



**CT Health IT Advisory Council  
CHA Public Comment  
Submitted by: Karen Buckley, Vice President, Advocacy  
December 15, 2016**

Good afternoon. Thank you for the opportunity to provide public comments today. My name is Karen Buckley and I am the Vice President of Advocacy for the Connecticut Hospital Association. Today I'd like to discuss DSS plans relating to Project Notify, as well as HIT planning in general.

Connecticut hospitals have a long-standing commitment to optimizing care management and coordination. As you know from our testimony at your last meeting, over the last year, through CHA, Connecticut hospitals have worked to help build a cross-continuum patient reference system – an innovative web-enabled application that allows providers and care coordinators to manage patient care in a way that helps to ensure that patients get the right care in the right place at the right time.

I previously testified that Connecticut has not historically invested the level of state resources required to implement the necessary technology to build a robust healthcare IT infrastructure and, as a result, hospitals and providers needed to move forward with implementing technology solutions on their own on several fronts, with the cross-continuum patient reference system being one such solution.

At the last meeting, we were told that DSS was working with one FQHC as it relates to Project Notify, a new notification system being developed by the Department. However, on November 22, 2016, DSS issued a bulletin (dated December 1, 2016) instructing all Connecticut hospitals and FQHCs to sign an addendum amending their Medicaid Provider Enrollment Agreements to initiate their engagement in Project Notify. While the Department has since indicated that this is a voluntary request, CHA remains concerned that Project Notify will result in the unnecessary duplication of efforts.

CHA again strongly recommends that all interested state entities take the time to investigate what systems have already been adopted by Connecticut hospitals and other providers, and are being used effectively today. We urge all agencies and stakeholders to avoid using scarce healthcare dollars on duplicative projects. It is essential to understand what will advance care and cost containment before designing or deploying new systems.

**Additional concerns related to Project Notify:**

- Project Notify is only applicable to the Medicaid population, and we do not believe the Medicaid population should be treated differently than other populations. (The existing cross-continuum patient reference system currently used by hospitals and providers captures all patients.)
- The complexity of the regulatory environment should not be underestimated. We recommend that there be better upfront assessments of privacy, permissions, security, and related concerns.

We stand ready to work with the state to improve care and care coordination for Connecticut residents.