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December 5, 2018

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

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

Dear Ms. Dortch,

United Way of Ventura County appreciates the opportunity to comment on the current effort undertaken by the Federal Communications Commission to study the feasibility of designating a three-digit number to the National Suicide Hotline and to assess the effectiveness of the current National Suicide Prevention Lifeline. In Ventura County, our United Way is fighting for the health, education and financial stability by investing in 211 and other programs related to vulnerable populations.

We acknowledge efforts are needed to create a safe place for all people to call – especially underserved or marginalized populations such as seniors, people with physical or intellectual disabilities, people that identify as LGBTQ+, Veterans, American Natives, non-English speakers, and individuals facing complex problems such as substance/opioid use, human trafficking, and domestic violence. Our organization has a 73-year history of reaching out to the underserved and today we partner with hundreds of businesses, nonprofit agencies, gov't stakeholders to drive systemic changes to solve our community's toughest problems like mental health and crisis.

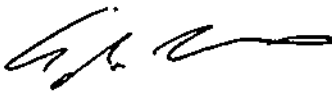
We encourage the FCC to consider our 211 work here in Ventura County as a vital partner in increasing access to suicide prevention and intervention services. Since the FCC designation of 211 in 2000, we have invested more than \$3.1 million to the success of 211 and our local 211 answer 32,000 requests for help each year. Moreover, last year our United Way invested more than \$3.107 million health, education, and other financial stability services as well as disaster relief. These critical investments position us to be key partners in the success of an improved mental health and crisis response system.

Another three-digit code may erode the simplicity of a single point of access for community help. Despite concerted efforts by numerous social services, and multiple hotlines, in our community to educate and market the distinctions, a person in crisis will likely always reach for the most familiar or most accessible number. Our 211 receives calls that are better suited for 911, and our 911 partners often receive calls that we can best answer. We recommend that resources should be invested to improve a unified single point of access with a blended partnership of the National Suicide Prevention Lifeline and United Way's 211 services. We believe in the power of partnership to address gaps, not duplicate services, and will be a valuable partner in the fight against suicide.

Because people occasionally call the wrong number or hotline for their need, any agent who answers a crisis call must be able to safely assess, deescalate, and manage the call. Both the National Suicide Prevention Lifeline and 211 networks currently provide many or all of the critical services for an effective system – and many are providing them in a co-located or “blended” environment with formal inter-agency transfer protocols, cross training, and shared outreach. More than 40 of our 211 centers answer calls to the National Suicide Prevention Lifeline along with other crisis and hotline calls. Moreover, all 211 agents are trained to triage, deescalate and ensure proper routing of crisis calls. All agents who work for 211 centers and other hotlines could be significantly more effective at assisting callers quickly if no-cost opportunities were available to provide universal training and certification to ensure a truly “no wrong door” approach to crisis intervention.

You can learn more about our work at <http://vcunitedway.org/> and <http://www.211ventura.org/>, and can reach my office for additional questions or discussion at 805-485-6288. Thank you for your time in addressing this important issue and for your consideration.

Sincerely,



Eric Harrison
President & CEO
United Way of Ventura County