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Office of the Attorney General
State of Connecticut

September 29, 2014

VIA ELECTRONIC MAIL

Nykole Roche, Associate Director
Massachusetts Nurses Association
340 Turnpike Street
Canton, Massachusetts 02021

Re: OAG Docket No. 13-486-01 - Proposal for Joint Venture between Greater Waterbury Health Network, Inc. and Vanguard Health Systems, Inc. – Ruling on Massachusetts Nurses Association’s Petition to Intervene

Dear Ms. Roche:

Enclosed is the ruling by the Office of the Attorney General on your Petition to Intervene, dated September 5, 2014.

Should you have any questions regarding this ruling, please do not hesitate to contact me at 860-808-5020 or gary.hawes@ct.gov.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Gary W. Hawes".

Gary W. Hawes
Assistant Attorney General

Cc: Steven Lazarus, OHCA/DPH
Ann Zucker, Carmody Torrence Sandak & Hennessey LLP
Collin P. Baron, Pullman & Comley, LLC

DOCKET NO: 13-486-01

IN RE APPLICATION FOR JOINT VENTURE BETWEEN GREATER WATERBURY HEALTH NETWORK, INC. and VANGUARD HEALTH SYSTEMS, INC. : STATE OF CONNECTICUT : OFFICE OF THE ATTORNEY GENERAL : SEPTEMBER 29, 2014

RULING ON A PETITION FILED BY THE MASSACHUSETTS NURSES ASSOCIATION TO BE DESIGNATED AS AN INTERVENOR WITH FULL PROCEDURAL RIGHTS

By petition dated September 5, 2014, the Massachusetts Nurses Association (“Petitioner”) requests Intervenor status with full rights of cross-examination in the public hearing to be held by the Office of the Attorney General (“OAG”) regarding the Application for Joint Venture between Greater Waterbury Health Network, Inc., and Vanguard Health Systems, Inc. (the “Application”), filed under OAG Docket No. 13-486-1. The Petitioner represents over 900 nurses employed at two hospitals in Massachusetts owned by Tenet Healthcare Corporation, an affiliate of Vanguard Health Systems, Inc., but does not represent any employees at Waterbury Hospital. The Applicants filed an Objection to the Petition to Intervene on September 23, 2014. The Petitioner filed a Reply on September 26, 2014.

Pursuant to Conn. Gen. Stat. § 4-177a, the Petitioner is hereby designated as an Intervenor with limited rights at the hearing scheduled for October 15, 2014, 1:00 p.m., at the Courtyard by Marriot Waterbury, Grand Ballroom, 63 Grand Street, Waterbury, Connecticut. As an Intervenor with limited rights, the Petitioner is allowed to participate as indicated below.

The Petitioner is granted the right to inspect and copy records on file with the OAG related to the Application and shall be copied on all pleadings, filings, and correspondence submitted from this point forward by the Applicant and other Intervenor until the issuance of a final decision by the OAG. As an Intervenor, the Petitioner shall copy the Applicants and all other Intervenor on all documents it submits to the OAG from this point forward in connection with this matter. As an Intervenor with limited rights, the Petitioner may be cross-examined by the Applicants, but the Petitioner does not have the right to cross-examine the Applicant. The Petitioner shall submit its pre-filed testimony on or before the close of business on October 6, 2014.

The OAG’s jurisdiction in this matter is limited to the issues set forth in Conn. Gen. Stat. § 19a-486c. Therefore, the Petitioner may present written or verbal evidence related to such issues. The Petitioner is not permitted to present written or verbal testimony regarding any matter beyond the scope of the 19a-486c issues identified in § 19a-486c. The OAG will make additional rulings regarding the Petitioner’s participation throughout the hearing, as necessary, in the interest of justice and to promote the orderly conduct of the proceedings.



Perry Zinn Rowthorn, Deputy Attorney General

9/29/14

Date