



**STATE OF CONNECTICUT**  
DEPARTMENT OF PUBLIC HEALTH  
*Office of Health Care Access*

January 8, 2014

VIA FACSIMILE ONLY

Mr. Dennis McConville  
Senior Vice President  
Strategic Planning, Marketing & Communications  
Eastern Connecticut Health Network, Inc.  
71 Haynes Street  
Manchester, CT 06040

RE: Certificate of Need Determination Report Number 14-31886-DTR  
Rockville General Hospital  
Removal of Women's Center for Wellness satellite from the hospital license

Dear Mr. McConville:

On December 5, 2013, the Office of Health Care Access ("OHCA") commenced an inquiry into the removal of the satellite location called "Women's Center for Wellness" ("Center") at 2800 Tamarack Avenue in South Windsor from the Rockville General Hospital ("Hospital") license and whether that removal constitutes a termination of an outpatient service by the Hospital. OHCA bases the determination issued herein on the following information:

1. The original Certificate of Need ("CON") action for this Center was issued in 1992 to Rockville General Hospital and its then parent corporation, Rockville Area Health Services, Inc. (Docket Number 91-524). The Center was to provide non-maternity women's health services. A second CON was issued in 1993 (Docket Number 92-588) to transfer ownership to Eastern Connecticut Healthcare Corporation, Inc. d/b/a Women's Center for Wellness. The Center was relocated to its current location at 2800 Tamarack Avenue in South Windsor in 2005.
2. Effective July 1, 2011, the Center became an outpatient department of the Hospital and it was added to the Hospital's license as a satellite location. Before that date<sup>1</sup>, the Center operated under a separate Outpatient Clinic license held by the Hospital's corporate affiliate<sup>2</sup>, ECHN Wellness Services, Inc.

<sup>1</sup> According to a note in the ECHN Fiscal Year 2011 audited financial statements, effective July 1, 2011 ECHN Wellness Services, Inc. d/b/a Women's Center for Wellness "merged into RGH".

<sup>2</sup> Both the Hospital and this affiliate were wholly-owned by the same parent corporation, Eastern Connecticut Health Network, Inc.

*An Equal Opportunity Provider*

*(If you require aid/accommodation to participate fully and fairly, contact us either by phone, fax or email)*

410 Capitol Ave., MS#13HCA, P.O.Box 340308, Hartford, CT 06134-0308  
Telephone: (860) 418-7001 Fax: (860) 418-7053 Email: OHCA@ct.gov

3. The Center focuses on women's prevention and early detection services including breast health education, breast imaging services and bone health assessments. The Hospital provides the following services at this location:
  - Digital Mammography;
  - Breast Ultrasound;
  - Non-Surgical Breast Biopsy Procedures (Stereotactic and Ultrasound-Guided);
  - Bone Density Testing;
  - Integrative Medicine Services (Acupuncture, Therapeutic Massage, Reiki);
  - Yoga Classes;
  - Free mammography and cervical cancer screenings to eligible women; and
  - The services of ECHN's Breast Care Collaborative, which provides patient navigation and breast care coordination focused on breast health.
4. The free mammography and cervical cancer screenings to eligible women are made possible via a grant from the Department of Public Health, through The Connecticut Cancer & Heart Disease Integrated Health Screening Program. It was because of these primary care services that the Center originally sought licensure as a freestanding Outpatient Clinic.
5. Since the transition from a freestanding licensed outpatient clinic to a satellite department of the Hospital in July 2011, the Hospital has sought to have the satellite department removed as a satellite listed on its license. The change to the Hospital license recently took place during November 2013 as part of the Hospital's regular licensure renewal process.
6. No services were terminated with the transition of the Center in 2011 to a hospital department or with the 2013 removal of the satellite location from the Hospital's license. Although the Center is no longer listed as a satellite location on the license, the Center remains in full operation with the services listed above and the Hospital remains the service provider.
7. All volumes, revenues and expenses are recorded as Hospital services and the Hospital bills for and/or receives all reimbursement for these services as Hospital services. The yoga classes and integrative medicine services are self-pay services.

The recent removal of the Women's Center for Wellness from the Rockville General Hospital license is not a termination of an outpatient service by a hospital pursuant to Connecticut General Statutes § 19a-638(a)(4). These services remain available as an outpatient department of the Hospital. Based upon the foregoing, OHCA concludes that a CON is not required.

If you have any questions regarding this letter, please contact Karen Roberts, Principal Health Care Analyst, at (860) 418-7041.

Sincerely,



Kimberly R. Martone  
Director of Operations

C: Rose McLellan, License and Applications Supervisor, DPH, DHSR