



**TESTIMONY OF  
CONNECTICUT HOSPITAL ASSOCIATION  
SUBMITTED TO THE  
PUBLIC HEALTH COMMITTEE  
Friday, March 1, 2024**

**SB 242, An Act Concerning The Office Of Health Strategy's Recommendations  
Regarding The All-Payer Claims Database**

The Connecticut Hospital Association (CHA) appreciates this opportunity to submit testimony concerning **SB 242, An Act Concerning The Office Of Health Strategy's Recommendations Regarding The All-Payer Claims Database**. CHA opposes the bill.

Connecticut hospitals are critical to their communities. They are confronting the challenges posed by a post-pandemic healthcare system with an exemplary healthcare workforce that continues to provide outstanding care. But challenges remain. Hospitals are treating sicker patients, it continues to be challenging to hire and retain staff, and the financial headwinds are grave. Through it all, hospitals are steadfast, providing high-quality 24-hour care for everyone who walks through their doors, focusing on making Connecticut's healthcare system more equitable, and driving world-class innovation right here in Connecticut.

SB 242 eliminates efficient access to healthcare data for hospitals to use for their community benefit programs and activities and expands the type of data collected by the All-Payer Claims Database (APCD).

During the 2021 session, the Office of Health Strategy (OHS) proposed making significant changes to hospitals' community benefit reporting requirements to provide OHS with additional information about hospitals' community benefit and community health activities. CHA opposed the original proposal because it went far beyond the already extensive federal reporting requirements on which OHS could have relied for its oversight and review. It also would have required hospitals to report on efforts with communities and populations for which they lacked necessary data.

After the public hearing, the chairs of the Public Health Committee encouraged OHS and CHA to meet to work through the issues. After a long process, OHS and CHA were able to reach an agreement that significantly expanded community benefit reporting. The agreement was only reached after OHS and CHA both aligned on the creation of a mechanism for OHS to provide hospitals with a broad set of data from the APCD to fulfill the reporting requirements. Unfortunately, due to the lateness of when the agreement was finalized and the uniqueness of the post-COVID session, the agreement was not able to become law in 2021. In 2022, the

changes to the community benefit reporting became law as CHA and OHS worked in partnership to support the legislation.

OHS only recently put in place the mechanism that provides hospitals with the agreed-to data as mandated by the 2022 law (codified as 19a-127k). The mechanism is overly complicated but arguably meets the legislative mandate on OHS—a mandate to which OHS agreed and that OHS accepted after the 2021 discussions with CHA and legislative leadership. Despite the fact that this year is the first time hospitals have the opportunity to access these data, let alone design and perform the complex analytics necessary to make the data useful in satisfying the increased reporting obligations, OHS is seeking to eliminate its obligations to provide access to the data as a condition of the state reporting. CHA opposes this change to the carefully crafted agreement that all sides understood and accepted in good faith in 2021.

In addition, SB 242 proposes to expand the data collected by the APCD. Currently, OHS is working hard to add data to the APCD from self-insured entities because, without those data, the APCD lacks the full picture of all claims data. For years, this data collection effort has been extremely challenging, and CHA applauds the progress OHS is beginning to achieve. While CHA supports the collection of additional data related to non-claims payment and pharmacy, CHA believes the APCD should continue focusing on obtaining self-insured health plan data before expanding the data submission element requirements.

Thank you for your consideration of our position. For additional information, contact CHA Government Relations at (203) 294-7310.