

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

January 17, 2014

Darlene Stromstad, FACHE  
President/Chief Executive Officer  
Greater Waterbury Health Network, Inc.  
64 Robbins Street  
Waterbury, Connecticut 06708

VIA FACSIMILE ONLY

Travis Messina  
Director, Development  
Vanguard Health Systems, Inc.  
20 Burton Hills Boulevard, Suite 100  
Nashville, Tennessee 37215

RE: Request for Certificate of Need Determinations related to The Waterbury Hospital's proposed change of ownership

Dear Ms. Stromstad and Mr. Messina:

The Office of Health Care Access ("OHCA") is in receipt of three Certificate of Need ("CON") applications for the transfer of ownership of Waterbury Imaging Center Limited Partnership, LLC, Imaging Partners, LLC, and Valley Imaging Partners, LLC, related to the proposed change of ownership of the Greater Waterbury Health Network, Inc. ("GWHN").

However, according to OHCA's records, CON approval related to the proposed change of ownership may also be required for: the Heart Center of Greater Waterbury, Harold Leever Cancer Center, a 64-Slice Computed Tomography scanner owned and operated by The Waterbury Hospital and the off-site Waterbury Hospital Sleep Laboratory. OHCA requests that you file a CON Determination (available at [www.ct.gov/ohca](http://www.ct.gov/ohca)) for each of the above four items, so that OHCA can formally determine if a CON is required pursuant Connecticut General Statutes § 19a-638.

Please file the four CON Determination requests by January 31, 2014. If for any reason, you are unable to do so by that date, you must file a written explanation detailing the need for the time extension prior to January 31, 2014.

If you have any questions regarding this correspondence, please contact Steven W. Lazarus at (860) 418-7012.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kim Martone", with a horizontal line extending from the end of the signature.

Kimberly R. Martone  
Director of Operations, OHCA

C: Ann H. Zucker, Carmody Torrance Sandak & Hennessey LLP  
Kristin Connors, Carmody Torrance Sandak & Hennessey LLP  
Henry A. Saltan, Attorney General's Office

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO 3939  
RECIPIENT ADDRESS 912035736181  
DESTINATION ID  
ST. TIME 01/21 12:55  
TIME USE 00'27  
PAGES SENT 3 ✓  
RESULT OK



STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
OFFICE OF HEALTH CARE ACCESS

FAX SHEET

TO: DRENE STRUMSTAD

FAX: (203) 573-6161

AGENCY: \_\_\_\_\_

FROM: STEVEN LAZARUS

DATE: 1/21/14 Time: \_\_\_\_\_

NUMBER OF PAGES: 3  
*(including transmittal sheet)*

Comments:  
  
See enclosed correspondence regarding Waterbury Health System Network and Vanguard Health Systems, Inc.

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO 3940  
RECIPIENT ADDRESS 916158658099  
DESTINATION ID  
ST. TIME 01/21 12:56  
TIME USE 00'31  
PAGES SENT 3  
RESULT OK ✓



STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
OFFICE OF HEALTH CARE ACCESS

FAX SHEET

TO: TRAVIS MESISINA ✓

FAX: (615) 665-6099

AGENCY: \_\_\_\_\_

FROM: STEVEN LAZARUS

DATE: 1/21/14 Time: \_\_\_\_\_

NUMBER OF PAGES: 3

*(including transmittal sheet)*

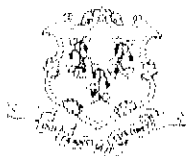
**Comments:**

See enclosed correspondence regarding Waterbury Health System Network and Vanguard Health Systems, Inc.

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO 3941  
RECIPIENT ADDRESS 912035752600  
DESTINATION ID  
ST. TIME 01/21 12:57  
TIME USE 00'28  
PAGES SENT 3 ✓  
RESULT OK



STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
OFFICE OF HEALTH CARE ACCESS

FAX SHEET

TO: ANN H. ZUCKER

FAX: (203) 575-2600

AGENCY: \_\_\_\_\_

FROM: STEVEN LAZARUS

DATE: 1/21/14 Time: \_\_\_\_\_

NUMBER OF PAGES: 3  
*(including transmittal sheet)*

Comments:

See enclosed correspondence regarding Waterbury Health System Network and Vanguard Health Systems, Inc.



TORRANCE | SANDAK | HENNESSEY<sup>LLP</sup>

Post Office Box 1950  
New Haven, Connecticut  
06509-1950

Telephone: 203 777-5501  
Facsimile: 203 784-3199  
<http://www.carmodylaw.com>

**Facsimile Transmission**

**DATE:** 01/28/2014

**TIME SENT:**

**PAGES (INCLUDING COVER):**

**SENT TO:** STEVE LAZARUS

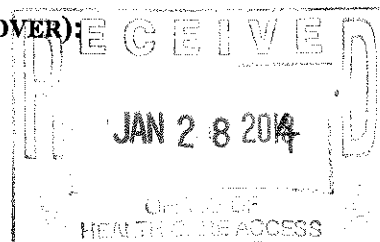
**FAX:** (860) 418-7053

**COMPANY:** Office of Health Care Access

**TELEPHONE:**

**FROM:** Ann H. Zucker

**FAX (NEW HAVEN) (203) 784-3199**



**CARMODY TORRANCE SANDAK & HENNESSEY LLP**

**RE: GREATER WATERBURY HEALTH NETWORK REQUESTS FOR DETERMINATION**

**COMMENTS:**

**IMPORTANT**

The information contained in this facsimile transmission is intended for the use of the designated recipients named above. This message may be an attorney-client communication and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us by mail. Thank you.

Please call 203-777-5501 if you have trouble receiving this facsimile transmission.

**NEW HAVEN**

**STAMFORD**

**WATERBURY**

**SOUTHBURY**

# CARMODY

TORRANCE | SANDAK | HENNESSEY<sub>LLP</sub>

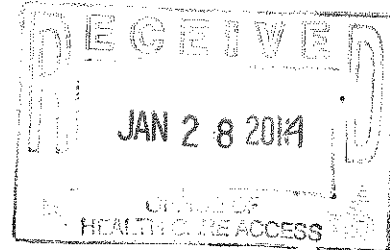
Ann H. Zucker  
Partner  
Direct: 203.784.3108  
Fax: 203.784.3199  
azucker@carmodylaw.com

195 Church Street  
P.O. Box 1950  
New Haven, CT 06509

January 28, 2014

**VIA FACSIMILE**

Office of Health Care Access, Dept. of Public Health  
410 Capitol Avenue  
Hartford, CT 06134  
Attn: Kimberly Martone



Re: Greater Waterbury Health Network Requests for Determination

Dear Ms. Martone:

By letter dated January 17, 2014, OHCA asked that Greater Waterbury Health Network prepare requests for determination for four matters. The letter requested that these be filed by January 31, 2014.

We are asking for a one week extension, until February 7, 2014, to file these requests for determination. The harsh weather conditions and typical wintertime illnesses have made it difficult to complete the requests for determination within the required time line.

If you have any questions or need anything further, please contact me at (203) 784 3108. Thank you for your assistance in this matter.

Very truly yours,

CARMODY TORRANCE SANDAK & HENNESSEY LLP

By Ann H. Zucker (sig)  
Ann H. Zucker  
Its Partner

cc: Darlene Stromstad - Greater Waterbury Health Network, Inc.  
Travis Messina - Tenet Healthcare Corporation  
Trip Pilgrim - Tenet Healthcare Corporation

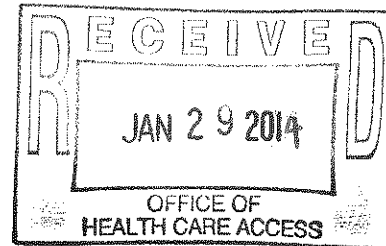
Office of the Attorney General  
55 Elm Street, P.O. Box 120  
Hartford, CT 06141-0120 - Attn: Gary W. Hawes, AAG

{NO987317}

January 28, 2014

**VIA FACSIMILE**

Office of Health Care Access, Dept. of Public Health  
410 Capitol Avenue  
Hartford, CT 06134  
Attn: Kimberly Martone



Re: Greater Waterbury Health Network Requests for Determination

Dear Ms. Martone:

By letter dated January 17, 2014, OHCA asked that Greater Waterbury Health Network prepare requests for determination for four matters. The letter requested that these be filed by January 31, 2014.

We are asking for a one week extension, until February 7, 2014, to file these requests for determination. The harsh weather conditions and typical wintertime illnesses have made it difficult to complete the requests for determination within the required time line.

If you have any questions or need anything further, please contact me at (203) 784 3108. Thank you for your assistance in this matter.

Very truly yours,

CARMODY TORRANCE SANDAK & HENNESSEY LLP

By Ann H. Zucker  
Ann H. Zucker  
Its Partner

cc: Darlene Stromstad - Greater Waterbury Health Network, Inc.  
Travis Messina - Tenet Healthcare Corporation  
Trip Pilgrim - Tenet Healthcare Corporation

Office of the Attorney General  
55 Elm Street, P.O. Box 120  
Hartford, CT 06141-0120 - Attn: Gary W. Hawes, AAG

(0987317)



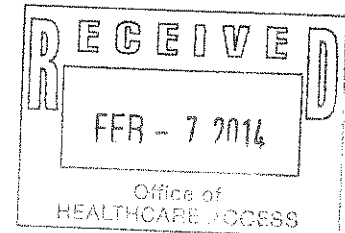
Kristin Connors  
Partner  
Direct: 203-578-4202  
Fax: 203.575.2600  
kconnors@carmodylaw.com

50 Leavenworth Street  
PO Box 1110  
Waterbury, CT 06721-1110

February 7, 2014

VIA ELECTRONICALLY IN PDF FORMAT

Office of Health Care Access, Dept. of Public Health  
410 Capitol Avenue  
Hartford, CT 06134  
Attn: Kimberly Martone



Re: Greater Waterbury Health Network CON Determinations

Dear Ms. Martone:

Previously the Greater Waterbury Health Network, Inc. (GWHN) submitted to the Office of Health Care Access ("OHCA") three Certificate of Need ("CON") applications for the transfer of ownership of Waterbury Imaging Center Limited Partnership, LLC, Imaging partners, LLC, and Valley Imaging Partners, LLC related to the proposed change of ownership of GWHN (OHCA Docket No. 13-31840-CON). By letter dated January 17, 2014, OHCA asked that GWHN prepare CON Determination Form 2020s for the following four related matters:

- ✓ 1. The Heart Center of Greater Waterbury
2. Harold Leever Regional Cancer Center
3. 64-Slice Computer Tomography Scanner
4. Off-site Waterbury Hospital Sleep Laboratory

We asked for and received a one week extension, until February 7, 2014, to file these four CON Determinations that are enclosed.

If you have any questions or require additional information, please contact me at (203) 578-4202 or kconnors@carmodylaw.com.

Very truly yours,

CARMODY TORRANCE SANDAK & HENNESSEY LLP

By

  
Kristin Connors  
Its Partner

c: VIA EMAIL

Darlene Stromstad – Greater Waterbury Health Network, Inc. (w/enclosures)

Travis Messina – Tenet Healthcare Corporation (w/enclosures)

Trip Pilgrim – Tenet Healthcare Corporation (w/enclosures)

VIA EMAIL AND US MAIL

Office of the Attorney General (w/enclosures)

Attn: Gary W. Hawes, AAG

55 Elm Street, P.O. Box 120

Hartford, CT 06141-0120

VIA US MAIL AND CERTIFIED MAIL

Chad Wable, President & CEO

St. Mary's Hospital

56 Franklin Street

Waterbury, CT 06706

(w/enclosures re: Heart Center of Greater Waterbury & Harold Leever Regional Cancer Center)

VIA US MAIL AND CERTIFIED MAIL

Frank M. Torti, M.D., M.P.H., Executive Vice President for Health Affairs

John Dempsey Hospital

263 Farmington Avenue

Farmington, CT 06030

(w/enclosures re: Heart Center of Greater Waterbury)



# State of Connecticut Office of Health Care Access CON Determination Form Form 2020

All persons who are requesting a determination from OHCA as to whether a CON is required for their proposed project must complete this Form 2020. The completed form should be submitted to the Director of the Office of Health Care Access, 410 Capitol Avenue, MS#13HCA, P.O. Box 340308, Hartford, Connecticut 06134-0308.

## SECTION I. PETITIONER INFORMATION

If this proposal has more than two Petitioners, please attach a separate sheet, supplying the same information for each Petitioner in the format presented in the following table.

Petitioner	
Full Legal Name	The Waterbury Hospital
Doing Business As	Heart Center of Greater Waterbury, Inc.
Name of Parent Corporation	Greater Waterbury Health Network, Inc.
Petitioner's Mailing Address, if Post Office (PO) Box, include a street mailing address for Certified Mail	64 Robbins Street, Waterbury CT 06708
What is the Petitioner's Status: P for profit and NP for Nonprofit	NP
Contact Person at Facility, including Title/Position: This Individual at the facility will be the Petitioner's Designee to receive all correspondence in this matter.	Darlene Stromstad, FACHE, President/CEO
Contact Person's Mailing Address, if PO Box, include a street mailing address for Certified Mail	64 Robbins Street, Waterbury CT 06708

Contact Person's Telephone Number	203-573-7101
Contact Person's Fax Number	203-573-6161
Contact Person's e-mail Address	<u><a href="mailto:dstromstad@wtbyhosp.org">dstromstad@wtbyhosp.org</a></u>

## SECTION II. GENERAL PROPOSAL INFORMATION

a. Proposal/Project Title:

**The Waterbury Hospital's Interest in The Heart Center of Greater Waterbury, Inc. to be a Retained Asset by The Waterbury Hospital Successor Foundation Following the Joint Venture by Greater Waterbury Health Network, Inc. and Vanguard Health Systems, Inc. Pursuant to OHCA Docket Number: 13-31838-CON**

b. Estimated Total Project Cost: \$0

c. Location of proposal, identifying Street Address, Town and Zip Code:

**64 Robbins Street, Waterbury, CT 06708**

d. List each town this project is intended to serve:

**Beacon Falls, Bethlehem, Cheshire, Middlebury, Morris, Naugatuck, Oakville, Oxford, Plantsville, Plymouth, Prospect, Seymour, Southbury, Southington, Terryville, Thomaston, Torrington, Waterbury, Watertown, Wolcott and Woodbury**

e. Estimated starting date for the project: **September 2014**

## SECTION IV. PROPOSAL DESCRIPTION

Please provide a description of the proposed project, highlighting each of its important aspects, on at least one, but not more than two separate 8.5" X 11" sheets of paper. At a minimum each of the following elements need to be addressed, if applicable:

1. If applicable, identify the types of services currently provided and provide a copy of each Department of Public Health license held by the Petitioner.
2. Identify the types of services that are being proposed and what DPH licensure categories will be sought, if applicable.
3. Identify the current population served and the target population to be served.

**PROPOSAL DESCRIPTION:**

No licensed services are provided by the entity known as "The Heart Center of Greater Waterbury, Inc. No service changes are requested. The Heart Center of Greater Waterbury, Inc. serves residents of the following towns: Beacon Falls, Bethlehem, Cheshire, Middlebury, Morris, Naugatuck, Oakville, Oxford, Plantsville, Plymouth, Prospect, Seymour, Southbury, Southington, Terryville, Thomaston, Torrington, Waterbury, Watertown, Wolcott and Woodbury.

As detailed in Docket No. 08-31302-CON, in order to develop the open heart program at Saint Mary's Hospital ("Saint Mary's") and The Waterbury Hospital, the two hospitals formed a corporation for the limited purpose of preparing and submitting an Application for a Certificate of Need and related administrative functions. This corporation is "The Heart Center of Greater Waterbury, Inc." ("Historic Entity").

The Certificate of Need for the Waterbury open heart program provides that the approved services are to be rendered by St. Mary's or WH. The Historic Entity does not and has never provided any health care services. Currently, it has one employee who provides heart care education in the community; it also coordinates the reporting required under the Agreed Settlement. Both of these functions would be performed by either hospital in the future.

Greater Waterbury Health Network, Inc. ("GWHN"), on behalf of its affiliates and subsidiaries, GWHN signed a Letter of Intent to form a joint venture with a subsidiary of Vanguard Health Systems, Inc. ("Vanguard", collectively the "JV"). GWHN and Vanguard submitted to the Attorney General and the Commissioner of the Department of Public Health an application for approval of the JV under Conn. Gen. Stat. § 19a-486 et seq. on May 3, 2013 (as supplemented by responses to completeness questions, Docket Number: 13-31838-CON, the "Application"). Vanguard is now a wholly owned subsidiary of Tenet Health Care, Inc.

The terms of the JV contemplate GWHN's contribution of substantially all of its assets to the JV in exchange for a 20% ownership interest in the JV. At Bates Number 00015 of the Application, Applicants list GWHN Contributed Assets which includes the interests held by Waterbury Hospital in various affiliates, including the Heart Center. While not yet formally submitted, GWHN and Vanguard have agreed that Waterbury Hospital's interest in the Heart Center will not be among the Contributed Assets and the first amendment to the JV Application, when filed, will so reflect that agreement. This interest will continue to be held in the entity now called "The Waterbury Hospital". The Waterbury Hospital entity will serve as the post conversion foundation; after the conversion, the Hospital will be renamed to reflect its new role. There is no anticipated transfer of the Waterbury Hospital's interest in the Heart Center to the JV or any other party.

**SECTION V. AFFIDAVIT**

**(Each Petitioner must submit a completed Affidavit.)**

**Petitioner: The Waterbury Hospital**

**Project Title:**

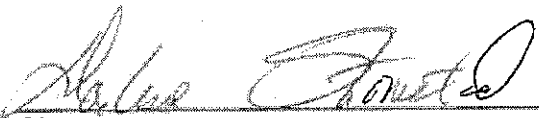
**The Waterbury Hospital's Interest in The Heart Center of Greater Waterbury, Inc. to be a Retained Asset by The Waterbury Hospital Successor Foundation Following the Joint Venture by Greater Waterbury Health Network, Inc. and Vanguard Health Systems, Inc. Pursuant to OHCA Docket Number: 13-31838-CON**

I, Darlene Stromstad, FACHE,  
(Name)

President/CEO  
(Position – CEO or CFO)

of The Waterbury Hospital, being duly sworn, depose and state that the  
(Organization Name)

information provided in this CON Determination form is true and accurate to the best of my knowledge.

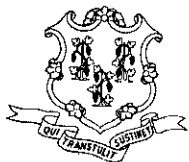
  
Signature

2/7/14  
Date

Subscribed and sworn to before me on February 7, 2014

  
Notary Public/Commissioner of Superior Court

My commission expires: August 31, 2014



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

March 5, 2014

VIA FACSIMILE ONLY

Darlene Stromstad  
President/CEO  
The Waterbury Hospital  
64 Robbins Street  
Waterbury, CT 06708

RE: Certificate of Need Determination Report Number 14-31896-DTR  
The Heart Center of Greater Waterbury, Inc.

Dear Ms. Stromstad:

On February 7, 2014, the Office of Health Care Access ("OHCA") received your Certificate of Need ("CON") Determination Form on behalf of The Waterbury Hospital d/b/a The Heart Center of Greater Waterbury, Inc. ("Petitioner") with respect to The Waterbury Hospital's interest in the Heart Center of Greater Waterbury, Inc. following the joint venture between Greater Waterbury Health Network, Inc. ("GWHN") and Vanguard Health Systems, Inc. ("Vanguard").

In order to develop an open heart program at Saint Mary's Hospital and The Waterbury Hospital, the two entities formed The Heart Center of Greater Waterbury, Inc. for the limited purpose of preparing and submitting a CON application. The Heart Center of Greater Waterbury, Inc. does not and has never provided any health care services. It currently has one employee who provides heart care education in the community. GWHN is the parent corporation of the Petitioner. GWHN and Vanguard are seeking to complete a joint venture which will include the contribution of substantially all of GWHN's assets to the joint venture in exchange for a 20% ownership interest in the joint venture. The Heart Center of Greater Waterbury, Inc. will not be included in those assets. Instead, it will remain an entity held by The Waterbury Hospital. There will be no impact or change in the governance or control of The Heart Center of Greater Waterbury, Inc. The CON application filed under Docket Number 13-31838-CON will be amended to reflect this understanding.

Connecticut General Statutes § 19a-638(a)(2) requires CON authorization for the "transfer of ownership of a health care facility". Connecticut General Statutes § 19a-630(14) defines a "transfer of ownership" as "a transfer that impacts or changes the governance or controlling body of a health care facility or institution..." Based upon the Petitioner's representation that The Heart Center of Greater Waterbury, Inc. will be excluded from the joint venture and that there will be no impact or change in the governance or control of The Heart Center of Greater Waterbury, Inc., OHCA concludes that a CON *is not required* for the Petitioner's proposal.

Sincerely,

Kimberly R. Martone  
Director of Operations

C: Rose McLellan, License and Applications Supervisor, DPH, DHSR  
Kristin Connors, Esq.

*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

\* \* \* COMMUNICATION RESULT REPORT ( MAR. 5. 2014 10:05AM ) \* \* \*

FAX HEADER:

TRANSMITTED/STORED : MAR. 5. 2014 10:04AM  
FILE MODE OPTION

ADDRESS

RESULT

PAGE

149 MEMORY TX

912035736161

OK

2/2

REASON FOR ERROR  
E-1) HANG UP OR LINE FAIL  
E-3) NO ANSWER

E-2) BUSY  
NO FACSIMILE CONNECTION



STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
OFFICE OF HEALTH CARE ACCESS

FAX SHEET

TO: DARLENE STROMSTAD  
FAX: 203-573-6161  
AGENCY: \_\_\_\_\_  
FROM: OHCA  
DATE: 3/5/14 Time: \_\_\_\_\_  
NUMBER OF PAGES: \_\_\_\_\_  
*(including transmittal sheet)*

Comments:

Determination for DN:14-31896

**PLEASE PHONE Barbara K. Olejarsz IF THERE ARE ANY TRANSMISSION PROBLEMS.**

Phone: (860) 418-7001

Fax: (860) 418-7053

410 Capitol Ave., MS#13HCA  
P.O.Box 340308  
Hartford, CT 06134



\* \* \* COMMUNICATION RESULT REPORT ( MAR. 5. 2014 10:06AM ) \* \* \*

FAX HEADER:

TRANSMITTED/STORED : MAR. 5. 2014 10:05AM  
FILE MODE OPTION

ADDRESS

RESULT

PAGE

150 MEMORY TX

912035752600

OK

2/2

REASON FOR ERROR  
E-1) HANG UP OR LINE FAIL  
E-3) NO ANSWER

E-2) BUSY  
E-4) NO FACSIMILE CONNECTION



STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
OFFICE OF HEALTH CARE ACCESS

FAX SHEET

TO: KRISTIN CONNORS  
FAX: 203 575 2600  
AGENCY: \_\_\_\_\_  
FROM: OHCA  
DATE: 3/5/14 Time: \_\_\_\_\_  
NUMBER OF PAGES: \_\_\_\_\_  
*(including transmittal sheet)*

Comments:

Determination for DN:14-31896

**PLEASE PHONE Barbara K. Olejarz IF THERE ARE ANY TRANSMISSION PROBLEMS.**

Phone: (860) 418-7001

Fax: (860) 418-7053

410 Capitol Ave., MS#13HCA  
P.O.Box 340308  
Hartford, CT 06134

## Greer, Leslie

---

**From:** Hansted, Kevin  
**Sent:** Wednesday, March 05, 2014 9:00 AM  
**To:** Greer, Leslie  
**Cc:** Martone, Kim  
**Subject:** FW: Determinations

Leslie, please add the below email to the 14-31898-DTR and 14-31896-DTR files.

Thank you.

Kevin T. Hansted  
Staff Attorney  
Department of Public Health  
Office of Health Care Access  
410 Capitol Ave., MS #13HCA  
P.O. Box 340308  
Hartford, CT 06134  
Phone: 860-418-7044

CONFIDENTIALITY NOTICE: This email and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take action in reliance on this message. If I have sent you this message in error, please notify me immediately by return email and promptly delete this message and any attachments from your computer system. We do not waive attorney-client or work product privilege by the transmission of this message.

---

**From:** Kristin Connors [<mailto:KConnors@carmodylaw.com>]  
**Sent:** Tuesday, March 04, 2014 4:31 PM  
**To:** Hansted, Kevin  
**Subject:** RE: Determinations

Attorney Hansted,

I am following up on your questions below.

With regard to the Heart Center of Greater Waterbury and The Harold Leever Regional Cancer Center, both are excluded assets for the purposes of the Joint Venture (JV) and there will be no impact or change in the governance or controlling body to either. Additionally, neither will be involved with any affiliation or merger of the JV.

With regard to billing, the Heart Center of Greater Waterbury does not bill as it does not provide services as the patients treated at either WH or SMH, whereas the Harold Leever Regional Cancer Center is a billing entity and will remain so.

Please advise of any additional questions.

Kristin Connors

Kristin Connors | [Bio](#)  
Carmody Torrance Sandak & Hennessey LLP

**From:** Hansted, Kevin [<mailto:Kevin.Hansted@ct.gov>]

**Sent:** Tuesday, February 25, 2014 9:37 AM

**To:** Kristin Connors

**Subject:** Determinations

Good morning Attorney Connors:

I am reviewing two Determinations related to The Heart Center of Greater Waterbury and The Harold Leever Regional Cancer Center. Both Determinations represent that the aforementioned entities will be excluded assets for purposes of the Joint Venture. Please advise if there will be any impact or change in the governance or controlling body of The Heart Center of Greater Waterbury or The Harold Leever Regional Cancer Center. If so, please detail. Also, please advise if The Heart Center of Greater Waterbury or The Harold Leever Regional Cancer Center will be involved with any affiliation or merger with the joint venture. Lastly, please advise who will be the billing entity for The Heart Center of Greater Waterbury and The Harold Leever Regional Cancer Center.

Thank you.

Kevin T. Hansted  
Staff Attorney  
Department of Public Health  
Office of Health Care Access  
410 Capitol Ave., MS #13HCA  
P.O. Box 340308  
Hartford, CT 06134  
Phone: 860-418-7044

CONFIDENTIALITY NOTICE: This email and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take action in reliance on this message. If I have sent you this message in error, please notify me immediately by return email and promptly delete this message and any attachments from your computer system. We do not waive attorney-client or work product privilege by the transmission of this message.

-----  
IRS CIRCULAR 230 DISCLOSURE. To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in the communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing, or recommending to another party any transaction or matter addressed herein.

This electronic message contains information from Carmody Torrance Sandak & Hennessey LLP, or its attorneys, which may be confidential, privileged or otherwise protected from disclosure. The information is intended to be used solely by the recipient(s) named. If you are not an intended recipient, be aware that any review, disclosure, copying, distribution or use of this transmission or its contents is prohibited. If you have received this transmission in error, please notify us immediately at 203-573-1200 or at the reply email address. For more information about Carmody Torrance Sandak & Hennessey LLP, please go to <http://www.carmodylaw.com>.

-----  
HTML