



Office of Health Care Access Certificate of Need Application

Final Decision

Applicant: Pastoral Counseling Center of West Hartford, Inc.

Docket Number: 05-30652-CON

Project Title: Termination of Psychiatric Outpatient Clinic for Adults in Woodbury and Waterbury

Statutory Reference: Section 19a-638 of the Connecticut General Statutes

Filing Date: November 17, 2006

Decision Date: January 25, 2007

Default Date: February 15, 2007

Staff Assigned: Paolo Fiducia

Project Description: Pastoral Counseling Center of West Hartford, Inc. (“Applicant”) is proposing to terminate its Psychiatric Outpatient Clinic for Adults in Woodbury and Waterbury, with no associated capital expenditure.

Nature of Proceedings: On November 17, 2006, the Office of Health Care Access (“OHCA”) received a Certificate of Need (“CON”) application from Pastoral Counseling Center of West Hartford, Inc. to terminate its Psychiatric Outpatient Clinic for Adults in Woodbury and Waterbury, with no associated capital expenditure. The Applicant 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 Applicant’s CON application was published in the *Waterbury Republican American*, Waterbury, on January 21, 2006. OHCA received no responses from the public concerning the Applicant’s proposal. Pursuant to Public Act 05-75, three individuals or an individual representing an entity with five or more people had until December 8, 2006, the twenty-first calendar day following the filing of the Applicant’s CON Application, to request that OHCA

hold a public hearing on the Applicant's proposal. OHCA received no hearing requests from the public by December 8, 2006.

OHCA's authority to review and approve, modify or deny the CON 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

Clear Public Need

Impact of the Proposal on the Applicant's Current Utilization Statistics Proposal's Contribution to the Quality of Health Care Delivery in the Region Proposal's Contribution to the Accessibility of Health Care Delivery in the Region

1. Pastoral Counseling Center of West Hartford, Inc. ("Applicant" or "PCCWH") is a health care provider that provides outpatient psychiatric services for adults at United Methodist Church, 3 Church Street, Woodbury and Mill Plain Union Church, 242 Southmayd Road, Waterbury, Connecticut. *(May 1, 2006 Initial CON Application Submission, page 3)*
2. The Applicant's additional service locations are as follows:

Table 1: Applicant's programs

Name of Program	Location	Services
PCCWH	2 North Eagleville Road, Storrs	Psychiatric Outpatient Clinic for Adults with Multi-Service Component Facility for the Care or Treatment of Substance Abusive or Dependent Persons
PCCWH	12 South Main Street, West Hartford	Psychiatric Outpatient Clinic for Adults with Multi-Service Component Facility for the Care or Treatment of Substance Abusive or Dependent Persons
PCCWH	280 Country Club Road, Avon	Psychiatric Outpatient Clinic for Adults with Multi-Service Component

(Department of Public Health Service Listings)

3. The Applicant provides services including individual, couples, family and group therapy, educational workshops and referral to other community resources. PCCWH serves individuals of all ages, including children, adolescents and adults. *(May 1, 2006 Initial CON Application Submission, page 3)*
4. The Applicant is proposing to terminate its Psychiatric Outpatient Clinic for Adults License in Woodbury and Waterbury, with no associated capital expenditure. *(May 1, 2006 Initial CON Application Submission, page 2)*

5. The Applicant states that the Woodbury and Waterbury clinics were acquired, at no cost, by PCCWH in February of 2002, when Rev. Raymond J. Odiorne was hired by PCCWH. The sites were previously used and leased by the Rev. Odiorne. *(May 1, 2006 Initial CON Application Submission, page 2)*
6. According to the Applicant, on November 17, 2004 PCCWH Board of Directors decided to terminate the employment of Rev. Odiorne. PCCWH and the Rev. Odiorne also agreed to transfer control and operation of the Woodbury and Waterbury clinics back to the Rev. Odiorne and to terminate these clinics as service locations for PCCWH effective immediately. *(May 1, 2006 Initial CON Application Submission, page 2)*
7. The Applicant states the decision was based primarily on the fact that the clients had relationships with Rev. Odiorne prior to PCCWH's acquisition of the clinics, which continued during PCCWH's tenure. For the sake of continuity of care for these clients, and in the interest of ensuring local access to services for these patients going forward, PCCWH decided to return the control and operation of the clinics to Rev. Odiorne. *(May 1, 2006 Initial CON Application Submission, page 2)*
8. The Woodbury site was open approximately four (4) hours per week and the Waterbury site was open approximately eight (8) hours per week. *(May 1, 2006 Initial CON Application Submission, page 4)*
9. The primary and secondary service area towns for the Woodbury and Waterbury service locations are as follows:

Table 2: Primary and Secondary Service Towns

Town	Primary	Secondary
Woodbury	Woodbury, Watertown	Roxbury, Southbury, Middlebury
Waterbury	Waterbury, Naugatuck, Cheshire	Southington

(May 1, 2006 Initial CON Application Submission, page 4)

10. The Applicant states that prior to the transfer of control and operation of the Woodbury and Waterbury clinics to PCCWH in 2002, Rev. Odiorne owned a private practice, Greater Waterbury Pastoral Counseling Center, at which he had an established referral base. Referrals for individual counseling came from Woodbury and Waterbury communities, and in particular through the churches at which he offered services. Rev. Odiorne continued to utilize existing referral sources to obtain clients for the Woodbury and Waterbury clinics under PCCWH control and operation. *(May 1, 2006 Initial CON Application Submission, pages 4 & 5)*
11. The Applicant states that upon approval of the transfer of control and operation of the clinics to Rev. Odiorne, PCCWH sent letters to all existing clients informing them that PCCWH would no longer be operating the sites in Woodbury and Waterbury. Ten (10) of the twelve (12) clients being seen at the Woodbury and Waterbury clinics as of November of 2004 decided to continue counseling with their current clinician, Rev. Odiorne. The remaining two (2) clients did not respond to PCCWH's letter. *(May 1, 2006 Initial CON Application Submission, page 5)*

12. PCCWH provided 271 hours of counseling at the Waterbury site in 2004, which, based upon one-hour counseling sessions, equals 271 clinic visits. For the Woodbury location it provided 124 hours of counseling (or 124 clinic visits) in 2004. *(May 1, 2006 Initial Con Application Submission, page 4)*

13. The following table shows the Applicant's proposal timetable:

Table 3: Applicant's proposal timetable

	Date
Termination Effective	11/18/04
State agency notified DPH	11/04
Notified OHCA	03/22/05
Returned licenses to DPH	01/25/05

(November 17, 2006, Supplemental Material Submitted, page 2)

14. The Applicant stated that Bradley Memorial Hospital and Health Center, St. Mary's Hospital, The Waterbury Hospital, Angelus House, Connecticut Counseling Centers, The Wellspring Foundation, Catholic Charities, Family Intervention Center, Family Services of Greater Waterbury, Morris Foundation, Inc., Southbury-Middlebury Youth and Family Services and Staywell Health Care, Inc.-South End Health Center, are the existing providers of psychiatric outpatient treatment in the Woodbury/Waterbury area. *(November 17, 2006 Supplemental Material Submitted, page 4)*

15. The Applicant's current payer mix for the Woodbury and Waterbury locations is as follows: *(May 1, 2006, Initial CON Application Submission, Page 11)*

Table 4: Payer Mix for the Woodbury and Waterbury locations

Payer Mix	Percentage
Medicaid	17%
Total Government Payers	17%
Commercial	83%
Total Non-Government Payers	83%
Total Payer Mix	100.00%

**Financial Feasibility and Cost Effectiveness of the Proposal and its Impact on the Applicant's Rates and Financial Condition
Impact of the Proposal on the Interests of Consumers of Health Care Services and Payers for Such Services
Consideration of Other Section 19a-637, C.G.S.
Principles and Guidelines**

16. The project has no associated capital expenditure. *(May 1, 2006 Initial CON Application Submission, page 8)*
17. The Applicant's actual losses from total operations for the Woodbury and Waterbury locations are (\$8,609) and (\$4,233) for FY 2004, respectively. *(May 1, 2006 Initial CON Application Submission, pages 54 & 55)*
18. There is no State Health Plan in existence at this time. *(May 1, 2006 Initial CON Application Submission, page 2)*
19. The Applicant has adduced evidence that the proposal is consistent with the Applicant's long-range plan. *(May 1, 2006 Initial CON Application Submission, page 2)*
20. The Applicant has not undertaken any activities to improve productivity and contain costs. *(May 1, 2006 Initial CON Application Submission, page 9)*
21. The proposal will not result in any change to the Applicant's teaching and research responsibilities. *(May 1, 2006 Initial CON Application Submission, page 9)*
22. The Applicant states that the current patient/physician mix will not change. *(May 1, 2006 Initial CON Application Submission, page 8)*
23. The Applicant has sufficient technical and managerial competence and expertise to provide efficient and adequate service to the public. *(May 1, 2006 Initial CON Application Submission, page 8)*

Rationale

The Office of Health Care Access (“OHCA”) approaches community and regional need for Certificate of Need (“CON”) proposals on a case by case basis. 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 proposal.

Pastoral Counseling Center of West Hartford, Inc. (“Applicant” or PCCWH”) is a health care provider that provides outpatient psychiatric services for adults at United Methodist Church, 3 Church Street, Woodbury and Mill Plain Union Church, 242 Southmayd Road, Waterbury, Connecticut. The Applicant is proposing to terminate its Psychiatric Outpatient Clinic for Adults License in Woodbury and Waterbury.

The Applicant acquired at no cost the Woodbury and Waterbury clinics in February, 2002. The sites were previously used and leased by the Rev. Odiorne. At the time of purchase Rev. Odiorne was hired by the Applicant. On November 17, 2004 PCCWH Board of Directors decided to terminate the employment of Rev. Odiorne. PCCWH and the Rev. Odiorne also agreed to transfer control and operation of the Woodbury and Waterbury clinics back to the Rev. Odiorne and to terminate these clinics as service locations for PCCWH effective immediately. The decision to transfer control back to the Rev. Odiorne was based primarily on the fact that the clients had relationships with Rev. Odiorne prior to PCCWH’s acquisition of the clinics, which continued during PCCWH’s tenure. For the sake of continuity of care for these clients, and in the interest of ensuring local access to services for these patients going forward, PCCWH decided to return the control and operation of the clinics to Rev. Odiorne. The Woodbury site was open approximately four (4) hours per week and the Waterbury site open approximately eight (8) hours per week. PCCWH provided 271 hours of counseling at the Waterbury site in 2004, which, based upon one-hour counseling sessions, equals 271 clinic visits. For the Woodbury location it provided 124 hours of counseling (or 124 clinic visits) in 2004. Since OHCA was deprived of the opportunity to review the information prior to closure, it can not determine that patient access was not impacted.

The proposal has no associated capital expenditure. The Applicant’s actual losses from total operations for the Woodbury and Waterbury locations are (\$8,609) and (\$4,233) for FY 2004, respectively.

Based on the foregoing Findings and Rationale, the Certificate of Need Application of Pastoral Counseling Center of West Hartford, Inc. to terminate its Psychiatric Outpatient Clinic for Adults in Woodbury and Waterbury, at no associated capital expenditure is hereby GRANTED.

Order

The proposal of Pastoral Counseling Center of West Hartford, Inc. to terminate its Psychiatric Outpatient Clinic for Adults in Woodbury and Waterbury, with no associated capital expenditure is hereby GRANTED.

Pastoral Counseling Center of West Hartford, Inc. shall hereafter notify OHCA of any and all proposed termination of services prior to finalizing any decision to terminate any services or programs. Failure to notify OHCA in advance of any proposed termination of services may be considered as not filing required information and subject Pastoral Counseling Center of West Hartford, Inc. to civil penalties pursuant to Section 19a-653, C.G.S.

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

By Order of the
Office of Health Care Access

January 25, 2007

Signed by Cristine A. Vogel
Commissioner

CAV:pf