

September 9, 2015

Office of the Healthcare Advocate
PO Box 1543
Hartford, CT 06144
Attention SIM PMO
sent via email to sim@ct.gov.

Pitney Bowes Inc. has been supportive of a state-wide health transformation with the goal of eliminating waste and inefficiency and to control the growth in health care spending. We are in strong support of a plan emphasizing improved access to higher quality providers and equitable healthcare that produces better health outcomes at a reduced cost.

While we appreciate the hard work of the Equity and Access Council (EAC) we do have concerns with some of the recommendations.

Shared Savings: The SIM model clearly sets out the ultimate goal of shared savings, not pay for performance. The concern with rewarding providers for simply achieving quality measurements without producing savings is that the important goal of mitigating growth in health care spending will not be achieved.

Employer Contributions: It is important to keep in mind that Connecticut's employers fund the majority of employees' health care coverage. We need to be careful in adopting recommendations that actually ADD cost to the system VS removing excess costs. This is particularly relevant in recommendation 3.5 which proposes a reinvestment of shared savings not paid out.

Administrative Complexity: Attention should be paid to those recommendations that add an administrative burden due to the level of complexity required for execution as this can also add cost to the system.

Thank you for the opportunity to offer comments.

Sincerely,



Andrew R. Gold
Vice President Total Rewards



Mary Bradley
Director Health Care Strategy