



CHCA

CONNECTICUT HEALTH CARE ASSOCIATES

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July 2, 2014

Kimberly Martone
Office of Health Care Access
CT Department of Public Health
410 Capitol Avenue
Hartford, CT 06134

Gary W. Hawes
Assistant Attorney General
55 Elm Street, P.O. Box 120
Hartford, CT 06141

Re: Proposal for a joint venture by Greater Waterbury Health Network, Inc. and Vanguard Health Systems, Inc. Attorney General Docket 13-486-01 and OHCA Docket 13-31838-CON

Dear Ms. Martone & Mr. Hawes:

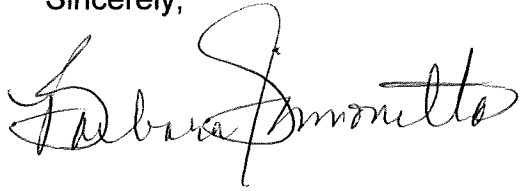
I am writing on behalf of the members of CHCA, NUHHCE, AFSCME to express our union's opposition to the above referenced Certificate of Need applications which were initially file with the Office of Health Care Access (OHCA) on or about May 3, 2013.

I am respectfully requesting that the OHCA hearing that is currently scheduled for July 24, 2014 be cancelled, or at least delayed, until such time as OHCA and the Attorney General's Office can investigate our claim that this application violates both the text and the spirit of Connecticut General Statutes §19a-639b-2.

To wit, the original October 4, 2013 applications for Certificate of Need (CONs) appear to have been filed on behalf of a joint venture being formed at that time by the Greater Waterbury Health Network, Inc. and Vanguard Health Systems, Inc. Since that time, however, it is our understanding that Vanguard Health Systems, Inc. has been acquired by, or has merged with, a company called Tenet. Accordingly, since both the statute and the regulation cited above prohibit the transferability and the assignability of CONs, Vanguard's application should be dismissed since Tenet will, at least in part, be the ultimate holder of such CONs. We respectfully contend that it would not be fair to the general public, nor to the process, if Vanguard/Tenet was simply allowed to submit "matter-of-fact" testimony at the public hearing that Tenet now owns Vanguard. The process should be recommenced with Tenet as the true applicant.

Thank you for consideration of our position.

Sincerely,

A handwritten signature in black ink, reading "Barbara Simonetta". The signature is written in a cursive style with a large, prominent initial "B".

Barbara Simonetta

President, CHCA, NUHHCE, AFSCME