July 8, 2019

Jack Marchbanks, Ph.D., Director
Office of Contract Sales, Purchasing Services
State of Ohio, Department of Transportation
1980 West Broad Street
Columbus, Ohio 43223

Submitted via email to: contracts.purchasing@dot.ohio.gov

RE: Request for Information (RFI) – Digital Infrastructure Assets and Strategy

Dear Director Marchbanks,

OCHIN applauds the Ohio Department of Transportation’s (ODOT’s) extensive work to address the lack of broadband connectivity throughout the State and appreciates the opportunity to submit comments based on our experience delivering health care technology and technological assistance to safety net providers across the nation.

OCHIN is a 501(c)(3) not-for-profit community-based health information technology (HIT) collaborative based in Portland, Oregon. OCHIN supports over 500 healthcare organizations operating in over 47 states. Broadband delivery programs are foundational for the services we deliver to health care providers who serve our nation’s most vulnerable patients. The patients OCHIN members care for, primarily dependent upon Medicaid, critically rely on the expansion of broadband infrastructure and subsidies provided for continued connectivity, as much of this population resides in rural and geographically remote areas and are often medically underserved. As a result, OCHIN operates two national broadband consortia, filing for subsidies utilizing the Federal Communications Commission (FCC) Rural Health Care (RHC) Program on behalf of participating organizations and others, helping them afford broadband within their communities.

OCHIN’s federal funding applications for broadband assistance are utilized to extend health information exchange, telehealth, virtual care, and health IT to bring our members the rapidly evolving technology that transforms their health care delivery process to improve patient outcomes. OCHIN’s experience with broadband expansion assistance programs allows us to have a well-educated lens through which to offer recommendations and suggested improvements to meet ODOT’s goals and community needs with increased efficiency.

Although OCHIN is primarily supporting communities through innovative health care delivery solutions, we understand what communities need in terms of broadband for a wide array of uses. Without this framework, these solutions do not reach communities which could most benefit from virtual care. We work directly with communities to assess their broadband delivery needs and assist in connecting them with funds to meet them where they are. We use this to build the critical architecture with health care as a
use case while simultaneously delivering broadband needs for the future development. As health care is broadening within the home through remote patient monitoring and expansion of virtual care, it is critical that the state consider these additional applications in community planning.

Q#3: What are your goals and how will achievement of your goals benefit both the public and Ohio government (ODOT, Municipalities, Counties, etc.), goals? How will your concept help you reach your goals and purpose(s)?

OCHIN’s efforts surrounding this project are to share our experience and expertise delivering telehealth through broadband connectivity to reduce costs to the State Medicaid Program. Every state across the nation is realizing the rapidly growing ageing population, the impacts of the opioid epidemic, and a variety of other public health crises. Virtual care and telehealth provide the connectivity and accessibility to begin to solve the health care delivery issues plaguing these populations in need. These solutions can overcome geographic isolation, provider shortages, and improve delivery systems to reduce provider burden, improving patient outcomes.

OCHIN suggests Ohio use health care as a use case for broadband extension. Telehealth provides the ability to combat diseases of despair which result from lack of connectivity, deliver behavioral health for those suffering from substance use disorder, and extending primary care, and offering specialty care to complex patients. To truly make an impact on these issues, it is critical to meet communities where they are. Telehealth also allows states to reduce Medicaid costs by preventing the need for transportation and reducing the number of no-show patients.

We operate with interoperability as a primary focus, and firmly believe in the necessity of a national framework to improve public health. Leveraging the current networks paired with new resources will allow Ohio to scale up to ensure the entire population’s needs are met. OCHIN also recommends coordinating with other public services utilizing the broadband framework, as improving public health is not solely based in health care delivery.

Public health is impacted by the digital divide through economic prosperity. Extending the broadband framework can deliver education and job opportunities which have the potential to revitalize communities hit hard by the opioid epidemic. The Department of Health and Human Services has determined “poverty, unemployment rates, and the employment-to-population ratio is highly correlated with the prevalence of prescription opioids and with substance use measures.”1 Remote employment opportunities are growing exponentially, and community access to broadband extends a lifeline for revitalization.

Additional Comments

- Consider Other States’ Models

OCHIN recommends looking to other states which have formed broadband commissions or offices of the broadband in formulating the Ohio model for broadband infrastructure and support. A

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couple of examples include Oregon’s HB 3158 passed in 2009, Wyoming’s SEA No. 0036 passed in 2018, and Texas’s SB 1960 and Washington’s SB 5511, both effective this year. Looking at other state comprehensive broadband models which are using both state and federal resources to expand the broadband framework could help Ohio to develop a program to fit the population’s specific needs. In many states, state agencies engaged with relevant stakeholders to ensure their needs were being addressed and collaborated to ensure broadband needs were met.

- Gain Stakeholder Input

  Schools, school-based health centers, and libraries, as well as safety net health care providers are commonly left out of the broadband conversation. It is imperative that these groups remain a strong voice at the table when formulating the broadband framework plan, especially to serve the most underserved communities to achieve the greatest results. Having these voices at the table ensures that the State’s evaluation of community needs include all members of society.

- Maintaining State Control

  It is important to understand that although many states have relied upon federal support for broadband extension and implementation, these programs are not without drawbacks and administrative difficulties. For example, the Federal Communications Commission (FCC) has delayed approval and disbursement of funding for the Rural Healthcare Connect Fund since 2017. Entities relying on this funding have faced instability and financial insecurity despite sufficient available funding as reported by the FCC to orchestrate this program.

  Because of this administrative difficulty, mostly independent state programs are preferable to ensure full control of funding and how it is allocated. By internally funding broadband programs, the state retains full control over funding decisions, allocations, and disbursement timeline. Making adjustments as needs evolve requires less effort, and the decisions can be made autonomously.

Conclusion

  OCHIN appreciates ODOT’s efforts to extend broadband infrastructure and consideration of our comments. We look forward to assisting ODOT in the stakeholder process in advancing community connectivity and the broadband expansion within the State of Ohio.

Please contact Jennifer Stoll at stollj@ochin.org for more information or to work with OCHIN directly in the future.

Sincerely,

Jennifer Stoll
EVP, Government Relations and Public Affairs