



HSHS
St. Elizabeth's
Hospital

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HEALTH FACILITIES &
SERVICES REVIEW BOARD

November 13, 2014

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

Re: Project 14-043 and 14-044

HSHS St. Elizabeth's Hospital ("we/Hospital") submits this response to the Safety Net Impact comments submitted by the St. Clair County Health Department ("Health Department") in a letter dated October 17, 2014. St. Elizabeth's appreciates the opportunity the Health Department has given to confirm that, indeed, the proposed replacement hospital will better serve the entire region and its associated poor, elderly, and disabled residents. St. Elizabeth's has enjoyed its work with the Health Department and believes the relationship that has existed between the two organizations will only strengthen as we embark on two major projects. These consist of replacing our outdated facility with one which will be state-of-the-art and better located to serve the residents of St. Clair County and an UrgiCare center to be located on our existing campus.

Safety Net Impact Statement

The Health Department comments on certain economic challenges that exist in St. Clair County. We could not agree more and have illustrated the economic and social factors existing in St. Clair County within our application. These challenges are well known to St. Elizabeth's, having served the region for 140 years. The Health Department states that, according to admission data found on page 128 of the Certificate of Need application, 42% of our patients come from East St. Louis and Belleville. These are two separate communities and the number references only inpatient medical/surgical volume. For inpatient medical surgical admissions, 32.6% of our patients are from Belleville zip codes, meaning 67% are not – which includes those from East St. Louis. If we consider all inpatient admissions (Med-Surg, ICU, OB, and Rehab) 24% of our patients are from Belleville, again meaning 76% are from other zip codes, which is inclusive of East St. Louis.

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*An Affiliate of
Hospital Sisters
Health System*

The Health Department refers to health disparities within the County and requests additional assurances that safety net services provided by St. Elizabeth's will continue at the proposed replacement hospital. As indicated in the table below, our proposed campus is closer to the majority of zip codes outlined in Mr. Hutchison's letter as having the highest percentage of residents living below the poverty line. For the two zip codes within East St Louis where our proposed campus is farther away, it is by only two minutes in each case, and those zip codes are also served by Touchette Regional Hospital. In addition to this subset of our patient population, the proposed campus will also be closer to other communities with a high level of poverty, including Brooklyn, Venice, Washington Park, Caseyville, Fairmont City, and the more rural areas which fall in our tertiary service area. For additional detail on poverty within our service area, see attached map for a graphical representation of the "Top 10 Zip Codes with Populations Living Below the Poverty Level" (Appendix, Figure/Table 1).

Belleville Summary					
Source	CON Defined Service Area (Databay)	Databay	Claritas 2012	Drive time to SEB (min, MapQuest)	
Zip	City	2014 Population Est	% of Population Living Under Poverty Level	Belleville Campus	Proposed Campus
62221	BELLEVILLE/SHILOH	26,705	9.8%	10	8
62220	BELLEVILLE	19,843	13.9%	4	17
62223	BELLEVILLE	17,291	8.4%	8	16
62226	SWANSEA/BELLEVILLE	30,365	12.4%	6	13
	Total	94,204	11.2%		
East St. Louis Summary					
Source	CON Defined Service Area (Databay)	Databay	Claritas 2012	Drive time to SEB (min, MapQuest)	
Zip	City	2014 Population Est	% of Population Living Under Poverty Level	Belleville Campus	Proposed Campus
62201	EAST SAINT LOUIS	8,441	73.0%	21	15
62203	EAST SAINT LOUIS	8,274	32.0%	15	13
62204	EAST SAINT LOUIS	7,810	65.5%	19	14
62205	EAST SAINT LOUIS	9,005	32.2%	17	15
62206	EAST SAINT LOUIS	16,181	37.0%	18	20
62207	EAST SAINT LOUIS	8,629	52.3%	15	17
	Total	58,340	46.8%		

Based on this information, St. Elizabeth's believes we will increase our safety net services and serve a greater number of Medicaid and uninsured patients. With respect to all residents within our primary and secondary service area, the replacement hospital will be closer to 63% of the residents living in zip codes currently served by St. Elizabeth's (Appendix, Table 2). The relocation of the Hospital to a more accessible location for the region demonstrates our continued commitment to improving healthcare access for the entire region.

While the City of Belleville's population has increased by 1.9% percent over the last 10 years, the City of O'Fallon's population has increased by 27.4% over the same time period (United States Census Bureau 2010). It makes sense for us to relocate to an area which is more accessible to the current and future regions of population growth, as well as the majority of the patients that we currently serve.

St. Elizabeth's assures the Health Department that it is not "abandoning" Belleville residents. We will be leaving significant outpatient services in Belleville, including an UrgiCare center comparable to what currently exists in O'Fallon. As the Health Department is aware, Belleville is currently a two-hospital town, while O'Fallon – the fastest growing area with only slightly less population – has no hospital. St. Elizabeth's does not expect its Belleville area patients to go to Memorial after our hospital moves. On the contrary, in 2013, 28% of the patients seen at our current O'Fallon facility were actually from Belleville. We see no reason why this dynamic would change.

Additionally, Touchette Regional Hospital (Southern Illinois Healthcare Foundation) and St. Elizabeth's (Hospital Sisters Health System) have collaborated extensively with each other to develop an improved care model for those who suffer from the negative health impacts associated with regions under extreme economic duress. Touchette is more immediately accessible to these patients than either St. Elizabeth's or Belleville Memorial. In the event where the acuity is such that a higher level of care is needed, we have the relationship in place to transition care of said patients and that relationship will not change upon moving our hospital to O'Fallon.

St. Elizabeth's collaborates with Southern Illinois Healthcare Foundation (SIHF) on many initiatives to support increased access to healthcare. One example of such is our partnership with SIHF, Saint Louis University School of Medicine and Scott Air Force Base in which all organizations collaborate to educate and train 42 family medicine resident physicians each year. SIHF operates the primary care clinic where the residents receive their outpatient training. This clinic model provides a successful option for patients who need access to primary care, as well as provide ample opportunity for our physicians in training to receive the experience needed to practice medicine in our communities. The Family Medicine Residency Program will relocate to the replacement campus on Interstate 64, and residents will continue to treat both outpatients and inpatients. We are continuing to communicate and plan with SIHF regarding appropriate outpatient clinic options for the Belleville campus and ensure access to care is not diminished in either location.

Access to Care

The Health Department cites the CON application's statement of the proposed site being more accessible by passenger and emergency vehicles than the existing site or other alternative sites that were considered. This is true, as reflected in the CON application. The proposed site is directly adjacent to Interstate 64, with two immediate exits in either direction. After exiting Interstate 64, travelers will be within one minute of our front entrance.

As intended, the new site already is and will continue to be easily accessible via public transportation. Attached is a map of public transportation options (Appendix, Figures 2-3). Residents have various routes via which to reach the #12 bus line, which already has established stops immediately surrounding the proposed campus area. As an enhancement, we are planning for a bus stop directly on our proposed campus so patients seeking care will have a short walk to the hospital's front door. Per their request, St. Elizabeth's will continue to work with Metro and other public transportation entities, after our project is approved, to further increase the degree of accessibility to our campus. Despite the Health Department's concerns and certainly respecting them, public transportation is not an issue.

Finally, with respect to a concern about a lack of analysis from first responders, the majority have not indicated a negative impact. In the extensive discussions that St. Elizabeth's has had with EMS stakeholders, the general consensus is that having a hospital directly located off the interstate will increase their ability to bypass local traffic and improve their ability to transport patients to the hospital as quickly as possible. It is known that first responders will take a patient to the closest, most appropriate hospital, regardless of where the patient is from. Again, placement of this facility increases access to an overwhelming majority of our service area. Regardless, as with the rest of the Belleville patients who are already seeking voluntary outpatient care in O'Fallon, we do not anticipate them to behave otherwise in their decision to seek out the healthcare provider that will best meet their needs. We appreciate the opportunity to clarify this for the Health Department.

Clinical Emergency Service and Same Day Access

As previously discussed in-depth, the communities mentioned by the Health Department as of concern (East St. Louis and Belleville) will still have access to emergency services. Whether we are discussing inpatient, outpatient, or emergency care, access is not an issue.

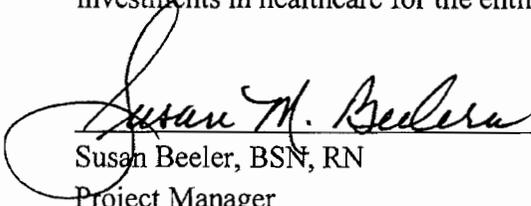
Memorial currently has, per its 2013 reported data, 10 more ED treatment bays than it needs, with capacity to treat an additional 20,000 patients annually (per State standards). There is no question it has the capacity to treat any additional patients it might see as a result of St. Elizabeth's replacement hospital in O'Fallon. However, there is no reason to believe that the patients who bring themselves to the ED (versus being brought via ambulance) will not choose to go to the St. Elizabeth's ED in O'Fallon since the majority of our patients will be living closer to it than to the current site.

In response for clarity regarding the facility that will remain in Belleville, St. Elizabeth's plans to construct an UrgiCare on the current campus. In reviewing its ED admissions, as noted by the Health Department, the amount of ESI Level 4 and 5 (low acuity) patients presenting at our current facility confirmed that the city of Belleville would be able to support and benefit from an UrgiCare/walk-in clinic. This is a more cost effective method of care and less financially burdening on patients, as opposed to presenting to a hospital based emergency department. In addition to providing service to low acuity patients seeking immediate/walk-in care, the resulting structure will house a variety of other outpatient services. Currently, the proposed hours of operation will be seven days a week from 8am to 9pm and provide the same level of care that Belleville patients are already seeking at the O'Fallon UrgiCare.

In addition, the following outpatient services will be provided at the current Belleville campus: laboratory, radiology, mammography, physical therapy, occupational therapy, and Back to Work center. As we move forward with an approved project we look forward to formally meeting with community leaders and stakeholders to seek input for additional services that may be feasible on the Belleville campus.

Conclusion

St. Elizabeth's is committed to working with the Health Department and continuing the long-standing relationship, as described by Mr. Hutchison in his letter, as we move forward with the replacement facility, should it be approved by the Health Facilities Planning and Review Board. We are confident the Health Department recognizes the proposed new hospital in O'Fallon and the UrgiCare in Belleville are both positive investments in healthcare for the entire County of St. Clair.



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Figure 1:
 Top 10 Zip Codes with Populations Living Below the Poverty Level
 (St. Clair County and St. Elizabeth's PSA/SSA)
 Source: Claritas 2012

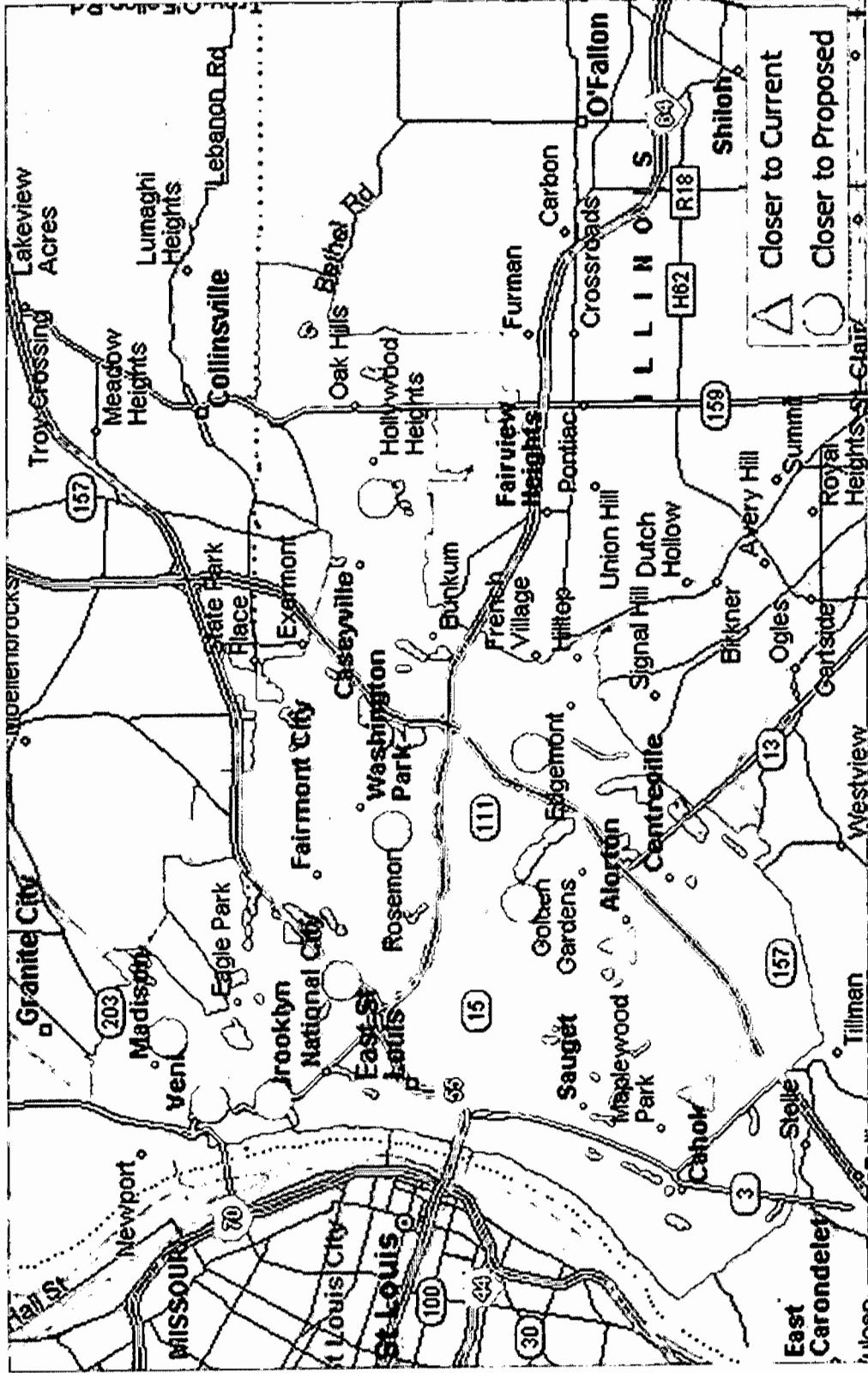


Table 1:
Top 10 Zip Codes with Populations Living Below the Poverty Level
(St. Clair County and St. Elizabeth's PSA/SSA)
Source: Claritas 2012

Rank	Zip Code	City	% of Population Living Below Poverty Level
1	62201	East St. Louis	73.0%
2	62059	Brooklyn	68.6%
3	62204	East St. Louis	65.5%
4	62090	Venice	56.9%
5	62207	East St. Louis	52.3%
6	62206	East St. Louis	37.0%
7	62060	Madison	36.2%
8	62205	East St. Louis	32.2%
9	62203	East St. Louis	32.0%
10	62232	Caseyville	14.4%

Table 2: Drive Time for Zip Codes within St. Elizabeth’s PSA/SSA

Source	CON Defined Service Area (Databay)	Databay	Drive time to SEB (min, MapQuest 2014)	
Zip	City	2014 Population Est	Belleville Campus	Proposed Campus
62208	FAIRVIEW HEIGHTS	17,808	13	8
62220	BELLEVILLE	19,843	4	17
62221	BELLEVILLE/SHILOH	26,705	10	8
62223	BELLEVILLE	17,291	8	16
62225	SCOTT AIR FORCE BASE	5,434	13	11
62226	SWANSEA/BELLEVILLE	30,365	6	13
62254	LEBANON	6,618	25	13
62258	MASCOUTAH	9,537	19	15
62269	O FALLON	32,794	18	5
62034	GLEN CARBON	13,741	31	27
62060	MADISON	4,806	26	20
62062	MARYVILLE	7,721	28	23
62090	VENICE	1,188	26	21
62201	EAST SAINT LOUIS	8,441	21	15
62203	EAST SAINT LOUIS	8,274	15	13
62204	EAST SAINT LOUIS	7,810	19	14
62205	EAST SAINT LOUIS	9,005	17	15
62206	EAST SAINT LOUIS	16,181	18	20
62207	EAST SAINT LOUIS	8,629	15	17
62230	BREESE	6,397	41	29
62232	CASEYVILLE	7,406	20	13
62234	COLLINSVILLE	33,096	22	15
62243	FREEBURG	5,916	14	20
62249	HIGHLAND	16,251	42	30
62255	LENZBURG	1,101	29	36
62257	MARISSA	3,585	32	35
62260	MILLSTADT	7,344	11	26
62264	NEW ATHENS	3,410	20	26
62265	NEW BADEN	5,186	27	18
62278	RED BUD	6,788	27	40
62281	SAINT JACOB	2,270	34	22
62285	SMITHTON	4,510	13	26
62286	SPARTA	6,883	46	53
62293	TRENTON	4,615	31	19
62294	TROY	14,206	30	18
62298	WATERLOO	16,779	28	38
Total PSA/SSA Population		397,934	799	755
Total PSA/SSA Population with Decreased Drive			249,309	
Percentage of PSA/SSA Population with Decreased Drive				63%

Figure 2: Metro Transit St. Louis ©2014 Bi-State Development Agency, Service Route Map

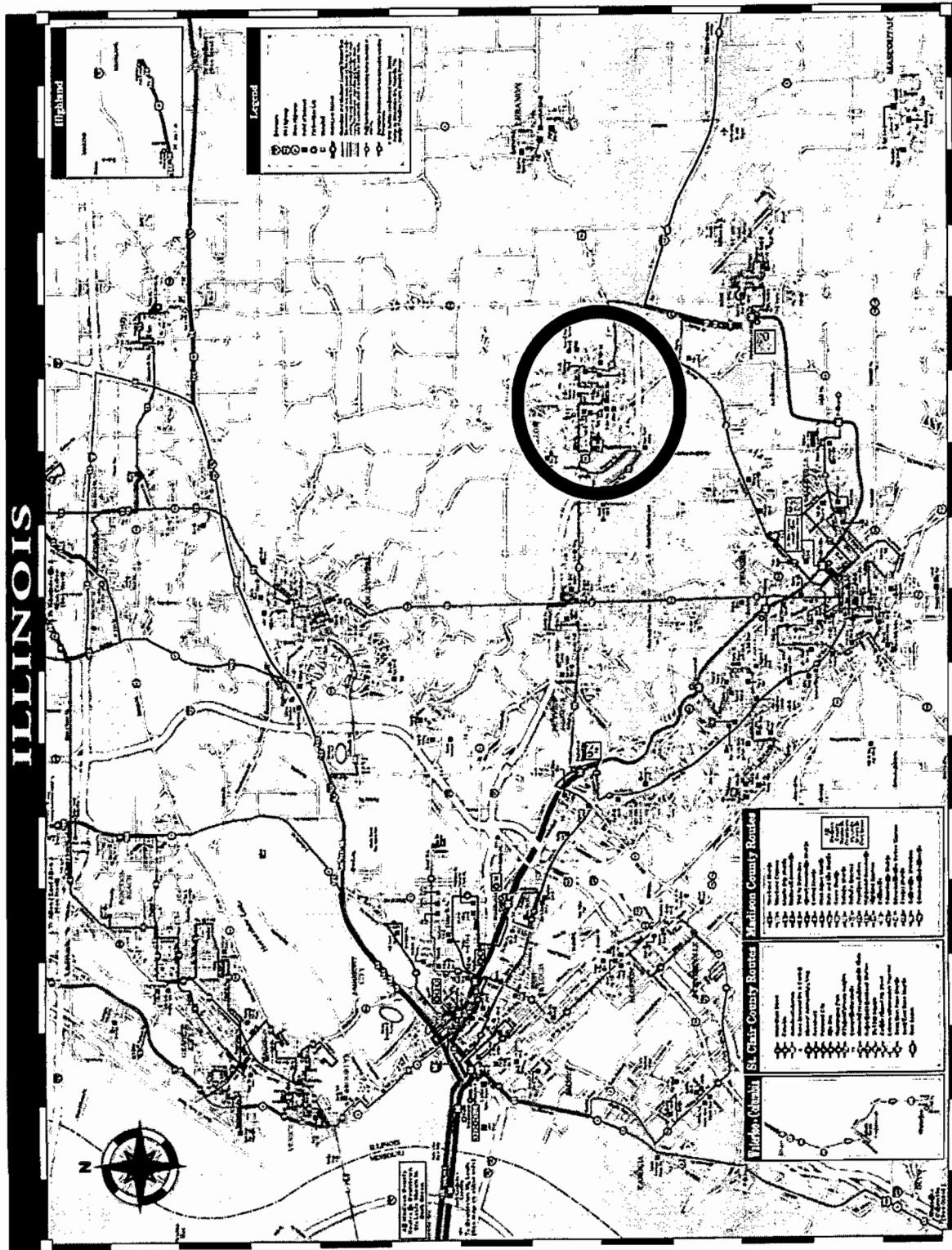
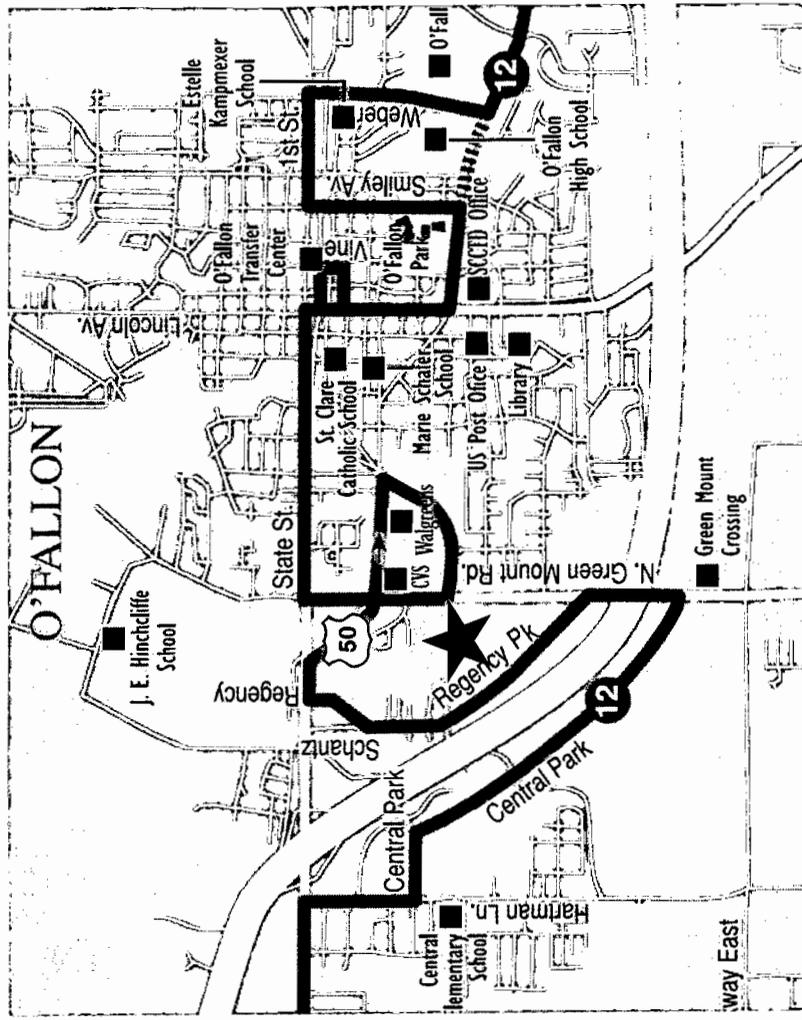


Figure 3: Metro Transit St. Louis ©2014 Bi-State Development Agency, Service Route Map Continued



★ Denotes Proposed Campus Site