city of
CINCINNATI
HEALTH DEPARTMENT

October 14, 2013

Mr. Jim Macrae, M.A., M.P.P.
Associate Administrator for Primary Health Care
Health Resources and Services Administration
U.S. Department of Health and Human Services

Dear Mr. Macrae:

We would like to bring to your attention our grave concerns over the potential merger of Neighborhood Health Care, Inc. and HealthPoint Family Care in Kentucky. We believe there is enough capacity and expertise in the City of Cincinnati and Hamilton County in general to provide services for Neighborhood Health Care's patients. We find it extremely troublesome that a FQHC from another state is being allowed to serve in an interim management structure (with competitive interests) when there are clearly (5) FQHC based organizations already operating in the service area. What is even more disturbing is the fact the parties involved did not seek or value our input. As a group we have long standing collaborative relationships with key community organizations including the large safety net hospital in the County and City and County government officials. We know our service area.

We are being told by our project officers at HRSA that a merger of two FQHCs does not guarantee the transfer of the federal grant. The appearance or possibility of a Kentucky based FQHC coming into Ohio and competing for federal grant funds that have historically been earmarked for Ohio, will have serious implications for not only us but also other states and cities across the country.

We know that a corporate merger is a board's decision but we also know that opening up a Service Area Competition where an entity in a neighboring state can cross state lines and apply really defeats the intent of the health center program and all the policy

Clinical Services & Population Health • 3101 Burnet Avenue, Suite 125 • Cincinnati, Ohio 45229-3098
P 513 357 7361 • F 513 357 7249 • www.cincinnati-oh.gov

and basic tenets that we have been committed to and believe in. There are over a 100 years of combined experience and expertise in the Community Health Center program in greater Cincinnati among the leadership that exist at The HealthCare Connection, Christian Community Health Services, Winton Hills Medical and Health Center, Cincinnati Health Department/City of Cincinnati Primary Care (CCPC) and the Cincinnati Health Network. We all have tried to work with Neighborhood to help it remain solvent. We do not want to see patients being abandoned or with limited access. Nor do we want to see the loss of another FQHC in our city. Due to circumstances surrounding Neighborhood Health Care, Inc. and its recent closure of two health center sites, we would like to request that the FQHCs in Hamilton County have the opportunity to participate in a service area competition (SAC) which would allow for more local community based options to be explored.

We are coming to you to formally raise our concerns but also asking the Bureau of Primary Health Care under HRSA to establish clear guidelines that minimize the risks of this becoming an acceptable practice. It is not warranted and it has serious and far reaching consequences for the community we serve. We know these are very challenging times for the Neighborhood board but we want what's best for the patients and underserved residents in the community and believe strongly that local based options or partnerships would be in the best interest of all of us.

Thank you sincerely for your time and attention to this matter. We look forward to hearing from you soon.

Best Regards,

Joyce Tate, CEO, Cincinnati Health Department/CCPC

Dolores Lindsay, CEO, The Health Care Connection

Miriam Crenshaw, CEO, Winton Hills Medical and Health Center

Sally Stewart, CEO, Christian Community Health Services

Kate Bennett, CEO, Cincinnati Health Network

Cc: Kelvin Benford, Branch Chief
Robin Levine and Linda Welle, HRSA Project Officers
Randy Runyon, Ohio PCA (OACHC)
Margaret Davis, Division Director, North Central Division