TESTIMONY OF
Saint Francis Hospital and Medical Center
SUBMITTED TO THE
PUBLIC HEALTH COMMITTEE
Wednesday, February 9, 2011

HB 5048, An Act Requiring Certificate of Need Approval For The Termination Of Inpatient And Outpatient Services by A Hospital

Saint Francis Hospital and Medical Center appreciates the opportunity to submit testimony concerning **HB 5048, An Act Requiring Certificate Of Need approval For The Termination Of Inpatient And Outpatient Services By A Hospital.** Saint Francis opposes this bill.

HB 5048 requires any hospital that seeks to terminate inpatient or outpatient services currently offered by the hospital to file a certificate of need application with the Office of Health Care Access division of the Department of Public Health.

Saint Francis Hospital and Medical Center is a tertiary acute care hospital affiliated with the University of Connecticut School of Medicine and offers a wide range of inpatient and outpatient services to individuals within the Greater Hartford Region. In FY 2010 Saint Francis provided services to over 32,000 inpatients, treated 69,000 individuals in its emergency department and provided well over 200,000 outpatient visits of various types. Saint Francis currently employs over 5,000 individuals and provided nearly $83,553,219 dollars in community benefits in FY2010.

In an era where the Governor of Connecticut is asking every citizen and organization to make universal sacrifices to address the looming state budget crisis:

- HB 5048 would impose significant burdens on hospitals by reinstating the requirement that hospitals first obtain OHCA approval before terminating any service. Further, there is no such burden placed on non-hospital entities, which creates an unfair and un-level playing field that adversely affects hospitals and promotes the interest of other providers.

- In an era of shrinking resources it seems very unfair to burden parts of the health care system with extra regulatory requirements or additional unfunded mandates that prevent appropriate and necessary expense reductions.

- The regulation changes made in the certificate of need law (Public Act 10-179) were intended to help hospitals survive in the ever shrinking world of health care reimbursement and this action would eliminate some of the benefits of these changes.

- HB 5048 will create a new – and ultimately unsustainable – system in which hospitals, and only hospitals will be forced to incur high legal and consulting costs to prepare CON applications. At a minimum, HB 5048 would place hospitals at an extreme disadvantage to other providers that are not subject to the same administrative and legal processes and delays. In the worst case situation, hospitals could be forced to curtail necessary programs because less valuable services had to be maintained regardless of their necessity.