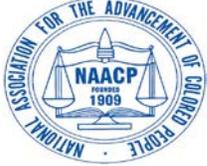


The National Association for the Advancement of Colored People
Connecticut State Conference of Branches of the NAACP



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The Connecticut State Conference of the NAACP Health Committee and the Greater Waterbury Branch of the NAACP Health Committee are writing to request legal status relative to the proposed Waterbury- Vanguard Joint Venture Application

The Connecticut State Conference of the NAACP Health Committee and the Waterbury Branch of the NAACP have several significant issues, we need to better understand as the proposed Joint Venture is currently structured and proposed. Our concerns are vested in the issues of the civil rights of the citizens of Greater Waterbury as it relates to health care access, availability, cost and quality. We, everyone needs to better understand how this JV will directly impact the overall health status of this very fragile community. These concerns are validated by the many documented indicators of the health status of this community by the Department of Public Health and Ct Voices for Children

Examples of the fragility of the Greater Waterbury community which must be integrated into any strategic plan and business model must be take into consideration. However in reading through the proposal these demographic challenges appear not to be a consideration of Vanguard and the present and future quality of health issues of this community. A few of the health and quality of life issues critical to enhanced quality improvements are:

- The City of Waterbury has one of the largest poverty rates in the State of Connecticut at 58.6% with those at under 200% of the Federal Poverty level while the state average is only 11% .We anticipate that this challenge have been incorporated into any enhanced community quality improvement is a critical aspect of this proposed joint venture
- The City of Waterbury has one of the highest unemployment rates in the State of Connecticut and will this JV add to this significant issue as this JV drives to cut cost (employment opportunities).
- With an epidemic of low birth weigh children exceeding 10% of all births, amongst the highest in the state how will turning over the mission of

Waterbury hospital to a margin driven business model impact this devastating indicator

- We have a city with one of the highest teen pregnancy rates in the State needs a hospital that is part of the community and part of the health status of the community in a true community partnership. Again in reviewing Vanguard's application this demographic appears to be understated and at best warmly appreciated and valued.

For those who do not understand the rich history of the NAACP either nationally or locally by way of background the issue of health care access/equity has been a civil rights issue as an essential and critical civil rights challenge for over our 100 year history. . With this as a back drop we have several more global concerns we hope to be addressed through the public hearing venue provided by the Office of Health Care Access and the Office of the Attorney General.

- Some of our broader concerns relate to the continuity of historic community benefit programs which are of the highest concern to our constituents and those concerned with health care access and quality which Waterbury Hospital has well documented in their community benefit reports to OHCA
- We would like to know, how the privatization of Waterbury hospital or any hospital would impact low income individuals in our State particularly low income minorities and new immigrants.
- We are concerned with the transition from a non-for-profit strategic plan to a private business model and the impact on access and services for Connecticut's residents with Medicaid as a payer. We have concerns relative to access in the future based on the lack of possible acceptance of this payer in many acute and private health care facilities and how a margin driven hospital system without the benefits of tax relief would continue to fully honor this state subsidized payer.
- Additionally, we would like to understand any changes in the collections policies of Vanguard under a for profit model that would negatively impact the Waterbury community and put homes and families at risk in this fragile economy.
- Lastly, no less important is the lack of choice embedded in Vanguard's noncompetitive position in Waterbury and the lack of options for providers, payers and most importantly, the citizens of Waterbury and the Citizens of our State. This non competitive proposal and position in Waterbury which limits options and choice for the citizens of Waterbury, we believe, presents as a possible serious anti-trust violation and of tremendous concern to the NAACP, the State of Connecticut and our constituents.

We regard this entrance of privatization of hospitals in Connecticut as a critical mild stone relative to health care access, quality and availability and the possible advancement of a multi tier health care system in our State, one for the richest, one for commercial insurance and one for the poor. We would appreciate the opportunity to share the voice of

our tens of thousands constituents through our voice at any venue provided by the Office of Health Care Access and the power of our State's Attorney's office.

Again we would appreciate adding the voice of the state and local NAACP at the highest legal status to assure in partnership with the Office of Health Care Access and the Office of the Attorney General a comprehensive understanding and potential impact of this critical paradigm shift in the provision of health services to our constituents in the State of Connecticut.

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