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GOVERNOR

**STATE OF CONNECTICUT**  
OFFICE OF HEALTH CARE ACCESS

CRISTINE A. VOGEL  
COMMISSIONER

May 8, 2009

Dennis McConville, Senior Vice President  
Strategic and Operational Planning  
Eastern Connecticut Health Network  
71 Haynes Street  
Manchester, CT 06040

RE: Certificate of Need Determination under Report Number 09-31339-DTR  
A planned change in the status of family planning services at Rockville General Hospital

Dear Mr. McConville:

On March 24, 2009, the Office of Health Care Access (“OHCA”) received your request for a Certificate of Need (“CON”) Determination regarding a planned change in the status of family planning services at Rockville General Hospital. Additional information was submitted to OHCA on April 17, 2009. OHCA has reviewed this matter and makes the following findings:

1. Rockville General Hospital (“RGH”) is a non-profit licensed acute care hospital located at 31 Union Street in Vernon, Connecticut.
2. In its CON Determination request to OHCA, RGH described a planned “*phase-out of the family planning services at Rockville General Hospital with the subsequent relocation of services to the Planned Parenthood of Manchester*” and requested a CON determination regarding these plans.
3. Planned Parenthood of Connecticut, Inc. of New Haven, CT (“PPC”), d/b/a Planned Parenthood of Connecticut, Inc. – Manchester is a licensed outpatient clinic located at 419 West Middle Turnpike in Manchester.
4. PPC has an existing contractual relationship with RGH wherein RGH provides family planning services to persons presenting in RGH’s Maternity Care Clinic. The RGH family planning program provides reproductive health care and sexuality education services for clients interested in pursuing options in the context of family planning. Encounters include an educational component to provide clients with information on the available family planning options and gynecological care as necessary in order for clients to pursue a selected option.
5. Patients treated in the Family Planning Program at RGH were identified as originating from Manchester, Vernon, Coventry, East Hartford, Ellington, Enfield and Stafford.
6. PPC obtains grant funding for the provision of reproductive health care and sexual education services through the Department of Public Health (“DPH”) family planning program and distributes

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these funds to contracted providers throughout the state. According to the current copy of the subcontract between RGH and PPC (for 10/1/2008 – 9/30/2009), PPC will pay RGH up to \$28,122 “for providing reproductive health care and sexuality education services” as a subcontractor.

7. Family planning appointments are currently woven into the schedule of the RGH Maternity Care Center which operates from 9:00 AM to 5:00 PM, three days per week. Subsequent to the planned transition, RGH will focus on providing services only to its Maternity Care Clinic patients at this location and the transition of family planning services out of the Maternity Care Clinic should result in an increase in the number of prenatal and obstetrical patients being able to be served.
8. PPC indicates that in recent years, it has found it increasingly difficult to make prenatal referrals for low-income women because some providers are limiting the number of self pay and Medicaid patients they will serve. Ending family planning services at RGH will enable RGH to serve more pregnant women and the strengthened partnership between RGH and PPC will help ensure women receive prenatal care early in pregnancy.
9. RGH has submitted a letter from the Chief Operating Officer of Planned Parenthood of Connecticut, Inc. to OHCA which confirms PPC’s support of this transition. Both RGH and PPC believe that clients would have more comprehensive family planning options if served by PPC directly rather than through this subcontractor relationship, for the following reasons:
  - o The contraceptive options that RGH is able to offer clients are extremely limited because the program is inelible for clinic pricing due to its location in a hospital setting.
  - o Provision of these services directly by PPC at a clinic location will enable these clients to obtain more family planning services at a reduced cost.
  - o Currently, the program limits the provision of services to clients specifically seeking family planning options and does not provide comprehensive gynecological care to the general population outside of those persons requesting family planning assistance.
10. PPC is the state’s largest provider of reproductive health care, providing about 110,000 visits to nearly 62,000 women, men and teens each year. PPC’s Manchester center, one of the agency’s largest sites, provides about 8,800 visits a year to 5,548 patients. Because PPC-Medicaid receives Title X funding, patients that are at or below 100% of the federal poverty level receive family planning services and supplies at no charge. PPC-Manchester has the capacity to accommodate the former RGH family planning clients. The center is open five days a week including some evenings and Saturdays. PPC-Manchester is located about 12 miles from the RGH Maternity Care Center and is on the bus line
11. RGH indicates that the family planning utilization has decreased significantly in recent years. Last year, RGH provided 667 family planning visits to 397 women, a 40% drop over three years. RGH has submitted a March 16, 2009 letter from the DPH to PPC which confirms that it has been notified regarding this planned transition and that RGH will no longer be the subcontractor for the

contract between PPC and DPH. DPH's letter indicates that "*According to the DPH, 2006 Registration Reports, Vernon and/or Rockville are not in the top 22 CT towns with the highest pregnancy rates and would no longer be considered areas in highest need.*"

12. Section 19a-638(a) (3) of the Connecticut General Statutes states the following:  
*"Each health care facility or institution ... which intends to terminate a health service offered by such facility or institution ... shall submit to the office, prior to the proposed date of such termination or decrease, a request to undertake such termination or decrease.*

Based on the above findings, OHCA hereby finds that the planned phase-out of the family planning services at Rockville General Hospital with the transition of family planning clients to Planned Parenthood of Manchester will not require Certificate of Need authorization. Rockville General Hospital will be ceasing to provide a service which is educational in nature and will not be terminating a health care function or service. OHCA authorization pursuant to Section 19a-638(a) (3) will not be required to pursue the termination of the subcontract with Planned Parenthood of Connecticut, Inc.

If you have any questions related to this letter, please contact Karen Roberts, Compliance Officer at OHCA at (860) 418-7001.

Sincerely,

***Signed by Commissioner Vogel on May 8, 2009***

Cristine A. Vogel  
Commissioner

CAV/kr

Copy: Rose McLellan, License and Applications Supervisor, DPH