

State of Connecticut
GENERAL ASSEMBLY
STATE CAPITOL
HARTFORD, CONNECTICUT 06106-1591

June 29, 2015

Jewel Mullen, MD, MPH, MPA
Commissioner
Department of Public Health
410 Capitol Avenue
Hartford, CT 06134

Dear Dr. Mullen:

We are writing to express our concern regarding Yale New Haven Health System's (YNHHS) plan to close two outpatient health clinics in East Haven and Branford and to request that the Office of Health Care Access (OHCA) conduct a full Certificate of Need (CON) review, including public hearings, to carefully examine the impact these closures will have on access to care for patients in the affected communities.

The East Haven facility, which provides urgent care as well as occupational health and radiology services, opened just four years ago. At that time, YNHHS touted the facility as responding to the need for community based services in the Foxon area. The Urgent Care center was intended to provide immediate care for minor emergencies such as lacerations and sprains as well as convenient care for conditions such as cold and flu and ear infections. The argument was that such services would allow patients to obtain prompt medical attention while avoiding costly emergency room visits. The other services provided at the East Haven facility also meet critical needs, such as treatment and therapy for workplace injuries, mammograms and bone density scans for women in the community.

The Branford location offers occupational health services in addition to physical therapy and was well established in the community before the YNHHS takeover of the location.

Now, just a few years after the East Haven facility opened and the Branford facility was taken over by YNHHS, and all for a possible savings of perhaps one million dollars a year, YNHHS claims that these services are not needed. This possible savings must be viewed in the context of a health system that has seen its profits rise by 280% in just five years and that realized total "excess revenue over expenses" (i.e. profit) of over \$240 million in 2013.

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YNHHS blames state taxes and Medicaid cuts for the clinic closures. While we believe these taxes and reimbursement cuts may impact community hospitals, we question why Yale New Haven is choosing to offset these burdens by targeting certain communities for service reductions, while they continue to expand eastward into Old Saybrook and a possible affiliation with Lawrence & Memorial Hospital.

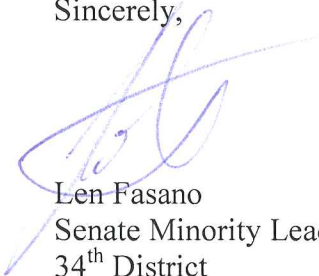
We have both raised concerns about the increasing consolidation of our health care system. As hospitals merge and buy up community based physician practices, the choices and options for care decrease. This horizontal and vertical integration gives just a few large health care systems, such as YNHHS, increasing control over the cost of and access to care.

This is why we both support legislation to require that certain physician practice acquisitions be subject to CON review and why we supported legislation this year to increase the market scrutiny of hospital sales and increase price transparency and consumer choice.

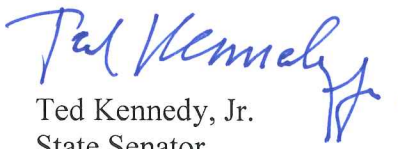
We are concerned that, having spent years buying physician practices and consolidating health care services in the greater New Haven area under the its umbrella, YNHHS now is choosing to deal with new burdens by terminating community services simply because it is not making as much money as it would like instead of making a decision based on maintaining access to care. Given the virtual monopoly that YNHHS has over many health care services, it is incumbent upon the state to ensure that it maintains adequate access to affordable care. Therefore, we are asking that OHCA subject these service termination requests to a rigorous review that includes ample opportunity for public comment and input.

Thank you for your time and attention.

Sincerely,



Len Fasano
Senate Minority Leader
34th District



Ted Kennedy, Jr.
State Senator
12th District