



## Office of Health Care Access Certificate of Need Application

### Final Decision

**Applicant:** Khmer Health Advocates

**Docket Number:** 01-901

**Project Title:** Establish Licensed Psychiatric Outpatient Clinics for Adults and Substance Abuse Outpatient Treatment Programs in West Hartford and Danbury

**Statutory Reference:** Section 19a-638, Connecticut General Statutes

**Filing Date:** June 15, 2001

**Hearing Date:** Not Applicable

**Decision Date:** July 2, 2001

**Default Date:** September 13, 2001

**Staff:** Kim Martone

**Project Description:** Khmer Health Advocates (“Applicant”) proposes to establish two licensed psychiatric outpatient clinics for adults and two licensed substance abuse outpatient treatment programs at 29 Shadow Lane in West Hartford and 325 Main Street in Danbury, Connecticut, with no associated capital expenditure.

**Nature of Proceeding:** On June 15, 2001, the Office of Health Care Access (“OHCA”) received the Applicant’s Certificate of Need (“CON”) application seeking authorization to establish two licensed psychiatric outpatient clinics for adults and two licensed substance abuse outpatient treatment programs to be located at 29 Shadow Lane in West Hartford and 325 Main Street in Danbury, Connecticut, 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.”).

OHCA’s authority to review and approve, modify or deny this 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**

#### **Contribution of the Proposal to the Quality and Accessibility of Health Care Delivery in the Region Impact on the Applicant’s Current Utilization Statistics**

1. Khmer Health Advocates (“Applicant”) is a non-profit corporation incorporated in 1982 with a mission to provide health services for Cambodian refugees who are victims of torture and survivors of genocide. (*CON Application, pages 4&7*)
2. The Applicant currently provides trauma evaluations; psychiatric evaluations; individual, family and group therapy; psychopharmacology; coordination of medical services; health education; alcohol and drug prevention program; and support services. (*CON Application, pages 7&9*)
3. These services are provided at the Applicant’s existing outpatient clinics located at the Association of Religious Communities (“ARC”) office at 325 Main Street in Danbury and at the Applicant’s office on 29 Shadow Lane in West Hartford. These services are offered every other week in Danbury and weekly in West Hartford. (*CON Application, pages 7&9*)
4. The Applicant seeks licensure of its existing outpatient psychiatric and substance abuse clinics at the above offices in West Hartford and Danbury, Connecticut. (*CON Application, page 8*)
5. The Applicant provided mental health services for more than 120 torture survivors. However, due to reductions in funding, the Applicant is currently serving only 60 people at the clinics in Danbury and West Hartford. The Applicant is projecting to serve 150 patients with the proposal. (*CON Application, page 8*)
6. The Applicant currently receives one (1) referral per week. However, only emergency cases are being accepted due to limited funding. The Applicant receives referrals from ARC in Danbury, the Cambodian Buddhist Temple, and several school systems. (*CON Application, pages 8&9*)

7. The need for the proposed outpatient psychiatric and substance abuse clinics for Cambodian torture victims is based on the following:
  - Historical and current volume
  - Increased accessibility
  - Reduction in rate of disabilities and consequences of violence
  - Lack of Khmer speaking providers

*(Letter of Intent received on February 15, 2001, Project Description, and CON Application, pages 7&8)*
8. The Applicant's proposal will increase access for the Cambodian torture victims by providing appropriate services for conditions associated with massive trauma.  
*(Letter of Intent received on February 15, 2001, Project Description)*
9. The Applicant is the only torture treatment program in CT and one of two programs that has the capacity to treat Khmer speaking patients. Asian Family is the other program that treats Southeast Asian patients. *(Letter of Intent received on February 15, 2001, Project Description)*
10. The proposed services will be provided by a psychiatrist, Khmer speaking therapist, and psychiatric nurse specialist. Each member of this mental health team has between 18-22 years of experience caring for Cambodian torture victims. *(Letter of Intent received on February 15, 2001, Project Description)*
11. The hours of operation are Monday through Friday, 9:00 a.m. to 5:00 p.m. The Applicant's patients are given access to the mental health team 24 hours a day, 7 days a week. *(CON Application, page 9)*

**Financial Feasibility of the Proposal and its Impact on the Applicant's Rates and  
Financial Condition  
Rates Sufficient to Cover Proposed Capital and Operating Costs  
Impact of the Proposal on the Interests of Consumers of Health Care Services and  
Payers for Such Services**

12. There is no associated capital expenditure with this proposal. *(CON Application, pages 29&30)*
13. The Applicant currently receives funding from the United Nations Voluntary Fund for Victims of Torture, as well as in-kind donations of service from the mental health team. Additional funding is being sought by the Applicant from The Office of Refugee Resettlement. *(Letter of Intent received on February 15, 2001, Project Description, and CON Application, page 6)*
14. The Applicant projects revenues to equal expenses for the first three years of operation of the outpatient mental health clinic and substance abuse treatment program, based on projected grant funding. *(CON Application, page 6)*

15. The Applicant's current payer mix is 98% Free Care. The Applicant is projecting a decline in Free Care to 83%, 80%, and 70% for the first three years of operation. The projected payer mix also includes government reimbursement between 12% and 22% and commercial payments between 4% and 8% over the same time period. *(CON Application, page 5)*
16. The Applicant's rates are sufficient to cover the operating costs with the proposal. *(CON Application, page 32)*

## **Consideration of Other 19a-637, C.G.S. Principles and Guidelines**

The following findings are made pursuant to other principles and guidelines set forth in Section 19a-637, C.G.S.:

17. There is no State Health Plan in existence at this time. *(CON Application, page 2)*
18. The Applicant has adduced evidence that this proposal is consistent with the Applicant's long-range plan. *(CON Application, page 2)*
19. The Applicant has improved productivity and contained costs through application of technology. Funding of the Applicant's proposal will allow the Applicant to collect and analyze data on a routine basis. *(CON Application, pages 3&9)*
20. The Applicant's proposal will allow the Applicant to develop an internship program and provide training for physicians and therapists. *(CON Application, page 9)*
21. The distinguishing characteristic of the Applicant's patient/physician mix is that the Applicant serves Cambodian torture victims who have co-occurring psychiatric and substance abuse problems. *(CON Application, pages 4&7)*
22. The Applicant has sufficient technical, financial and managerial competence to provide efficient and adequate services to the public. *(CON Application, pages 14-21)*

## **Rationale**

The need for the proposal is mainly based on the historical and current number of Cambodian torture victims receiving mental health and substance abuse services at the existing clinics in West Hartford and Danbury. The Applicant currently provides trauma evaluations; psychiatric evaluations; individual, family and group therapy; psychopharmacology; coordination of medical services; health education; alcohol and drug prevention program; and support services. These services are provided at the existing outpatient clinics located at the ARC office on Main Street in Danbury and at the Applicant's office on 29 Shadow Lane in West Hartford. These services are offered every other week in Danbury and weekly in West Hartford. The Applicant seeks

licensure of the two existing outpatient clinics at the above offices in Danbury and West Hartford. The Applicant provided mental health services for more than 120 torture survivors. However, due to reductions in funding, the Applicant is currently serving only 60 people at the clinics in Danbury and West Hartford. The Applicant is projecting to serve 150 patients with the proposal. The Applicant currently receives one (1) referral per week. However, only emergency cases are being accepted due to limited funding. The Applicant receives referrals from ARC in Danbury, the Cambodian Buddhist Temple, and several school systems.

The Applicant's proposal will increase access to care for the Cambodian torture victims by providing appropriate services for conditions associated with massive trauma. The proposed licensed outpatient clinics in Danbury and West Hartford will also reduce the rate of disabilities and consequences of violence for these torture victims. The Applicant is the only torture treatment program in CT and one of two programs that has the capacity to treat Khmer speaking patients. A psychiatrist, Khmer speaking therapist, and psychiatric nurse specialist will provide the proposed services. Each member of this mental health team has between 18-22 years of experience caring for Cambodian torture victims. The proposal will contribute in a favorable way to the quality and accessibility of health care delivery in the region.

The proposal is financially feasible. There is no associated capital expenditure with the proposal. The Applicant currently receives funding from the United Nations Voluntary Fund for Victims of Torture, as well as in-kind donations of service from the mental health team. Additional funding is being sought by the Applicant from The Office of Refugee Resettlement. The Applicant projects revenues to equal expenses for the first three years of operation of the two licensed outpatient clinics, based on projected grant funding. The Applicant's current payer mix is 98% Free Care. The Applicant is projecting a decline in Free Care to 83%, 80%, and 70% for the first three years of operation. The projected payer mix also includes government reimbursement between 12% and 22% and commercial payments between 4% and 8% over the same time period. Given the current and projected volume of patients and additional grant funding, the Applicant's financial projections appear to be both reasonable and achievable.

Based upon the foregoing Findings of Fact and Rationale the Certificate of Need application of Khmer Health Advocates to establish two licensed psychiatric outpatient clinics for adults and two licensed substance abuse outpatient treatment programs at 29 Shadow Lane in West Hartford and 325 Main Street in Danbury, Connecticut, with no associated capital expenditure, is hereby GRANTED.

## ORDER

Khmer Health Advocates is hereby authorized to establish two licensed psychiatric outpatient clinics for adults and two licensed substance abuse outpatient treatment programs at 29 Shadow Lane in West Hartford and 325 Main Street in Danbury, Connecticut, with no associated capital expenditure.

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

\_\_\_\_\_  
Date

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Raymond J. Gorman  
Commissioner

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