

March 7, 2017

Esteemed Chairs Gerratana, Somers, and Steinberg,
Esteemed members of the Public Health Committee:

The Western Connecticut Council of Governments (WestCOG) is pleased to share its comments on the following bills:

Bill 7170, An Act Concerning the Department of Public Health's Recommendations regarding the Integration of Municipal Health Departments into Regional Health Districts

WestCOG **strongly opposes** the required consolidation of local health departments and districts. In addition to opposing this concept, WestCOG is particularly concerned by the constellation of questions that surrounds this bill. These include:

1. *Unclear purpose.* The bill as proposed does not identify what problems it aims to solve, or what outcome(s) it is intended to achieve.
2. *Vague goals.* The numerical targets the bill is supposed to meet (and how progress toward them is to be measured) have not been specified.
3. *Questionable efficacy.* It has not been explained how, or demonstrated that, the creation of regional health districts will produce the desired outcome(s).
4. *Insufficient study.* No analysis of the range of projected benefits, costs, or outcomes has been presented, nor has any evaluation of alternatives or discussion of risks.
5. *Lack of stakeholder involvement.* It appears the decision to seek consolidation was made before local practitioners and experts were consulted.
6. *Incongruence with best practice.* Public health is best when local. It is unclear what effect forced regionalization would have on the relationships built and the trust earned between health workers and the communities they serve, which are the backbone of public health.

As our regional Public Health Emergency Planning Committee, regional Drug Task Force, and regional Tickborne Illness Prevention Task Force demonstrate, WestCOG supports collaboration and sharing among its members in public health. The success of these activities owes to the facts that they are voluntary, low-cost, and build on existing arrangements.

In requiring the creation of a new health system, bill 7170 differs fundamentally from the approach we have had success with. It is not inconceivable that a shake-up of the magnitude called for by the proposed legislation may be attended by high costs or even a worsening of health outcomes. Yet bill 7170 does not address these, or any other, very real risks. In a field as vital as public health, WestCOG cannot support any bill with as many unanswered questions as 7170.

Bill 5754, An Act Allowing for the Regionalization of Certain Health Services

- WestCOG **supports** enabling municipalities to share new services and to share services in new ways. Bill 5754 would give municipalities the option to share public health services on a voluntary basis, without requiring them to establish an independent health district.

Bills 5169, An Act Prohibiting the Department of Public Health from Consolidating the District Departments of Health and Municipal Health Authorities; and 5757, An Act Prohibiting the Department of Public Health from Requiring the Consolidation of Municipal Health Authorities

- WestCOG **supports** these bills, which prohibit the mandatory consolidation of local health departments and districts. Consolidation of departments and districts should be voluntary.

Bills 5765, An Act Concerning the Consolidation of District Departments of Health and Municipal Health Authorities; and 6033, An Act Prohibiting the Consolidation of the District Departments of Health or Municipal Health Authorities

- While it may not be their intent, the bills could be interpreted as barring the Department of Public Health from assisting voluntary consolidations. WestCOG would support clarifying language that prohibits DPH from requiring consolidations, while directing DPH to assist and facilitate voluntary consolidations initiated by municipalities.

Should you have questions, please do not hesitate to contact me.

Sincerely,



Francis R. Pickering
Executive Director