



ADVOCACY & BENEFITS COUNSELING FOR HEALTH, INC.  
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July 8, 2009

Wisconsin United for Health Foundation  
c/o Charles I. Henderson  
Davis & Kuelthau S.C.  
111 East Kilbourn Avenue, Suite 1400  
Milwaukee, WI 53202

RE: General Comments on Annual Report: Role of WUHF

Dear Members of the Wisconsin United for Health Foundation Board-

Thank you for the opportunity to briefly discuss the Wisconsin Partnership Program and Healthier Wisconsin Partnership Program. ABC for Health continues our efforts to ensure that the medical schools effectively and appropriately apply fund resources to improve the public health of Wisconsin. In our capacity as advocates for low-income and underserved populations, we advocate for proper oversight and enforcement of the partnership funds. Over the past six years, ABC for Health has shared our recommendations and observations on the use of these public funds with representatives of the Partnership Programs, the Insurance Commissioner, the Wisconsin United for Health Foundation Board, and the Legislative Audit Bureau. Please find the following recommendations to the WUHF Board as they review the five year plans submitted by both schools.

**ENFORCEMENT OF THE COMMISSIONER'S ORDER.** The WUHF Board, in concert with the Insurance Commissioner, must have the explicit authority to enforce the Order issued by the Commissioner of Insurance. A watchdog function must include enforcement authority, particularly as it relates to oversight of funding decisions and the possible supplanting of program funds. Over the past six years, ABC for Health identified a series of medical school projects and programs that appear to supplant partnership program funds from a wide variety of other sources. The original Commissioners' Order defines and strictly prohibits supplanting of grant funds.

(16) **SUPLANTING OF OTHER RESOURCES PROHIBITED.** The funds may not be used to supplant funds or resources that are available from other sources. The medical schools, for each proposal approved, and for each program funded, must make a written determination that the application of the funds will not supplant other resources that may be available to accomplish the same purpose and file the written determination with the PCHOAC (Public and Community Health Oversight and Advisory Committee).

However, the Order lacks any description of a means or process to investigate violations of the Order or means to enforce violations of the Order. The WHUF Board must work with the Commissioner's Office to create such explicit investigatory and enforcement authority.

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**35%-65% SPLIT OF FUNDS.** The WUHF Board must monitor the distribution of funds between education and research and community based initiatives. The fact that the 35%-65% split has remained unchanged over the past years is highly suspect. The number picked by then Commissioner O'Connell has remained the same despite dramatic economic changes in the country and evolving threats to the public health of Wisconsin. One can conclude that the Schools apply significant undue influence on public members of the Oversight and Advisory Committees to keep the distribution of funds weighted more heavily to politically powerful research interests within those institutions.

**UNILATERAL FUNDING REDUCTIONS.** The WUHF Board must monitor the program policies on funds distribution from the medical schools to community partners. In a period of difficult economic times, the Wisconsin Partnership Program has cut funds to existing grantees, including a 15% cut in funds to all Community-Academic Partnership grantees. (Meanwhile, The Healthier Wisconsin Partnership Program instituted a 20% reduction in community partner funds.) The Wisconsin Partnership Program described these cuts as necessary due to the UW Foundation endowment dropping below a "floor." Yet, the Wisconsin Partnership Program offers few guidelines to describe the protocol for funding in this situation. The Wisconsin Partnership Program used bullying tactics and threats of grant termination to require grantees to accept lower grant awards. We also note that neither Program offered increase funding during periods of rapid increase in funds.

**LEADERSHIP.** Now, more than ever, The Wisconsin United for Health Board has a special opportunity to fulfill a leadership and effective oversight role to help improve the health status of Wisconsinites. As trustees of public funds, the medical schools must prioritize and direct that these scarce public health resources benefit people in Wisconsin

We appreciate working with you as the Partnership Program enters its second five-year period. We will continue our conversation in the near future.

Regards,

**ABC for Health, Inc.**

Bobby Peterson  
ABC for Health, Inc.