Jan. 14, 2021

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
45 L St., NE  
Washington, DC 20554

RE: COVID-19 Telehealth Program Application Evaluation Metrics (WC Docket No. 20-89)

Dear Secretary Dortch:

On behalf of our more than 55,000 Texas physician and medical student members, the Texas Medical Association (TMA) writes in response to the request for comments on COVID-19 Telehealth Program application evaluation metrics as posted by the Federal Communications Commission (FCC) on Jan. 6, 2021.

TMA fully concurs with the FCC; telehealth is a critical tool in the fight against the ongoing COVID-19 pandemic. We agree it allows physicians to monitor patients in a nonclinical setting, reduces demands on hospital staff and supplies, and avoids potential exposure to the coronavirus for patients seeking treatment for other conditions. TMA appreciates FCC administering $200 million, as appropriated by Congress, in the first round of funding for the COVID-19 Telehealth Program. We equally appreciate how the FCC recognizes demand for the program continues and exceeds congressionally appropriated funding.

The first round limited financial assistance to physicians in nonprofit and public health settings, including federally qualified health centers. In addition to physicians practicing in traditional hospital facilities, those in office-based settings are also providing urgent and nonurgent medical care to patients via telehealth. In the second round of funding, TMA urges the FCC to expand eligibility to include physician office-based practices, especially those in rural areas. As an evaluation metric in this program, we call upon the FCC to include these physician practices, which are, despite the pandemic, continuing to provide needed medical care to patients.

Thank you for the opportunity to provide these comments. If you have any questions, please do not hesitate to contact Shannon Vogel, associate VP for health information technology, at shannon.vogel@texmed.org.

Sincerely,

Diana L. Fite, MD  
President  
Texas Medical Association