



STATE OF CONNECTICUT
OFFICE OF HEALTH CARE ACCESS

M. JODI RELL
GOVERNOR

CRISTINE A. VOGEL
COMMISSIONER

July 22, 2004

Stephen M. Cowherd, Esq.
Jeffers & Ireland
55 Walls Drive
Fairfield, Connecticut 06824

Re: Stamford Health System
CON Determination Report Number 04-30338-DTR
Reconfiguration and Relocation Project involving the Rehabilitation Center of
Southwestern Connecticut, Inc. and Termination of Contracted Audiology Service.

Dear Attorney Cowherd:

On July 15, 2004 and July 19, 2004, the Office of Health Care Access ("OHCA") received Stamford Health System's ("SHS" or "System") request for Certificate of Need ("CON") Determination regarding the reconfiguration and relocation projected involving the Rehabilitation Center of Southwestern Connecticut, Inc. and ("RCSC") and contracted audiology service.

OHCA has carefully reviewed the information submitted by the Petitioner and makes the following findings:

1. SHS is the parent corporation of The Stamford Hospital ("TSH") and RCSC.
2. In an effort to streamline operations and improve efficiencies in delivering its core health care services to the community, SHS is proposing to merge RCSC into TSH. The surviving entity will be TSH.

3. RSCS provides a variety of physical medicine and rehabilitation (“PM&R”) programs as well as other outpatient health services. These services are presently offered at SHS’ Rich Campus located at 26 Palmer Hill Road in Stamford and include:

PM& R Programs: Physical Therapy; Occupational Therapy; Speech Therapy;
 Pulmonary Rehabilitation; Fitness Program; Psychology Services;
 and Neuromotor Services.

Other Services: Audiology Service.

4. There will be no change in SHS’ ownership or control of TSH as a result of the proposed reconfiguration.
5. SHS is also proposing to relocate the seven PM&R programs to the Tully Center.
6. The Tully Center (“Center”) is located at 32 Strawberry Hill Avenue in Stamford. The facility currently provides a variety of outpatient rehabilitation programs, including cardiac rehabilitation and physical therapy.
7. The relocation of the PM&R programs to the Center will enhance the range of services offered at the Center and it will eliminate existing redundancies in programs offered by the SHS, as well as reduce the need of physicians, therapists and patients to travel between outpatient locations. The PM&R programs are expected to be relocated in October of 2004.
8. SHS further seeks to discontinue the audiology services currently offered at the Rich Campus. Audiology services are no longer compatible with SHS’s overall strategic plan, which focuses on acute care and necessary ancillary services.
9. The audiology services have been provided at the Rich Campus for the past 10 years through contract services of Advanced Center for Rehabilitation Medicine at Norwalk Hospital.
10. The total number of visits for the audiology service for fiscal year 2004 is only projected at 70 visits. After discontinuation of audiology service, patients requiring a hearing test at TSH will still be able to access these services though the private office of a number of physicians on the medical staff (including 2 physician offices at Tully Center) and other providers, including Norwalk Hospital.
11. The total cost associated with the proposed reconfiguration and relocation proposal is approximately \$400,000.

12. Section 19a-638 (1) of the Connecticut General Statutes (“C.G.S.”), states, in part, that each health care facility or institution, that intends to (A) transfers all or part of its ownership or control, (B) change the governing powers of the board of a parent company or any affiliate, or (C) change or transfer the power or control of a governing or controlling body of an affiliate shall request permission to undertake such transfer or change control.

Based on the above findings, OHCA has determined that the reconfiguration and relocation projected involving the Rehabilitation Center of Southwestern Connecticut Inc. by Stamford Health System does not constitute a change of ownership or control as given in Section 19a-638, C.G.S. and the total cost of the proposal is approximately \$400,000, which does not exceed the \$1,000,000 threshold of Section 19a-639 C.G.S. Therefore, Certificate of Need approval from the Office of Health Care Access to proceed with the proposed corporate reconfiguration is not required.

If you have any questions concerning this letter or the Certificate of Need process, please contact Steven Lazarus, Health System Development, at (860) 418-7012.

Sincerely,

Signed by Cristine A. Vogel
Commissioner

CAV:sl