

From: Joan Palmer [<mailto:JPalmer@hungerford.org>]
Sent: Thursday, February 16, 2017 3:08 PM
To: Foster, Tillman <Tillman.Foster@ct.gov>
Cc: Roberts, Karen <Karen.Roberts@ct.gov>
Subject: RE: Charlotte Hungerford Hospital Multispecialty Group

Good Afternoon,

It was a pleasure talking to you today. After consulting with our attorney, she feels that we do not meet the criteria as our physicians are either contracted or employed by our Hospital. They do not have a separate TIN, nor are they formally organized as a group. I'm happy to submit this data, but if after reading this you agree and don't feel we meet the criteria, I will not send in for 2017.

Looking forward to hearing from you, Joan

From: Foster, Tillman [<mailto:Tillman.Foster@ct.gov>]
Sent: Friday, January 27, 2017 11:14 AM
To: Joan Palmer
Cc: Roberts, Karen
Subject: Charlotte Hungerford Hospital Multispecialty Group

Ms. Palmer-

This is acknowledgement of the Office of Health Care Access receiving your submission of the Charlotte Hungerford Hospital Multispecialty Group's Annual Group Practice filing on January 16, 2017.

After reviewing your filing OHCA had a question in regards to the following:
In your filing of January 16, 2017, can you confirm that Charlotte Hungerford Hospital Multispecialty Group (CHMSG) meets the definition of 'Group Practice' as defined in 19a-486i (10) and also is CHMSG a separate legal entity?

According to Section 19a-486i (10) group practice is defined as the following:

(10) "Group practice" means two or more physicians, legally organized in a partnership, professional corporation, limited liability company formed to render professional services, medical foundation, not-for-profit corporation, faculty practice plan or other similar entity (A) in which each physician who is a member of the group provides substantially the full range of services that the physician routinely provides, including, but not limited to, medical care, consultation, diagnosis or treatment, through the joint use of shared office space, facilities, equipment or personnel; (B) for which substantially all of the services of the physicians who are members of the group are provided through the group and are billed in the name of the group practice and amounts so received are treated as receipts of the group; or (C) in which the overhead expenses of, and the income from, the group are distributed in accordance with methods previously determined by members of the group. An entity that otherwise meets the definition of group practice under this section shall be considered a group practice although its shareholders, partners or owners of the group practice include single-physician professional corporations, limited liability companies formed to render professional services or other entities in which beneficial owners are individual physicians;

Please respond as soon as you can.

Call or email me, if you have any questions.

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