



CHCA

CONNECTICUT HEALTH CARE ASSOCIATES

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July 9, 2014

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Kimberly Martone
Office of Health Care Access
CT Department of Public Health
410 Capitol Avenue
Hartford, CT 06134

Gary W. Hawes
Assistant Attorney General
55 Elm Street P.O. Box 120
Hartford, CT 06141

Re: Proposal for a joint venture by Greater Waterbury Health Network Inc. and Vanguard Health Systems Inc.
Attorney General Docket 13-486-01 and OCHA Docket 13-31838-CON

Dear Ms. Martone & Mr. Hawes:

I am writing again today on behalf of Connecticut Health Care Associates (CHCA)/AFSCME as a follow-up to the letter that I sent to you both on July 2, 2014. I am respectfully re-confirming our Union's opposition to the above –referenced Certificate of Need applications initially filed with the Office of Health Care Access (OCHA) on or about May 3, 2013. Our renewed opposition is based upon the news that we learned yesterday that Tenet Healthcare Corporation of Texas is now buying Saint Mary's Hospital in Waterbury, CT.

Again, I am respectfully requesting that the OHCA hearing currently scheduled for July 24, 2014 be canceled – or at least postponed – until such time as OHCA and the Attorney General's Office can investigate our claim that this Greater Waterbury Healthcare Corporation/Vanguard Health Systems Joint Venture application violates both the text and the spirit of Connecticut General Statutes §19a-639b and Connecticut Regulation §19a-639b-2. The fact that Tenet has already acquired or merged with Vanguard – coupled with the fact that Tenet is now taking over Saint Mary's Hospital – bolsters our concern regarding the breadth and scope of health care services that will be controlled by Tenet Corporation in the Greater Waterbury area.

Further, Tenet, in its various corporate guises, and with its apparent strategic partner Yale New Haven, will exert varying levels of control of ten (10) Connecticut

hospitals (1/3 of our state's hospitals) in short order if the process is allowed to go forward. Our Union believes that in this new landscape for Connecticut's health care providers, Tenet/Vanguard/VHS/YNH could emerge as the dominant actor in establishing rates and standards for health care. The result will be establishing a monopoly or near monopoly in wide corridors in our small state. This latest proposed acquisition buttresses the public's need for the CON process to be deliberate and re-started with an eye toward gauging the effects of all of Tenet's (in its various iterations and alliances) plans that could lead to its dominance of the Connecticut hospital market.

Respectfully, as stated in my prior letter, since both the statute and the regulation cited above both prohibit the transferability and the assign-ability of CONs, Vanguard's application should be dismissed since Tenet will, at least in large part, be the ultimate holder of such CONs. It will also presumably apply in the future to obtain the CONs relating to Saint Mary's Hospital. The process should be recommenced with Tenet as the true applicant with respect to the CONs for Greater Waterbury Healthcare Services/Vanguard.

Thank you again for your consideration of our position.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara Simonetta". The signature is written in black ink and is positioned above the typed name.

Barbara Simonetta
President, CHCA