



STATE OF CONNECTICUT
OFFICE OF HEALTH CARE ACCESS

M. JODI RELL
GOVERNOR

CRISTINE A. VOGEL
COMMISSIONER

July 23, 2009

VIA FACSIMILE ONLY

Kevin Kinsella
Vice President
Hartford Hospital
80 Seymour Street
Hartford, CT 06102-5037

Rita Parisi
Chief Executive Officer
Eastern Rehabilitation Network
181 Patricia M. Genova Drive
Newington, CT 06111

Re: Certificate of Need Determination Request; Report Number: 09-31378-DTR
Provision of Physical Therapy and Rehabilitation Services by Eastern Rehabilitation
Network and Hartford Hospital

Dear Mr. Kinsella and Ms. Parisi:

The Office of Health Care Access ("OHCA") is in receipt of your request for a CON Determination Report regarding the transfer of physical therapy and rehabilitation services from the Eastern Rehabilitation Network to Hartford Hospital. Upon review of the information contained in the request, OHCA finds the following:

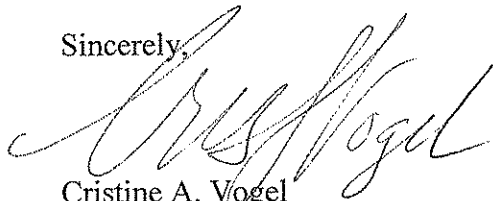
1. Eastern Rehabilitation Network ("ERN") and Hartford Hospital ("Hospital"), collectively identified as the Applicants, are subsidiaries of Hartford Healthcare Corporation.
2. ERN provides physical therapy and rehabilitation services at numerous sites throughout Connecticut. The Hospital is an acute care, general hospital located at 80 Seymour Street in Hartford.
3. The Hospital currently provides inpatient rehabilitation services, including physical therapy, occupational therapy, speech language pathology and health and wellness programs to patients at its Hartford campus.
4. Both the Hospital and ERN provide outpatient physical therapy, occupational therapy, and speech language pathology at thirteen locations across northern and central Connecticut.
5. Currently, patients treated at the thirteen locations who are insured by Anthem are registered to and treated by the Hospital under a management agreement with ERN. All other individuals treated at these sites are patients of ERN.

6. The Hospital currently contracts with ERN to provide treatment to patients at the thirteen locations. Clinical staff are employed by ERN and leased from ERN by the Hospital.
7. The Hospital proposes to transfer all rehabilitation services under the Hospital. All patients would be registered to the Hospital and all billing would be under the Hospital's tax identification number.
8. The patients will continue to receive treatment from the same licensed therapists and at the same thirteen locations.
9. As a result of CMS regulations, the therapists will become employees of the Hospital; however, ERN will continue to exist as a legal entity and will continue to provide management and clinical oversight of all rehabilitation services under a contract between Hartford Hospital and ERN.
10. The ownership of ERN will not change as a result of this proposal. Hartford Healthcare Corporation is the sole member of ERN and ERN membership will not change as a result of the proposal.
11. The proposal will not result in any change to the type of services provided, the location of the existing service sites or the therapists providing the service.
12. There is no capital expenditure associated with the proposal.

Based on the above findings, OHCA has determined that the proposed service transfer of physical therapy and rehabilitation services from the Eastern Rehabilitation Network to Hartford Hospital will not result in a change to the delivery of health care services provided nor will it result in a change in the ownership of either of the Applicants. Additionally, there is no capital expenditure associated with the proposal. Therefore, a CON is not required pursuant to General Statutes §§ 19a-638 and 19a-639.

Thank you for providing information to OHCA regarding this proposal. If you have any questions concerning this letter, please contact Melanie Dillon, OHCA Staff Attorney, at (860) 418-7060.

Sincerely,



Cristine A. Vogel
Commissioner