



ST. CLAIR COUNTY HEALTH DEPARTMENT

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James Vest, M.D.
President, Board of Health

Kevin D. Hutchison, R.N., M.S., M.P.H.
Executive Director

October 17, 2014

RECEIVED

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HEALTH FACILITIES &
SERVICES REVIEW BOARD

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street (2nd Floor)
Springfield, Illinois 62761

Re: 14-043 St. Elizabeth's Hospital, O'Fallon

Dear Ms. Avery:

In accordance with the requirements of the Illinois Health Facilities Planning Act, we wish to submit comments on proposed project 14-043 St. Elizabeth's Hospital, O'Fallon to establish an acute care hospital in O'Fallon, Illinois

St. Elizabeth's Hospital is a key provider of essential health services to the residents of St. Clair County and surrounding communities. As noted in their application (p.335), the St. Clair County Health Department has had a long-standing collaborative relationship with St. Elizabeth's Hospital in community health assessment, identification of priority health needs, and coordination of services. This includes the development of the **St. Clair County Community Health Plan** adopted by the Board of Health in conformance to Illinois Department of Public Health regulations for completion of the Illinois Project for Local Assessment of Needs (IPLAN). In addition, the department directly works with St. Elizabeth's professional staff on public health emergency planning, infectious disease control, coordination of Community Benefits services offered by the hospital, and direct assistance in helping at-risk members of the community access to public health services such as Women, Infant and Children's nutrition program, Illinois Breast and Cervical Cancer program, and HIV Care Connect Services provided through the Ryan White Act.

We have reviewed the application for the replacement hospital in O'Fallon, Illinois and wish to submit the following comments and concerns to the State Board Staff as they develop their report.

Administrative/Fiscal
618.233.7703
618.825.4443 fax

Community Health
618.233.7703
618.233.7713 fax

Communicable Disease
618.233.6175
618.233.9356 fax

Environmental /
Emergency Preparedness
618.233.7769
618.236.0676 fax

Personal Health
618.233.6170
618.236.0821 fax

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Safety Net Impact Statement

St. Elizabeth's states: *"To the applicant's knowledge, neither the discontinuation of pediatrics nor the discontinuation and re-establishment of St. Elizabeth's Hospital will impact safety net services in the Hospital's market area. In fact, the proposed replacement will bring safety net services closer to the most vulnerable population because of improved access to the proposed site. The new hospital will be located closer to a greater number of communities with people living at or below the poverty line and will generally be easier to get to because it is right off Interstate 64, with two exits going in either direction."* (p.331)

Comment:

The percentage of St. Clair County residents living in poverty has steadily increased from 12% in 2006 to 17.1% in 2010. Extreme poverty (below \$10,325 for a family of four) affects 17,319, a rate of 6.7%. Children are particularly vulnerable to poverty. An estimated 17,757 children (26.9%) of the children in St. Clair County live below the poverty line. (*St. Clair County Community Health Plan, 2011, www.health.co.st-clair.il.us*). While every community will have persons living at or below poverty, the concentration of St. Clair County residents living in poverty is higher in the communities of East St. Louis, Centerville, Cahokia, and Washington Park. Due to the migration of families moving within the county, the population of East St. Louis and surrounding communities has declined by 10% or more and the diversity of the Belleville population has increased as reflected in a 76% increase in African-American population since the 2000 Census. Correspondingly, the population of the suburban/community areas of the county has increased. Minority families in lower socio-economic conditions are moving into Belleville and families with higher socio-economic conditions are migrating to other communities including to Fairview Heights, Swansea, O'Fallon, Mascoutah, and Shiloh (*St. Clair County Community Health Plan, 2011, www.health.co.st-clair.il.us, East West Gateway Council of Governments, 2012 www.ewgateway.org*). According to the applicant's admission data (p.128), 42% of the hospital admissions in 2013 resided in zip code areas for Belleville and East St. Louis indicating a large proportion of the patients served live in close proximity to the current location.

Older adults are also impacted by poverty and experience an increased incidence of disability associated with various chronic diseases and the aging process. In St. Clair County, it is projected that 13.8% of the population is disabled. Given the association of poverty, aging, and health disparities, East St. Louis has the highest incidence of disability with a rate of 21.1% of the population. Alorton (18.7%), Cahokia (16.5%), Centerville (16.7%), and Belleville (14.4%) all have higher rates of persons with disability. Conversely, O'Fallon (9.6%), Fairview Heights (11.7%), Swansea (9.9%), Shiloh (10.7%) and Mascoutah (12.1%) have lower rates of persons with disability (*East West Gateway Council of Governments, 2012 www.ewgateway.org*)

Concern:

An analysis of the demographics, health disparities, and patient utilization of safety net services does not align with the applicant's statement that the new hospital will be located closer to a greater number of vulnerable people living at or below the poverty residing in

medically underserved areas. Additional evidence and clarification is needed to assure that safety net services currently provided by St. Elizabeth's hospital are not reduced. A specific Health Impact Assessment is needed.

Access to Care

St. Elizabeth's states: *"This site is more accessible by passenger and emergency vehicles than the existing site or other alternative sites that were considered."* (p.104)

Comment:

As a component of the community health assessment utilizing the Mobilizing for Planning and Partnership (MAPP) model, a Quality of Life assessment was conducted that included a survey of over 1500 persons over age 18 residing in representative areas of St. Clair County. In the findings, 18.9% of the respondents expressed dissatisfaction with transportation availability (*St. Clair County Community Health Plan, 2011, www.health.co.st-clair.il.us*). In addition, the East West Gateway Council of Governments analysis of transportation needs reports that of the 102, 936 households in St. Clair County, 8,737 reported having no personal vehicle. The communities of Belleville, Cahokia, Centerville, East St. Louis, and Washington Park account for 5,367 (62%) of the households with no personal vehicle. The rate for Zero Cars was highest in impoverished communities including Brooklyn (30.1%), Centerville (20.6%), and East St. Louis (26.2%). (*East West Gateway Council of Governments, 2012 www.ewgateway.org*)

Concern:

The applicant states the proposed site is more accessible by passenger and emergency vehicles than the existing site or other alternative sites that were considered. However, many households do not have a passenger car and depend on others for transportation. This is particularly true for Belleville and East St. Louis. In addition, transportation barriers are an identified problem in St. Clair County. The applicant did not provide information or analyze the vulnerable population's access to passenger cars, public transportation, or non-emergency medical transportation resources. Further, an analysis of Emergency Medical Services transportation input and impact statements on the relocation to the proposed site was not provided. Additional evidence and clarification is needed to validate the assertions made by the applicant. This evidence could include but is not limited to public transportation routes and proximity to the proposed location, pedestrian access and safety, and impact analysis by first responders; police, fire, and ambulance.

Clinical Emergency Service and Same Day Access

St. Elizabeth's states: *"At the time the replacement hospital opens in 2017, the Urgi-Care volume will be integrated into the Emergency Department at the Hospital. Concurrently, a same day access clinic will open on the Belleville campus. Based upon patient acuity and residence, the Hospital determined that 7,505 of the emergency patients currently being seen at the current Belleville Emergency Department and the O'Fallon Urgi-care Center would use the Belleville same day access clinic leaving 52,027 patients to use the new Emergency Department."* (p.280)

Comment:

Belleville, East St. Louis, and surrounding communities in the urban/industrial area of St. Clair County account for a high number of medically underserved individuals associated with lower socio-economic conditions and health disparities. In the analysis of the residence location of patients admitted in 2013 (p.128), it is noted that 42% of the admissions reside zip code areas serving Belleville and East St. Louis. The basis for the applicant determination that only 12.6% of the emergency patients would continue to access the same day clinic is not clear. The high concentration of vulnerable population's residing in close proximity to the current location coupled with barriers to transportation indicate a strong likelihood that many patients will continue to access emergency and same day services in Belleville. Medically underserved and vulnerable persons often utilize emergency rooms as their primary point of access to medical care, often for non-emergent health concerns. Other hospital emergency rooms in Belleville and Centerville may see a surge in demand and their capacity to meet this need has not been clearly addressed in the application. The hours of operation and capacity of the same day access clinic are not defined.

Concern:

The applicant states that closing the Emergency Department in the current location will not adversely affect patients or capacity of the other emergency service provider's ability to meet service demands. The basis for this statement is not clearly defined or supported by other hospitals in St Clair County. The scope and capacity of the same day access clinic is not clearly described. Additional evidence and clarification is needed to validate the assertion made by the applicant.

In summary, we are very concerned that the proposed replacement hospital location will adversely impact the safety net services currently provided by St. Elizabeth's hospital to residents of St. Clair County. A large concentration of medically underserved and vulnerable population lives in close proximity to the current location. Transportation barriers may reduce access to the proposed location, resulting in a shift of emergency and ambulatory care services to other hospitals that may not have the capacity to meet this increased demand.

Thank you for the opportunity to submit comments and express our concerns regarding 14-043 St. Elizabeth's Hospital, O'Fallon.

Sincerely,



Kevin D. Hutchison, R.N., M.S., M.P.H.
Executive Director

cc: Mike Constantino, Supervisor, Project Review Section