



CALIFORNIA
HOSPITAL
ASSOCIATION

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Health Policy and Advocacy*

September 6, 2012

Federal Communications Commission

Comments from the California Hospital Association Re: FCC Rural Health Care Reform
WC Docket No. 02-60 (Public Notice Dated July 19, 2012)

The California Hospital Association (CHA), representing nearly 400 hospitals and health systems, strongly supports the comments submitted by the California Telehealth Network (CTN) regarding the FCC Rural Health Care Reform WC Docket No. 02-60, publicly noticed on July 19, 2012.

CHA is represented on the CTN Advisory Board and is committed to the goals of advancement of broadband-enabled health IT for its potential to improve health care outcomes while simultaneously controlling costs and extending the reach of the limited pool of health care professionals.

CHA supports the FCC intentions with the Broadband Services Program proposed in the Universal Services Fund to sustain a federal investment in telehealth/telemedicine. In support of the comments submitted by CTN, CHA would like to emphasize the following additional points:

- 1) **Retain the 85% Subsidy.** CHA represents 68 small and rural hospitals who are providing critical health care services to the medically underserved areas of the state. They currently operate on thin financial margins but are highly motivated to participate in broadband-enabled health care delivery. Reduction in the subsidy could jeopardize the progress made to date with these providers and could discourage further participation.
- 2) **Expand Broadband Services Eligibility.** CHA supports the expansion of eligibility to include rural safety net providers in settings that enable patient monitoring for underserved and elderly patient populations. Broadband enabled patient monitoring in skilled nursing facilities, and other health care settings, can improve care transitions and positively impact the cost and efficiency of Medicare and Medicaid.

Thank you for your attention to these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lois Suder".

Lois Suder
Executive Vice President/Chief Operating Officer

LS/PW:nr/bd