



October 28, 2013

Commissioner Mary O'Dowd
NJ Department of Health and Senior Services
John Fitch Plaza
PO Box 360
Trenton, NJ 08625

Re: Meadowlands Hospital Medical Center Non-Compliance with CN# FR 100201-09-01

Dear Commissioner O'Dowd:

I am writing on behalf of the registered nurses and health professionals providing patient care at Meadowlands Hospital Medical Center (MHMC), members of HPAE Local 5147, to notify you of the hospital owners' continuing violation of Condition 17 of their Certificate of Need, and to request that your office immediately take all measures available to you to end this violation, including assessment of penalties as provided at N.J.A.C. 8:43E-3.4.

Condition 17 of the CN granted to the owners of MHMC provides:

In accordance with the provisions of N.J.S.A. 26:2H-18.59h, MHA LLC shall "offer to its employees who were affected by the transfer, health insurance coverage at substantially equivalent levels, terms and conditions to those that were offered to the employees prior to the transfer."

Since assuming the license to operate MHMC, MHA LLC has made two sweeping changes to the health benefits it offers to its employees. The most recent, and significant change limits employees to coverage under "TruPlan," the Multiple Employer Welfare Arrangement (MEWA) created by the MHA LLC principals. TruPlan's "sole hospital provider model" restricts coverage to services provided at MHMC (regardless of where an employee's family resides) and eliminates coverage of home health, hospice and long-term care. I have attached a chart outlining the changes and their effect on employees.

Hospital management has informed HPAE that it "hopes" to begin open enrollment into TruPlan for HPAE-represented employees in November 2013 with implementation scheduled for January 1, 2014. Hospital management also has informed us that TruPlan will go into effect for

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non-bargaining unit staff on November 1, 2013. If MHA LLC is allowed to make these drastic changes to employee health benefits, employees will be unable to continue to receive care from the providers with whom they have long-standing relationships, unless those providers are affiliated with MHMC. This will be especially harmful to those individuals who are being treated for chronic illnesses or who have been receiving specialized care from a provider not affiliated with MHMC. Your prompt intervention is critical to the health and well-being of these employees.

Sincerely,

Renee Steinhagen
Executive Director

Cc: Ann Twomey