

TSP for Health Care Providers

FREQUENTLY ASKED QUESTIONS

Q. How does the telecommunications service priority (TSP) program work?

A. There are two aspects of the TSP program: restoration and provisioning. For priority restoration, a qualifying organization must first enroll its essential telecommunications lines in the telecommunications service priority (TSP) program. For Health Care Providers, this may include communication circuits used for voice and data communications in emergency departments, with first responders (ambulance) as well as with state and local health departments.

If any of these TSP services become inoperable, the telecommunications service provider must restore them on a priority basis before it restores any non-TSP services. Having TSP coverage is especially important following a major disaster in which the telecommunications infrastructure has been damaged and large numbers of customers are without telecommunications service.

Qualifying organizations can also use the TSP program to have essential communications services installed on a priority basis. This can ensure that essential communications services are available without lengthy delays that can occur otherwise. For example, if due to a disaster the existing communications circuits into the Health Care Provider's facility is inadequate to handle an increased need for communications or data transmission (e.g. telemedicine applications or transfer of patient medical records), the Health Care Provider can request priority provisioning of additional lines through the TSP program.

For more information, visit the Department of Homeland Security's National Communications System (NCS) web site at <http://tsp.ncs.gov>.

Q. Do all Health Care Providers qualify for TSP?

A. Yes. To qualify for the TSP program, an organization must: (1) be engaged in activities essential to the nation's security or emergency preparedness and response functions (e.g., the promotion of public health, safety, and maintenance of law and order), and (2) rely on telecommunications services to provide these essential functions. Health Care Providers meet these criteria and therefore will qualify.

Q. When should a Health Care Provider enroll in TSP?

A. A Health Care Provider should enroll in the TSP program at its earliest convenience. It should not wait until there is a major disaster or emergency. During a disaster or emergency, the telecommunications service providers must restore services to those organizations that **are already enrolled** in the program. An attempt to enroll in the program during the disaster would not be effective since the enrollment process itself takes a considerable amount of time and would delay rapid restoration of essential telecommunications services.

A TSP application can be completed via the Internet on the NCS web-site at: <http://tsp.ncs.gov> .

Q. How does a Health Care Provider enroll in the TSP program?

A. The Health Care Provider should take the following steps:

- Consult with its telecommunications service provider to determine its essential services and the cost of TSP coverage. From this they should determine which services to cover;
- Contact the Department of Health and Human Services (HHS) via email (Commo@hhs.gov) to request Federal sponsorship for TSP.
- Go to the TSP website at <http://tsp.ncs.gov> to establish an account. (Select “E-forms”, then “Register to use E-forms”). NCS will provide a login ID and password via an email;
- After receiving the login and password, re-enter the TSP web-site and fill out the application form. [Select “E-forms”, then “Access to e-forms application”, then “TSP request for service users (Form 315)].” List HHS as the Federal sponsor.
- The NCS approves TSP coverage and provides the Health Care Provider’s Administrator with TSP authorization codes for each circuit (e.g., TSP02H682.)
- Provide those authorization codes to the telecommunications carrier so that they can be assigned to specific essential communications lines identified as TSP circuits via enrollment in the program. This enables the carrier to quickly identify TSP enrolled circuits and work to restore service or replace them with new lines.

For more information regarding enrollment via email, contact the “NCS Priority Programs” hotline at 1-866-NCS-CALL (1-866-627-2255) or send an e-mail to tsp@ncs.gov.

Q. Who is involved in the TSP program?

A. Four organizations are involved:

- (1) User -- a telecommunications service customer that has its essential telecommunications services enrolled in the program.
- (2) Telecommunications service provider -- the service provider develops internal operating procedures and practices to ensure that TSP-designated services are given priority restoration and installation.
- (3) NCS -- this organization provides the day-to-day administration of the TSP program, including approval of TSP requests.
- (4) Federal sponsor -- any non-Federal TSP user must have a Federal sponsor; the Department of Health and Human Services (HHS) serves as the sponsor for Health Care Providers.

Q. What is the Federal sponsor’s role in the TSP process?

A. Any non-federal organization that requests TSP coverage must be sponsored by a federal agency. The federal sponsor's responsibilities include: (1) ensuring that the telecommunications service for which TSP coverage is requested supports a national security or emergency preparedness or response function; and (2) determining the appropriate priority level assignment.

Q. Who is my Federal sponsor for TSP?

A. The Department of Health and Human Services (HHS) is the Federal sponsor for Health Care Providers. Health Care Provider administrators rely on telecommunications services to provide the essential functions that they perform for the health and welfare American citizens, especially in the aftermath of a disaster or other emergency event. As a result, many of their telecommunications services qualify for TSP coverage. HHS will sponsor Health Care Providers, in order to help ensure that these facilities have access to essential communication services at all times. Any Health Care Provider administrator seeking HHS sponsorship in the TSP program should contact HHS at: Commo@hhs.gov.

Q. How long does the enrollment process take?

A. In most cases, the NCS will complete the sponsorship and approval process within 30 days of the receiving the request from the Health Care Provider. The telecommunications service provider also needs time to issue service orders and make the changes in its records to enable the priority service. The amount of time the service provider requires to process the orders depends on the number of circuits requested.

Q. What should the Health Care Provider do once it receives the TSP authorization codes from NCS?

A. The Health Care Provider should provide the TSP authorization codes to its communications service provider and request TSP service. The service provider generates a service order and enrolls the designated circuits in the TSP program by entering them into its priority service operations support systems. The service provider then has 45 days in which to send a confirmation report back to the TSP Program Office.

Q. What recourse does the applicant have if the application is disapproved?

A. The applicant is afforded due process and may appeal a decision to disapprove the application with the FCC. Applicants who wish to appeal a denial of a request to enroll in TSP may file an appeal in writing with the FCC at tsinfo@fcc.gov. Applicants may also contact the FCC’s Public Safety and Homeland Security Bureau at 202-418-1300 for additional information on the appeals process.

Q. How much does it cost to participate in the TSP program?

A. The Federal government does not charge for TSP. The charge normally varies by telecommunications service provider and depends on the number of lines covered. Your service provider may have a tariff for TSP. Typically, service providers impose a one-time charge for each line selected, as well as a monthly per-line charge. The one-time charge for a local line is approximately \$100; the monthly per-line charge is approximately \$3. The Health Care Provider must consult with its service provider in order to determine its cost for TSP coverage.

Q. Does a user such as a Health Care Provider need to purchase TSP coverage for all of its telecommunications lines?

A. It is critical that health care providers enroll their most essential telecommunications circuits to ensure that the facility is able to continue to provide quality health care to patients at all times. In general, hospitals and other health care providers should enroll essential telecommunications lines that allow for communications with first responders (i.e. police, fire and ambulance) as well as to state and local health departments (including lines that allow for data transfer of patient case specific information, telemedicine, bed availability and other resources and medical equipment needs). Some telecommunications for hospitals and health care facilities would not qualify for TSP, for example telephone lines to patients' rooms and circuits used for billing and administrative functions.

Q. What is TSP restoration?

A. When a telecommunications service covered by the TSP program fails for any reason, including due to a major disaster, the telecommunications service provider must restore the service on a priority basis. TSP restoration can be thought of as an insurance policy for existing circuits (both voice and data). By paying minimal amounts to enroll essential communications services in the program, during a major disaster when it may take days or weeks to restore service to many subscribers, TSP enrollees will have their services restored much more quickly than telecommunication users who are not enrolled in the program.

Q. What is TSP provisioning?

A. TSP provisioning is used when new, essential communications services must be installed on a priority basis to ensure they are available without lengthy delays that would occur otherwise. This includes emergency provisioning of new services at the Health Care Provider's primary location or at an alternate, pre-designated site. For example, to the extent that a Health Care provider envisions needing additional transmission capacity during an emergency to accommodate additional needs of telemedicine and transfer of medical health records, the TSP program would provide for priority provisioning of these services. To request priority provisioning, contact the TSP Program Office at 1-866-627-2255.

Q. During a crisis how long will it take to have service restored for the lines covered by the TSP program?

A. It depends on the extent of the damage to the critical telecommunications infrastructure and the amount of resources (personnel and spare parts) available to the telecommunications service provider to repair the damage. In any event, the telecommunications service provider must

restore all TSP-designated services, on a priority basis, before any others. **This is a legal requirement.**

A good example of how quickly restoration can be made under the TSP program is the situation in Lower Manhattan following the attacks on the World Trade Center in September 2001. Despite unprecedented damage to the telecommunications infrastructure that took many weeks to restore, the telecommunications services supporting the New York Stock Exchange were back in operation in just three days.

Q. Are there any provisions under TSP for health care providers, and in particular a hospital, forced to evacuate and relocate to another facility or venue to provide health care to patients?

A. Yes. In situations in which a hospital or other health care provider was forced to evacuate and relocate operations to another location due to a hurricane, flooding or other type of disaster, the organization would have the option of establishing new priority telecommunications lines under the TSP program. Those facilities enrolled in TSP are strongly encouraged to pre-identify alternate care sites and discuss this TSP provisioning option for those sites with their telecommunications service provider.

Q. Does TSP restoration only apply to situations in which the Federal government has declared an emergency?

A. No. Under the TSP program, there is no requirement for any authority (Federal, state, or local) to declare an emergency or disaster. TSP priority restoration applies at all times. When any TSP-designated service is disrupted it goes to the front of the line for restoration, regardless of the cause of the outage -- whether it was caused by a hurricane, flood, terrorist attack, or backhoe.

Q. If my service contract requires the service provider to restore my service within a specified time frame, e.g., within 24 hours, should I consider TSP coverage?

A. Yes. In accordance with FCC rules, service providers must restore TSP-designated lines before any others, regardless of whether their service contracts specify rapid restoration time frames. Without TSP coverage, a Health Care Provider's lines may not be restored until all other TSP lines are restored and until commercial customers' lines which have contract-designated restoration periods have been restored.

Q. Are there TSP priority levels higher than that which is designated for Health Care Providers? If so, why is it important for Health Care Providers to participate in TSP?

A. There are five TSP priority restoration levels. A Health Care Provider typically will qualify for level three, which includes communications lines necessary for public health, safety, and maintenance of law and order. The higher priority levels, i.e., levels one and two, include national security leadership and certain high-level military communications lines. Fortunately, very few communications lines actually have a priority one or two assignment. In fact, less than one-tenth of one percent of the nation's access lines has been assigned a TSP priority level of

one or two. Therefore, it is highly unlikely that restoration of higher priority TSP lines will appreciably slow restoration of level-three TSP lines.

If a Health Care Provider does not enroll its lines in the TSP program, its telecommunications service provider cannot restore these lines until it has restored all TSP lines in priority levels one, two, three, four, and five. More importantly, the organization's lines would also have to compete with all other (non-TSP) lines for telecommunications service provider maintenance and repair resources. During major disasters, all telecommunications customers would likely be clamoring for rapid service restoration, thereby severely overextending the telecommunications service providers' maintenance and repair resources. Under such circumstances, the only way the organization can be certain it will go near the front of the line is by participating in the TSP program.

Q. If a Health Care Provider's telecommunications lines are working but the public telecommunications networks are congested, will the TSP program help complete its calls?

A. The TSP program is designed to ensure that the most critical telecommunications lines are working. It does not, however, provide for priority completion of calls. That role is provided by Government Emergency Telecommunications Service (GETS) for wireline service and Wireless Priority Service (WPS) for mobile cellular phones.

GETS and WPS are emergency telecommunications programs administered by the NCS that provide for priority completion of out-bound calls when the public telecommunications networks are congested. GETS does not provide priority completion of in-bound calls. Since Health Care Providers are so vital to the health and welfare of the public during emergencies, the FCC, HHS and the NCS recommend that they participate in all three programs, GETS, WPS, and TSP. For information on these programs please visit the NCS web-site at: <http://gets.ncs.gov/> for GETS and <http://wps.ncs.gov/> for WPS.

For further information about the TSP program, call or email:

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