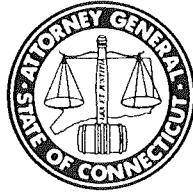


GEORGE C. JEPSEN
ATTORNEY GENERAL



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P.O. Box 120
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Office of The Attorney General
State of Connecticut

October 18, 2013

VIA U.S. and ELECTRONIC MAIL

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

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

Re: Proposal for Joint Venture between Greater Waterbury Health Network, Inc., and Vanguard Health Systems, Inc. – OHCA Docket No. 13-31838-CON and Attorney General Docket No. 13-486-01

Dear Ms. Stromstad and Mr. Messina:

The purpose of this letter is to correct a publicly reported statement attributed to a representative of Tenet Healthcare Corporation that relates to the pending proposal for a joint venture between Greater Waterbury Health Network, Inc. (“GWHN”) and Vanguard (the “Applicants”). According to the published report, the representative stated: “[Tenet] has been talking with the attorney general’s office on an interim arrangement that would allow the Yale-New Haven Hospital System to create another medical foundation which Tenet could join as a way for it to be able to hire physicians.”

The Applicants recently presented to the OAG and the Office of Health Care Access in preliminary and outline form a potential arrangement under which the joint venture would seek to address legal issues relating to the for-profit corporate practice of medicine. To be clear, however, the OAG is not participating in any on-going discussions on this issue. We have not yet received any detailed or supporting documents related to the proposal. Nor have we provided any feedback with respect to the preliminary proposal.

The OAG’s role at this stage is not to counsel the Applicants on an appropriate modification of their application, and we have not and will not preapprove or otherwise respond

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to a proposal outside of the statutory review process that is set forth in the Hospital Conversion Act, Conn. Gen. Stat. § 19a-486 et seq.

As you know, the application is currently stayed indefinitely pending its potential supplementation by the Applicants. Any material changes to the joint venture, including changes made to address corporate practice of medicine issues, should be addressed in a supplement to the Application. In the event that the Application is supplemented, the OAG will complete its review, including by conducting additional discovery as necessary, holding a public hearing, and ultimately issuing a decision based on the statutory criteria set forth in Conn. Gen. Stat. § 19a-486c.

We hope this letter provides clarity on the OAG's role in the review of hospital conversions in general and of the proposed joint venture between GWHN and Vanguard specifically.

Very truly yours,



Perry Zinn Rowthorn
Deputy Attorney General

cc: Gary W. Hawes (via electronic mail)
Steven Lazarus (via electronic mail)

Anne Zucker, (via electronic mail)
John J. Faldetta, Jr. (via electronic mail)