

203 Redwood Shores Parkway #800 Redwood City, CA 94065

June 27, 2017

Xavier Becerra Attorney General

Attn: Wendi A. Horwitz
Deputy Attorney General
Department of Justice
Office of the Attorney General
300 South Spring Street, Suite 1702
Los Angeles, CA 90013

Re: Request Pursuant to Corp. Code Sec. 999.5(h) ("Subdivision h") – St. Francis Medical Center ED Diversion

Dear Ms. Horwitz:

Pursuant to the provisions of Subdivision h, St. Francis Medical Center hereby requests approval of an amendment to the Conditions issued by the Attorney General in the decision issued December 15, 2015 on the Proposed Change in Governance and Control of the Daughters of Charity Health System, in particular Condition IV, paragraph g, of those Conditions as they relate to the Emergency Department Diversion hours of St. Francis Medical Center.

As background, SFMC has engaged in numerous changes completed over the past 18 months to decrease incidence of diversion. These include:

- 1. Redesign triage and registration to expedite lower level of care patient to faster access and treatment:
- 2. Allocated phlebotomy resources to the ED to hasten blood draws and results;
- Implement ED throughput huddle 5X's daily to hasten and facilitate admitted patient's departure from ED;
- 4. Purchased mobile registration cart;



203 Redwood Shores Parkway #800 Redwood City, CA 94065

- 5. Opened 6 bed in patient staging unit to provide appropriate safe beds for telemetry patients;
- 6. Increased telemetry bed capacity on the 7th floor by 9 beds for a total of 60 beds total;
- 7. Weekly throughput meeting with SFMC and Verity leadership to review opportunities;
- 8. Develop and implement new Telemetry policy to limit inappropriate admissions to telemetry;
- 9. Recruit and train over 50 new RN's to expand capacity on existing floors; and 10. Develop and open 30 new beds on 5^{th} floor.

We also would like to point out several elements of the diversion program. Diversion is only selective and independent as to what specific clinical area is impacted. Second, trauma diversion is only called when both trauma teams are in surgery. Third STEMI diversion in only called when an actual patient is in the Cath lab undergoing a procedure. Fourth, diversion secondary to saturation is based on the capacity SFMC measures to provide care for emergency room patients. Finally, if diversion is called for saturation, we want to point out that SFMC remains open to accept trauma patients as well as STEMI patients.

Based on the current available providers (Trauma facilities) in similar socioeconomic geographic area, the ED diversion trends secondary to saturation, and other relevant data set forth on Attachment A hereto, St. Francis believes the applicable condition should be amended to 15% of total operational time of 8,760 hours (based on 24 hrs. x 365 days a year) or 1,314 hrs. per year. This would equate to 109 hrs. per month or roughly 27 hrs. per week. Saint Francis Medical Center has made significant improvement in their current rate of diversion, posting a reduction of 75% over the past 3 years. Comparing Saint Francis Medical Center to similar sized



203 Redwood Shores Parkway #800 Redwood City, CA 94065

Trauma facilities with similar populations and trending their ED diversion hours over the past 3 years, the request of 1,314 hours per year for ED diversion secondary to saturation is appropriate.

Please contact me should you have any questions with respect to this request.

Very truly yours,

). Mark Waxman General Counsel

Enclosure

cc: Mr. Andrei Soran, Chief Executive Officer, Verity Health System of California, Inc. Gerald Kozai, Pharm. D., President & Chief Executive Officer, St. Francis Medical Center

Marche-OLCIA 372 586 438 388 327 367 342 498 475 319 252 238 4384 50.0%	Total diversion (Caturation)	Trauma a	1 CTERAIL E-	r the nest	E voors for	not only	aint France	ic Madical	Conter ICE	MC\ but =	omnersh!-	cizod +cc.	ıma fasili	tos in similar saa	io acanomic areas	
Second Company Seco	Total diversion (Saturation,	rauma, and	STEMI) to	or the past	5 years for	not only S	aint Franc	is Medical	Center (SF	MC) but co	omporable	sized trau	ima facilit	tes in similar soc	io-economic areas	
SMMC 28 31 31 31 31 31 31 31 3	Monthly	Hour Dive	rsion 2012										-			
Maribor-UCLA 372 388 438 388 327 376 342 348 389 379 376 342 348 350 3		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec			A CONTRACTOR OF THE PARTY OF TH
Monthly Hour Diversion 2014 74 74 74 74 74 74 74	SFMC	282	313	319	165	126	129	163	230	244	200	165	156	2492	28.4%	207.
St.Mary Medical Certee	Harbor- UCLA	372	368	438	388	327	367	342	498	475	319	252	238	4384	50.0%	365
California Hospital 8.1 104 126 50 29 36 37 59 86 52 57 66 789 8.99 6 Monthly Hour Diversion 2013	Long Beach Memorial	327	264	342	230	171	136	245	290	230	178	129	133	2675	30.5%	222
Monthly Hour Diversion 2013	St.Marys Medical Center	111	97	141	93	66	60	126	156	108	126	79	119	1282	14.6%	106.
SPINC 297 181 238 200 156 130 215 223 244 193 158 267 267 271 271 271 271 271 272 273 275 280 245 144 136 287 281 281 282 282 282 283 284 283 284 283 284 283 284 283 284 283 284 283 284 283 284 283 284 283 284 283 284 283 284 283 284 28	California Hospital	81	104	126	50	29	36	37	59	86	52	57	66	783	8.9%	65.
Semicrophysical Registrophysical Regis	Monthly	y Hour Dive	rsion 2013				- 1			_		-		1		
SFMC 197 181 238 208 156 180 215 231 244 133 158 267 256 256 292 22 12 126 237 319 275 280 246 144 156 281 33.115 232 10ng Beach Memorial 364 161 208 172 133 187 199 148 64 64 96 43 41 1810 20.7% 155 155 180 180 180 180 180 180 180 180 180 180					N. Pines									The same of the sa		
Nambor Parbor P												-			7030000	The same of
Long Beach Memorial 364 151 208 172 133 187 193 148 64 96 43 41 1810 20.7% 155 SEMARY SMEdical Center 215 154 141 122 66 89 104 111 93 89 66 96 137 157 157 157 157 157 157 157 157 157 15	Section Distriction	-					The second secon	-		Marine San Control	-	-				
St.Marys Medical Center 215 154 141 122 66 89 104 111 93 96 86 96 1373 15.75% 111 115	The state of the s	100000000000000000000000000000000000000	72222	72.00000		-				-	2 20 7 10 20 20 20 20 20 20 20 20 20 20 20 20 20	200000000000000000000000000000000000000	2000000			
California Hospital 156					-			-	120000000	-		-				
Monthly Hour Diversion 2014												-				
SPMC 431 215 260 295 334 316 327 290 367 238 208 215 3496 39.9% 294 231 241 241 242 242 246 243 245 246 245 245 246 245 246 245 246 245 246	California Hospital	156	80	89	64	52	64	29	81	43	89	43	104	894	10.2%	74.
SFMC	Monthly	y Hour Dive	rsion 2014							-					THE THE P	27
SFMC		lan	Fah	Mar	Apr	May	lun	Inl	Διισ	Sen	Oct	Nov	Dec			
Harbor- UCLA 177 180 74 178 179 179 180 74 179	SEMC	-170,000,00	NORTH STATE	GALLOGIA Z.	-		27.50.00				- 2000000	SINGRES.	0.0000000000000000000000000000000000000	APRIL MARK DESCRIPTION	120000000000000000000000000000000000000	200000000000000000000000000000000000000
St.Marys Medical Center 223 94 89 144 148 170 178 126 172 133 115 156 167 1678 19.2% 133 134 156 1678 19.2% 134 135 136 136 137 135 136 136 136 136 137 135 136 136 136 137 135 136 136 136 137 135 136 136 136 137 135 136 137 135 136 136 137 135 136 136 137 137 135 136 137 137 137 135 136 137																
St.Marys Medical Center 223 168 126 129 171 135 186 186 201 200 144 200 2069 23.6% 177 California Hospital 178 80 96 64 96 79 96 119 144 89 151 126 1318 15.0% 10 10 10 10 10 10 10 10 10 10 10 10 10	The state of the s															
California Hospital 178 80 96 64 96 79 96 119 144 89 151 126 1318 15.0% 100	The Control of Control	- Distriction	17500			-	-	-			-					
SEMC 431 315 290 230 223 180 163 223 187 148 86 89 2565 29.3% 21		-	-			2/02/2014	-	and the second		-	-	-	The San		And the second second	
SEMC 431 315 290 230 223 180 163 223 187 148 86 89 2565 29.3% 21	Monthly	/ Hour Dive	reion 2015	7-11												7 7825
SFMC Martin Luther King CH Mar Martin Luther King CH Martin Luther K	ivionally	/ Hour Dive	151011 2015	7	N Good			-						Total Diversion	Percentage of total	Monthly
SFMC 431 315 290 230 223 180 163 223 187 148 86 89 2565 29.3% 21		lan	Eah	Mar	Apr	May	lun	tol	Διισ	Sen	Oct	Nov	Dec		(S)	
Martin Luther King CH	SENAC			100		100		- 1000								
Harbor- UCLA 312 168 171 108 148 187 208 133 288 178 115 74 2090 23.9% 177 Long Beach Memorial 297 141 238 172 133 122 111 96 158 178 100 223 1969 22.5% 166 St. Marys Medical Center 305 194 171 43 22 20 37 29 36 44 28 22 951 10.9% 77 California Hospital 200 161 156 86 126 93 111 133 237 186 144 223 1856 21.2% 15 Monthly Hour Diversion 2016 SFMC 215 174 29 28 14 28 81 52 50 74 72 119 936 10.7% Average SFMC 215 174 29 28 14 28 81 52 50 74 72 119 936 10.7% Average Martin Luther King CH 111 146 126 79 59 72 119 89 93 37 57 104 1092 12.5% 9 Harbor- UCLA 163 180 104 151 52 122 126 81 79 116 93 74 1341 15.3% 11 Long Beach Memorial 245 292 133 108 74 144 156 156 156 172 141 158 230 2009 22.9% 166 St. Marys Medical Center 126 146 74 28 14 46 59 81 115 59 72 44 864 9.9% 77		431	313	230	230	443	100	103	20000000		0.01000000	25239/A			25.570	213.
Long Beach Memorial 297 141 238 172 133 122 111 96 158 178 100 223 1969 22.5% 165 St.Marys Medical Center 305 194 171 43 22 20 37 29 36 44 28 22 951 10.9% 77 California Hospital 200 161 156 86 126 93 111 133 237 186 144 223 1856 21.2% 155 Monthly Hour Diversion 2016		312	168	171	108	148	187	208							23.9%	174.
St.Marys Medical Center 305 194 171 43 22 20 37 29 36 44 28 22 951 10.9% 77		-														
California Hospital 200 161 156 86 126 93 111 133 237 186 144 223 1856 21.2% 155	AND THE RESIDENCE OF THE PARTY	the state of the s	100000000000000000000000000000000000000		-		-	and the same of th								
SFMC 215 174 29 28 14 28 81 52 50 74 72 119 936 10.7% 7.5% 1.5%		-	-	- 10.00				111	133		186	144	223	1856	21.2%	154.
SFMC 215 174 29 28 14 28 81 52 50 74 72 119 936 10.7% 77 Martin Luther King CH 111 146 126 79 59 72 119 89 93 37 57 104 1092 12.5% 9 Harbor- UCLA 163 180 104 151 52 122 126 81 79 116 93 74 1341 15.3% 11 Long Beach Memorial 245 292 133 108 74 144 156 156 172 141 158 230 2009 22.9% 16 St.Marys Medical Center 126 146 74 28 14 46 59 81 115 59 72 44 864 9.9% 73	Monthly	Hour Dive	rsion 2016													
Martin Luther King CH 111 146 126 79 59 72 119 89 93 37 57 104 1092 12.5% 9 Harbor- UCLA 163 180 104 151 52 122 126 81 79 116 93 74 1341 15.3% 11 Long Beach Memorial 245 292 133 108 74 144 156 156 172 141 158 230 2009 22.9% 16 St. Marys Medical Center 126 146 74 28 14 46 59 81 115 59 72 44 864 9.9% 73		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct		Dec	Charles and the second of the		
Harbor- UCLA 163 180 104 151 52 122 126 81 79 116 93 74 1341 15.3% 11 Long Beach Memorial 245 292 133 108 74 144 156 156 172 141 158 230 2009 22.9% 16 St.Marys Medical Center 126 146 74 28 14 46 59 81 115 59 72 44 864 9.9% 77	SFMC	215	174	29		14	100000000000000000000000000000000000000	-	-		100000					
Long Beach Memorial 245 292 133 108 74 144 156 156 172 141 158 230 2009 22.9% 16 St.Marys Medical Center 126 146 74 28 14 46 59 81 115 59 72 44 864 9.9% 73		111	2000000	126	A STATE OF THE PARTY OF THE PAR	10000	-			- Colores	- Indiana			-	100 000 1000	
St.Marys Medical Center 126 146 74 28 14 46 59 81 115 59 72 44 864 9.9% 7.	Control of the Contro		200000		2233112			-				-				1000000
							-			-		1 7/05-017/7				
California Hospital 37 431 290 252 163 273 394 252 417 267 136 81 2993 34.2% 24																
	California Hospital	37	431	290	252	163	273	394	252	417	267	136	81	2993	34.2%	249