage applicants to include information such as a description of the service or device, its eligibility category, the quantity ordered, the upfront and monthly expenses, and the service dates for recurring services.

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