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March 6, 2017

Representative Jonathan Steinberg, Senator Terry Gerratana, and Senator Heather Somers, Co-Chairs
Public Health Committee
Legislative Office Building, Room 3000
Hartford, Connecticut 06106

RE: Regional Health District Bills: HB 7170, HB 5754, HB 5169, HB 5757, HB 6033, and HB 5765

Dear Co-Chairs Steinberg, Gerratana, and Somers and Members of the Public Health Committee:

Thank you for this opportunity to comment on proposed bills HB 7170, HB 5754, HB 5169, HB 5757, HB 6033, and HB 5765 regarding the consolidation of existing municipal health departments and districts into nine regional health districts along COG boundaries.

The Lower Connecticut River Valley Council of Governments' (RiverCOG) seventeen municipalities **strongly oppose HB 7170** and the forced creation of regional health districts along COG boundaries. When draft legislation mandating the creation of county health departments was first released by the CT Department of Public Health (DPH) in October 2016, RiverCOG strongly objected (see attached letter). Although the language in HB 7170 has changed from the October draft, the top-down nature of the proposal and the absence of a compelling rationale remain. It is our experience that successful regionalism is based on voluntary cooperation and cost savings. Neither core principle is evident in HB 7170.

HB 7170 mandates the creation of regional health districts along COG boundaries and disbands existing municipal health departments and regional health districts. In doing so, DPH would dismantle successful local public health services and impose a larger regional service that will be more expensive and, at least initially, less effective. It is unclear what unmet public health needs exist in the Lower Connecticut River Valley that requires such a massive and costly overhaul. A better approach would be to conduct regional public health needs assessments, and then devise tailored interventions to address the identified public health deficiencies. If there were compelling reasons to do so, municipalities may very well seek they types of regional cooperation and consolidation sought by DPH.

Geography is incredibly important when dealing with a public health emergency. The mandatory reliance on COG boundaries in HB 7170 conflicts with the successful regional health districts, which have been voluntarily formed around logical public health geographies. For example, Old Lyme recently joined Ledge Light Health District, specifically because Old Lyme is on the eastern bank of the Connecticut River, is in DEMHS Region 4, and is in the evacuation zone for Millstone nuclear power plant. For those reasons it made sense for Old Lyme to be a member of Ledge Light. HB 7170 would dismember the successful Ledge Light regional health district and impose an irrelevant geography that could make Old Lyme less safe in the event of an emergency.

RiverCOG **strongly supports HB 5754** *An Act Allowing for the Regionalization of Certain Health Services* as a common sense and economical approach to regional shared public health services. The bill would allow a municipality to contract with another municipality for public health services. This arrangement provides cost savings, and removes the need to create a new health district and the associated administrative and bureaucratic structures. Under the proposal, cities and towns with robust public health expertise and capabilities could offer public health services to their neighbors. These contracts would be voluntary, and could be competitive, helping ensure that quality services are provided for a reasonable price.

RiverCOG **supports HBs 5169 and 5757**, prohibiting the mandatory consolidation of municipal health departments and districts by DPH. Consolidation of public health services should be voluntary.

RiverCOG is **neutral on HBs 6033 and 5765**. As drafted, these bills could be construed as prohibiting DPH from facilitating voluntary consolidation of health departments and districts. RiverCOG would like clarifying language added that prohibits DPH from mandating consolidations, while directing DPH to assist and facilitate voluntary consolidations initiated by municipalities.

RiverCOG and its member municipalities feel strongly that successful regionalization comes from the bottom-up and must first make sense for our residents and taxpayers. Please do not hesitate to contact me if I can be of any further assistance on the issue (sgold@rivercog.org or 860-581-8554).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Samuel S. Gold', written in a cursive style.

Samuel S. Gold, AICP
Executive Director