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April 11, 2018

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

**RE: Promoting Telehealth and Telemedicine in Rural America, WC Docket No. 17-310**

Dear Ms. Dortch,

I write in support of the Emergency Waiver Petition filed by the Schools, Health & Libraries Broadband (SHLB) Coalition on April 3, 2018. This Petition asks the FCC to waive Section 54.675(a) of its Rules and fully fund qualified applications for Rural Health Care (RHC) funding for Funding Year 201 until the Commission completes the open rulemaking in WC Docket No. 17-310.

The RHC program funding cuts of 15 to 25 percent were much larger than anticipated and are effectively retroactive because they were not announced by USAC until more than eight months after the start of the funding year, much later than was reasonable or reasonably expected. As a result, health care providers across the nation that entered into contracts for eligible services effective at the start of FY 2017 (July 1, 2017) face immediate and significant financial hardship.

As a Federally Qualified Community Health Center, we provide accessible, affordable health care which supports the health of people in our community with lower incomes and funding sources of Medicare and Medicaid. Our patients might not have another welcoming resource for primary healthcare if we were no longer able to provide them integrated care.

As a nonprofit, we utilize grants and other programs to subsidize our mission, and operate without sufficient margins to absorb additional liabilities when programs are cut. Our current unfunded liability to our service provider through March is \$575,600. This creates an *enormous financial uncertainty for our health center* and could jeopardize the results of our financial and compliance audits next month. This also creates an uncertainty which could impact the ability of our service provider to continue to offer services to healthcare providers that utilize this program as their collections suffer as a result.



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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 must also urge the Commission to act to alleviate the more immediate problems being caused by the recent funding delays and shortages.

Sincerely,

A handwritten signature in black ink, reading 'Jennifer Youngberg'.

Jennifer Youngberg  
Chief Financial Officer

CC:

The Honorable Senator Murkowski  
The Honorable Senator Sullivan  
The Honorable Congressman Young