



STATE OF CONNECTICUT
OFFICE OF HEALTH CARE ACCESS

M. JODI RELL
GOVERNOR

CRISTINE A. VOGEL
COMMISSIONER

October 11, 2005

Joan Feldman, Esquire
Shipman and Goodman, LLP
Once Constitution Plaza
Hartford, CT 06103-1919

Re: Certificate of Need Determination, Report Number 05-30592-DTR
Hartford Hospital
Duncaster- Primary Care for the Elderly

Dear Attorney Feldman:

On September 30, 2005, the Office of Health Care Access ("OHCA") received your Certificate of Need ("CON") Determination on behalf of Hartford Hospital to provide primary care services to the elderly at Duncaster, located in Bloomfield.

Please be advised that OHCA has reviewed the information submitted and makes the following findings:

1. Hartford ("Hospital") is an acute care hospital located at 80 Seymour Street, Hartford, Connecticut.
2. Duncaster is a continuing care retirement community located at 40 Loeffler Road, Bloomfield, Connecticut.
3. Duncaster currently offers independent living, assisted living, skilled nursing services, and primary care services to senior citizens residing at Duncaster in Bloomfield.
4. Hartford Hospital is proposing to provide the primary care services currently offered at Duncaster to the Bloomfield community and Duncaster residents.
5. Duncaster currently has an arrangement with a geriatrician and employs an APRN and nursing staff to assist the physician in providing the medical services.
6. The Hospital will employ the on-site clinical staff and bill for the primary care services.

7. Duncaster currently performs the third-party billing for the physician and the APRN services and only bills for professional fees.
8. The Hospital will assume the financial and operational responsibility for offering the primary care services.
9. The primary care services will be billed as outpatient hospital services, under the Hospital's license.
10. The Hospital will charge a facility fee for the proposed services.
11. The Hospital will not take control of Duncaster or have any representation on Duncaster Board.
12. There is no capital expenditure associated with this proposal.
13. Section 19a-638 of the Connecticut General Statutes ("C.G.S.") states:

Subsection (1) "Each health care facility or institution, that intends to (A) transfer all or part of its ownership or control...shall submit to the office, prior to the proposed date of such transfer or change, a request for permission to undertake such transfer or change".

Subsections (2) "Each health care facility or institution ..., which intends to introduce any additional function or service into its program of health care shall submit to the office, prior to the proposed date of the institution of such function or service, a request for permission to undertake such function or service"

Based on the above findings, OHCA has determined that Hartford Hospital's proposal to provide primary care services at Duncaster is considered to be a transfer of control of the primary care service from Duncaster to Hartford Hospital. The proposal also represents an additional service for Hartford Hospital at a new location in Bloomfield, Connecticut; therefore, Certificate of Need authorization is required.

OHCA considers your CON Determination filing of September 30, 2005 as your Letter of Intent; therefore you may file your completed CON application with OHCA between November 29, 2005 and December 29, 2005. The CON application is being mailed to your attention separately.

If you have any questions regarding this letter, please feel free to contact Steven Lazarus at (860) 418-7012.

Sincerely,

Signed by Cristine A. Vogel
Commissioner

cc: Rose McLellan, DPH

An Equal Opportunity Employer
410 Capitol Ave., MS#13HCA, P.O.Box 340308, Hartford, CT 06134-0308
Telephone: (860) 418-7001 Toll-Free: 1-800-797-9688
Fax: (860) 418-7053