



May 4, 2018

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

**Re: Rural Health Care Program: Request to Promptly Approve Emergency Petition for Waiver of the Funding Cap Pending Conclusion of the Open Rulemaking**

Dear Ms. Dortch,

The Horizon Health Care, Inc. a Federally Qualified Health Center is writing to strongly urge the Commission to approve the Emergency Petition for Waiver of the Rural Health Care Program (RHCP) Funding Cap Pending Conclusion of the Open Rulemaking, which was recently filed by the Schools, Health & Libraries Broadband (SHLB) Coalition.

Horizon Health Care (Horizon) owns and operates 32 primary care, oral health, mental health facilities in the rural and frontier area of South Dakota, our service area encompasses over 28,000 square miles. In the majority of these rural/frontier communities Horizon is the only health care provider in the community and in many instances it is over a two hour drive to the next health care provider. In 2017 Horizon saw over 27,000 patients through more than 102,000 distinct patient visits. Horizon's electronic medical and dental records operate with the server located in the community of Howard and all other clinics are connected to the server via dedicated T-1 lines, many of these locations are over 5 hour drive time from each other. Over these lines we operate our medical/dental records, video conferencing for staff meetings and education, video conferencing for Board of Directors meetings. Through our partnership with USDA we have been able to provide tele-health services over our T-1 lines to many of our rural/frontier locations providing mental health services, specialty services such as pulmonology, dermatology, cardiology and primary care. Many of our rural/frontier locations lack the robust internet connection that our colleagues in the urban communities enjoy and without the T-1 lines and the assistance offered by the RHCP program Horizon would not be able to provide the services we do today.

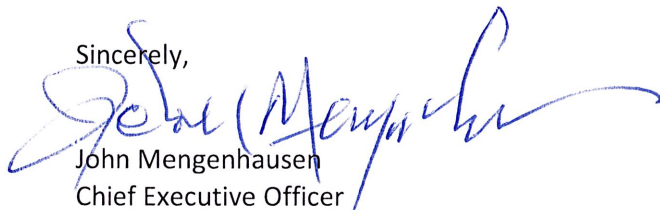
Horizon Health Care, Inc. strongly urges the FCC to promptly approve the Emergency Petition for Waiver of the RHCP Funding Cap Pending Conclusion of the Open Rulemaking, for the following reasons:

- The reductions in FY2017 RHCP payments to rural FQHCs are in direct contradiction to Congress' and HHS' long-standing efforts to expand EHRs and telehealth in rural communities.
- The reductions in FY2017 RHCP payments to rural FQHCs are significant, unexpected and largely-retroactive – and particularly difficult for small safety-net providers to absorb.

- Given the size of the FY2017 reductions – and the unpredictability of future payment amounts – many rural FQHCs are considering giving up activities that require broadband access, despite significant pressure from Congress and HHS to engage in these activities.
- Both the \$400 million cap and FCC oversight of the RHCP are outdated, and rural safety-net providers should not be penalized while waiting for the FCC to complete its updates of both.
- Given that rural providers and carriers are presently determining if -- and under what terms -- they will participate in the RHCP in FY18, the FCC should approve the emergency waiver promptly.

Thank you for your attention to this request, and for your efforts to increase access to care for medically underserved patients in rural areas. Please feel free to contact me directly if you would like additional information.

Sincerely,



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