

Via OHS Electronic CON Portal

January 16, 2019

Ms. Micheala Mitchell
Hearing Officer
Health Systems Planning Unit
Office of Health Strategy
450 Capital Avenue
P.O. Box 340308
MS# 51OHS
Hartford, CT 06134-0308

Re: Certificate of Need Application: **Docket Number 18-32231-CON**
Yale New Haven Hospital
Termination of Primary Care Services
Late File Response to Third Order

Dear Ms. Mitchell:

Attached please find the Yale New Haven Hospital (“Applicant” or “YNHH”) response to the Health System Planning Unit (“HSP”) Late File Third Order dated January 11, 2019. The response is provided in both Word and PDF format, and will be uploaded to the OHS CON portal.

Please do not hesitate to contact me at 203-688-5721 or Jeryl.Topalian@ynhh.org if you have questions or need additional information.

Sincerely,



Jeryl Topalian
Director, Strategy & Regulatory Plan

cc: Cynthia Sparer, Sr. VP Operations, YNHHS
Jennifer Willcox, VP Legal Services, YNHHS

IN THE MATTER OF:

Via Electronic CON Portal Only

Certificate of Need Application by
Yale New Haven Hospital

Docket Number: 18-32231-CON

ORDER

The Office of Health Strategy (“OHS”) issued an Order on December 24, 2018, requiring the Applicant to submit certain information. OHS has additional questions regarding the Applicant’s submissions. Therefore, the Applicant is hereby ordered to provide the following information to OHS, via the electronic portal, on or before the close of business on January 16, 2019:

1. Utilizing the floor plans on pages 559 and 560 of Exhibit A (the Initial Application), label **and** provide a narrative description of all planned common and exclusive entryways for both of the FQHCs.

Response:

The floor plans submitted on pages 559 and 560 of Exhibit A (the Initial Application) were marked DRAFT as these were preliminary designs, which have undergone significant refinement as the program planning has progressed. Attached as Exhibit 1 are the current floor plans, with planned common and exclusive entryways for both of the FQHCs identified by yellow arrows. The main entrance to 150 Sargent Drive is a common entryway (labeled #1) for all who enter the building, whether for Yale New Haven Hospital (YNHH) services, Cornell Scott-Hill Health Center (CSHHC) services, or Fair Haven Community Health Center (FHCHC) services.

The first entryway off the main corridor (labeled #2) is exclusive for YNHH services. Farther down the corridor is the exclusive entrance to CSHHC Women’s Center (labeled #3), and the corridor ends at the exclusive entrance to FHCHC Pediatric services (labeled #4). The elevator lobby to the second floor is off the main corridor, opposite the entrance to YNHH services. On the second floor, there are two entrances to CSHHC (labeled #5 and #6), both exclusive, where Adult Medicine services will be located.

2. Disclose when the Applicant will know whether UberASSIST will become available in the greater New Haven area. If UberASSIST does become available within the greater New Haven area:
 - a. provide an implementation date for the service;
 - b. clearly state whether the Applicant will pay to transport patients to the FQHCs utilizing UberASSIST, and if not, explain why.

Response:

As was noted in the Response to Late File Second Order, the Applicant is currently working through contract details with Uber, so that the contract can be finalized several months prior to the commencement of services. UberASSIST has been implemented in fifteen cities across the United States, and Uber indicated they were confident in meeting a Fall 2019 deadline for UberASSIST operations to begin in the greater New Haven area, commensurate with the opening of 150 Sargent Drive.

It is important to note that UberASSIST is for patients who need assistance with transportation, as in utilizing foldable wheelchairs or walkers. The Applicant will pay to transport patients meeting the eligibility requirements as part of the ride-sharing program.

As was stated in the Response to the Late File Second Order, the transportation plan ride-sharing program is intended for those patients who are currently walking or taking public transportation to the existing PCC sites. YNHH expects that current and future patients with special transportation needs, who currently utilize the services of Veyo, medical taxis, other specialized modes of transportation will continue to do so.

3. Page 2 of Exhibit U (Second Late File Response) states that the criteria for the ride share service will include the requirement that patients live where currently available public transportation requires a trip of 40 minutes or longer, *including* one or more transfers.

Conversely, page 3 of Exhibit R (Late File Response) states that patients must live where currently available public transportation requires one or more transfers *or* a trip of 40 minutes or longer.

Clarify the discrepancy between the two responses.

Response:

As the Applicant continued to develop the transportation plan, it became apparent that the criteria for the ride-share service needed further clarification. Bus routes to travel to 150 Sargent Drive vary as to if or how often they require a rider to transfer, depending on the time of the day. In addition, while the Applicant had mapped the bus routes and schedules when responding to the initial Late File Order, this was an exercise done from a selected bus stop in various neighborhoods, and did not assume a wait time for transfers, or time to get to the bus stop from the patient's residence. The Applicant has since sent staff members to travel various bus routes, at various times of day to 150 Sargent Drive, and based on that experience, determined that the total length of the trip would determine eligibility. The 40 minute time criteria includes the time to walk to the bus stop, time waiting at the transfer location (if applicable), and the time on one or more buses. If the length of the trip, including transfers is less than 40 minutes, then the patient would continue to utilize public transportation to get to their appointments.

Exhibit 1



150 Sargent Clinic Building
 First Floor Plan

15 Jan 2019 0 4 8 16



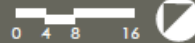
Yale New Haven Medical Center
 New Haven, CT





150 Sargent Clinic Building
 Second Floor Plan

15 Jan 2019



Yale New Haven Medical Center
 New Haven, CT

