



STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
Office of Health Care Access

October 5, 2010

IN THE MATTER OF:

An Application for a Certificate of Need filed
Pursuant to Section 19a-638, C.G.S. by:

Notice of Final Decision
Office of Health Care Access
Docket Number: 10-31615-CON

Bridgeport Hospital

**Proposal to Establish and Operate of an Off-
Campus Antenatal Testing Unit Service in
Trumbull, Connecticut**

To: Carolyn Salsgiver
Senior Vice-President, Planning & Marketing
Bridgeport Hospital
267 Grant Street
P.O. Box 5000
Bridgeport, CT 06610

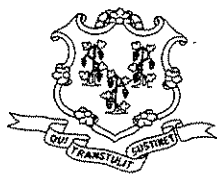
Dear Ms. Salsgiver:

This letter will serve as notice of the Final Decision of the Office of Health Care Access in the above matter, as provided by Section 19a-638, C.G.S. On October 5, 2010, the Final Decision was rendered as the finding and order of the Office of Health Care Access. A copy of the Final Decision is attached hereto for your information.



Kimberly R. Martone
Director of Operations

Enclosure
KRM:jah



**Department of Public Health
Office of Health Care Access
Certificate of Need Application**

Final Decision

Applicant: Bridgeport Hospital

Docket Number: 10-31615-CON

Project Title: Proposal to Establish and Operate an Off-Campus Antenatal Testing Unit Service in Trumbull, CT

Project Description: Bridgeport Hospital ("Hospital") proposes to establish and operate an Antenatal Testing Unit Service at a medical office building in Trumbull, Connecticut. The total capital expenditure for the proposal is \$287,834. The project will allow the Hospital to expand its antenatal testing services from its current on-campus site, located at 267 Grant Street in Bridgeport, to an off-campus site located at 5520 Park Avenue in Trumbull.

Nature of Proceedings: On August 3, 2010, the Office of Health Care Access ("OHCA") received the Hospital's Certificate of Need ("CON") application in the above referenced matter. The Hospital is a health care facility or institution as defined by Section 19a-630 of the Connecticut General Statutes ("C.G.S.").

Pursuant to Section 19a-638, C.G.S., a notice to the public concerning OHCA's receipt of the Hospital's Letter of Intent was published in *The Connecticut Post* of Bridgeport on May 28, 2010. OHCA received no responses from the public concerning the Hospital's proposal. Three individuals or an individual representing an entity with five or more people had until August 24, 2010, the twenty-first calendar day following the filing of the Hospital's CON application, to request that OHCA hold a public hearing on the Hospital's proposal. OHCA received no hearing requests from the public.

OHCA's authority to review and approve, modify or deny this application is established by Section 19a-638, C.G.S. The provisions of this section, as well as the principles and guidelines set forth in Section 19a-637, C.G.S., were fully considered by OHCA in its review.

Findings of Fact

1. Bridgeport Hospital is a non-profit acute care teaching hospital, located at 267 Grant Street in Bridgeport, Connecticut. *(August 3, 2010, Initial CON Submission, page 27 and Attachment IV, page 175)*
2. The Hospital provides antenatal testing unit (“ATU”) services¹ primarily as an outpatient service to women with normal and high-risk pregnancies. *(August 3, 2010, Initial CON Submission, page 20)*
3. The ATU service is located on the Hospital’s fifth floor and operates Monday through Friday, from 8:00 a.m. to 4:30 p.m. *(August 3, 2010, Initial CON Submission, page 20)*
4. The Hospital proposes to open an off-campus, suburban location of its ATU service at 5520 Park Avenue in Trumbull, Connecticut. *(August 3, 2010, Initial CON Submission, page 20)*
5. The proposed service location will operate three days a week (Monday, Tuesday and Friday) from 8:00 a.m. to 4:30 p.m. and will offer the same array of services currently offered at the Hospital ATU. *(August 3, 2010, Initial CON Submission, page 20)*
6. Each of the ATU sites will be managed by the same Bridgeport Hospital physicians and staff. The opening of the proposed service location will require the addition of a .82 full-time equivalent employee to cover the Trumbull program. *(August 3, 2010, Initial CON Submission, page 20)*
7. The Hospital’s objective in opening an off-campus ATU within its service area is to better serve the Hospital’s maternity patients and to provide easier access to antenatal care by bringing ATU services closer to the patient. *(August 3, 2010, Initial CON Submission, pages 20 and 21)*
8. It can be physically demanding and time consuming for ATU patients who have high-risk pregnancies to drive into Bridgeport, park in the Hospital’s garage and travel through the facility to reach the ATU for a routine visit. This is especially true for those patients with gestational diabetes or those patients expecting multiple births, each group patients requiring frequent ATU monitoring visits. *(August 3, 2010, Initial CON Submission, page 21)*
9. Many of the Hospital’s maternity patients experience high-risk pregnancies, and appropriate clinical monitoring can help ensure healthy pregnancies and prevent premature births. *(August 3, 2010, Initial CON Submission, page 21)*

¹ ATU services include basic and targeted ultrasound, prenatal diagnosis, genetic counseling, preconceptual and perinatal consultation, fetal monitoring, diabetic education and management, prematurity prevention and nutritional counseling.

10. The Hospital's ATU cares for emergency patients that present with an urgent obstetrical issue as well as laboring patients from Labor and Delivery who require an ultrasound. As a result ATU outpatients who arrive at the Hospital for a schedule, routine visit are sometimes subject to delayed appointments due to the ATU service's need to care for the urgent, non-scheduled patients first. The patients utilizing the proposed Trumbull service location will be less likely to experience delays, since it is less likely that an unscheduled patient will require immediate attention by program staff. *(August 3, 2010, Initial CON Submission, page 21)*
11. The proposed service location will provide Hospital maternity patients with easy access to ATU care in a convenient location with on-site, free surface parking. *(August 3, 2010, Initial CON Submission, page 21)*
12. Additional benefits for locating the ATU service at this location include:
 - a. The office is in the same building as Women's Health Care of Trumbull, one of the Hospital's largest OB/GYN groups as well as other Bridgeport Hospital physicians; and
 - b. A Hospital blood draw station is located in the building for easy access by patients requiring blood-work during their pregnancy.
(August 3, 2010, Initial CON Submission, page 21)
13. The proposed service location will serve the same individuals as the Hospital-based service. Individuals currently served by the service come from the following municipalities: Bridgeport, Trumbull, Easton, Fairfield, Milford, Monroe, Shelton, and Stratford. *(August 3, 2010, Initial CON Submission, pages 22 and 30)*
14. The ATU performed the following number of Hospital visits in the last three full fiscal years and for the first eight months of FY 2010 (i.e. October 2009 through May 2010):

Table 1: Actual ATU Visits, FY 2006 through Partial FY 2010

Fiscal Year	2007	2008	2009	2010
Actual Total Visits	8,732	8,719	9,013	5,688

(August 3, 2010, Initial CON Submission, page 25)

15. Thirty-three percent (33%) of the Hospital's existing ATU volume can be expected to move to Trumbull based on the number of visits that can be accommodated in the Trumbull office and the availability of appointments. Patients will be referred based on their preference of office location and scheduling requirements. *(August 3, 2010, Initial CON Submission, page 25)*
16. A three percent (3%) per year growth can be expected at the Trumbull service location in ensuing fiscal years. The number of visits to be performed at the Trumbull office in the next four years are as follows:

Table 2: Projected Trumbull Office ATU Visits, Partial FY 2011 through FY 2014

Fiscal Year	2011*	2012	2013	2014
Projected Total Visits	2,722	2,804	2,888	2,975

**Latter eight months of FY 2011, January 2011-September 2011)*

(August 3, 2010, Initial CON Submission, page 25)

17. The ATU is certified to perform obstetrical ultrasound by the American Institute of Ultrasound in Medicine. The Hospital's diabetes in pregnancy program is certified by the American Diabetes Association. *(August 3, 2010, Initial CON Submission, page 20)*
18. The ATU is staffed by perinatologists from the Bridgeport Hospital's section of Maternal-Fetal Medicine of the Department of Obstetrics and Gynecology, along with experienced sonographers, nurses and genetic counselors. *(August 3, 2010, Initial CON Submission, pages 29 & 30)*
19. The Standard of Practice Guidelines that will be utilized at the Hospital's off-campus ATU service are the "Guidelines for Perinatal Care," Sixth Edition, 2007 from the American Academy of Pediatrics and the American College of Obstetricians and Gynecologists. *(August 3, 2010, Initial CON Submission, page 26)*
20. St. Vincent's Medical Center in Bridgeport and Griffin Hospital in Derby are two area hospitals that provide antenatal services. *(August 3, 2010, Initial CON Submission, page 24)*
21. The proposal is not expected to negatively affect existing providers, as the proposal will provide an alternative community site of ATU services for the Hospital's maternity patients. *(August 3, 2010, Initial CON Submission, page 24)*
22. OHCA finds that the proposal will contribute to the quality of health care delivery in the region by improving ease of access to antenatal care for pregnant patients of the Hospital, especially women with high risk pregnancies who require frequent monitoring to help prevent premature births. *(August 3, 2010, Initial CON Submission, page 26)*
23. The capital expenditure for the proposal is \$287,834 and is itemized in the following table:

Table 3: Total Project Costs

Description:	Amount
Imaging Equipment Purchase	\$136,250
Non-Medical Equipment Purchase	46,349
Medical Equipment Purchase	11,903
Renovation Work	45,868
Furnishings	47,464
Total Capital Expenditure	\$287,834

(August 3, 2010, Initial CON Submission, page 28)

24. The proposal includes renovation of 3,200 square feet of existing space, furnishings for the office, information system equipment upgrades and connectivity to the Hospital. The renovation work will commence upon CON approval and will take approximately four weeks. *(August 3, 2010, Initial CON Submission, page 28)*
25. One ultrasound unit will be moved from the Hospital ATU to the Trumbull office, and one additional ultrasound unit and two additional fetal monitors will be purchased for the new location. *(August 3, 2010, Initial CON Submission, page 20)*

26. The commencement of operations at the Trumbull office is projected for January 2011.
(August 3, 2010, Initial CON Submission, page 28)
27. The project will be funded through Hospital equity. *(August 3, 2010, Initial CON Submission, page 28)*
28. The Hospital will bill for the facility fee, and Northeast Medical Group (“NEMG”), a Hospital-affiliated not-for-profit medical foundation, will bill for the physician component. *(August 3, 2010, Initial CON Submission, page 21)*
29. The Hospital’s projected incremental total revenue, total operating expense and loss from operations associated with the implementation of the proposal is presented in the table below:

Table 4: Financial Projections Incremental to the Project

Description	FY 2012	FY 2013	FY 2014
Incremental Total Revenue	\$26,000	\$56,000	\$89,000
Incremental Total Operating Expenses	\$146,000	\$149,000	\$152,000
Loss from Operations	(\$120,000)	(\$93,000)	(\$63,000)

(August 3, 2010, Initial CON Submission, page 29 and Attachment VIII, Financial Attachment 1, page 189)

30. The Hospital’s overall projected total revenue, total operating expense and gain from operations associated with the implementation of the proposal is presented in the table below:

Table 5: Overall Financial Projections with the Project

Description	FY 2012	FY 2013	FY 2014
Total Revenue	\$384,211,000	\$398,375,000	\$413,649,000
Total Operating Expenses	\$378,175,000	\$392,215,000	\$406,801,000
Gain for Operations	\$6,036,000	\$6,160,000	\$6,848,000

(August 3, 2010, Initial CON Submission, page 29 and Attachment VIII, Financial Attachment 1, page 189)

31. Averaging the case rate across all payers and applying an estimate for increases in future years, the projected case rate averages for FYs 2011 through FY 2014 are as follows:

Table 6: Projected Case Rate Average, FY 2011 through FY 2014

Fiscal Year	2011*	2012	2013	2014
Case Rate Average	\$1,482	\$1,586	\$1,697	\$1,815

* From January 2011-September 2011

(August 3, 2010, Initial CON Submission, page 30 and Attachment IX, Financial Attachment II, page 190)

32. The Hospital's existing ATU payer mix illustrated below is not expected to change as a result of this project:

Table 7: Hospital's Current and Projected Trumbull Office ATU Population Payer Mix

Payer	Current FY 2010**	FY2011	FY2012	FY2013	FY2014
Medicare*	0.56%	0.48%	0.50%	0.48%	0.50%
Medicaid*	45.50%	45.08%	45.08%	45.08%	45.08%
CHAMPUS & TriCare	0.32%	0.29%	0.32%	0.31%	0.30%
Total Government	46.38%	45.85%	45.90%	45.88%	45.88%
Commercial Insurers*	47.15%	47.43%	47.40%	47.40%	47.39%
Uninsured	6.47%	6.72%	6.70%	6.72%	6.72%
Workers Comp.	0%	0.00%	0.00%	0.00%	0.00%
Total Non-Government	53.62%	54.15%	54.10%	54.12%	54.12%
Total Payer Mix	100.00%	100.00%	100.00%	100.00%	100.00%

*Includes managed care activity

**Period covered is 8 months (October 1-May 30)

(August 3, 2010, Initial CON Submission, pages 29 and 30)

33. OHCA finds that the financial projections appear to be reasonable and achievable. (August 3, 2010, Initial CON Submission, page 30 and Attachment IX, Financial Attachment II, pages 190 through 193)

34. The Hospital's proposal is consistent with the Hospital's long-range plan as the project seeks to ensure that the community has access to high quality ATU outpatient services. (August 3, 2009, Initial CON Submission, page 31)

35. The Hospital's proposal will not result in changes to the Hospital's current teaching and research responsibilities. (August 3, 2009, Initial CON Submission, page 31)

31. There are no distinguishing characteristics of the patient/physician mix with respect to the proposal. (August 3, 2009, Initial CON Submission, page 31)

32. The Hospital has sufficient financial, managerial, and technical competence to provide efficient and adequate service to the public. (August 3, 2009, Initial CON Submission, page 26 and Attachment I, pages 33 through 87)

Rationale

The Office of Health Care Access (“OHCA”) approaches community and regional need for the proposed service on case by case basis. Certificate of Need (“CON”) applications do not lend themselves to general applicability due to a variety of factors, which may affect any given proposal, e.g. the characteristics of the population to be served, the nature of the existing services, the specific types of services proposed to be offered, the current utilization of services and the financial feasibility of the proposed service.

Bridgeport Hospital currently provides ATU services on its main campus, primarily as an outpatient service to women with normal and high-risk pregnancies. The Hospital proposes to establish and operate ATU services at a medical office building in Trumbull, Connecticut. The proposed service location will operate three days a week and will offer the same array of services currently offered at the Hospital ATU.

Many of the Hospital’s maternity patients experience high-risk pregnancies and appropriate clinical monitoring can help ensure healthy pregnancies and prevent premature births. The proposed service location will provide Hospital maternity patients with easy access to ATU care in a convenient location with on-site, free surface parking. Additionally, the proposed service location is in the same building as Women’s Health Care of Trumbull, one of the Hospital’s largest OB/GYN groups as well as other Bridgeport Hospital physicians. A Hospital blood draw station is also located in the building for easy access by patients requiring blood-work during their pregnancy. Based on the above, OHCA finds that the proposal will contribute to the quality of health care delivery in the region by improving ease of access to antenatal care for pregnant patients of the Hospital, especially women with high risk pregnancies who require frequent monitoring to help prevent premature births.

The proposal has a capital expenditure of \$287,834. OHCA finds that while the proposal incurs small incremental losses in the first few years, the Hospital is expected to break even in year 6 of operation. For the facility as a whole, the Hospital projects gains from operation with the project ranging from \$6.5 million in FY 2012 to \$7.3 million in FY 2014. OHCA finds that the Hospital’s volume and financial projections upon which they are based appear to be reasonable and achievable and therefore, the proposal is financially feasible.

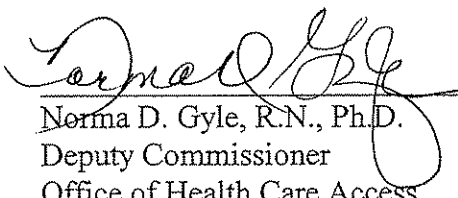
Order

Based upon the foregoing Findings and Rationale, the Certificate of Need application of Bridgeport Hospital to establish and operate an Antenatal Testing Unit Service, located at 5520 Park Avenue in Trumbull, Connecticut at a capital expenditure of \$287,834, is hereby **approved**.

All of the foregoing constitutes the final order of the Office of Health Care Access in this matter.

By Order of

10-5-10
Date


Norma D. Gyle, R.N., Ph.D.
Deputy Commissioner
Office of Health Care Access

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STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
OFFICE OF HEALTH CARE ACCESS

FAX SHEET

TO: CAROLYN SALSGIVER

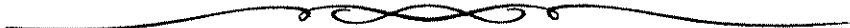
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AGENCY: BRIDGEPORT HOSPITAL

FROM: JACK HUBER

DATE: 10/5/2010 Time: ~ 10:15 am

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Comments: Transmitted-
Final Decision regarding:
Bridgeport Hospital's Antenatal Testing Unit Project
DN: 10-31615-CON

