

Connecticut State Innovation Model (SIM) Project
Healthcare Innovation Steering Committee & Workgroups
Office of the Healthcare Advocate, Hartford CT
June 30th 2015

My name is Supriyo B. Chatterjee and I reside in West Hartford Connecticut. I would like to submit my comments for your consideration. This past weekend, the Wall St Journal published an Op-Ed piece – ‘A Cure for ‘Conflict of Interest’ Mania’ in which it called ‘Conflict of Interest’- a holier-than-thou ‘moralistic bullying’ in the medical industry. Interestingly, the word ‘trust’ was missing from the Journal’s 4-page Op-Ed piece. ‘Trust’ was the operative word in my public comment to the CT SIM Steering Committee on June 11th and within it, why CT Multicultural Health Partnership (CTMHP) in its fiduciary duties to its 400 partnership members, should furnish the Declaration Statements of Conflict-of-Interest as required by the US Health & Human Services’ Public Health Service Funding regulations. I believe, this is applicable even if CTMHP has an administrative sponsor Eastern-AHEC, to handle its funding accounting. In retrospect, I would like to suggest to examine how the US Health & Human Services’ Public Health Service Funding regulations may be applied to the CT SIM project. It has well defined responsibilities, management and reporting of conflicts of interest and remedies for compliance failures.

In the draft CT SIM ‘Conflict of Interest’ Safeguards, there is much about protocols and beneficiaries but little about its effect on the outcomes. To illustrate – in Feb 2014, CT Multicultural Health Partnership with funding from CT Dept of Public Health, published an ‘Analysis of the 2013 National Standards for Culturally and Linguistically Appropriate Services (CLAS).’ This multicolored, glossy format 17-page analysis document sourced the US HHS - Office of Minority Health’s CLAS Standard Blueprint document; but somehow in this analysis, the name of our state ‘Connecticut’ got lost in the paraphrasing and is missing and there are no Spanish or other languages version of the analysis document available.

In closing, I must mention that CT Multicultural Health Partnership does have a ‘Code of Ethics’ and I hope CT SIM will have one too.

Thank you.

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

Supriyo B. Chatterjee, West Hartford CT sbc@gmx.us June 30th 2015

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REFERENCES - Supplement to Public Comment

A Cure for 'Conflict of Interest' Mania - Wall Street Journal June 26, 2015

<http://www.wsj.com/articles/SB11760718815427544683404581068401388235760>

Analysis of the 2013 National Standards for Culturally and Linguistically Appropriate Services (CLAS) in Health and Healthcare – Connecticut Multicultural Health Partnership

<http://www.ctmhp.org/wp-content/uploads/2014/02/CMHP-CLAS-Standards-Analysis.pdf>

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>

FAQ - Promoting Objectivity in Research for Public Health Service Funding (FCOI)

http://grants.nih.gov/grants/policy/coi/coi_faqs.htm

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>

National Standards for Culturally and Linguistically Appropriate Services in Health and Health Care: A Blueprint for Advancing and Sustaining CLAS Policy and Practice

<https://www.thinkculturalhealth.hhs.gov/pdfs/EnhancedCLASStandardsBlueprint.pdf>

Betancourt, JR et al, Addressing Disparities and Achieving Equity: Cultural Competence, Ethics, and Health-care Transformation. Chest. 2014;145(1):143-148.

<http://journal.publications.chestnet.org/article.aspx?articleid=1793887>

Gostin, Lawrence O., "Mapping the Issues: Public Health, Law and Ethics" (2010). Georgetown Law Faculty Publications. <http://scholarship.law.georgetown.edu/facpub/374>

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>

Prior CT SIM Public Comments:

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

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

CT SIM - Equity and Access Council Meeting May 28th (under Public Comment)

http://www.healthreform.ct.gov/ohri/lib/ohri/work_groups/equity_access/2015_05_28/ctsim-may28.pdf

CT SIM - Practice Transformation Task Force Meeting May 19th (under Public Comment)

http://www.healthreform.ct.gov/ohri/lib/ohri/work_groups/practice_transformation/2015-05-19/ctsim-may19.pdf