



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

March 8, 2012

Nancy M. Hamson
Director of Planning
Greenwich Hospital
5 Perryridge Road
Greenwich, CT 06830

VIA FACSIMILE ONLY

RE: Certificate of Need Determination; Report Number: 12-31743-DTR
Greenwich Hospital
Discontinuance of Dental Clinic Services

Dear Ms. Hamson:

On February 22, 2012, the Office of Health Care Access ("OHCA") received your responses to our inquiry regarding the discontinuance of Dental Clinic Services at Greenwich Hospital ("Hospital"). The following information has been gathered by OHCA regarding the Dental Clinic program.

1. The Hospital has for a number of years operated a Dental Clinic as well as other clinic services at its Outpatient Center located on the Hospital's campus.
2. The Dental Clinic was located on the second floor of the Watson Pavilion and dental services were offered on a Monday through Friday, 8:00 a.m. to 4:15 p.m. schedule.
3. The Dental Clinic provided a variety of routine services, plus minor procedures and oral surgery were available from a rotation of volunteer dentists from the community, aided by the clinic's dedicated full-time dental support staff of four individuals. A pediatric dentist was also available to care for children under the age of 12.
4. The following dental services were available at the clinic: cleanings, examinations, X-rays, fillings, fluoride treatments, sealant treatments, extractions, limited periodontal services, consultations and referrals, and pediatric dentistry.
5. On September 20, 2011, the Hospital's Chief Executive Officer notified dental clinic patients that the Hospital was discontinuing the Dental Clinic's basic dental care.

6. On September 30, 2011, the Dental Clinic provided care to its last patient.
7. For patients formerly seen and treated at the Dental Clinic, the Hospital now provides these individuals with a list of practicing dentists located in the service area.
8. The Dental Clinic is recognized as a separate and discrete Hospital outpatient service by virtue of the following:
 - a. The Hospital's Medicare Cost Report identifies the Dental Clinic as a designated cost center;
 - b. Dental Clinic Visits are identified as a separate line item in the Hospital's OHCA Health Reporting System Report 450, Line L.2.; and
 - c. Through the Hospital's website the Dental Clinic was identified as a separate clinic service amongst several clinic services provided at the Hospital's Outpatient Center.
9. The Dental Clinic had served the needs of Greenwich residents, adults and children, who were under- or uninsured and whose income fell within government poverty guidelines.
10. Clinic patients were charged on a sliding scale, based on their financial status. Dental services were about half the average cost of private care.
11. The Dental Clinic's service utilization had been increasing annually from 1,885 visits in FY 2007 to 2,598 visits in FY 2010.
12. The Hospital has not described any efforts on its part to identify opportunities to collaborate with community service providers (i.e. federally qualified health centers) who may be better suited to provide complimentary dental care services to the target population within the community either prior to or after its decision to discontinue Dental Clinic services.

While it is the Hospital's position that it has not discontinued providing dental services by terminating its preventative and restorative dental care services, the termination of its preventative and restorative dental care services was accomplished by the closing of its Dental Clinic, a separate and discrete Hospital outpatient service, which operated under the auspices of volunteer dentists and a dedicated full-time dental support staff. OHCA was not afforded an opportunity to determine whether a CON was required in this matter as the Hospital did not file a timely CON determination request as to whether the discontinuance of the Dental Clinic required the filing of a CON application. Pursuant to Section 19a-638 of the Connecticut General Statutes ("C.G.S."), as amended by Public Act 11-183, Section 1, a Certificate of Need issued by OHCA shall be required for the termination of inpatient or outpatient services offered by a hospital. As the discontinuance of the Dental Clinic services at the Hospital's Outpatient Center at 5 Perryridge Road, Greenwich, is a termination of an outpatient service at a hospital, Greenwich Hospital is required to file a Certificate of Need application with OHCA specific to this termination of service pursuant to Section 19a-638 of the CGS, as amended by Public Act 11-183, Section 1.

If you have any questions concerning this letter, please contact Jack A. Huber at (860) 418-7001.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly R. Martone". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Kimberly R. Martone
Director of Operations, OHCA

C: Rose McLellan, License and Applications Supervisor, DPH, DHSR