



May 6, 2024

**Re: Request for Information (RFI) on Consolidation in Health Care Markets**

Submitted electronically to [www.regulations.gov](http://www.regulations.gov)

On behalf of the Coalition to Transform Advanced Care (C-TAC), we appreciate the opportunity to respond to this RFI regarding the impact on those living with serious illness.

C-TAC is a broad national non-partisan, not-for-profit coalition dedicated to ensuring that all those living with serious illness, especially the sickest and most vulnerable, receive comprehensive, high-quality, person- and family-centered care that is consistent with their goals and values and honors their dignity. C-TAC comprises more than 200 national and regional organizations including patient and consumer advocacy groups, practitioners, health plans, faith-based and community organizations, and others who share a common vision of improving care for serious illness in the U.S. Our focus is ever on the patient and those who matter most to them.

**Responses to RFI Question- Effect of Consolidation on Patients**

We appreciate the opportunity to comment on this RFI question as we are concerned that increasing health market consolidation is not necessarily improving access, quality, or equity of care for patients. In fact, our members tell us that it is more likely creating confusion at the local level. We therefore recommend that there be a mandatory patient protection aspect to any future health care market consolidation consideration and approval.

One framework for that could be [the core principles](#) C-TAC developed for models providing care to those living with serious illness and their families. The pertinent ones for health market consolidation are:

- Care is person- and family-centered, improving quality of life.
- Care is inclusive – reducing inequities and disparities and removing barriers to access and to quality care.
- Each person’s physical, social, psychological, and spiritual needs are assessed on an ongoing and standardized basis.
- A care plan is developed, using shared decision making, based on those needs and the person’s individual goals and preferences.
- Care is provided by a qualified core interdisciplinary team, with additional team members as needed.

- Care is accessible 24/7 (using technology as appropriate) and available throughout the continuum of a serious illness (including in the home when appropriate).
- Care is comprehensive, coordinated, with seamless transitions, and with integration of clinical and community-based services and supports for the person and family caregiver(s).

With that framework in mind, we make the following recommendations:

1. Patients and their family caregivers should be a key consideration when consolidation arrangements are considered, negotiated, and finalized. Such deals should be required to confirm how they will improve access to care, quality of care, and health equity and what proof of that will be required after consolidation is approved. That should be as important as the financial viability of any consolidation.
2. Consolidation arrangements must include consideration and specific plans for the practical impact on patients. Administrative details that must be included are plans and deadlines to update outreach materials and whether the affected websites, phone lines, and other information are still accurate. We hear stories from places where such websites are woefully out of date, meaning that patients have difficulty or are unable to access the new consolidated services.
3. There needs to be some mechanism to review and provide oversight to patient protections after consolidation takes place. It is all well and good to have a plan to address our recommendations above but there must be some oversight and authority to enforce those plans after consolidation is approved.

Thank you for the opportunity to respond to this RFI. If you have any questions, please contact Marian Grant, Senior Regulatory Advisor, C-TAC, at [mgrant@thectac.org](mailto:mgrant@thectac.org).

Sincerely,

***Marian Grant***

Advisors  
Coalition to Transform Advanced Care (C-TAC)