

November 27, 2013

The Honorable Nancy Wyman
State Capitol
Hartford, Connecticut
LtGovernor.Wyman@ct.gov

Dear Lieutenant Governor Wyman:

I am writing to you with concerns about development of the State Innovation Model (SIM) project.

Low income Connecticut residents already have a difficult time accessing health care services. This is particularly true for Medicaid enrollees. Under the payment model proposed for SIM, "shared savings" and possibly "downside risk" on providers, doctors will be financially incentivized to restrict access to care even further. This kind of harm must be prevented, for all Connecticut residents. The current draft SIM plan does not commit to denying financial incentives to providers found to have generated savings at the expense of needed care for their patients. I am also concerned that the plan has been developed with no independent consumer advocate input.

To prevent harm from the SIM proposal, the final plan must make a clear, unequivocal commitment that:

- Providers found to have denied or restricted access to necessary care will be prohibited from receiving shared savings or other financial rewards
 - Robust quality measures of under-treatment which are the basis for denial of shared savings, including inappropriate denials or limitations on care or avoidance of expensive patients, must be developed in an inclusive committee with significant independent consumer advocacy membership
 - The system to measure and sanction under-treatment, and a fair process to resolve disputes, will be in place before any provider incentives are implemented
- All decisions will be reached in a transparent, public process based on significant public input
- Independent consumer advocates will be included in meaningful numbers on all SIM committees
- As in the first SIM plan draft, downside risk payment models are excluded in the Medicaid program

Thank you.

Respectfully,



Laurel D. Mangan
Attorney at Law
130 Union Street, P.O. Box 195
Vernon, CT 06066