

June 7, 2019

Ms. Marlene H. Dortch  
Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: WC Docket No. 18-336 and CC Docket No. 92-105 regarding the National Suicide Prevention Improvement Act of 2018

Dear Secretary Dortch:

United Way of Utah 2-1-1 aims to inform decisions, build connections, and empower Utahns across our entire state. We do this by providing information, assessment, and referral to individuals in need of services, and by following up with them to understand and address any barriers to receiving services. Services are available 24/7. We respond to inquiries via phone, chat, email, text, an app, and a comprehensive website.

Suicide is a leading cause of death in our state, and we are committed to continuing to work with our state's community of providers, elected officials, residents, and other stakeholders to address the problem. And, while we see the value that a nationwide N11 (or other three-digit number that is easy to remember and dial), we respectfully submit that 2-1-1 is not the best vehicle for addressing our region's suicide crisis. We have connected with multiple elected officials and leaders in the mental health and social services community in our region over the course of the past six months before drafting the below.

The first local reality which shapes our thinking that 2-1-1 should not be Utah's suicide prevention number relates to our local vision for suicide prevention. Utah is home to numerous organizations and crisis lines that are working together to prevent deaths by suicide. Our 2-1-1 is fully engaged in these conversations and in the efforts to assess the local options for how to connect Utahns contemplating suicide to assistance from a qualified professional. While 2-1-1 is an important partner in this process, the partnership has agreed 2-1-1 is not the best solution to address callers needs.

The second reality which shapes our thinking that 2-1-1 should not be our region's suicide prevention number relates to technology, wait time, and staff capacity. We have studied the models used in other states where 2-1-1 takes both suicide calls and resource information calls. In one model, suicide calls are separated in the 2-1-1's interactive voice response system (IVR). This separation of calls within the IVR creates a lag time in connecting a suicidal individual to the help they need. In the other model, there is no separation of calls, which results in suicidal individuals having to wait behind other calls. Further, 2-1-1 staff are experts in assessing callers' basic needs, in locating appropriate community resources, and in delivering that information in a comprehensive way to callers. Our 2-1-1 staff are not mental health experts, let alone suicide prevention experts. Both models have inherent issues and ultimately create a time gap that can mean life or death. When someone is having suicidal ideations and seeks out help, that help must be immediate.

The third reality relates to the usage of 2-1-1 by phone carriers. In some areas in our state, the 2-1-1 number does not function, forcing people to call the ten-digit number instead. Additionally, we have encountered situations where Utahns have not been able to connect to 2-1-1 from their phones because it is not a functioning option through their carrier. (Customers of one carrier have been able to successfully dial 2-1-1 from one area of the state, but not another). This led 2-1-1 to add our ten digit toll free number to our marketing material. If 2-1-1 is going to be the suicide hotline, it will need to function almost like a 9-1-1 and work for every caller when dialed. Further, we would need to ensure that 2-1-1 had geo-targeting ability similar to 9-1-1 to ensure callers are sent to the correct mental health provider and if police need to be dispatched they sent to the correct location.

Last, we have significant concerns that if 2-1-1 becomes the suicide prevention hotline our core mission and purpose will be diluted. This could lead to 2-1-1 not serving the community in the best way possible.

United Way of Utah 2-1-1 is committed to improving the lives of individuals in our region. Our entire business model has shifted toward convening, facilitating and participating in partnerships that focus on our most pressing community needs and that use structured, thoughtful processes to identify the solutions that best address those needs. We are very committed to addressing our state's suicide crisis - and it is with this commitment that we submit the recommendation that, at least for our region, 2-1-1 is not our best solution for the problem at hand.

Thank you for your consideration,



Bill Crim  
President & CEO  
United Way of Salt Lake



Bill Hulterstrom  
President & CEO  
United Way of Utah County



Tim Jackson  
President & CEO  
United Way of Northern Utah