

May 22, 2009

The Honorable Gary Locke  
Secretary  
U.S. Department of Commerce  
1401 Constitution Ave., NW  
Washington, DC 20230

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Ave., SW  
Washington, DC 20250

The Honorable Anna Gomez  
Deputy Assistant Secretary  
for Communications and Information  
U.S. Department of Commerce  
1401 Constitution Ave., NW  
Washington, DC 20230

The Honorable James R. Newby  
Acting Administrator  
U.S. Department of Agriculture – Rural  
Development  
Room 5135 – South  
1400 Independence Av., SW  
Washington, DC 20250

**Re: Request for Information on Section 6001 of the *American Recovery and Reinvestment Act of 2009* Broadband Initiatives (Docket No. 090309298-9299-01)**

Dear Secretary Locke, Secretary Vilsack, Deputy Assistant Secretary Gomez and Acting Administrator Newby:

On behalf of our more than 5,000 member hospitals, health systems and other health care organizations, and our 40,000 individual members, the American Hospital Association (AHA) appreciates the opportunity to comment on your request for information regarding the Broadband Technology Opportunities Program (BTOP) consistent with the requirements of the *American Recovery and Reinvestment Act of 2009* (ARRA).

With the right information at the right time, we can improve patient safety and increase efficiency by removing duplicative testing and unnecessary costs from the equation. Easy patient access to their records and medical information improves the health care experience, and enables better care coordination. Broadband connectivity plays a critical and expanding role in achieving these benefits, especially in rural America. It is vital that the BTOP support broadband investment that will generate efficiencies in our health care system, provide access to information and expertise in remote medical facilities, and that will ultimately save lives.



Section 6001(b) of the ARRA sets forth the key purposes of BTOP and states in relevant part that BTOP funding is to be used to:

- 3) provide broadband education, awareness, training, access, equipment, and support to –
  - (A) schools, libraries, medical and health care providers, community colleges, and other institutions of higher education, and other community support organizations and entities to facilitate greater use of broadband service by or through these organizations;

In light of these statutory objectives, it is important that the BTOP grant program afford appropriate priority to grant and loan applications that will provide broadband education, awareness, training, access, equipment and support to hospitals, health systems and other medical and health care providers. Under the statutory language, all health care facilities are eligible for grants, even if they may have some level of broadband service today.

Improvements in broadband infrastructure nationwide will improve the health of all Americans. Among the numerous health care initiatives that advanced broadband infrastructure will facilitate is E-prescribing, which connects physicians, pharmacists and payers. E-prescribing reduces prescriber time spent on phone calls, faxes and call-backs to pharmacies; improves formulary adherence; improves drug recall ability; allows greater prescriber and patient mobility; and ultimately improves patient safety and quality of care.

We urge you to grant priority in BTOP funding to proposals that will deliver the high-capacity bandwidth necessary to support telemedicine in rural and other underserved communities. Expanded access to telemedicine using broadband technologies serves important public interest goals. It promotes expanded opportunities to remotely monitor patients, facilitate collaboration among medical professionals, exchange medical data such as mammograms, MRI and CT scans, and reduces the need for patients to travel to specialized facilities for treatment or routine check-ups. As technologies advance and telemedicine continues to expand to more areas of the country, the therapeutic benefits to patients will increase, even while the costs and burdens of patient traveling are substantially reduced.

Another promising area that could benefit significantly through broadband investments funded by BTOP is health information technology (HIT). Adoption of a nationwide HIT system offers great promise for patients, caregivers and society as a whole. HIT can promote patient safety, limit errors and improve care. It also can improve efficiency, reduce costs and enhance patient satisfaction. The ability to access a patient's electronic health records (EHRs) efficiently and cost-effectively through broadband connections can drive the business case for adoption of the necessary technology by hospitals nationwide. For example, Sanford Health in Sioux Falls, South Dakota, which serves some very rural settings, has implemented an EHR system, named docZ, which stores all of a patient's personal health information in one place, eliminating the need for redundant questions

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and additional paperwork. In addition, Sanford Health is implementing a system that gives its patients direct, online access to portions of their EHR. Lab results, appointment information, medications, immunizations and more are all securely stored for quick reference.

Increased broadband connectivity has the added benefit of spurring greater demand for HIT and EHR, thereby promoting job growth in these high tech industries. In fact, IBM estimates that investing \$10 billion to bring advanced broadband networks to areas that lack them would create 498,000 new jobs in a year, while investing \$10 billion in computerizing health care records and other health care IT would create 212,000 jobs.<sup>1</sup>

Finally, the BTOP gives your agencies a rare opportunity to advance three overarching goals of the administration: job creation, broadband expansion and improved health care. The AHA urges your respective agencies to seize this opportunity to bring improved and more efficient health care to all Americans.

If you have any questions, please feel free to contact me or Kristin Welsh, vice president of strategic initiatives and business community liaison, at (202) 626-2322 or [kwelsh@aha.org](mailto:kwelsh@aha.org).

Sincerely,

Rick Pollack  
Executive Vice President

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<sup>1</sup> See <http://online.wsj.com/article/SB123120010817055565.html> (January 5, 2009).