

Office of the Health Care Advocate
Capitol Ave.
Hartford, CT 06106

ATTN: Victoria Veltri

I am writing these comments on behalf of United Connecticut Action for Neighborhoods and our health care organizing project, the Caring Families Coalition.

We are particularly concerned about the lack of details regarding the quality measures needed to insure that patients under the proposed payment system are not denied care in the interests of saving money. From the way the document reads it appears that each insurer or payor will negotiate quality standards with each provider with whom they have a contractual arrangement. The quality standards could vary significantly from one insurer to another with both the insurer (to increase competitive advantage) and the provider (to achieve a bonus for saving money) having a financial incentive to reduce and or deny medical benefits to patients. The quality standards should be set by an independent committee and apply to all contracts.

We would like the SIM plan to be very clear that no provider will receive a bonus or participate in shared savings until a system of quality standards are in place. Likewise, no provider who is found to be reducing or denying benefits should be allowed to receive any shared savings or bonus.

Sincerely ,

Alta Lash

UCAN Executive Director