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July 24, 2014

Ms. Jamie Hernandez  
New Jersey Department of Health  
Office of Legal and Regulatory Compliance  
Market & Warren Streets  
P.O. Box 360  
Trenton, New Jersey 08625-0360

**Re: Public Hearing for the Certificate of Need Application for Prime Healthcare Services, Inc. to acquire Saint Clare's Hospital – Denville**

Dear Ms. Hernandez –

Attached you will find written copy of my testimony before the State health Planning Board at their July 23, 2014 above referenced hearing.

I send this to you according to instructions on the Department of Health website indicating that:

*“Comments may also be submitted in writing after the hearing. Commenters are urged to make their comments concise. Comments must be received by the State Health Planning Board no later than Wednesday, July 30, 2014 at the following address:*

*New Jersey Department of Health  
Office of Legal and Regulatory Compliance  
Market & Warren Streets  
P.O. Box 360  
Trenton, New Jersey 08625-0360  
Attention: Jamie Hernandez”*

Should you have any questions or concerns, please reach me at my contact information below.

Sincerely,



India R. Hayes Larrier  
India@NJCitizenAction.org  
Office - (973) 643 - 8800 X216  
Cell - (201) 412 - 1016

Attachment

RECEIVED

JUL 28 2014

OFFICE OF THE DEPUTY  
COMMISSIONER

www.njcitizenaction.org



## TESTIMONY

India R. Hayes Larrier  
New Jersey Citizen Action

**For Immediate Release**  
**July 23, 2014**

**For more information, contact:**  
India Hayes Larrier, NJCA  
Cell: 201-412-1016  
Email: [India@njcitizenaction.org](mailto:India@njcitizenaction.org)

New Jersey Department of Health  
State Health Planning Board Public Hearing  
Re: St. Clare's Hospital System - Denville

Good evening. I am India Hayes Larrier representing New Jersey Citizen Action and the Campaign to Protect Community Health Care. New Jersey Citizen Action is the State's largest consumer watchdog coalition that has worked on healthcare issues since it was established in 1983. We are one of the founders of the "Campaign to Protect Community Health Care", a coalition of organizations and individuals working together to protect and advance access to quality and affordable healthcare.

While we recognize the need for St. Clare's to stay open, we have serious concerns about the fitness of this organization to run a hospital that will benefit the community in the long run.

We submit the ongoing federal investigations into Medicare coding and billing practices at Prime's other facilities. We submit their history of cutting services and staff in other states. We submit litigation regarding access to primary care physicians and handling of employee issues. We submit the fact that Truven Health Analytics, subsequent to naming Prime on its list of top hospitals, actually publicly struck it from the list due to some of these issues.

However, while we saw these issues rearing their heads in other states, we now see many of our worst fears being realized here in NJ. Within a week of your February recommendation that Prime be allowed to purchase St. Mary's Hospital in Passaic, insurance companies received word that St. Mary's would be canceling participation contracts. Within six weeks, employees lost their jobs at the hospital. We hope that you will take better, more vigilant care of the St. Clare's community.

We ask that Prime not be allowed to have yet another hospital in our state unless you appoint a monitor to oversee their handling of the hospital and the community's needs. We urge you to require them to remain in network with insurances -not just post their status on a website. Such requirements do nothing to safeguard the affordability and access of care for patients who go to the hospital. We urge you to require enforceable safe staffing models, because if they are not required to maintain adequate staffing, they cannot maintain adequate

New Jersey Citizen Action

Re: St. Clare's Hospital System - Denville

care. Though they commit to rehiring a substantial number of employees, all that guarantees is 50% plus one. We urge you to not allow THEM to decide whether to increase charity care, but to require that they meet the need levels of the community.

This community, like others, deserves a hospital that will meet its needs for the long term. Outside of NJ-and now within our state, this company shows it is less interested in meeting those needs than it is in increasing its own nation-wide profits. You have the opportunity to stand in the chasm between their interests and those of the community.

Respectfully Submitted:

India R. Hayes Larrier

Organizer

New Jersey Citizen Action

Campaign to Protect Community Health Care

India@NJCitizenAction.org

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