



January 15, 2018

The Connecticut Healthcare Cabinet
Program Management Office
PO Box 1543
Hartford, CT 06144

Dear Members of the Healthcare Cabinet,

On behalf of the SIM Quality Council we would like to thank you for your recommendations, and we welcome the charge to deliberate on potential measures of medication counseling.

The SIM Quality Council's role is to recommend a set of quality measures that payers are encouraged to use to assess the quality of services delivered under value-based payment arrangements. The SIM PMO is working with all payers in Connecticut so that they voluntarily align around the Council's recommended measures in their value-based payment contracts. The council also advises on the development of a public scorecard with quality measure and CAHPS survey data measuring the performance of FQHC's and Advanced Networks.

The Healthcare Cabinet has recommended that the Quality Council add measures to its core measure set related to: medication adherence, assistance and monitoring; and communication with patients about drug prices, barriers, the clinical value of each prescription, patient priority setting and alternatives. We acknowledge that prescription drug prices are a major contributor to the increase in the cost of healthcare. It is an important factor to be addressed; however, as suggested in the recommendation, there are currently no NQF endorsed measures that target this issue, with the exception of a single question included in the Consumer Assessment of Healthcare Providers and Systems (CAHPS). The Council will consider additional options within CAHPS to ask about medication counseling, and specifically the issue of cost as a potential barrier to adherence.

Communicating with patients in a clinical practice setting on cost, however, is a challenge given that patient specific cost information is not readily available to either the provider or the patient at the point of service. In fact, cost information is often not available until the patient reaches the pharmacy to fill their prescriptions. We strongly recommend that the Cabinet pursue strategies for making this important information available to providers and patients in the practice setting, at the time that options are being considered for pharmacological treatment.

The Cabinet further recommended that the Council formalize care delivery expectations regarding communication with patients about their ability to afford medications and discussion of alternative options. We believe that this issue might best be considered by the SIM Practice Transformation Task Force



(PTTF), which has responsibility for recommending practice improvement standards and corresponding payment reforms.

Thank you again for the opportunity to provide comment and feedback on this important issue.

Regards,

Dr. Steve Wolfson, Co-Chair SIM Quality Council

Dr. Mehul Dalal, Co-Chair SIM Quality Council