

STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
*Office of Health Care Access*

October 30, 2013

Sent by Fax and Email

Ms. Nancy Rosenthal  
Senior Vice President - Health Systems Development  
Department of Planning & Business Development  
Yale New Haven Hospital  
2 Howe Street  
New Haven, CT 06510

RE: Removal of "Smiles to Go" Dental Mobile Van from the Hospital license

Dear Ms. Rosenthal:

It has come to the attention of the Office of Health Care Access ("OHCA") that Yale-New Haven Hospital ("Hospital") recently made a change to its hospital license by removing the satellite dental mobile van called "Smiles to Go" effective October 3, 2013. In order for OHCA to determine whether the removal of this satellite service location is a termination of service requiring OHCA authorization pursuant to General Statute §19a-638(a)(4), please respond to the following questions.

1. Fully describe the removal of this mobile dental van service from the Hospital's license. List the specific services that were provided by this mobile van.
2. If the van itself was decommissioned but the mobile dental services continue, in full, please describe how and where these services continue to be offered. How are mobile dental services now provided to the Hospital's patient population and in what specific manner (new van, relocated headquarters, new service provider, etc.)?
3. Has any service line or cost center been discontinued as a result of this action?
4. Previous to the change to the licensed satellite, did Yale-New Haven Hospital record all associated utilization, revenues, expenses and reimbursement for this service as a hospital service on its books? If not, please identify what legal entity recorded volumes, revenues, expenses and reimbursement.
5. Subsequent to the change to the licensed satellite, does Yale-New Haven Hospital continue to record all mobile dental services as hospital services on its books? If not, please identify what legal entity now records volumes, revenues, expenses and reimbursement on its books.
6. Does this change result in any reduced availability of the mobile dental services (hours of operation, staffing, etc.)? If so, please discuss.

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7. Please indicate how the hospital has provided necessary information to the patient population it serves and where those patients must now seek comparable services. If any services have been discontinued, how is the Hospital following up with patients to determine on-going patient service needs and issues if service changes have occurred?

Please provide a response to the above OHCA inquiry by November 25, 2013. Please contact me at 860-418-7041 if you have any questions on the above.

Sincerely,

A handwritten signature in cursive script that reads "Karen Roberts".

Karen Roberts  
Principal Health Care Analyst

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
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TRANSMISSION OK

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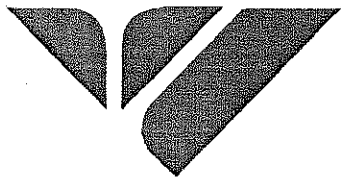
STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
OFFICE OF HEALTH CARE ACCESS

FAX SHEET

TO: NANCY ROSE JTHAL  
FAX: (203) 863-4736  
AGENCY: YALE-NEW HAVEN HOSPITAL  
FROM: KAREN ROBERTS  
DATE: 10/30/13 TIME: \_\_\_\_\_  
NUMBER OF PAGES: 3  
*(including transmittal sheet)*

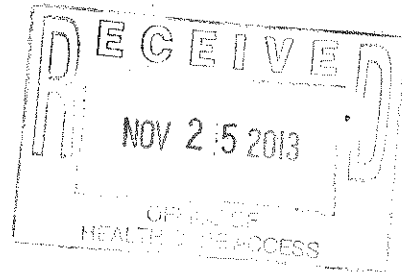
Comments:

*PLEASE PHONE IF THERE ARE ANY TRANSMISSION PROBLEMS.*



# YALE NEW HAVEN HEALTH

Planning  
2 Howe Street, 3<sup>rd</sup> Floor  
New Haven, CT 06519  
Phone: (203) 688-2609  
Fax: (203) 688-5013



## Fax Transmission Sheet

**ATTN.: Karen Roberts**  
**Principal Health Care Analyst OHCA**

**From: Nancy Rosenthal**  
**Phone: 203-863-3908**

**OHCA Fax: (860) 418-7053**

**Date: November 25, 2013**

**K. Roberts' Phone: (860) 418-7041**

**Pages: 11 including cover sheet**

**Re: Removal of the "Smiles to Go" Dental Mobile Van  
from the Hospital License**

**CC:**

Urgent     For Review     Please Comment     Please Reply     Please Recycle

**•Comments: see attachments**

Please call to confirm receipt of this fax.

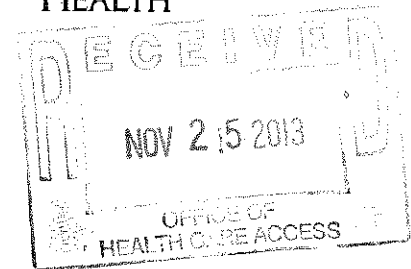
Thank you, Rose Arminio, 203-688-2609

November 25, 2013

Karen Roberts  
Principal Health Care Analyst  
Office of Health Care Access  
410 Capital Avenue, MS #13HCA  
P.O. Box 340308  
Hartford, CT 06134



YALE NEW HAVEN  
HEALTH



RE: Removal of the "Smiles to Go" Dental Mobile Van from the Hospital License

Dear Ms. Roberts:

As requested per your letter dated October 30, 2013, Yale-New Haven Hospital (Y-NHH) submits the following information regarding a change made to its hospital license removing the satellite dental mobile van called "Smiles to Go".

1. *Fully describe the removal of this mobile dental van service from the Hospital's license. List the specific services that were provided by this mobile van.*

Response: The "Smiles to Go" mobile dental van (a 60+ foot tractor trailer) was retired in June, 2013 due to age, the cost of servicing the vehicle, and the inability to travel reliably to the sites to be served. This van provided screening, preventative and simple restorative dental services at elementary and middle schools and community locations. At the time the request was made to remove the van from the license, the van was ending its school year of service. Historically, the van did not provide service during the summer months to any locations other than two high risk residential locations (Boys and Girls Village in Milford and the Children's Center of Hamden). Staff continued to deliver mobile dental equipment to these two sites in an effort to maintain continuity of care.

2. *If the van itself was decommissioned but the mobile dental services continue, in full, please describe how and where these services continue to be offered. How are mobile dental services now provided to the Hospital's patient population and in what specific manner (new van, relocated headquarters, new service provider, etc.?)*

Response: When the mobile dental van was decommissioned in June of 2013, and the Y-NHH license was revised to eliminate a reference to this van in early October, 2013, Y-NHH believed that it could continue providing high-quality mobile dental services to certain high-risk sites by utilizing mobile equipment, and that children at other sites would be better served with a different method of delivering dental care. Y-NHH had determined that replacing the aged dental van was not financially feasible, nor did the delivering of dental services through the van provide optimal, continuous high quality dental services to the children it served.

789 Howard Avenue  
New Haven, CT 06519

Y-NHH made significant preparations for the change from the van to a different method of dental services. With respect to those sites where it was determined that a fixed site would provide greater continuity of dental care, school nurses were contacted after the summer recess, 2013. It was explained that the van is no longer available to visit the schools and that children should be referred to the Y-NHH Dental Center in Hamden or the Long Wharf Dental Center sites for uninterrupted service. In addition to the school nurse notification, Y-NHH plans to send a letter to parents explaining how to obtain dental services at these dental service locations. Hospital social workers are arranging transportation for those who qualify and are in need of such service. The Long Wharf Dental Center is located on a city bus route, Both sites offer free parking and are open during normal business hours. All dental van patient records are readily accessible to dentists and staff at either location.

The provision of mobile dental services to the high risk locations continued during and after the summer recess. Staff used mobile equipment and their own vehicles to deliver dental care at these sites. Due to recent abrupt and unanticipated staffing changes (medical leave for the hygienist who provided the service and resignation of other key staff), which occurred after Y-NHH removed the dental van from its license, Y-NHH has determined that further changes in the delivery method at the high risk sites are required. Y-NHH has also learned that delivery of the mobile equipment to the sites was not an optimal service as the equipment is very heavy and cumbersome and provides only limited services. Y-NHH has collaborated with the medical personnel at the high risk locations, and, going forward, the facilities will coordinate transportation to the Y-NHH Dental Center in Hamden. Y-NHH has granted exclusive dental block time for all these children; the Center will be closed to all other patients when these sessions are in process. Some of these at-risk children are wards of the state and are required to be seen by a dentist within a set time of arrival at their residential community.

The Y-NHH Dental Center in Hamden and Long Wharf Dental Center in New Haven, provide expanded services – screening, prophylaxis and additionally, full restorative care—as opposed to the limitations necessitated by a mobile service. Children can be treated in one visit within a comprehensive and fully staffed facility. Children are assigned a “dental home” (see Attachment A) as part of their primary dental care, they are scheduled for regular visits and their parents may attend the appointment with them. Since the dental van visited each school no more than twice a school year, only episodic care could be provided. For those children that needed to receive more extensive service, prolonged treatment would ensue due to the gaps of time between van visits. Children associated dental care with a van coming to their schools rather than receiving dental care by a dentist at an established location. All of the children seen at the schools are Husky insured, and the change in service delivery from a mobile van to more expanded services at a fixed site will not result in any financial burden for parents.

By way of background, the Smiles 2 Go van originated in 1998 at the Hospital of Saint Raphael. At that time, the Hospital received a determination from OHCA that this mobile van service did not need a CON as OHCA considered it part of the Hospital’s dental outpatient services program (see Attachment B). All services that were provided via the dental van, and other expanded services, continue to be provided at one of the fixed outpatient dental sites within the patients’ community and in the same town that

care was provided by the mobile unit. The van is only one of many extensive outreach dental services that Y-NHH provides to its community.

Patients from the ACES sites continue to receive outpatient dental services at the Long Wharf location, as many of these special needs children require sedation to obtain necessary dental care. Changes to the dental van service does not affect the current outreach screening services provided to Head Start pre-school programs throughout the greater New Haven region. Ongoing dental education continues to be provided at sites previously served by the mobile dental van. Y-NHH continues to provide preventative outreach at these sites along with literature, toothbrushes, dental floss and toothpaste. These visits have been well-received by school officials including principals, school nurses, parents and children. Parents are encouraged to schedule appointments and visit the Hamden and Long Wharf locations for comprehensive care and follow-up services.

3. *Has any service line or cost center been discontinued as a result of this action?*

Response: No service line or cost center has been discontinued as a result of this action. The cost center that included the van also includes all mobile dental and outreach services – primarily educational services and teaching tools such as toothbrushes and toothpaste, which continue to be provided by Y-NHH as discussed above.

4. *Previous to the change to the licensed satellite, did Yale-New Haven Hospital record all associated utilization, revenues, expenses and reimbursement for this service as a hospital service on its books? If not, please identify what legal entity recorded volumes, revenues, expenses and reimbursement.*

Response: Yes, prior to the change to the licensed satellite, Y-NHH recorded all associated utilization, revenues, expenses and reimbursement for the dental van service, and other outreach dental services on its books. Prior to September 12, 2012, the dental van was recorded as a service of the Hospital of Saint Raphael (HSR). After September 12, 2012, when Y-NHH acquired HSR, Y-NHH has recorded this service on its books.

5. *Subsequent to the change to the licensed satellite, does Yale-New Haven Hospital continue to record all mobile dental services as hospital services on its books? If not, please identify what legal entity now records volumes, revenues, expenses and reimbursement on its books.*

Response: Yes, subsequent to the change to the licensed satellite, Y-NHH continues to record all dental outreach services as hospital services on its books. Although these services are no longer offered via a mobile dental van, Y-NHH continues to offer dental outreach services recorded in the same cost center.

6. *Does this change result in any reduced availability of the mobile dental services (hours of operation, staffing, etc.)? If so, please discuss.*

Response: Decommissioning of the dental van did not result in reduced availability of dental services; staff continued to offer dental outreach with mobile dental equipment at select locations and others were directed to fixed site dental services. Due to unexpected staffing issues occurring after the Smiles 2 Go van was removed from the license, as

described above, Y-NHH has taken expedited steps to ensure continuity of dental care to the high risk children in the community.

As part of the review and planning necessitated by these sudden staffing changes, Y-NHH clinicians and management determined that mobile dental services does not provide the level of quality and continuity of dental care that children need at this time of their growth and development. This assessment has resulted in replacing the mobile service (whether delivered by a van or by staff utilizing mobile dental equipment) by integrating the school and community populations into a dental home model of outpatient care at sites in Hamden and Long Wharf. The parent of any child seen by the mobile service may now schedule an appointment at any of Y-NHH's outpatient sites to assure uninterrupted treatment. The result is a higher quality program and improvements in the availability of extensive, state-of-the-art outpatient screening, preventative and restorative dental care services to the school age population.

As noted earlier, Hospital social workers are arranging transportation for those who qualify and are in need of such service and the Long Wharf center is located on a city bus route.

7. *Please indicate how the Hospital has provided necessary information to the patient population it serves and where those patients must now seek comparable services. If any services have been discontinued, how is the Hospital following up with patients to determine on-going patient service needs and issues if service changes have recurred?*

Response: Management has been in close telephone contact with all sites served. Y-NHH has coordinated care of the high risk population (Boys and Girls Village in Milford and the Children's Center of Hamden) by offering exclusive dental sessions at its site in Hamden. ACES children located in North Haven and Hamden continue to receive services at the Long Wharf location due to their special needs. Y-NHH has been in communication with the school nurses at the non-high risk schools and instructed them to refer any child with dental needs to the Hamden and Long Wharf locations. Y-NHH will be sending a letter to parents shortly instructing them how to schedule their children for dental services at one of the fixed sites. Dental outreach education continues to be provided to children in their schools and community sites on an on-going basis.

As mentioned previously, Y-NHH will continue to provide all screening, preventative and restorative services to children served by the mobile dental service at any of its pediatric dental outpatient locations. All patient dental records of those who utilized the van service are readily available at either the Hamden or Long Wharf sites. Care will be provided via the dental home model to promote continuity of care with state-of-the-art equipment and appropriate staffing.

The Fair Haven Community Health Center approached Y-NHH about purchasing the Smiles 2 Go van. Although the Smiles 2 Go van's mechanical problems and maintenance needs means that it no longer can travel the distances it once was required to travel to service all the mobile sites, it can travel short distances within the Fair Haven Community Health Center's neighborhood. This transaction is in process and may or may not be realized. If it is realized, it will provide another means to help ensure access



to dental services in the community. Y-NHH will notify OHCA of any future changes in this program.

### Summary

At the time that a request was submitted to remove the van from the Hospital's license, mobile dental and outpatient dental services continued to be provided to all high risk children who had previously received services via the Smiles 2 Go van. In addition, school nurses at other sites which had been visited by the van, were asked to direct children/families to the Y-NHH Hamden and Long Wharf outpatient dental sites. As no CON was required to initiate the Smiles 2 Go van, Y-NHH believed in good faith that no CON was necessary to simply move to a different method of delivering mobile dental care. The change in service venue of dental services to the high risk sites was brought about by abrupt and unanticipated staffing changes. Management and clinicians have identified a number of ways to improve the service provided to the patients served. The changes discussed within this document unequivocally provide a higher level of quality care, in a safer environment and offer to each child consistent and continuous care within a dental home model as opposed to episodic mobile dental care. Parents can attend scheduled dental appointments with the children, at sites that house a full complement of appropriate staff and equipment, which will assist in reducing fear and anxiety often experienced by children. High risk children will continue to be seen in exclusive sessions at the Y-NHH Dental Center in Hamden or in the case of the ACES children, at Long Wharf. All outreach dental educational services continue to be provided within the community.

As noted, in 1998, the Hospital of Saint Raphael received a determination that the Smiles To Go van did not need a CON as it was considered part of the dental outpatient services program (see Attachment B). Outpatient dental services at Y-NHH have expanded dramatically since 1998 and the extensive offerings and individual dental attention received at its various outpatient locations exceed the service than could be provided by a mobile service, particularly a mobile service in an outdated and mechanically unreliable van.

If OHCA considers that this change in the dental service delivery model implicates any CON requirements, please consider this a request for a determination.

If you have any further questions, please let contact me at (203) 863-3908.

Sincerely,



Nancy Rosenthal  
Senior Vice President – Health System Development

cc: Jennifer Willcox, Esq.

\*Enclosures

## **ATTACHMENTS**

A. Dental Home Article

B. CON Determination 98-L4

**Originating Council**

Council on Clinical Affairs

**Review Council**

Council on Clinical Affairs

**Adopted**

2001

**Revised**

2004, 2012

**Reaffirmed**

2010

**Purpose**

The American Academy of Pediatric Dentistry (AAPD) supports the concept of a dental home for all infants, children, adolescents, and persons with special health care needs. The dental home is inclusive of all aspects of oral health that result from the interaction of the patient, parents, dentists, dental professionals, and nondental professionals. Establishment of the dental home is initiated by the identification and interaction of these individuals, resulting in a heightened awareness of all issues impacting the patient's oral health. This concept is derived from the American Academy of Pediatrics' (AAP) definition of a medical home which states pediatric primary health care is best delivered where comprehensive, continuously-accessible, family-centered, coordinated, compassionate, and culturally-effective care is available and delivered or supervised by qualified child health specialists.<sup>1-4</sup>

**Methods**

This policy is based on a review of the current dental and medical literature related to the establishment of a dental home. A MEDLINE search was conducted using the terms "dental home", "medical home in pediatrics", and "infant oral health care". Expert opinions and best current practices were relied upon when clinical evidence was not available.

**Background**

The AAP issued a policy statement defining the medical home in 1992.<sup>5</sup> Since that time, it has been shown that health care provided to patients in a medical home environment is more effective and less costly in comparison to emergency care facilities or hospitals.<sup>4-6</sup> Strong clinical evidence exists for the efficacy of early professional dental care complemented with caries-risk assessment, anticipatory guidance, and periodic supervision. The establishment of a dental home may follow the medical home model as a cost-effective and higher quality health care alternative to emergency care situations.

Children who have a dental home are more likely to receive appropriate preventive and routine oral health care. Referral by the primary care physician or health provider has been recommended, based on risk assessment, as early as six months of age, six months after the first tooth erupts, and no later than 12 months of age.<sup>7-9</sup> Furthermore, subsequent periodicity of reappointment is based upon risk assessment. This provides time-critical opportunities to implement preventive health practices and reduce the child's risk of preventable dental/oral disease.<sup>10</sup>

**Policy statement**

The AAPD encourages parents and other care providers to help every child establish a dental home by 12 months of age.

The AAPD recognizes a dental home should provide:<sup>11</sup>

- comprehensive oral health care including acute care and preventive services in accordance with AAPD periodicity schedules<sup>12</sup>;
- comprehensive assessment for oral diseases and conditions;
- individualized preventive dental health program based upon a caries-risk assessment<sup>13</sup> and a periodontal disease risk assessment<sup>14</sup>;
- anticipatory guidance about growth and development issues (ie, teething, digit or pacifier habits);
- plan for acute dental trauma;
- information about proper care of the child's teeth and gingivae. This would include the prevention, diagnosis, and treatment of disease of the supporting and surrounding tissues and the maintenance of health, function, and esthetics of those structures and tissues;
- dietary counseling;
- referrals to dental specialists when care cannot directly be provided within the dental home;
- education regarding future referral to a dentist knowledgeable and comfortable with adult oral health issues for continuing oral health care; referral at an age determined by patient, parent, and pediatric dentist.

The AAPD advocates interaction with early intervention programs, schools, early childhood education and child care programs, members of the medical and dental communities, and other public and private community agencies to ensure awareness of age-specific oral health issues.<sup>15</sup>

## References

1. American Academy of Pediatrics Committee on Children with Disabilities. Care coordination: Integrating health and related systems of care for children with special health care needs. *Pediatrics* 1999;104(4Pt1):978-81.
2. American Academy of Pediatrics Committee on Pediatric Workforce. Culturally effective pediatric care: Education and training issues. *Pediatrics* 1999;103(1):167-70.
3. American Academy of Pediatrics Committee on Pediatric Workforce. Pediatric primary health care. *AAP News* November 1993;11:7. Reaffirmed June 2001.
4. American Academy of Pediatrics. The medical home. *Pediatrics* 2002;110(1Pt1):184-6.
5. American Academy of Pediatrics Ad Hoc Task Force on the Definition of the Medical Home. The medical home. *Pediatrics* 1992;90(5):774.
6. Kempe A, Beary B, Englund BP, Roark RJ, Hester N, Steiner JF. Quality of care and use of the medical home in a state-funded capitated primary care plan for low-income children. *Pediatrics* 2000;105(5):1020-8.
7. Nowak AJ, Casamassimo PS. The dental home: A primary oral health concept. *J Am Dent Assoc* 2002;133(1):93-8.
8. Nowak AJ. Rationale for the timing of the first oral evaluation. *Pediatr Dent* 1997;19(1):8-11.
9. American Academy of Pediatrics Section on Pediatric Dentistry. Oral health risk assessment timing and establishment of the dental home. *Pediatrics* 2003;111(5):1113-6.
10. US Dept of Health and Human Services. *Healthy People 2010: Understanding and improving health*. 2nd ed. Washington, DC, US Government Printing Office; November 2000.
11. Poland C. Pediatric oral health. In: Burns CE, Brady MA, Dann AM, Starr N, eds. *Pediatric Primary Care: A Handbook for Nurse Practitioners*. 2nd ed. Philadelphia, Pa: WB Saunders Co; 2000.
12. American Academy of Pediatric Dentistry. Guideline on periodicity of examination, preventive dental services, anticipatory guidance, and oral treatment for children. *Pediatr Dent* 2009;31(special issue):118-25.
13. American Academy of Pediatric Dentistry. Guideline on caries-risk assessment and management for infants, children, and adolescents. *Pediatr Dent* 2011;33(special issue):110-17.
14. American Academy of Periodontology. Periodontal diseases of children and adolescents. *J Periodontol* 2003;74(11):1696-704.
15. American Academy of Pediatric Dentistry. Dental home resource center. Available at: "<http://www.mychildrensteeth.org/oralhealth/dentalhome/>". Accessed July 5, 2012.



## An Online Reference for Parents and Policymakers

### What is a Dental Home?

Establishing a "Dental Home" means that your child's oral health care is delivered in a comprehensive, continuously accessible, coordinated and family-centered way by a licensed dentist. The concept of the Dental Home reflects the AAPD's clinical guidelines and best principles for the proper delivery of oral health care to all children, with a concentration on infant/age one patients. The Dental Home enhances the dental professional's ability to assist children and their parents in the quest for optimum oral health care, beginning with the age one dental visit for successful preventive care and treatment as part of an overall oral health care foundation. Additionally, the establishment of the Dental Home will include referral to other dental specialists when the pediatric or general dentist cannot provide the needed care.

- CON Waiver letter -



STATE OF CONNECTICUT  
OFFICE OF HEALTH CARE ACCESS

COPY TO:

Jim C., Roberta S.G.,  
Jeanne, Jay P., Chanté  
K., Steve M.

JOHN G. ROWLAND  
GOVERNOR

August 21, 1998

Alfred E. Fasulo, Jr.  
Vice President  
Planning and Marketing  
Hospital of Saint Raphael  
1450 Chapel Street  
New Haven, CT 06511

*Sister Mary  
Corquats  
Jim*

Re: Certificate of Need Determination, Report Number: 98-L4  
Hospital of Saint Raphael  
Establishing and Operating a Mobile Dental Service

Dear Mr. Fasulo,

On August 17, 1998, the Office of Health Care Access (OHCA) received your letter requesting a waiver of a Certificate of Need (CON) by the Hospital of Saint Raphael for the establishment and operation of a mobile dental clinic. OHCA has reviewed this matter and makes the following findings:

1. The Hospital of Saint Raphael is proposing to establish and operate a mobile dental service (program) for school aged children. The program would work in concert with area school systems and other community based organizations in order to best reach the target population.
2. The services to be provided would include basic preventive care including exams, cleanings, fluoride treatment and sealants. Referrals would be made to other providers for patients requiring extensive dental work.
3. Total capital requirements to start the program are estimated at \$300,000.
4. The program would be funded by an equity contribution from the Hospital.

Based on the above findings, OHCA finds that the provision of dental services on a mobile basis does not constitute a new or additional function or service for the Hospital of Saint Raphael, pursuant to Section 19a-638 of the Connecticut General Statutes, as amended. Based on the information presented to OHCA, it does not appear that approval by OHCA is required for you to provide mobile dental services.

An Equal Opportunity Employer

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Telephone: (860) 418-7001 Fax: (860) 418-7053 Consumer Information Help-Line: (800) 797-9689

## Roberts, Karen

---

**From:** Roberts, Karen  
**Sent:** Thursday, December 05, 2013 9:13 AM  
**To:** 'Nancy.Rosenthal@greenwichhospital.org'  
**Cc:** Martone, Kim  
**Subject:** Smiles to Go Dental Mobile Van Inquiry

Tracking:	Recipient	Delivery
	'Nancy.Rosenthal@greenwichhospital.org'	
	Martone, Kim	Delivered: 12/5/2013 9:14 AM

To: Nancy Rosenthal  
Senior Vice President Health System Development  
Yale-New Haven Health

Good Morning Nancy

On November 25, 2013, OHCA received Yale's response to the inquiry regarding the removal of the "Smiles to Go" Dental Mobile Van from the Hospital license. After reviewing the Hospital's responses, we find we need for further information or clarification. Please see below several additional questions regarding this matter:

1. Please list the name and the location of the elementary and middle schools and the community locations served by the dental van as of June 2013 when it was decommissioned.
2. In response to questions #4 and #5, the Hospital states the following:
  - "prior to the change to the licensed satellite, Y-NHH recorded all associated utilization, revenues, expenses and reimbursement for the dental van services, and other outreach dental services on its books."
  - "subsequent to the change to the licensed satellite, Y-NHH continues to record all dental outreach services as hospital services on its books. Although these services are no longer offered via a mobile dental van, Y-NHH continues to offer dental outreach services recorded in the same cost center."

Please clarify whether the Hospital's use of the term **dental outreach services** in the second statement covers all of the services which shifted from the mobile van setting to the fixed sites at 2560 Dixwell Avenue in Hamden and 1 Long Wharf Drive in New Haven.

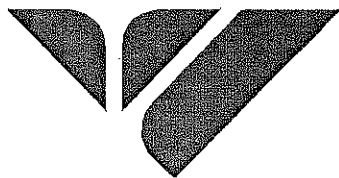
3. The van had provided screening, preventative and simple restorative dental services. Are those same services as now provided at the two fixed sites all booked as Hospital services for volume, revenue and expense purposes? Does Yale-New Haven Hospital bill for and receive reimbursement for all these services as Hospital services? If not, please identify the legal entity (whether affiliated or non-affiliated with the Hospital) which is the provider of record for these services.

Thank you for your assistance in OHCA's review of this matter and please let me know if you have any questions on this email.

Sincerely,

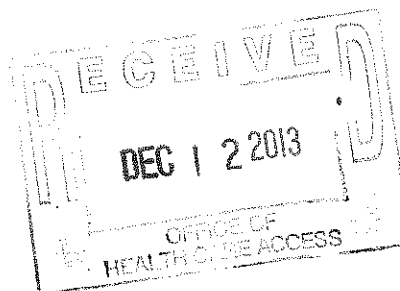
*Karen Roberts*  
Principal Health Care Analyst  
Department of Public Health  
Office of Health Care Access  
(860) 418-7041  
[karen.roberts@ct.gov](mailto:karen.roberts@ct.gov)





# YALE NEW HAVEN HEALTH

Planning  
2 Howe Street, 3<sup>rd</sup> Floor  
New Haven, CT 06519  
Phone: (203) 688-2609  
Fax: (203) 688-5013



## Fax Transmission Sheet

**ATTN.: Karen Roberts**  
**Principal Health Care Analyst OHCA**

**From:** Nancy Rosenthal  
**Phone:** 203-863-3908

**OHCA Fax:** (860) 418-7053

**Date:** December 12, 2013

**K. Roberts' Phone:** (860) 418-7041

**Pages:** 3 including cover sheet

**Re:** Removal of the "Smiles to Go" Dental Mobile Van  
from the YNHH License

**CC:**

Urgent     For Review     Please Comment     Please Reply     Please Recycle

•Comments: see attachments

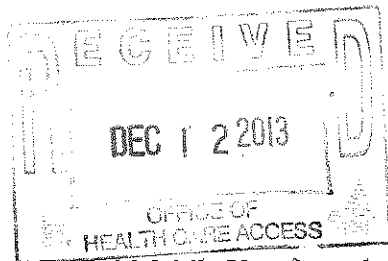
Please call to confirm receipt of this fax.

Thank you, Rose Arminio, 203-688-2609

December 13, 2013



Karen Roberts  
Principal Health Care Analyst  
Office of Health Care Access  
410 Capital Avenue, MS #13HCA  
P.O. Box 340308  
Hartford, CT 06134



RE: Removal of the "Smiles to Go" Dental Mobile Van from the Yale-New Haven Hospital License

Dear Ms. Roberts:

On December 5, 2013, Yale-New Haven Hospital received additional OHCA questions after reviewing the Hospital's original response to OHCA inquiries sent on November 25, 2013. This matter is regarding the removal of the "Smiles to Go" Dental Mobile Van from the Hospital license. Please see the responses below.

- 1. Please list the name and the location of the elementary and middle schools and the community locations served by the dental van as of June 2013 when it was decommissioned.

The names and locations of the elementary and middle schools and the community locations served by the dental van as of June 2013 are as follows:

**High Risk Locations**

Boys and Girls Village	Milford
The Children's Center	Hamden

Mobile care was still provided to students at the high risk locations until October 2013, when Yale-New Haven Hospital lost the services of several key staff members. At that time, alternate arrangements were made to treat the children at the Y-NHH Dental Center in Hamden in exclusive sessions.

**Other school locations**

Barnard School	New Haven
Clinton Avenue School	New Haven
John Martinez	New Haven
Roberto Clemente School	New Haven
Ross Woodward School	New Haven
Troup School	New Haven
Truman School	New Haven

**Community Locations**

Fair Haven Community Center	New Haven
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The van was decommissioned at the end of the school year.

2. In response to questions #4 and #5, the Hospital states the following:

- "prior to the change to the licensed satellite, Y-NHH recorded all associated utilization, revenues, expenses and reimbursement for the dental van services, and other outreach dental services on its books."
- "subsequent to the change to the licensed satellite, Y-NHH continues to record all dental outreach services as hospital services on its books. Although these services are no longer offered via a mobile dental van, Y-NHH continues to offer dental outreach services recorded in the same cost center."

Please clarify whether the Hospital's use of the term **dental outreach services** in the second statement covers all of the services which shifted from the mobile van setting to the fixed sites at 2560 Dixwell Avenue in Hamden and 1 Long Wharf Drive in New Haven.

No, not all of the services shifted from the mobile van setting to the fixed sites. The cost center for this service still exists and houses several dental employees who provide dental outreach services at health fairs and schools for educational and teaching sessions. They can also do simple screenings. The more robust preventative, prophylaxis and simple restorative services have shifted from the van to the fixed sites which offer much more comprehensive services. The fixed dental sites are housed in a separate Hospital cost center.

3. The van had provided screening, preventative and simple restorative dental services. Are those same services as now provided at the two fixed sites all booked as Hospital services for volume, revenue and expense purposes? Does Yale-New Haven Hospital bill for and receive reimbursement for all these services as Hospital services? If not, please identify the legal entity (whether affiliated or non-affiliated with the Hospital) which is the provider of record for these services.

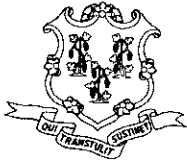
Yes, those same services are now provided at the two fixed sites and are booked as Hospital services for volume, revenue and expense purposes. These services were booked as hospital services before and after the transition.

If you have any further questions, please do not hesitate to contact me.

Happy Holidays,



Nancy Levitt Rosenthal  
Senior Vice President, Greenwich Hospital and  
Vice President, Yale New Haven Health System



**STATE OF CONNECTICUT**  
DEPARTMENT OF PUBLIC HEALTH  
*Office of Health Care Access*

February 10, 2014

VIA FACSIMILE ONLY

Ms. Nancy Rosenthal  
Senior Vice President Health System Development  
Yale-New Haven Health Services Corporation  
789 Howard Avenue  
New Haven, CT 06519

RE: Certificate of Need Determination Report Number 13-31882-DTR  
Yale-New Haven Hospital  
Decommissioning of the "Smiles to Go" Dental Mobile Van

Dear Ms. Rosenthal:

On October 30, 2013, the Office of Health Care Access ("OHCA") commenced an inquiry into the removal of the satellite dental mobile van called "Smiles to Go" from the Yale-New Haven Hospital ("Hospital") license effective October 3, 2012 and whether that removal constituted a termination of an outpatient service by the Hospital. OHCA bases the determination issued herein on the following information:

1. The mobile dental van had provided screening, preventative and simple restorative dental services to seven schools in New Haven and to the Fair Haven Community Center in New Haven. The van also served two high-risk sites: Boys and Girls Village in Milford and The Children's Center in Hamden.
2. The Hospital retired the mobile dental van from service in June 2013 due to the age of the vehicle, the cost of servicing the vehicle and the inability to travel reliably to the above sites. The Hospital had determined that replacing the aged dental van was not financially feasible and that delivering dental services through the van did not provide optimal, continuous high quality dental services to these children.
3. The children that had previously received the dental services via the dental van are now referred through the school nurse to the Y-NHH Dental Center in Hamden or the Long Wharf Dental Center in New Haven. These two locations are hospital service locations listed as satellites on the Hospital's license. Hospital social workers are arranging transportation for those who qualify and are in need of such service and the Long Wharf center is on the city bus route.
4. Staff had continued to deliver services to the two high-risk sites (Boys and Girls Village and to The Children's Center) after the van was decommissioned by bringing the mobile dental equipment in their own vehicles. This model of care was discontinued during the fall of 2013 due to unanticipated staffing changes. This service delivery model was found to be limited and not optimal. Instead, the Hospital has granted exclusive dental block time at the Y-NHH Dental

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*(If you require aid/accommodation to participate fully and fairly, contact us either by phone, fax or email)*

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Center in Hamden for the children from these high-risk sites and transportation is being coordinated.

5. The two fixed sites, Y-NHH Dental Center in Hamden and the Long Wharf Dental Center in New Haven, provide expanded services, including screening, prophylaxis and full restorative care as opposed to the limited mobile service. These two sites will be the "dental home" for these children as part of their primary dental care and the children will be scheduled for their regular visits there as opposed to the episodic care provided by the mobile dental van.
6. All of the children that had previously been seen at the schools are Husky insured and the change in service delivery to a fixed site will not result in any financial burden for the family. The Hospital continues to send staff to the schools and to health fairs for dental education as part of preventative outreach efforts. This staff can also do simple screenings.
7. No service lines or cost centers have been discontinued because of this change. The Hospital continues to record the dental outreach services as hospital services on its books within this cost center.
8. The revenues, expenses and volume for all of the services provided at the fixed dental sites are housed within a separate Hospital cost center and are booked as Hospital services.
9. Decommissioning the dental van did not result in reduced availability of dental services. The referral of the children to the fixed sites results in greater accessibility to a site that provides extensive, state-of-the-art outpatient screening, preventative and restorative dental care services and promotes continuity of care to the school age population. All dental records of those who utilized the van services are readily available at either of the two fixed dental sites.
10. The Hospital indicates that the van may be sold to the Fair Haven Community Health Center for use within its neighborhood.

Decommissioning of the "Smiles to Go" mobile dental van is not a termination of an outpatient services by a hospital pursuant to Connecticut General Statutes § 19a-638(a)(4). The Hospital provides outpatient dental care to this same patient population through its two existing dental satellites which are hospital service locations. Based upon the foregoing, OHCA concludes that a CON is not required.

If you have any questions regarding this letter, please contact Karen Roberts, Principal Health Care Analyst, at (860) 418-7041.

Sincerely,



Kimberly R. Martone  
Director of Operations

C: Rose McLellan, License and Applications Supervisor, DPH, DHSR

\* \* \* COMMUNICATION RESULT REPORT ( FEB. 10. 2014 3:32PM ) \* \* \*

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**STATE OF CONNECTICUT  
 DEPARTMENT OF PUBLIC HEALTH  
 OFFICE OF HEALTH CARE ACCESS**

**FAX SHEET**

**TO:** NANCY ROSENTHAL

**FAX:** (203) 863-4736

**AGENCY:** YALE-NEW HAVEN HOSPITAL

**FROM:** KAREN ROBERTS

**DATE:** 2/10/14

**NUMBER OF PAGES:** 3  
*(including transmittal sheet)*

**Comments:** DN: 13-31882-DTR

**PLEASE PHONE IF THERE ARE ANY TRANSMISSION PROBLEMS.**

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