



December 8, 2014

Kimberly R. Martone, Director of Operations
Office of Health Care Access, 410 Capitol Avenue
Hartford, CT 06134

Re: Commentary on Proposed Final Decision, OHCA Docket No. 13-31838-486, Greater Waterbury Health System, Inc. and Vanguard Health Systems, Inc., Dec. 1, 2014 and AG decision OAG-13-486-01

Dear Ms. Martone:

The National Physicians Alliance appreciates important provisions that the State of Connecticut has attached to the merger of St. Mary's Hospital and Waterbury Hospital under the auspices of Tenet Healthcare. We believe these provisions will help to ensure access, equity and quality for the many patients served in the catchment area of these hospitals.

On October 24, 2014, the NPA-CT submitted testimony to the Attorney General on behalf of our patients outlining three areas that are critical to maintaining individual and public health not just within the greater Waterbury area but in our state and nation generally. These include maintaining access, ensuring transparency, and limiting cost increase while providing high quality, safe, patient-centric care. There are several pieces of the proposed merger approval which we feel support these aims, namely:

- Implementation of a Community Advisory Board
- Maintaining staffing levels and continued recruitment of new staff, with reported changes being transparent and publicly accessible
- Provisions to continue providing essential services and departments for at least 7 years after the merger occurs
- Required reporting on cost-saving and other high value care principles
- Ongoing community need assessments and continued community involvement and town-hall meetings
- Provisions to ensure improved access to care and to accept patients regardless of ability to pay

We appreciate these and the inclusion of other provisions and hope that this spirit of healthcare transformation continues to resonate throughout the ongoing process.

Sincerely,

Alicia Dodson, MD, FAAP
Steering Committee Chair
National Physicians Alliance-CT

Douglas P. Olson, MD, FACP
Immediate-Past Chair, Steering Committee
National Physicians Alliance-CT