



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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COREY JOHNSON
Chair

ROBERT J. BENFATTO, JR., ESQ.
District Manager

February 6, 2013

Timothy Day
Chief Operating Officer
St. Luke's Roosevelt Hospital
1000 Tenth Avenue
New York, NY 10019

Dear Mr. Day:

At its meeting on January 17th, 2013, Manhattan Community Board 4's Housing, Health, and Human Services Committee (HH&HS) heard a presentation from the New York State Nurses Association (NYSNA) on the proposals issued in December, 2012 by the Public Health and Health Planning Council (PHHPC) to redesign the Certificate of Need (CON) process. It is our understanding that their concerns with the redesign were presented as a written statement to the Public Health and Health Planning Committee at the December 5th, 2012 meeting but that they did not have the opportunity to present their position or participate in the discussion.

According to the NYSNA, the proposed CON deregulation will:

- Make it easier for large private hospitals and hospital chains/systems to cut unprofitable services, and will shift the burden of caring for patients who rely on these services to our state's already over-extended public and community hospitals;
- Expand the scope of operation of for-profit health care providers in New York and opens the door to market penetration and control by for-profit chains and private investors;
- Reduce the scope of CON review and oversight of large segments of the healthcare industry, and thus weaken hospital/provider accountability to the communities they serve, limit access to quality care, and effectively silence community and patient voices; and,
- Fail to adequately take into account, and institute, proven, meaningful patient care quality measures, such as minimum staffing requirements.

An example of particular concern for CB4, involves changes after Hurricane Sandy when administrators at St. Luke's Roosevelt Hospital merged the detoxification unit into a separate substance abuse rehabilitation unit. It is our understanding that 14 rehabilitation beds have been lost to detoxification. Those closures should have been subject to Certificate of Need review, but the hospital services were cut without input from the community or the State.

We urge the State to reconsider the PHHPC proposals to ensure community dialog and input into the redesign. We also urge St. Luke's Roosevelt Hospital to reinstate the rehabilitation beds and bring to the Community Board any proposed changes impacting care in our district.

Sincerely,



Corey Johnson
Chair

[signed 2/5/2013]
Barbara Davis, Co-Chair
Housing, Health
& Human Services Committee



Joe Restuccia, Co-Chair
Housing, Health
& Human Services Committee

Cc: Continuum Health Partners
Assemblyman Richard Gottfried