ADVOCACY & BENEFITS COUNSELING FOR HEALTH, INC



32 N. Bassett St. · Madison, WI 53703 · 608.261.6939 · fax: 608.261.6938 · www.abcforhealth.org

July 14, 2008

Eileen Smith, Director
Wisconsin Partnership Program
UW School of Medicine and Public Health
Room 4221
Health Sciences Learning Center
750 Highland Avenue
Madison, WI 53705-2221
wpp@hslc.wisc.edu

RE: ABC for Health Comments on the Draft 2007 Annual Report

Advocacy and Benefits Counseling for Health, Inc. (ABC for Health) is a Wisconsin-based nonprofit public interest law firm dedicated to ensuring health care access for children and families, particularly those with special needs or who are at risk. ABC for Health's mission is to provide health care consumers with the information, advocacy tools, legal services, and expert support they need to navigate through America's complex and confusing health care financing system.

The proceeds from the conversion of Blue Cross Blue Shield (BCBS) to a for-profit corporation created a tremendous opportunity to transform the public health landscape in Wisconsin. Through the unprecedented allocation of over 800 million dollars of public capital, Wisconsin's medical schools were trusted to take a leadership role to distribute the funds in order to serve the public health needs of the people of Wisconsin. ABC for Health has a longstanding interest in the appropriate allocation of the public's dollars. ABC for Health and our partners has vigorously advocated that these public assets be directed to serve the public health needs of Wisconsin people and communities.

We appreciate the opportunity to provide comment on the draft 2007 Annual Report of the Wisconsin Partnership Program.

- 1. As the Wisconsin Partnership Program prepares for next five years, now is a good time to address the reason for and future allocation of the unspent funds, projected to reach \$45 million as of 12/31/09. The balance sheets provided in the draft annual report indicate over \$54 million in revenue for 2007, with total expenditures only reaching \$12 million, resulting in a net increase in assets of \$42 million. ABC for Health looks forward to detailed strategies on how the WPP will spend these funds on public health initiatives. For example, WPP can detail additional strategies to provide enhanced outreach and assistance to community agencies and groups to foster quality proposals, and otherwise focus energy on getting unspent funds into the community.
- 2. Highlighted in this annual report are "special funding initiatives" preparing research and outcomes around the areas of birthing outcomes, for example. ABC for Health is



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concerned about non-supplanting review related to the special funding initiatives. After a brief search, we were able to identify NIH, RWJ, State and local initiatives all focused on this birth outcomes initiative. This example, where non-supplanting provisions are not clearly developed provides many avenues for improvement. First, WPP can strengthen its non-supplanting review process for special initiatives. WPP can outline a new non-supplanting review process for special initiatives in the next five year plan. Second, WPP can engage in better community outreach to encourage the state and community groups already focusing on these initiatives to partner or collaborate with this focused project. Third, WPP can identify local, foundation or other funders to assist in these projects, allowing better allocation of WPP funds.

- 3. Similarly, the annual report outlines projects funded by MERC that are not germane to the public health of Wisconsin. For example, the report mentions HIV-AIDS and sleep apnea projects. The projects, while demonstrating national statistics on need, do not demonstrate or address why the particular WPP funding source should be concerned. Funds should be geared toward projects that clearly demonstrate a Wisconsin-specific public health need.
- 4. Once again, the WPP report outlines the principles the form the foundation of WPP's efforts. The fourth principle is facilitation of a transformation into an integrated School of Medicine and Public Health. The annual report does not make clear how this principle connects to benefiting the public health of the people of Wisconsin. Currently, this tangential purpose is using funds that may better be spent by an endowment or other source of funding. ABC for Health will look to the upcoming five year plan for more clarification and statement of purpose on this principle.

Thank you for the opportunity to provide comment on this draft Annual Report. We await a final copy in the near future.

Sincerely,

ABC for Health, Inc.

Brynne McBride

Assistant Agency Director