



May 29, 2020

Victoria Veltri, JD, LLM
Executive Director
Department of Public Health
Office of Health Strategy
P.O. Box 340308
450 Capital Avenue, MS# 51OHS
Hartford, CT 06134

Docket Number: 18-32238-CON

Project Title: Transfer of Ownership of Western Connecticut Health Network, Inc. with Health Quest Systems, Inc. to a New Not-for-Profit Parent Corporation

Dear Victoria,

As stipulated in the Agreed Settlement executed on April 1, 2019 (“Closing Date”) regarding approval for the transfer of ownership of the two organizations - Western Connecticut Health Network, Inc. (“WCHN”) and Health Quest Systems, Inc. (“HQ”) - Condition sixteen (16) requests the following:

- a. A written report describing the achievement of the Strategic Plan components;
- b. A written report on its activities directed at meeting condition 4, regarding efforts toward making culturally and linguistically appropriate service available and integrated throughout the Hospital’s operations;
- c. An updated Services Plan demonstrating how health care services are currently provided and will be provided by Danbury, Norwalk and Sharon Hospital;
- d. An affirmation document attesting to the following:
 - i. Obligations of Conditions 1-2;
 - ii. No Danbury, Norwalk or Sharon Hospital physician office has been converted to hospital-based status;
 - iii. All Danbury, Norwalk and Sharon Hospital commercial health plan contracts in place as of the Date of Closing are/were maintained through the remainder of their terms, and that any new contracts are consistent with the commitments of Condition 13;
 - iv. Maintenance of separate emergency room services, inpatient general medicine services, cardiology services, inpatient obstetrics/gynecology services, inpatient behavioral health services, critical care unit services and oncology services;
 - v. No change in the service provision plan

Please find enclosed a status report addressing these required elements.

If you should have any questions, please feel free to give me a call directly at 203-739-4903 or e-mail me at sally.herlihy@wchn.org.

Sincerely,

Sally F. Herlihy

Sally F. Herlihy, FACHE
Vice President, Planning

Condition #16 Response:

- a. **A written report describing the achievement of the Strategic Plan components** to retain and enhance healthcare services in the Danbury, Norwalk and Sharon Hospital communities, including with respect to physician recruitment and resource commitments for clinical service programming.

The Nuvance Health Strategic Plan was endorsed by the Nuvance Health Board of Directors on March 9, 2020. The Plan has been submitted in Response to Condition 14 of the Agreed Settlement. No achievements have been realized to-date.

- b. **A written report on its activities** directed at meeting condition 4, **regarding efforts toward making culturally and linguistically appropriate service available and integrated throughout the Hospital's operations.**

The Nuvance Health hospitals are guided by The Joint Commission (TJC) Hospital Standards and Elements of Performance. The National CLAS Standards can be directly cross-walked to the standards and elements of performance that TJC Hospitals follow. This cross-walk, published by TJC, is available online [here](#). The hospitals have no TJC survey deficiencies in the area of CLAS or noted deficiencies from the independent monitor's onsite review in October 2019.

Additionally, Nuvance Health is working to move to one standardized, easy-to-use platform for culturally and linguistically appropriate interpretation service. An internal committee has been tasked with reviewing current language and ASL interpretation services in an effort to select one vendor that can meet the current needs across the system. Any changes to the current policies will be shared with OHS 30-days prior to implementation.

There have been no changes to the insurance navigation services. Danbury Hospital and Norwalk Hospital have bilingual financial counselors, as well as materials regarding applying for financial assistance in English, Spanish and Portuguese. Sharon Hospital continues to use Quality Billing Services (QBS) for their insurance navigation services. QBS has bilingual financial counselors on staff and Sharon Hospital provides all patient financial assistance paperwork in English and Spanish. All hospitals utilize interpretation services when needed.

Finally, a key module of Nuvance Health's online Mandatory Annual Training are the Anti-Harassment and Anti-Discrimination Modules which reflect our commitment to Diversity & Inclusion our HR policies, Reason for Being Values as well as the states of Connecticut and New York's regulatory language and requirements. The Mandatory Annual Training offers "Proctor Sessions" for employees delivered by Nuvance Health Subject Matter Experts. Employees whose first language is other than English found these helpful, focusing on translation and explanation of legal, regulatory and other clinical descriptions in order to complete the online modules which include quizzes and other knowledge summary requirements.

- c. An updated plan demonstrating how health care services are currently provided and will be provided by Danbury, Norwalk and Sharon Hospital for the first five (5) years following the Closing, including any consolidation, reduction or elimination of existing services/group practices or introduction of new services/ group practices (the “Services Plan”).

There have been no changes to the Services Plan for Danbury, Norwalk and Sharon Hospital. Sharon’s previously reported construction to add 5 additional behavioral health beds was completed in Fall 2019.

HOSPITAL SERVICE PLAN FOR FIRST THREE FISCAL YEARS
(Please note hours may be temporarily adjusted today due to COVID-19)

Service Category	# of Available Inpatient Beds	Address of Service	Hours of Operation	Consolidating	Reducing	Eliminating	Expanding	Adding New Service
Inpatient (list existing & planned)								
DANBURY HOSPITAL								
Danbury/New Milford Adult/Peds Med/Surg	317	24 Hospital Avenue, Danbury, CT and 21 Elm Street, New Milford CT 06776	24/7					
Danbury ICU/Progressive Care	52							
Danbury Maternity	32							
Danbury NICU	19							
Danbury Psych	22							
Danbury Rehab	14							
NORWALK HOSPITAL								
Norwalk Adult/Peds Med/Surg	248	34 Maple Street, Norwalk, CT	24/7					
Norwalk ICU/CCU/Telemetry	52							
Norwalk Maternity	27							
Norwalk NICU	18							
Norwalk Psych	21							
SHARON HOSPITAL								
Sharon Med/Surg	44	50 Hospital Hill Rd, Sharon, CT	24/7					
Sharon ICU	9							
Sharon Maternity	8							
Sharon Psych	17						X	

Service Category	Address of Service	Hours of Operation	Consolidating	Reducing	Eliminating	Expanding	Adding New Service
Outpatient (list existing & planned)							
DANBURY HOSPITAL							
Danbury/New Milford Therapies (e.g. Nutrition, Chemo, Infusion, etc.)	24 Hospital Avenue Danbury, CT	Varies by program					
	21 Elm Street New Milford, CT	Varies by program					
Danbury Hospital Medical Arts Center (e.g. Cardiovascular and Gastroenterology, etc.)	111 Osborne Street Danbury, CT	Varies by specialty					
Lab Service Center	120 Park Lane Road New Milford, CT	M-F 7am-4pm					
	79 Sand Pit Road Danbury CT	M-Sat variable					
	60 Old New Milford Road Brookfield, CT	M-F 7:30am-4pm					
	10 South Street Ridgefield, CT	M-F 7:30am-4pm					
	22 Old Waterbury Road Southbury, CT	M-F 7:30am-4pm					
Diagnostic Imaging	20 Germantown Road Danbury, CT	Varies by modality					
	901 Ethan Allen Highway Ridgefield, CT	Varies by modality					
Cardiac Rehab	24 Hospital Avenue Danbury, CT	M-F 6:30am-7:15pm					
	21 Elm Street New Milford, CT	M-Sat variable					
Rehab and Physical Therapy	235 Main Street Danbury, CT	M-F variable					
	22 Old Waterbury Road Southbury, CT	M-F variable					
Sleep Center	21 Lake Avenue Extension Danbury CT	M-F variable					
	24 Elm Street New Milford, CT	M-F variable					
Ambulatory Surgery	24 Hospital Avenue Danbury, CT	M-F					
	901 Ethan Allen Highway Ridgefield, CT	M-F					
Wound Care	24 Hospital Avenue Danbury, CT	M-F 8am-5pm					
	21 Elm Street New Milford, CT	Tue 1-5pm					

Service Category	Address of Service	Hours of Operation	Consolidating	Reducing	Eliminating	Expanding	Adding New Service
NORWALK HOSPITAL							
Norwalk Therapies (e.g. Nutrition, Chemo, Infusion, etc.)	34 Maple Street Norwalk, CT	Varies by program					
Norwalk Cardiovascular Center	34 Maple Street Norwalk, CT	9:15am-2:45pm					
Lab Service Center	40 Cross Street Norwalk, CT	M-F 7:30am-4pm					
	333 Post Road West Westport, CT	M-F 8:30am-4:45pm					
Norwalk Radiology	148 East Avenue Norwalk, CT	Varies by specialty					
Norwalk Rehab and Physical Therapy	520 West Avenue Norwalk, CT	M-F variable					
	45 Grove Street New Canaan, CT	M-F 8am-4:30pm					
Norwalk Sleep Center	520 West Avenue Norwalk, CT	M-F 9am-5pm					
Norwalk Wound Care	34 Maple Street Norwalk, CT	8am-4:30pm					
Sharon Hospital							
Sharon Therapies (e.g. Rehab, Nutrition, Respiratory, etc.)	50 Hospital Hill Rd Sharon, CT	Varies by program					
Sharon Radiology	50 Hospital Hill Rd Sharon, CT	MRI M-F 8a- 4 or 6p Diagnostic and CT 24/7					
Sharon Wound Care	50 Hospital Hill Rd Sharon, CT	Varies					
Sharon Pain Management	50 Hospital Hill Rd Sharon, CT	Once a week (Friday 8a – 5p)					
Sharon Cardiology	50 Hospital Hill Rd Sharon, CT	Varies					
General/Orthopedic Surgery	50 Hospital Hill Rd Sharon, CT	M-F 8a – 5p					



May 29, 2020

I am writing on behalf of Nuvance Health and its subsidiaries Vassar Health Connecticut, Inc. d/b/a Sharon Hospital, The Danbury Hospital and The Norwalk Hospital Association, to make attestations as required in Condition 16(d) of the Agreed Settlement dated April 1, 2019 with the Department of Public Health Office of Health Care Access, regarding the transfer of Western Connecticut Health Network, Inc. and Health Quest Systems, Inc. to a New Not-for-Profit Parent Corporation (Nuvance Health), under docket number 18-32238-CON.

As agent/representative of Nuvance Health, I affirm the following regarding Condition number 16(d) to the Agreed Settlement:

- i. Nuvance Health is meeting the obligations of Conditions 1-2.
- ii. No Danbury, Norwalk or Sharon Hospital physician office has been converted to hospital-based status.
- iii. All Danbury, Norwalk and Sharon Hospital commercial health plan contracts in place as of the Date of Closing are/were maintained through the remainder of their terms, and that any new contracts are consistent with the commitments of Condition 13.
- iv. Danbury, Norwalk and Sharon Hospital have each continued to maintain separate emergency room services, inpatient general medicine services, cardiology services, inpatient obstetrics/gynecology services, inpatient behavioral health services, critical care unit services and oncology services, such services shall assure patient affordability and adhere to standards of care, quality, and accessibility and reflect local community need.
- v. There has been no change in the service provision plan submitted on pages 66-69 of "Repaginated Exhibit A 18-32238-CON WCHN HQ Affiliation."

Dated: May 29, 2020

Signed: 
Name: Kerry Eaton
Title: Chief Operating Officer

Sworn to before me this 29 day of May, 2020

Name: Virginia Marie DeLillo

Notary Public

Virginia Marie DeLillo
Notary Public, State of New York
No. 01DE6136954
Qualified in Ulster County
Term Expires November 14, 2021