

Constantino, Mike

From: Jo Patton [JPatton@afscme31.org]
Sent: Thursday, March 25, 2010 3:39 PM
To: Carvalho, David; Constantino, Mike
Subject: HFSRB process

First, thank you for helping us better understand the HFSRB process for considering change of ownership permits and exemptions.

Second, I wanted to urge the HFSRB staff to require Vanguard Health Systems to go through the full CON permit process rather than an exemption.

When and if VHS submits an application it should be clear that there are significant questions regarding the corporation's ability to meet the financial thresholds required in order to be eligible for an exemption.

In addition, the problems with regulatory compliance in the case of VHS's two Illinois hospitals (both lost their deemed status for violations of the Medicare Conditions of Participation in 2009 and remain on state monitoring to date) raise concerns and would also indicate a need to investigate the corporation's out of state hospitals to determine regulatory compliance throughout the system.

Thanks again (and I may call if we have further questions about timeline or criterion).

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