



April 7, 2020

Deidre S. Gifford, MD, MPH
Commissioner
Connecticut Department of Social Services
55 Farmington Avenue
Hartford, CT 06105

Victoria Veltri
Executive Director
Connecticut Office of Health Strategy
450 Capitol Avenue, MS#51OHS
P.O. Box 340308
Hartford, CT 06134-0308

Dear Commissioner Gifford and Ms. Veltri,

As you know, the COVID-19 pandemic is forcing a massive shift in use of resources and priority setting across the healthcare continuum. As you know, Connecticut's hospitals and health systems have acted quickly to prepare for the surge in COVID-19 infections. They are taking every step possible to enable access to all necessary services to ensure the best possible healthcare outcomes for Connecticut residents. Their preparations required fully dedicating their clinical, operational, and financial resources to address the many challenges they face, i.e., space, staffing, and supplies, in order to maximize capacity and deliver the highest standard of care. They are, of course, fully embracing this core element of their mission, even as it presents unprecedented financial challenges, which are likely to endure through the first and subsequent waves of the pandemic. These efforts are requiring that hospitals dedicate 100% of their clinical, operational and financial resources to their response to the pandemic. CHA and Connecticut's hospitals appreciate the support of the Office of Health Strategy (OHS) in making adjustments to the Certificate of Need process and other processes that simply are not workable if we are to make our best stand against the ravaging effects of the pandemic.

CHA has been working with the Governor and his office, and almost every state agency, to identify all possible resource reallocation and regulatory steps that can be made to give us every possible advantage and keen focus to fight this public health emergency. The Governor continues to challenge us to be sure we are leaving no area unexamined.

One area in which we are working on with you which requires a significant amount of time and hospitals' operational focus is planning for the Health Information Alliance and the State-wide Health Information Exchange (HIE). Therefore, we request that you pause, indefinitely, all current activity in planning for the HIE. We all want hospitals focused on the pandemic and not be forced to divide their attention,

Commissioner Gifford and Ms. Veltri

April 7, 2020

Page 2

resources, and staff for a project that is not essential to the public health emergency, and which will not be an asset as we fight waves of COVID-19 in the coming months and year.

To further this reprioritization, we would like to work with you and the Governor to enter an Executive Order that modifies Connecticut General Statutes section 17b-59e as follows:

With respect to subsection (b) of Sec. 17b-59e, the time frame for hospitals to comply with the requirements of the statute shall be two years after commencement of the operation of the State-wide Health Information Exchange.

With respect to subsection (c) of Sec. 17b-59e, the time frame for providers to comply with the requirements of the statute shall be three years after commencement of the operation of the State-wide Health Information Exchange.

The public health emergency will offer many lessons on how to improve the state's healthcare infrastructure and response capabilities. An important lesson we've already learned is that the infrastructure for telehealth is *dangerously* underdeveloped. The Department of Social Services (DSS) can play a critical role in bridging that infrastructure gap. Telehealth must be a key focus of OHS and DSS work so that providers will be able to address patient concerns while keeping vital social distancing requirements in place.

We recognize that some decisions regarding the HIE may be driven by a desire to use available federal funding by specific deadlines as mapped out in a plan that was made before anyone knew that the pandemic was going to be this extensive. As it stands now, under the best of circumstances, the HIE would not have wide-spread community provider engagement until 2022. In the current environment, that's not a luxury that Connecticut can afford.

We urge OHS, DSS, and the Governor's office to examine redirecting funds that were tagged for the State-wide Health Information Exchange. Specifically, we urge the state to immediately seek any necessary waivers or permissions from the appropriate federal authorities to change the project to refocus the HIE funds in a way that allows DSS to immediately support telehealth as the core of the HIE infrastructure.

Sincerely,



Karen M. Buckley
Vice President, Advocacy

KMB:ljs
By E-mail