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April 4, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

Re: Immediate Waiver of the FY2017 RHC Funding Cap

Dear Secretary Dortch:

On behalf of Community Care of West Virginia, Inc. (CCWV), I am writing to express our support of the Emergency Petition for Waiver of the Rural Health Care Program Funding Cap Pending Conclusion of the Open Rulemaking, which was recently filed by the Schools, Health & Libraries Broadband (SHLB) Coalition.

CCWV is a federally qualified health center with fifteen (15) community health center locations, fifty (50) School-Based Health Center (SBHC) sites, five (5) 340(b) pharmacies, and a full service dental office. Our various locations, which served a total of approximately 40,000 individual patients last year, are spread throughout a wide area in West Virginia, including some of the most rural and geographically isolated parts of our state. We offer a full range of medical services to a population that is largely at or below the poverty line, and we do so regardless of the patient's ability to pay.

In order to offer the highest quality care at the lowest possible costs – something that CCWV continually strives to do – we simply must continue to invest in and utilize technology. Because we have committed to this way of thinking, we now require a robust and extensive telecommunications network to interact with and care for our patients across so many locations and such a broad service area. As you can imagine, we now rely on this network for virtually every aspect of our practice, including but not limited to patient care and administrative tasks. We use technology to transmit X-rays, MRIs, and other large files; for the exchange of electronic health records and electronic patient billing; and for video conferencing, distance learning, and training. As such, Rural Health Care Universal Service Funding has become critical to CCWV's current and future operations.

The Rural Health Care Program was designed specifically to provide funding for these critical resources, and we rely on that program to function effectively. Given all of the other

financial uncertainties facing healthcare providers, we simply cannot sustain our current operations in the face of prolonged delays in USAC funding announcements and the addition of unduly burdensome procedures like the FY2017 pro-rata factor.

As I stated in my recent letters to Senators Capito and Manchin regarding the USAC funding delays, we all understand that broader reform of the Rural Health Care Program is actively being considered by the Federal Communications Commission. I think we all look forward to any positive changes that will result from those efforts. For now, however, we need the USAC Program to work under the rules that were in place at the time that it solicited eligible funding proposals. CCWV needs this funding now if we are to continue our work in advancing healthcare for all West Virginians. Otherwise, so many of us will have to consider making substantial cuts – which ultimately will decrease access to affordable healthcare for thousands residing in our region – in order to meet our own financial commitments.

Thank you for carefully considering our support of SHLB's emergency petition. While we hope long-term solutions to improve the Rural Health Care Program come from the open rulemaking docket, we also must urge the Commission to take swift action to alleviate the more immediate problems being caused by the recent funding delays and shortages.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rick Simon", with a stylized flourish at the end.

Rick Simon
Chief Executive Officer