



September 10, 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 18-213, Promoting Telehealth for Low-Income Consumers; Connected Care Pilot Program

Dear Madam Secretary:

On behalf of the California Health Care Foundation (CHCF), I appreciate the opportunity to COMMENT in response to the Federal Communication Commission's request for public comment on **WC Docket 18-213: Promoting Telehealth for Low-Income Consumers**. I would like to 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.

I 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, 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 can accommodate, 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 can 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.

For example, one of the California Health Care Foundation's grantees and partners, ResolutionCare Network, provides palliative care services via telehealth and house calls to seriously ill people in rural communities in Northern California. ResolutionCare Network demonstrates positive outcomes in terms of patient-reported quality of life, satisfaction, and reduced costs with a threefold return on investment in rural Medicaid recipients who would otherwise have no access to home-based palliative care services. This improved quality with substantial savings results from offering a preferred care alternative to the emergency department and acute care settings. If the Connected Care Pilot includes a focus on palliative care, this type of model could be replicated in many more communities across California and the nation.

The California Health Care Foundation is a non-profit independent philanthropy dedicated to advancing meaningful, measurable improvements in the way the health care delivery system provides care to the people of California, particularly those with low incomes and those whose needs are not well served by the status quo. We work to ensure that people have access to the care they need, when they need it, at a price they can afford.

Again, thank for the opportunity to submit comment.

Sincerely,

A handwritten signature in black ink that reads "Kate Meyers". The signature is fluid and cursive, with a long horizontal flourish extending from the end of the name.

Kate Meyers  
Senior Program Officer  
California Health Care Foundation