

APPEAL for Funding Denial for HCP 14408's packets 61104, 61421, 62190, 62191, 62192, 62193, 62194, 62195, 62196.

Thank you for your time in considering this appeal to the program rules regarding Form 466-A, Line 19.

2004 was the first year that CGH Medical Center applied for the USAC funding grants.

Funds were denied for nine circuits that CGH Medical Center has to provide Internet Service to offsite health care service facilities and staff. These circuits represent a total funding commitment of approximately \$3748.00. A total yearly CGH Medical Center expense of \$15,024.00

Reason for denial:

"Line 19 requires providing the location where the service is being provided. This location should be the HCP's physical address."

In order to comply with the current ruling of using the HCP's physical address, each location would need its own HCP. This appeal would not be as critical if it were as simple as requesting HCP numbers for each of the 10 locations. Unfortunately, under the newest 2005 listing for Rural areas, these addresses are being considered Urban.

CGH Medical Center would like to voice concern over the changes regarding Whiteside County's rural/urban eligibilities. The 2005 list states Whiteside County is "Rural only in 0002.00, 0003.00, 0006.00, 0007.00 and 0008.00. This now creates a greater financial burden for CGH Medical Center to provide benchmark medical care to the "Urban" sectors in Whiteside County. A county already distressed by the closing of several major employers. CGH Medical Center would like to request a review of the mechanisms used to determine rural and urban status.

What needs to be taken into consideration for this appeal by CGH Medical Center is that these ten circuits are \$15,024.00 of additional expenses incurred by the HCP, CGH Medical Center to pass its Internet Services on to the offsite locations to perform hospital business via the Internet. (See diagram.) CGH Medical Center would like to request a new cost study done to calculate the level of universal service support available to Health Care Providers in order to provide affordable quality care to its surrounding communities.

This appeal by CGH Medical Center actually has two parts. Most importantly, that all of Whiteside County remain listed as Rural to benefit from the forward looking economic costs. In regards to the nine current 2004

circuit denials, CGH Medical Center would like to request to have these ten locations granted their own HCP numbers and grandfather the same as CGH Medical Center's HCP 144408 is being grandfather for the next 3 years.