



September 7, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW, Room TW-B204  
Washington, DC 20554

RE: WC Docket 18-312, Promoting Telehealth for Low-Income Consumers; Connected Care Pilot Program

Dear Madam Secretary:

The Coalition for Compassionate Care of California (CCCC) appreciates the opportunity to COMMENT in response to the Federal Communication Commission's request for public comment on **WC Docket 18-312: Promoting Telehealth for Low-Income Consumers**. We provide comment specifically on the proposed creation of an experimental "**Connected Care Pilot Program**" to support the development of telehealth services and delivery for low-income Americans, especially rural and veteran populations.

We strongly recommend that the FCC include people with serious illness / people with palliative care needs in the target populations for the Connected Care Pilot Program.

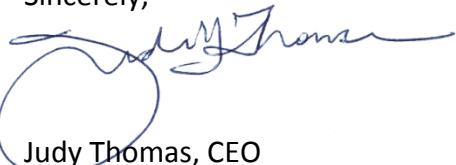
Palliative care is specialized medical care for people with serious illnesses, focused on providing relief from the symptoms, pain, and stress of a serious illness - whatever the diagnosis. Palliative care is provided by a team of doctors, nurses, social workers and others who work together with a patient's other doctors to provide an extra layer of support to the patient and their family. It is appropriate at any age and at any stage in a serious illness, and can be provided along with curative treatment. With its whole-person approach to enhancing quality of life for people with advanced illness, palliative care helps patients avoid health crises, reducing unnecessary and burdensome emergency department visits and hospitalizations, resulting in improved care, better patient and family satisfaction, and reduced health care costs.

While the availability of palliative care services has increased in recent years, large gaps still remain, particularly in rural communities where trained palliative care teams are in limited supply. Organizations providing home-based palliative care services, typically specialty medical groups or hospices that have moved upstream to provide non-hospice palliative care, often have more demand for their services than their staffing allows for, given long distances to travel to patient homes. This is where palliative care delivered via telehealth (typically video visits) can offer a high-quality, cost-effective option for addressing and managing the stress and suffering of serious illness. Through telehealth, palliative care patients receive holistic care without the time, expense, and complication of having to travel. Palliative care providers are able to monitor patient status and intervene to address problems without spending hours driving to patient homes, enabling this relatively scarce resource to be deployed more efficiently and effectively. Communication between community providers spread out over large distances is improved.

The Coalition for Compassionate Care of California is a collaboration of organizations—representing healthcare providers, local coalitions, consumers, and regulatory agencies—working in every corner of California to increase access to quality, compassionate care for all seriously ill Californians.

Again, thank for the opportunity to submit comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Judy Thomas". The signature is fluid and cursive, with a large loop at the end.

Judy Thomas, CEO  
Coalition for Compassionate Care of California