



December 8, 2018

Peter J. Mucchetti  
Chief, Healthcare and Consumer Products Section  
Antitrust Division  
United States Department of Justice  
450 Fifth Street NW, Suite 4100  
Washington, DC 20530

Dear Attorney Mucchetti,

I am writing to express the support of the Value Care Alliance for CVS Health's acquisition of Aetna. The basis of our support was articulated in a letter to the Connecticut Department of Insurance that I have attached for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. James". The signature is fluid and cursive, with the first name "Robert" and last name "James" clearly distinguishable.

President and CEO, Griffin Health  
Chairman, The Value Care Alliance



September 10, 2018

Katherine L. Wade  
Insurance Commissioner  
Connecticut Insurance Department  
P.O. Box 816  
Hartford, Connecticut 06142-0816

Dear Commissioner Wade,

I am writing to express the support of the Value Care Alliance and its members for CVS Health's Form A application to acquire Aetna (Docket No. EX 18-03). The Value Care Alliance (VCA) is a collaboration of high quality, cost efficient healthcare systems that include the Western Connecticut Health Network, St. Vincent's Medical Center, Griffin Hospital and Middlesex Hospital along with their affiliated physician organizations working together to become an essential partner for patients, employers, payers and providers seeking a competitive integrated system of care that operates at high efficiency and produces superior outcomes.

The Value Care Alliance formed a collaborative relationship with Aetna in 2015 to bring Connecticut's first tiered network health insurance product to the market offering plan sponsors and their employees a health plan option that contains the essential elements of value based insurance design to create incentives for consumers to seek care from value providers and for providers to deliver efficient and effective care. By introducing the Aetna Whole Health tiered network product Aetna demonstrated that it is willing to take the steps necessary to drive down health insurance costs for plan sponsors and consumers (who now pay approximately 40% of the cost of health care out of pocket when premium contribution, co-pays and deductibles are considered) even if lower plan premiums adversely impact Aetna's revenue and profitability which is a consequence that other health insurers appear unwilling to endure.

The Value Care Alliance believes that Aetna shares its view that the current volume based fee for service U.S. sick care system is unsustainable given that we have seen the company establish new partnerships and build new capabilities to ensure that its health plan members develop a strong relationship with a primary care provider who is incentivized and empowered with actionable information to ensure that his or her patients who are Aetna health plan members receive recommended preventive services, adopt a healthy lifestyle, improve medication compliance, participate actively in available chronic disease management programs to avoid acute exacerbations and associated hospitalization, and use health care services like expensive hospital emergency room care more appropriately. The steps we have seen Aetna take are consistent with recent statements by Aetna Chairman and CEO Mark Bertolini who indicated that Aetna is striving to develop a 'better understanding of patients' health goals, guide them through the healthcare system and help them achieve their best health". We appreciate Aetna's enlightened perspective and the fact that the company recognizes the important role that health care providers play in managing the health of populations and that health insurers need to delegate more responsibility to health care providers for disease management and care coordination to achieve higher levels of patient/health plan member engagement, produce better outcomes and reduce the total cost of care.



Recognizing that effective population health management will reduce hospital utilization and result in less acute care revenue for hospitals, Value Care Alliance member hospitals and health systems are working together to reduce their operating cost through group purchasing, shared services and other initiatives. One of the VCA's most successful initiatives has been the establishment a uniform employee health plan across the Value Care Alliance including a common administrative services provider and a common pharmacy benefit manager. Aetna is administering the VCA's employee health plan and CVS Caremark is providing pharmacy benefit management services. Through this relationship we have a unique perspective on the potential that the planned acquisition of Aetna by CVS Health holds. While Aetna and CVS Caremark have achieved considerable savings for the VCA member employee health plan sponsors, the two have worked in parallel. The planned merger will result in a tighter integration of Aetna's health plan administration services with CVS' pharmacy benefit management, local community based clinical care delivery, and home monitoring capabilities. It will also align incentives so that decisions about medication management can be made in the context of total cost of care not the cost to the PBM versus the health plan

In addition, one of the VCA's biggest challenges is to aggregate and normalize claims and clinical data from various sources and turn it into actionable information to help providers and patients make informed healthcare decisions. The merger of CVS and Aetna will likely result in improved data integration leading to better informed consumers and health care providers, greater care efficiency and care coordination ultimately resulting in better outcomes which are essential to the country's ability to afford the cost of health care for an aging population with a growing chronic disease burden and to slow the growth of or reduce the oppressive cost of health care that consumers are now expected to pay out of pocket.

For the numerous reasons stated above the Value Care Alliance believes that the proposed acquisition of Aetna by CVS will benefit healthcare consumers, health plan sponsors and advanced networks of healthcare providers that are pursuing accountable value based relationships, and therefore, we encourage you to approve CVS Health's application

Sincerely,

A handwritten signature in black ink that reads "Patrick Chamee". The signature is written in a cursive, flowing style.

President and CEO, Griffin Health  
Chairman, The Value Care Alliance