

CONNECTICUT ASSOCIATION FOR  
**HEALTHCARE AT HOME**

November 26, 2013

The Office of the Healthcare Advocate  
P.O. Box 1543  
Hartford, CT 06144  
sim@ct.gov  
Attn: Victoria Veltri  
Mark Schaefer

Dear Vicky and Mark,

The CT Association for Healthcare at Home, representing 62 CT DPH licensed/CMS certified home care agencies as well as 28 hospice agencies, respectfully submits the following comments for incorporation into the State Innovation Model (SIM) proposal document.

Our Association member agency providers, a growing workforce of 12,000 individuals, provided over 5-million home care visits in CT in 2012. We are the "feet on the ground" in all 169 CT communities. Our provider members already maintain the chronically ill, dually-eligible, and behavioral health populations of all ages, which facilitates successful rebalancing and adoption of person-centered care.

Home care agencies are the only entities that have existing community-based relationships with CT primary care physicians and health systems, using daily interactions to create a virtual team approach to achieve person-centeredness. We are the only provider sector that goes into CT residents' homes on a daily basis, has expertise in psychosocial and environmental factors, and facilitates the transition and coordination of care across the provider continuum and with community-based supports.

**As the SIM design relies heavily on physician practices and a population-based public health approach, it is our vision that home care agencies can be of significant value to physician practices by adapting ourselves to fill the role of the Certified Community-based Practice Support Entity. Through our existing and growing workforce, we are able to quickly train and fit the needs of the SIM model to become a glide path for Community Health Workers (CHW).**

We request that you incorporate the following language into the SIM Draft 1.1 document:

1. **Page 6, Under "Community Health Improvement" Item #2 – adding language to the end of the statement, therefore changed to:**

**Strengthening community-based health services and linkages to primary healthcare by establishing a certified Community-Based Practice Support Entity comprised of an existing and ready DPH-licensed workforce of experienced community-based workers to enable fast track training and SIM Implementation.**

2. Page 94, in 3 places, add: "CT League for Nursing" (CLN) and "CT Association for Healthcare at Home," (CAHCH) as educational training resources for glide path CHWs. Both entities have been providing training for community workers for decades and have the ability to provide virtual or classroom-style formats. Therefore change to:

Connecticut DPH will consult with CT AHEC, the CT Assoc. for Healthcare at Home, and the CT League for Nursing and CT's advanced primary care practices to gain their perspective on how best to train CHWs...

Include the CT Association for Healthcare at Home's Wallingford location as an additional training center.

Include the CT Association for Healthcare at Home and the Ct League for Nursing as "showing Interest in contributing to the building of a capable CHW workforce".

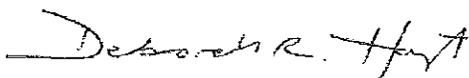
Include "the inclusion of home health care agencies is important to ensuring that there is a career ladder for CHWs ..."

3. Page 95, under "Preparing today's workforce for care delivery reform". Add the following:

Home care agencies are actively innovating in this space and are willing to hire and create new jobs with varying skill levels and growth opportunity to work effectively within new models of care to fast track SIM model success. The State and DPH need not reinvent existing capacity and community-based expertise and can look to existing DPH licensed home care agency strength as a glide path to meet the CHW need.

Thank you. If you have any questions, please feel free to call me directly at 203-774-4939 or [hoyt@cthealthcaerathome.org](mailto:hoyt@cthealthcaerathome.org).

Sincerely,



Deborah R. Hoyt  
President & CEO