



Via OHS Electronic CON Portal and E-Mail

March 23, 2023

Lara L. Manzione, Esq.
Manager, Health Systems Planning
Connecticut Office of Health Strategy
450 Capitol Avenue, MS #510HS, PO Box 340308
Hartford, CT 06134
Lara.Manzione@ct.gov

RE: Certificate of Need Application: Docket Number: 23-32628-INQ
Letter of Inquiry

Dear Ms. Manzione:

On behalf of Starling Physicians, PLLC ("**Starling PLLC**")¹, please accept this in response to the letter dated March 14, 2023, received by Starling PLLC. Specifically, the Connecticut Office of Health Strategy ("**OHS**") is requesting information regarding why Starling PLLC did not file an application for a Certificate of Need ("**CON**") or a Determination of Need as part of the acquisition by VillageMD, and further asked for an explanation of the current corporate structure and relationship between/among Starling PLLC, VillageMD and Walgreens Boots Alliance, Inc. ("**Walgreens**").

Thank you for providing an opportunity to address OHS's concerns and to clear up some potential misunderstandings regarding the transaction.

Connecticut law requires a CON for

" ... [a] transfer of ownership of a large group practice to any entity other than a (A) physician, or (B) group of two or more physicians, legally organized in a partnership, professional corporation or limited liability company formed to render professional services and not employed by or an affiliate of any hospital, medical foundation, insurance company or other similar entity... " Connecticut General Statutes ("C.G.S.") Sec. 19a-638(a)(3).

¹ Please note that the letter was addressed to "Starling Physicians, LLC." The correct legal entity name as described herein is Starling Physicians, PLLC.



The Starling transaction meets exception (A). Prior to the transaction, Starling Physicians, P.C. ("**Starling PC**") underwent an internal restructuring to become a Connecticut professional limited liability company, Starling PLLC. At that time, Starling PLLC transferred its non-clinical assets to a business support company, Starling Physicians MSO, LLC ("**Starling MSO**"), which is wholly owned by Starling MSO Holdings, LLC ("**Starling Holdings**"). At that time, the ownership of Starling PLLC was consolidated to an individual Connecticut-licensed physician, Sarit M. Patel, M.D.², who is still the owner of Starling PLLC. Starling PLLC retained Starling PC's tax identification and provider numbers.

Following the above, Village Practice Management Holding Company, LLC ("**VillageMD**"), via a subsidiary, consummated a transaction with Starling MSO and Starling Holdings with Starling Holdings surviving as a subsidiary of VillageMD. Walgreens is a majority owner of VillageMD.


Starling MSO continues to provide business support services to Starling PLLC pursuant to certain service agreements with Starling PLLC. At no time was there or is there a direct or indirect ownership relationship between Starling MSO, Starling Holdings, VillageMD or Walgreens on the one hand and Starling PLLC on the other hand.

As the transfer of ownership of the Starling PC/Starling PLLC group practice was from several physician-owners of Starling PC to a single physician owner of Starling PLLC, a CON filing under C.G.S. Sec. 19a-638(a)(3)(A) was not required under the statute.

Importantly, VillageMD, through the medical practices it provides support services to, is committed to partnering with strong physician leadership at the medical practice levels, improving access to medical care and expanding the ability of medical practices to provide high quality value-based care. We further note that: (a) there are no anticipated impacts to the employment status of physicians/providers/staff at Starling PLLC or the Starling MSO; (b) Starling PLLC will continue to participate in-network with all payors it participated with prior to the transaction; and (c) Starling PLLC will continue to retain and recruit physicians to expand access to high quality medical care in the State of Connecticut.

Should you have any further questions about this matter, please do not hesitate to contact Rebecca Levy, General Counsel and Chief Legal Officer of VillageMD at rlevy@summitthealth.com or 908-277-8655.

Sincerely,

By: 
Gary D. Golliber
Interim Chief Executive Officer/Chief Financial Officer
Starling Physicians, PLLC

² Dr. Patel is an actively practicing physician, holding Connecticut Medical License #43082.