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October 14, 2022

Office of Health Strategy  
450 Capitol Avenue  
Hartford, Connecticut

Re: Docket 32511, Vassar Health Connecticut d/b/a Sharon Hospital  
Via: [CONcomment@ct.gov](mailto:CONcomment@ct.gov)

I strongly urge the Office of Health Strategy to reject the application of Vassar Health Connecticut/Nuvance Health to termination the certificate of need for labor and delivery services at Sharon Hospital. The health interests of the people in northwestern Connecticut require the provision of a comprehensive suite of health care services at Sharon Hospital including, critically, labor and delivery services.

Certificates of Need (CON) are not just about dollars and cents. Ending a CON service cannot be justified solely because the holder cannot make a profit on a discreet health service. It cannot be ended because the holder finds it difficult to fill certain health care professional positions.

Rather, the key word in CON is need. And in this instance, it is clear that Sharon Hospital's labor and delivery services are critical to ensuring people in the region have a safe, readily accessible place for their maternity health needs.

While I have tremendous respect for Nuvance and its dedicated employees, I cannot disagree more strongly with their decision to seek termination of this CON.

It is incumbent on the CON holder must carry out its responsibility under the CON to find the most effective means of delivering the health service in collaboration with the community. While it is true that there is a shortage of nurses and other health care professionals in Connecticut, the federal government is supplying significant job training funds to Connecticut to encourage more people to enter the health care field and supply them with required education and experience.

I have a long affiliation and affection for Sharon Hospital. Twenty years ago, during my tenure as Attorney General, I led the legal effort, along with many relentless and fearless residents, to

ensure that its new for-profit owner, Essent, kept its promise to ensure quality health services for all the region's inhabitants. It was a fight that we won – but it has never been truly over. Since 2004, there were battles with Essent, combined with new hope for a better future with each successive owner of Sharon Hospital.

Yet, here we are today – again fighting for the rights of the people of Northwestern Connecticut for comprehensive, quality health care at Sharon Hospital.

This fight is ongoing in other rural areas of Connecticut and across the nation.

Rural areas by their nature are not densely populated and therefore the delivery of health services may not be as lucrative as in urban centers. However, people must have safe and easily accessible health care no matter where they live. According to a 2021 study by the American Journal of Obstetrics and Gynecology, birthing people in rural counties are two to three times as likely to die of complications related to pregnancy than their counterparts in urban areas. This is in part because of a lack of hospital obstetric services to provide emergency services, as well as prenatal and maternal care prior to delivery. This is a disparity that we cannot allow to grow.

That is why the Office of Health Strategy and the CON process is the most critical safety net for Connecticut residents of rural areas. OHS must stop these health care moves that are based on economic interests rather than health care needs.

OHS must reject the proposed termination of Sharon Hospital's CON for labor and delivery needs.

Sincerely,

A handwritten signature in blue ink that reads "Richard Blumenthal". The signature is fluid and cursive, with the first name being the most prominent.

Richard Blumenthal  
United States Senator