

Connecticut State Innovation Model (SIM) Project  
Healthcare Innovation Steering Committee & Workgroups  
Office of the Healthcare Advocate, Hartford CT  
Sept 17th 2015

My name is Supriyo B. Chatterjee and I reside in West Hartford Connecticut. I would like to submit my comments for your consideration. In a June 9<sup>th</sup> Public Comment to CT SIM Committee – I had mentioned my request to US Health & Human Services - Office of Minority Health (US HHS OMH) and the CT Department of Public Health (CT DPH) for copies of Connecticut Multicultural Health Partnership (CTMHP)'s two Cultural Competency (CLAS) Reports along with its Conflict-of-Interest Disclosures. On September 9<sup>th</sup>, I received from CT DPH, copies of the two reports but not their associated Conflict-of-Interest Disclosures as required by Federal HHS 'Public Health Service' Funding requirements.

According to CT DPH – CTMHP is an organization supported by the Federal HHS grant and is a statewide coalition of various health and social service organizations, businesses and community members.

Eastern AHEC was appointed by CT DPH for matters of fiscal sponsorship of CTMHP. The absence of Conflict-of-Interest Disclosures as required by Federal HHS regulations raises the question, if CTMHP is enjoying State Rights Immunity under the Tenth Amendment. Quite recently, the National Science Foundation suspended millions in grants to University of Connecticut after a Conflict-of-Interest Probe (Hartford Courant, May 1<sup>st</sup>). This leads me to believe that Federal subcontracts do not carry over State Rights Immunity to subcontractors, perhaps CTMHP has been misinterpreting the Federal statutes since 2008.

My question to the CT SIM Committee is: if the CT SIM's Code-of-Ethics statement, currently under discussion, will include clarifications regarding Federal HHS statutes, Conflicts-of-Interest Disclosures and State Rights Immunity under the Tenth Amendment.

Thank you.

Supriyo B. Chatterjee MBA, MSc, MA (Econ)  
[sbc@gmx.us](mailto:sbc@gmx.us)  
West Hartford CT 06107

References used in above comments are shown below (next page).

## REFERENCES

Connecticut Department of Public Health - Office of Health Equity  
<http://www.ct.gov/dph/cwp/view.asp?a=3137&pm=1&Q=552788>

US HHS Office of Minority Health: Grant award & the role of Connecticut Multicultural Health Partnership <http://minorityhealth.hhs.gov/omh/content.aspx?ID=9136>

Connecticut Multicultural Health Partnership Bylaws and Code of Ethical Principles  
<http://www.ctmhp.org/wp-content/uploads/2010/12/CMHP-Bylaws-Approved-June-27-2012.pdf>

Editor's Note - Introduction to the Publius Virtual Issue:  
Federalism and Health Policy. Publius: The Journal of Federalism, 2012.  
[http://www.oxfordjournals.org/our\\_journals/pubjof/pjs050.pdf](http://www.oxfordjournals.org/our_journals/pubjof/pjs050.pdf)

Federalism in Health Care: Identifying Roles for Federal and State Partners. The Commonwealth Fund. August 6, 2014.  
<http://www.commonwealthfund.org/publications/blog/2014/aug/federalism-in-health-care>

STATES VS. FEDS: JULY/AUGUST 2013 | STATE LEGISLATURES MAGAZINE  
[http://www.ncsl.org/bookstore/state-legislatures-magazine/states-vs-feds\\_sl-magazine.aspx](http://www.ncsl.org/bookstore/state-legislatures-magazine/states-vs-feds_sl-magazine.aspx)

Disparities and Quality Improvement: Federal Policy Levers. Lurie N et al. Health Affairs March 2005 vol. 24 no. 2 354-364 - <http://content.healthaffairs.org/content/24/2/354.full>

Federal Register - Objectivity in Research for Public Health Service Funding 42 CFR Part 50 45 CFR Part 94  
<http://www.gpo.gov/fdsys/pkg/FR-2011-08-25/pdf/2011-21633.pdf>

Hartford Courant May 1, 2015: Feds Freeze Millions In Grants To UConn After Conflict-Of-Interest Probe  
<http://www.courant.com/news/connecticut/hc-uconn-nsf-grants-suspended-20150501-story.html>

### **Prior CT SIM Public Comments:**

CT SIM - Practice Transformation Task Force Meeting June 30th (under Public Comment)  
[http://www.healthreform.ct.gov/ohri/lib/ohri/work\\_groups/practice\\_transformation/2015-08-26/public\\_comment\\_sb\\_chatterjee\\_08262015.pdf](http://www.healthreform.ct.gov/ohri/lib/ohri/work_groups/practice_transformation/2015-08-26/public_comment_sb_chatterjee_08262015.pdf)

CT SIM Healthcare Innovation Steering Committee Meeting August 13th (under Public Comment)  
[http://www.healthreform.ct.gov/ohri/lib/ohri/sim/steering\\_committee/2015-08-13/pc\\_chatterjee\\_08132015.pdf](http://www.healthreform.ct.gov/ohri/lib/ohri/sim/steering_committee/2015-08-13/pc_chatterjee_08132015.pdf)

CT SIM Healthcare Innovation Steering Committee Meeting June 11th (under Public Comment)  
[http://www.healthreform.ct.gov/ohri/lib/ohri/Public\\_Comment\\_Chatterjee\\_06112015.pdf](http://www.healthreform.ct.gov/ohri/lib/ohri/Public_Comment_Chatterjee_06112015.pdf)

CT SIM - Practice Transformation Task Force Meeting June 9th (under Public Comment)  
[http://www.healthreform.ct.gov/ohri/lib/ohri/PublicComment\\_PTF\\_Chatterjee\\_06092015.pdf](http://www.healthreform.ct.gov/ohri/lib/ohri/PublicComment_PTF_Chatterjee_06092015.pdf)