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August 6, 2014

VIA OVERNIGHT MAIL

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
Illinois Department of Public Health
525 West Jefferson Street, Second Floor
Springfield, IL 62761

Re: Project 13-076 Support Letters

Dear Ms. Avery:

Enclosed are two support letters regarding the above-referenced project. One is from Joseph Carney and the other from Lori Pacura.

Very truly yours,


Clare Connor Ranalli

cc: Mike Constantino w/enclosure

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HEALTH FACILITIES &
SERVICES REVIEW BOARD



HOLY CROSS
HOSPITAL

by FEDEX

August 5, 2014

Ms. Courtney Avery Administrator
Illinois Health Facilities and
Services Review Board
525 West Jefferson
Springfield, IL 62761

**RE: Written Public Comment
Project 13-076
Holy Cross Hospital**

Dear Ms. Avery:

My name is Joe Carney, and I am the Director of Emergency Services at Holy Cross Hospital ("HCH"). I have been in that position for 3 years and have worked for 15 years in hospital emergency services in Chicago. I am very familiar with the need for better access to inpatient psychiatric services at Holy Cross Hospital.

In light of the opposition to the proposed unit, over a three month period from March 1 through May 31, 2014 we undertook a study to demonstrate the need in even greater detail. The study supports unequivocally the substantial need for inpatient behavioral health beds at Holy Cross Hospital. Some of the hospitals opposing an inpatient mental health unit at Holy Cross have stated that this service is not needed because their hospitals readily accept Holy Cross's psychiatric ED patients needing transfer. Unfortunately, my experience for the past three years and the recent study show the exact opposite --that the hospitals opposing our project usually *refuse* to accept Holy Cross psychiatric ED patients who need inpatient care. It is obvious to the caregivers who work in the Holy Cross ED that there is a critical need, as we are required to routinely make multiple calls over many hours to numerous hospitals to attempt to find a hospital which will accept Holy Cross psychiatric emergency patients (ED AMI Patients) in need of transfer for inpatient care. We want to show the Health Facilities and Services Review Board the facts. I instructed those who routinely make these calls to maintain data on the hospitals called for placement, as well as how long patients were waiting without appropriate inpatient mental health treatment in the Holy Cross ED for transfer. I also personally made many of these calls.

Individuals making the calls were instructed to make sure that hospitals opposing inpatient mental health services at Holy Cross (and who had stated they do and would accept our patients) were called. These included St. Bernard, Mercy, South Shore, Jackson Park and Loretto. Calls were also made to Norwegian American, St. Elizabeth's and St. Anthony's. It is important to note these hospitals were not called for every patient. For example, we routinely contact Mount Sinai first, and if it has a bed the patient will go there. We know it will take the patient regardless of funding status, psychiatrists on the Medical Staff of Mount Sinai are also on the Medical Staff of Holy Cross, and Mount Sinai provides outpatient psychiatry services in collaboration with Holy Cross. At times SASS may arrange for transfer, or a patient may be appropriate for placement at the Veterans Hospital or Madden. However, during the study, the hospitals who say we don't call them and if we would they would take our patients were called numerous times, and took very few patients.

On Attachment A you will find data for hospitals called, the number of times they were called, and the number of patients accepted during the study time frame between March 1, 2014 through May 31, 2014. During these three months, 179 patients had to be transferred from Holy Cross for acute inpatient psychiatric services. **Nearly fifty-eight percent (57.5%) were Medicaid patients and over sixteen percent (16.2%) were uninsured patients.**

The following shows the number of times certain opposition hospitals were called during the Study. The data covers almost 2 months prior to April 22, 2014, when representatives of these opposition hospitals stated that Holy Cross was not calling their hospitals.

<u>Hospital</u>	<u>Called</u>	<u>Accepted</u>
St. Bernard	40	0
South Shore	45	1
Loretto	27	4
Mercy	22	1

Total Calls To Certain Opposition Hospitals

134

Total Patients Accepted

6

It is my understanding that as part of the review process before the Health Facilities and Services Review Board, representatives of Loretto, Mercy, SouthShore and St. Bernard hospitals stated on April 22, 2014 that they have capacity to treat our patients but that they are not contacted for placement of ED AMI Patients. **The information obtained during the Study reflects that these opposition hospitals DO NOT accept Holy Cross ED AMI patients when asked to do so.** Although Roseland is opposing the HCH unit, the HCH unit will not treat adolescents and Roseland's unit is solely adolescent. If an adolescent patient comes to the HCH ED and requires inpatient AMI services, Roseland will be among those hospitals called to accept the patient.

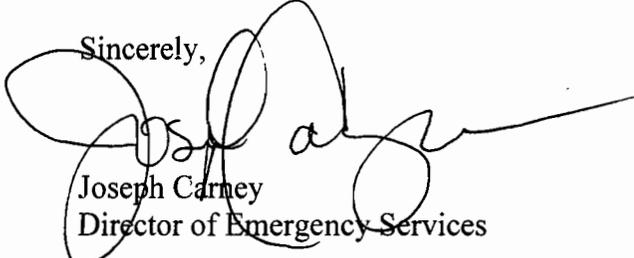
Of the 179 patients, 29 were uninsured. Twenty-four (24) of the uninsured patients went to Madden, three (3) to Mount Sinai, one (1) to Garfield Park and one (1) to Hartgrove. Individual callers took notes on hospitals called, so we could track the data presented. Some of the reasons given by staff at the opposition hospitals were "no bed available" or that the patient was "unfunded".

The study also demonstrates the severe wait times for acute psychiatric patients needing inpatient treatment. The average wait time in the ED from disposition (the time when the ED AMI Patient is medically stable for transfer and we are looking for an accepting facility) is approximately 10 hours. **Over a three month period, 17% waited 12 plus hours prior to transfer, 35% waited 10 plus hours and 47% waited 8 plus hours (see Attachment B).** As you can see, dozens of patients in an acute position are regularly waiting over 10 hours to be transferred by ambulance to another hospital that is frequently 45 minutes to an hour away.

If Holy Cross had an inpatient unit, it would greatly benefit the patients we see in our Emergency Department who need immediate acute care psychiatric services. Given the 179 patients seen and transferred during the Study, and extrapolating that number forward, 716 patients could potentially be transferred from our Emergency Department over a 12 month period beginning February 1, 2014 and ending January 31, 2015. These patients on average will wait approximately 10 hours in the Emergency Department for transfer, and many will wait much longer. Holy Cross is willing to invest the resources to care for these patients promptly in their community. I cannot imagine why the hospitals that are opposing inpatient mental health services at Holy Cross are doing so, since they routinely refuse to accept our patients, even at a time when they are opposing a Holy Cross unit.

As a health care professional who works in the Emergency Department at Holy Cross and represents our caregiver team, and who sees the circumstances our ED patients and their families face on a regular basis, as well as the time, cost and strain these circumstances cause, I urge the Health Facilities and Services Review Board to approve an inpatient behavioral health unit at Holy Cross Hospital.

Sincerely,



Joseph Carney
Director of Emergency Services

ATTACHMENT A

	* Initial Inquiries Made:																	Total Inquiries	Patients Accepted	Accepted %
	WE 3/8	WE 3/15	WE 3/22	WE 3/29	WE 4/5	WE 4/12	WE 4/19	WE 4/26	WE 5/3	WE 5/10	WE 5/17	WE 5/24	WE 5/31							
Mount Sinai	12	12	7	5	13	6	10	5	7	12	17	6	5	117	22	18.8%				
Jax Park	1	8	7	4	8	4	2	2	4	5	7	2		54	9	16.7%				
SouthShore	2	5	7	3	7	2	1	1	4	5	6	1	1	45	1	2.2%				
MacNeal	3	4	2	6	8	1	2	4	5	1	4	2	2	44	31	70.5%				
St. Bernard	2	4	3	3	8	2	1	1	4	5	6	1		40	0	0.0%				
Riveridge	4	1	2	2		1		1	2	7	9	2	2	33	19	57.6%				
Madden	3	1	2		3	1	3	1	1	5	5	1	2	28	28	100.0%				
Loretto		4	2			1		1	3	7	8	1		27	4	14.8%				
Mercy					3	1		2	3	5	7	1		22	1	4.5%				
Lakeshore	4	5	3	0	1	1		1	2	2	1	3	1	18	17	94.4%				
Hartgrove		2	1	3	1		1	1	2	1	4	3	1	20	11	55.0%				
Methodist	2	2	2		2	1	1	1	4	2	1			16	15	93.8%				
Norweg. Am.	2	1			1			1	1	2	1		1	10	8	80.0%				
GlenOaks								1	1		1	1		5	1	20.0%				
St. Mary/Eliz									2	0	1	1	2	4	2	50.0%				
St. Anthony										1	3	1		5	0	0.0%				
Kindred			1		1		1				1			4	3	75.0%				
Garfield Pk.	1							1						3	3	100.0%				
VA	1									2				3	1	33.3%				
UIC									2					2	1	50.0%				
Christ									1					1	0	0.0%				
Streamwood				1										1	1	100.0%				
Weiss								1						1	0	0.0%				
Ingalls									1					1	0	0.0%				
Rush									1					1	0	0.0%				
St. Joseph										1				1	1	100.0%				
Swed. Cov.											1			1	0	0.0%				
TOTAL	37	49	40	27	56	20	22	25	50	60	82	22	17	507	179					

*hospitals are often contacted multiple times prior to deciding whether to accept the patient

ATTACHMENT B

PATIENT (V#)	DISPO TIME (ACTUAL TIME)	ACCEPTED (ACTUAL TIME)	DEPARTED (ACTUAL TIME)	DISPO TO ACCEPT (TOTAL HRS)	ACCEPT TO DEPART (TOTAL HRS)	FUNDING SOURCE	Hours	Min	Tot Min	Pts
3/1-3/8										
79975	21:44	3:13	3:42	5:29	0:29	IDPA	5:58	358		
79983	3:00	6:39	7:59	3:39	1:20	IDPA	4:59	299		
80015	8:25	11:15	16:30	2:50	5:15	IDPA	8:05	485		
80067	18:03	7:40	8:40	13:37	1:00	SELF PAY	14:37	877		
80093	22:57	17:47	19:36	18:50	1:49	SELF PAY	20:39	1,239		
80098	3:20	10:00	11:30	6:40	1:30	MEDICARE	8:10	490		
80372	10:30	9:00	9:25	22:30	2:00	SELF PAY	24:30	1,470		
80530	16:20	0:43	0:53	4:52	0:10	MEDICARE	5:02	302		
80537	18:22	23:50	23:55	5:28	0:05	COUNTY CARE	5:33	333		
80595	4:14	5:11	6:40	0:57	1:29	IDPA	2:26	146		
80697	16:50	20:55	21:57	4:05	1:02	SELF PAY	5:07	307		
80797	1:52	3:32	4:32	1:40	1:00	IDPA	2:40	160		
80821	4:22	11:59	13:16	7:37	1:17	JESSIE BROWN VA	8:54	534		
80849	11:00	11:25	12:01	0:25	0:36	BCBS PPO	1:01	121		
80938	17:31	22:57	0:08	5:26	1:12	COUNTY CARE	6:38	398		
81029	19:41	21:47	23:15	2:06	1:28	MEDICARE/IDPA	3:34	214		
81127	16:21	18:40	19:00	2:19	0:20	IDPA	2:39	159		
81317	1:21	4:39	6:20	3:18	1:41	IDPA	4:59	299		
81360	9:25	13:15	14:58	3:50	1:43	MEDICARE	5:33	333		
81433	13:00	16:37	17:26	3:37	0:49	IDPA	4:26	266		
81464	21:00	22:10	23:09	1:10	0:59	IDPA	2:09	129	8,919	21
3/9-3/15										
81524	15:45	17:55	20:06	2:10	2:11	IDPA	4:21	261		
81565	21:29	6:30	6:39	9:00	0:09	COUNTY CARE	9:09	549		
81571	10:43	2:30	2:40	33:30:00	0:10	SELF PAY	9:40	580		
81655	14:49	23:44	0:15	8:55	0:29	IDPA	9:24	564		
81666	13:56	22:00	23:34	8:04	1:34	COUNTY CARE	9:38	578		
81817	18:18	3:03	4:12	8:45	1:09	COUNTY CARE	9:54	594		
81868	15:10	21:00	21:15	9:45	0:15	IDPA	10:00	600		
81878	5:36	8:26	9:29	10:45	1:03	IDPA	11:48	708		
81929	9:22	14:00	16:56	11:45	2:56	IDPA	14:41	881		
82070	15:33	22:31	22:48	12:45	0:17	MEDICARE	13:02	982		
82120	0:53	19:00	19:50	13:45	0:50	IDPA	14:35	875		

ATTACHMENT B

861736	14:25	20:05	20:35	5:40	0:30	MEDICARE	6:10	370		
86195	21:14	17:25	18:09	16:11	0:44	SELF PAY	16:55	151		
86271	7:53	13:20	14:20	5:27	1:00	IDPA	6:27	387		
86280	10:09	13:06	14:15	2:57	1:09	FHN	4:06	246		
86302	16:00	22:11	22:40	6:11	0:29	COUNTY CARE	6:40	400		
86405	16:00	18:14	19:10	2:14	0:56	IDPA	3:10	190		
86621	17:30	8:00	8:18	14:30	0:18	SELF PAY	14:48	768		
86709	22:17	6:40	7:15	8:23	0:35	HUMANA	8:58	538		
86745	3:11	7:00	8:17	3:49	1:17	SELF PAY	5:06	306		
86725	13:51	17:26	18:20	3:35	0:54	IDPA	4:29	269		
86993	8:51	16:09	17:18	7:18	1:09	IDPA	8:27	507		
87202	19:10	22:47	0:11	3:37	1:24	SELF PAY	5:01	301		
87212	16:00	22:03	22:40	6:03	0:37	AETNA	6:40	400		
87353	17:15	5:23	6:22	12:08	0:59	IDPA	13:07	787		
87431	5:00	1:48	2:49	22:48	1:01	IDPA	23:49	1,429		
87583	3:25	6:40	9:08	3:15	2:28	IDPA	5:43	343		
									7,392	16
4/6-4/12										
87683	1:52	11:11	12:24	9:19	1:13	IDPA	10:32	692		
87621	6:13	9:07	9:35	2:54	0:28	HARMONY HMO	3:22	202		
88046	10:06	1:24	1:58	15:18	0:34	IDPA	15:52	952		
88219	19:04	6:00	6:24	10:56	0:24	IDPA	11:20	680		
88317	21:03	2:43	3:18	17:40	0:35	SELF PAY	18:15	1,095		
88721	18:00	20:13	21:11	2:13	0:58	MEDICARE	3:11	191		
89147	17:37	4:04	5:47	9:27	1:43	IDPA	11:10	670		
									4,482	7
4/13-4/19										
89341	4:41	9:43	10:09	5:02	0:26	IDPA	5:28	328		
89541	3:13	3:59	5:20	0:46	1:21	IDPA	2:07	127		
89632	18:56	20:32	22:36	1:36	2:04	IDPA	3:40	220		
89749	18:55	8:15	8:56	13:10	0:41	SELF PAY	13:51	831		
89801	18:56	22:15	23:31	3:19	1:16	IDPA	4:35	275		
89842	21:39	0:15	1:07	3:36	0:52	MEDICARE	4:28	268		
89921	13:23	21:00	22:20	7:37	1:20	IDPA	8:57	537		
90093	6:06	9:00	9:27	2:54	0:27	SELF PAY	3:21	201		
90337	4:51	16:30	17:30	11:39	1:00	NON-ACTIVE IDPA	12:39	759		
90553	2:43	5:48	6:09	3:05	0:21	COUNTY CARE	3:26	206		
90558	4:47	7:45	11:23	2:58	3:38	IDPA	6:36	396		

ATTACHMENT B

95024	12:30	23:00	0:11	10:30	1:11	SELF PAY	11:41	701		
95073	21:44	5:44	6:50	8:00	1:06	IDPA	9:06	546		
95105	16:15	20:54	21:44	4:39	0:50	IDPA	5:29	329		
95198	8:26	12:23	13:42	3:57	1:19	MEDICARE	5:16	316		
95235	8:04	8:46	9:41	0:42	0:55	FHN SFHC ACCESS	1:37	97		
95247	11:23	14:18	15:05	2:55	0:47	IDPA	3:42	222		
95334	21:30	12:32	12:59	15:02	0:27	IDPA	15:29	929		
95347	22:15	13:00	14:31	14:45	1:31	SELF PAY	16:16	976		
95376	5:30	14:00	16:00	8:30	2:00	IDPA	10:30	630		
95380	8:50	17:00	18:08	8:10	1:08	SELF PAY	9:18	558		
									12,895	21
5/11-5/17										
95393	8:41	13:35	15:00	4:54	1:25	IDPA	6:19	259		
95444	18:30	4:42	6:17	10:12	1:35	MEDICARE	11:47	707		
95495	22:56	17:19	18:19	18:19	1:00	CHARITY	19:19	1,159		
95518	7:09	11:20	12:22	4:11	1:02	BCBS	5:13	313		
95530	6:55	21:05	22:26	14:10	1:21	IDPA	15:31	931		
95539	10:00	13:25	18:09	3:25	4:44	IDPA	8:09	489		
95788	4:52	10:00	11:10	5:08	1:10	IDPA	6:18	378		
95810	13:03	16:30	17:29	3:27	0:59	SELF PAY	4:26	266		
95481	7:52	0:30	1:29	15:38	0:59	SELF PAY	16:37	997		
95815	7:50	11:16	12:14	3:26	0:58	MEDICARE	4:24	264		
95893	16:03	1:30	2:35	9:27	1:05	SELF PAY	10:32	632		
95914	18:18	20:35	21:50	2:17	1:15	IDPA	3:32	212		
96023	22:03	3:58	5:30	5:55	1:32	MEDICARE	7:27	447		
96043	20:00	6:02	6:38	10:02	0:36	MEDICARE	10:38	638		
96064	8:05	12:09	13:10	4:04	1:01	IDPA	5:05	305		
96080	11:00	18:50	19:50	7:50	1:00	ILLINICARE	8:50	530		
96176	18:47	1:40	2:53	30:53	1:13	SELF PAY	32:06	1,926		
96299	23:32	15:05	16:44	15:33	1:39	IDPA	17:12	1,032		
96342	13:46	17:35	19:27	16:33	1:52	SELF PAY	18:25	1,905		
96344	14:07	16:45	18:34	17:33	1:49	COUNTY CARE	19:22	1,162		
96520	20:29	4:16	5:46	7:47	1:30	HARMONY HMO	9:17	557		
96834	10:34	15:58	16:40	5:24	0:42	IDPA	6:06	366		
96936	18:25	2:31	3:16	8:06	0:45	COUNTY CARE	8:51	531		
									16,006	23
5/18-5/24										
97066	17:16	2:47	3:58	9:31	1:11	IDPA	10:42	642		
97135	8:49	21:41	23:03	12:52	1:22	IDPA	14:14	856		



HOLY CROSS
HOSPITAL

by **FEDEX**

August 5, 2014

Ms. Courtney Avery
Administrator
Illinois Health Facilities and
Services Review Board
525 West Jefferson
Springfield, IL 62761

RE: Written Public Comment
Project 13-076
Holy Cross Hospital

Dear Ms. Avery:

This letter is being provided to explain without question that Project 13-076 needs to be approved.

Background

On December 30, 2013 Holy Cross Hospital (“Holy Cross”) and Sinai Health System (“Sinai”) filed their Certificate of Need application proposing the establishment of a 50-bed acute mental illness (“AMI”) unit at Holy Cross Hospital on the southwest side of Chicago. The purpose of the project then, as it is now, was to improve access to inpatient AMI services for the financially disadvantaged residents of the neighborhoods surrounding Holy Cross that have looked to Holy Cross for their health care needs for decades. Holy Cross Hospital is a designated “Safety Net” hospital, and during 2013 7.3% of the patients admitted to the hospital were classified as “charity care”, and 23.8% were Medicaid recipients. Sinai Health System operates the planning area’s only AMI unit that is operating above the IHFSRB’s target utilization rate, and cannot expand that unit due to facility-related limitations.

Following the filing of the application, and to the surprise of Holy Cross, opposition to the proposed 50-bed unit was expressed by some area hospitals, and a Public Hearing was conducted on March 4, 2014. Testimony in support of the project was provided by a number of community-based organizations, many of which address the health care/mental health needs of area residents on a daily basis. That testimony focused on the need for additional inpatient mental health services. Those organizations that provided supportive testimony included:

- Metropolitan Family Services
- Community Behavioral Health Association of Illinois
- Southwest Organizing Project
- Chicago Police Department

Testimony in opposition to the project was provided by four area hospitals: South Shore Hospital, Mercy Hospital, Loretto Hospital and St. Bernard Hospital. The testimony in opposition focused on excess beds in the planning area, the alleged financial impact that the proposed project would have on the hospitals providing opposing testimony, and the need for outpatient mental health services. **The issue of access to inpatient AMI services for the population to be served was not mentioned a single time during the testimony in opposition to this project.**

A second Public Hearing was requested by an opposing hospital, and that hearing was conducted on July 30, 2014. At that hearing the applicants explained the rationale behind the Type A Modification (see below), and summarized the supportive testimony previously provided by community-based organizations interested or involved in the provision of mental health services. Testimony in opposition to the project was provided by four area hospitals, addressing the previously-raised issues.

This project was originally scheduled to be heard by the IHFSRB at its April 22, 2014 meeting. During the Public Participation portion of that meeting, testimony was again provided by area hospitals, and once more the focus of the opposing testimony was on the hospitals' bottom lines. **Again, the issue of access was ignored**, but for statements that the hospitals opposing the Holy Cross unit could accept patients initially seen in the Holy Cross ED. Following the Public Participation portion of the meeting, the applicants elected to defer consideration of the project.

Modification

The proposed 50-bed category of service was to be provided through a 24-bed unit and a 26-bed unit. The volume of patients needed to justify 50 beds came from three primary sources: patients from the Holy Cross Emergency Department, patients from the Mount Sinai Hospital Emergency Department that could not be admitted to the hospital's AMI unit due to high occupancy, and non-ED patients identified by physicians and patients that would have been admitted to an AMI unit at Holy Cross, had a unit been available. This justification was consistent with IHFSRB reporting requirements and resulted in a positive finding for the applicable review criterion in the State Board Staff Report prepared for the April 22nd meeting.

Following the April 22nd meeting (Sinai elected not to present its project to the Board at that time), the decision was made to reduce the scope essentially in half, to balance ensuring that Holy Cross and Mount Sinai can appropriately address the needs of the two hospitals' ED patients who confront the most difficult barriers to access to acute inpatient mental health care, while also responding to the opposition hospitals.

Access to AMI Services

As noted in the opening of this letter, an AMI unit at Holy Cross Hospital is needed to address the continued difficulties experienced by Holy Cross patients in accessing inpatient AMI services. These difficulties are exacerbated for the financially disadvantaged component of the hospital's patient population, which is a substantial number of patients. Below is identified the current payer mix of Holy Cross ED patients transferred to another hospital for admission to an inpatient AMI unit:

Medicaid	57.5%
Charity/Self Pay	16.2%
Medicare	16.2%
Commercial Insurance	8.4%
VA	<u>1.67%</u>
	100.0%

As can be seen from the table above, Medicaid recipients represent over half of the patients transferred for inpatient AMI care, and when combined with charity care or “unfunded” patients, represent three of every four patients.

While area hospitals claim—and in some cases have testified during an IHFSRB hearing that they will accept AMI patients from Holy Cross—actual experience tells a different story.

In order to document for the IHFSRB the difficulties experienced on a day-to-day basis in the Holy Cross Hospital ED when a patient needs to be transferred to another hospital’s AMI unit, a three-month study was undertaken to confirm the difficulties and to rebut the statements of the opposition hospitals. During the period March-May 2014 a total of 179 patients were transferred to another hospital’s AMI unit, with the following findings:

- the average delay (the period from the decision to transfer a patient to the patient leaving the ED) was 9.32 hours
- the average delay for transferred charity care/unfunded patients was 13.92 hours
- 16.9% of transferred patients experienced delays of 12+ hours
- 47% of the transferred patients experienced delays of 8+ hours
- the hospitals that have opposed the project rarely accepted Holy Cross AMI patients:
 - South Shore Hospital was contacted on 45 patients and accepted 1
 - St. Bernard Hospital was contacted on 40 patients and accepted 0
 - Loretto Hospital was contacted on 27 patients and accepted 4
 - Mercy Hospital was contacted on 22 patients and accepted 1
 - St. Anthony Hospital was contacted on 5 patients and accepted 0
- in total, these “opposition” hospitals identified above were contacted 139 times and accepted 6 patients

A complete listing of hospital contacts and resulting transfers is attached.

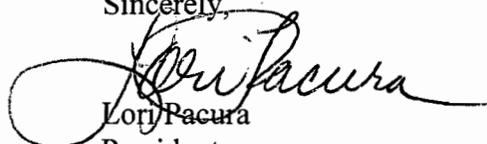
Another argument made to the IHFSRB by the opponent hospitals is that there is a need for additional outpatient mental health services in the planning area. Sinai and Holy Cross wholeheartedly agree. In fact, Sinai is the largest provider of access to outpatient mental health care on the west side of Chicago serving the State’s communities most challenged by poverty, chronic disease, and violence. Among the outpatient mental health programs and services offered by Sinai at sites throughout Chicago’s west and southwest sides are psychological evaluations and rehabilitation, individual, family and small group therapy, medications management, case management, a community-based alternative to inpatient care (Pioneer House) and a specialized program targeting the community’s youth (Under the Rainbow).

Almost immediately after Holy Cross joined Sinai, Sinai established an outpatient mental health clinic at the hospital and also began offering needed inpatient mental health consult services at Holy Cross. However, outpatient mental health care cannot respond to patients who are in crisis, a danger to themselves or others and/or who need acute inpatient AMI services. Based on a diligent evaluation of community need as evidenced by the support for this project from longstanding, respected community groups in Holy Cross's service area, the population served in the neighborhoods surrounding Holy Cross need prompt access to inpatient AMI services with the opportunity for continuity of care through comprehensive, quality outpatient mental health care in their own community. Sinai and Holy Cross are firmly committed to bringing comprehensive, quality inpatient and outpatient mental health care to a challenged community where there is great need and significant barriers to access. This is a substantial component of Sinai's commitment to "Making Lives Better" and improving health not only of the individuals but also of the communities we serve.

Last, Review Criterion 1110.730.b includes a subsection (5) entitled Service Accessibility. In that subsection factors defining service restrictions are identified. Among those factors are: restrictive admissions policies of existing providers and access limitations. The findings of the study of 179 patients demonstrates what Holy Cross ED caregivers already knew-that there were substantial and unacceptable access limitations. This is particularly true for charity care patients. During the study period, 29 patients were identified as such. None of these patients were accepted for transfer to any of the opposition hospitals identified above. In addition, other restrictions limiting transfers exist for a variety of reasons. Examples of such are: psychiatric hospitals cannot take patients having medical problems that need to be monitored or addressed, only hospitals with an obstetrics unit can take a pregnant AMI patient, the State-operated hospital does not admit patients during the weekend, few psychiatric units will accept developmentally disabled patients, one area provider limits admissions to geropsychiatry patients, one area provider limits admissions to children and adolescents, some area hospitals will not accept a patient with a history of violence, and some area hospitals will not accept a patient who has been incarcerated during the prior six months. Holy Cross, as is the case with Mount Sinai, will operate without any such restrictions, with the exception that Holy Cross (as is the case with Mount Sinai) will not accept children.

Thank you for the opportunity to provide this information, and Sinai Health System looks forward to the opportunity to present this needed project to the Board.

Sincerely,



Lory Pacura

President

Holy Cross Hospital

cc M. Constantino

ATTACHMENT A

	* Initial Inquiries Made:																	Total Inquiries	Patients Accepted	Accepted %
	WE 3/8	WE 3/15	WE 3/22	WE 3/29	WE 4/5	WE 4/12	WE 4/19	WE 4/26	WE 5/3	WE 5/10	WE 5/17	WE 5/24	WE 5/31							
Mount Sinai	12	12	7	7	5	13	6	10	5	7	12	17	6	5	117	22	18.8%			
Jax Park	1	8	7	4	4	8	4	2	2	4	5	7	2	4	54	9	16.7%			
SouthShore	2	5	7	3	7	7	2	1	1	4	5	6	1	1	45	1	2.2%			
MacNeal	3	4	2	6	8	8	1	2	4	5	1	4	2	2	44	31	70.5%			
St. Bernard	2	4	3	3	8	8	2	1	1	4	5	6	1	4	40	0	0.0%			
Riveridge	4	1	2	2	2	1	1	1	1	2	7	9	2	2	33	19	57.6%			
Madden	3	1	2		3	1	1	3	1	1	5	5	1	2	28	28	100.0%			
Loretto		4	2			1	1		1	3	7	8	1	2	27	4	14.8%			
Mercy						3	1		2	3	5	7	1	1	22	1	4.5%			
Lakeshore	4	5	3	0	0	1	1	1	1	2	1	1	1	1	18	17	94.4%			
Hartgrove		2	1	3	3	1	1	1	1	2	1	4	3	1	20	11	55.0%			
Methodist	2	2	2		2	2	1	1	1	4	1	1		1	16	15	93.8%			
Norweg. Am.	2	1			1	1		1	1	1	2	1		1	10	8	80.0%			
GlenOaks			1					1	1	1	1	1	1	2	5	1	20.0%			
St. Mary/Eliz										2	0			2	4	2	50.0%			
St. Anthony											1	3	1	1	5	0	0.0%			
Kindred						1		1			1			4	4	3	75.0%			
Garfield Pk.	1								1		1			3	3	3	100.0%			
VA	1										2			3	1	1	33.3%			
UIC														2	2	1	50.0%			
Christ										2				1	1	0	0.0%			
Streamwood					1					1				1	1	1	100.0%			
Weiss								1						1	1	0	0.0%			
Ingalls										1				1	1	0	0.0%			
Rush										1				1	1	0	0.0%			
St. Joseph											1			1	1	1	100.0%			
Swed. Cov.														1	1	0	0.0%			
TOTAL	37	49	40	27	56	20	22	25	50	60	82	22	17	507	179					

*hospitals are often contacted multiple times prior to deciding whether to accept the patient

ATTACHMENT B

PATIENT (V#)	DISPO TIME (ACTUAL TIME)	ACCEPTED (ACTUAL TIME)	DEPARTED (ACTUAL TIME)	DISPO TO ACCEPT (TOTAL HRS)	ACCEPT TO DEPART (TOTAL HRS)	FUNDING SOURCE	Hours	Min	Tot Min	Pts
3/1-3/8										
79975	21:44	3:13	3:42	5:29	0:29	IDPA	5:58	358		
79983	3:00	6:39	7:59	3:39	1:20	IDPA	4:59	299		
80015	8:25	11:15	16:30	2:50	5:15	IDPA	8:05	485		
80067	18:03	7:40	8:40	13:37	1:00	SELF PAY	14:37	877		
80093	22:57	17:47	19:36	18:50	1:49	SELF PAY	20:39	1,239		
80098	3:20	10:00	11:30	6:40	1:30	MEDICARE	8:10	490		
80372	10:30	9:00	9:25	22:30	2:00	SELF PAY	24:30	1,470		
80530	16:20	0:43	0:53	4:52	0:10	MEDICARE	5:02	302		
80537	18:22	23:50	23:55	5:28	0:05	COUNTY CARE	5:33	333		
80595	4:14	5:11	6:40	0:57	1:29	IDPA	2:26	146		
80697	16:50	20:55	21:57	4:05	1:02	SELF PAY	5:07	307		
80797	1:52	3:32	4:32	1:40	1:00	IDPA	2:40	160		
80821	4:22	11:59	13:16	7:37	1:17	JESSIE BROWN VA	8:54	534		
80849	11:00	11:25	12:01	0:25	0:36	BCBS PPO	1:01	121		
80938	17:31	22:57	0:08	5:26	1:12	COUNTY CARE	6:38	398		
81029	19:41	21:47	23:15	2:06	1:28	MEDICARE/IDPA	3:34	214		
81127	16:21	18:40	19:00	2:19	0:20	IDPA	2:39	159		
81317	1:21	4:39	6:20	3:18	1:41	IDPA	4:59	299		
81360	9:25	13:15	14:58	3:50	1:43	MEDICARE	5:33	333		
81433	13:00	16:37	17:26	3:37	0:49	IDPA	4:26	266		
81464	21:00	22:10	23:09	1:10	0:59	IDPA	2:09	129	8,919	21
3/9-3/15										
81524	15:45	17:55	20:06	2:10	2:11	IDPA	4:21	261		
81565	21:29	6:30	6:39	9:00	0:09	COUNTY CARE	9:09	549		
81571	10:43	2:30	2:40	33:30:00	0:10	SELF PAY	9:40	580		
81655	14:49	23:44	0:15	8:55	0:29	IDPA	9:24	564		
81666	13:56	22:00	23:34	8:04	1:34	COUNTY CARE	9:38	578		
81817	18:18	3:03	4:12	8:45	1:09	COUNTY CARE	9:54	594		
81868	15:10	21:00	21:15	9:45	0:15	IDPA	10:00	600		
81878	5:36	8:26	9:29	10:45	1:03	IDPA	11:48	708		
81929	9:22	14:00	16:56	11:45	2:56	IDPA	14:41	881		
82070	15:33	22:31	22:48	12:45	0:17	MEDICARE	13:02	982		
82120	0:53	19:00	19:50	13:45	0:50	IDPA	14:35	875		

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82175	9:38	15:07	15:43	14:45	0:36	IDPA	15:21	921
82371	3:14	7:00	7:40	15:45	0:40	IDPA	16:25	985
82534	1:30	4:00	4:17	16:45	0:17	FHN SFHC	17:02	1,022
82600	6:20	12:14	13:04	17:45	0:50	IDPA	18:35	1,115
82743	19:21	23:30	1:42	18:45	0:42	IDPA	19:27	1,167
82788	19:58	0:26	2:59	19:45	1:42	COUNTY CARE	21:27	1,287
							13,669	18
3/16-3/22								
8302	6:26	8:47	9:30	2:21	0:43	IDPA	3:04	184
83137	3:49	5:17	6:17	1:28	1:00	IDPA	2:28	268
83262	17:30	22:30	23:23	5:00	0:53	MEDICARE	5:53	353
83320	21:25	0:25	1:45	3:00	1:20	IDPA	4:20	260
83711	12:26	16:50	18:42	4:24	1:52	IDPA	6:16	376
83887	4:47	6:53	8:25	2:06	1:32	COUNTY CARE	3:38	218
83966	9:20	2:25	2:25	5:00	0:00	SELF PAY	5:00	300
84189	22:13	5:50	7:39	7:37	1:49	IDPA	9:26	566
84209	5:01	23:50	0:48	18:49	0:58	SELF PAY	19:47	1,187
84410	6:42	12:10	13:17	5:28	1:07	COUNTY CARE	6:35	395
84490	16:16	18:16	19:15	2:00	0:59	IDPA	2:59	179
84579	1:33	7:30	8:35	5:57	1:05	IDPA	7:02	422
							4,708	12
3/23-3/29								
84629	19:15	23:15	1:21	4:00	2:06	IDPA	6:06	366
84978	3:50	5:49	6:23	1:59	0:34	IDPA	2:33	153
85042	15:30	19:50	20:28	4:20	0:38	IDPA	4:58	298
85096	1:02	17:33	17:56	16:31	0:23	SELF PAY	16:54	1,014
85129	17:15	20:55	22:05	3:40	1:10	AETNA	4:50	290
85197	17:42	20:06	21:01	2:24	0:55	IDPA	3:19	199
85208	4:10	10:59	11:20	6:49	0:21	IDPA	7:10	430
85522	14:30	5:00	6:00	14:30	1:00	COUNTY CARE	15:30	930
85658	18:00	21:00	22:35	3:00	1:35	COUNTY CARE	4:35	275
85681	19:35	23:15	1:05	3:40	1:50	ILLINICARE	5:30	330
85760	1:00	10:18	11:34	9:18	1:16	LOCAL 1546	10:34	634
85765	2:46	5:40	6:54	2:54	1:14	MEDICARE	4:08	248
							5,167	12
3/30-4/5								

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861736	14:25	20:05	20:35	5:40	0:30	MEDICARE	6:10	370
86195	21:14	17:25	18:09	16:11	0:44	SELF PAY	16:55	151
86271	7:53	13:20	14:20	5:27	1:00	IDPA	6:27	387
86280	10:09	13:06	14:15	2:57	1:09	FHN	4:06	246
86302	16:00	22:11	22:40	6:11	0:29	COUNTY CARE	6:40	400
86405	16:00	18:14	19:10	2:14	0:56	IDPA	3:10	190
86621	17:30	8:00	8:18	14:30	0:18	SELF PAY	14:48	768
86709	22:17	6:40	7:15	8:23	0:35	HUMANA	8:58	538
86745	3:11	7:00	8:17	3:49	1:17	SELF PAY	5:06	306
86725	13:51	17:26	18:20	3:35	0:54	IDPA	4:29	269
86993	8:51	16:09	17:18	7:18	1:09	IDPA	8:27	507
87202	19:10	22:47	0:11	3:37	1:24	SELF PAY	5:01	301
87212	16:00	22:03	22:40	6:03	0:37	AETNA	6:40	400
87353	17:15	5:23	6:22	12:08	0:59	IDPA	13:07	787
87431	5:00	1:48	2:49	22:48	1:01	IDPA	23:49	1,429
87583	3:25	6:40	9:08	3:15	2:28	IDPA	5:43	343
								7,392
4/6-4/12								16
87683	1:52	11:11	12:24	9:19	1:13	IDPA	10:32	692
87621	6:13	9:07	9:35	2:54	0:28	HARMONY HMO	3:22	202
88046	10:06	1:24	1:58	15:18	0:34	IDPA	15:52	952
88219	19:04	6:00	6:24	10:56	0:24	IDPA	11:20	680
88317	21:03	2:43	3:18	17:40	0:35	SELF PAY	18:15	1,095
88721	18:00	20:13	21:11	2:13	0:58	MEDICARE	3:11	191
89147	17:37	4:04	5:47	9:27	1:43	IDPA	11:10	670
								4,482
4/13-4/19								7
89341	4:41	9:43	10:09	5:02	0:26	IDPA	5:28	328
89541	3:13	3:59	5:20	0:46	1:21	IDPA	2:07	127
89632	18:56	20:32	22:36	1:36	2:04	IDPA	3:40	220
89749	18:55	8:15	8:56	13:10	0:41	SELF PAY	13:51	831
89801	18:56	22:15	23:31	3:19	1:16	IDPA	4:35	275
89842	21:39	0:15	1:07	3:36	0:52	MEDICARE	4:28	268
89921	13:23	21:00	22:20	7:37	1:20	IDPA	8:57	537
90093	6:06	9:00	9:27	2:54	0:27	SELF PAY	3:21	201
90337	4:51	16:30	17:30	11:39	1:00	NON-ACTIVE IDPA	12:39	759
90553	2:43	5:48	6:09	3:05	0:21	COUNTY CARE	3:26	206
90558	4:47	7:45	11:23	2:58	3:38	IDPA	6:36	396

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90591	20:20	1:07	2:44	4:47	1:37	IDPA	6:24	384	4,532	12
4/20-4/26										
90853	9:29	11:27	13:31	1:58	2:04	MEDICARE	4:02	242		
90886	11:51	1:30	3:09	13:30	1:39	IDPA	15:09	909		
91118	21:10	1:17	3:51	4:07	3:51	IDPA	7:58	478		
91136	15:00	22:12	23:28	7:12	1:16	MEDICARE	8:28	508		
91181	20:10	18:30	20:00	10:20	1:30	SELF PAY	11:50	710		
91343	6:33	12:56	14:18	6:23	1:22	IDPA	7:45	465		
91526	14:04	18:09	20:03	4:05	1:54	IDPA	5:59	359		
91619	3:41	7:30	8:05	3:49	0:35	COUNTY CARE	4:24	264		
91867	3:04	9:18	10:05	6:14	0:47	IDPA	7:01	421		
92064	23:24	13:12	14:09	13:48	0:57	IDPA	14:45	885		
									5,241	10
4/27-5/3										
92428	23:00	14:24	15:14	15:24	0:50	IDPA	16:14	974		
92629	19:31	0:29	1:00	5:00	0:31	IDPA	5:31	331		
92770	12:58	13:23	16:59	0:25	3:36	HARMONY HMO	4:01	241		
93126	19:14	23:30	23:40	4:16	0:10	MEDICARE	4:46	286		
93157	22:55	3:55	4:25	5:00	0:30	MEDICARE	5:30	330		
93491	23:25	9:30	10:35	9:05	1:05	AETNA	10:10	610		
93539	2:02	9:59	10:51	7:57	0:52	IDPA	8:49	529		
93579	13:42	23:54	2:01	10:12	2:07	MEDICARE	12:19	739		
93640	18:27	1:00	2:14	30:33:00	3:07	SELF PAY	33:40:00	2,020		
93694	13:46	16:16	17:41	2:30	1:25	IDPA	3:55	235		
93877	23:57	2:54	3:38	2:57	0:44	IDPA	3:41	221		
									6,516	11
5/4-5/10										
93927	15:10	18:06	21:59	2:56	3:53	MEDICARE	6:49	409		
94051	12:25	6:09	6:44	16:44	0:35	BLUE ADV HMO	17:19	1,039		
94090	17:00	9:00	10:00	16:00	1:00	IDPA	17:00	1,020		
94052	22:44	10:00	12:23	11:16	2:23	SELF PAY	13:39	819		
94247	23:19	9:04	10:53	9:55	1:49	MEDICARE	11:44	704		
94389	16:00	13:37	14:36	20:37	0:59	HARMONY HMO	21:36	1,296		
94323	12:00	15:12	15:30	3:12	0:18	SELF PAY	3:30	210		
94488	3:07	5:09	5:48	2:02	0:39	JESSIE BROWN VA	2:41	281		
94776	5:48	12:15	14:29	6:27	2:14	FHN ST BERNARDS	8:31	511		
94810	8:40	21:16	21:17	12:36	0:01	MEDICARE	12:37	757		
94813	9:29	18:20	18:34	8:51	0:14	IDPA	9:05	545		

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95024	12:30	23:00	0:11	10:30	1:11	SELF PAY	11:41	701	
95073	21:44	5:44	6:50	8:00	1:06	IDPA	9:06	546	
95105	16:15	20:54	21:44	4:39	0:50	IDPA	5:29	329	
95198	8:26	12:23	13:42	3:57	1:19	MEDICARE	5:16	316	
95235	8:04	8:46	9:41	0:42	0:55	FHN SFHC ACCESS	1:37	97	
95247	11:23	14:18	15:05	2:55	0:47	IDPA	3:42	222	
95334	21:30	12:32	12:59	15:02	0:27	IDPA	15:29	929	
95347	22:15	13:00	14:31	14:45	1:31	SELF PAY	16:16	976	
95376	5:30	14:00	16:00	8:30	2:00	IDPA	10:30	630	
95380	8:50	17:00	18:08	8:10	1:08	SELF PAY	9:18	558	
								12,895	21
5/11-5/17									
95393	8:41	13:35	15:00	4:54	1:25	IDPA	6:19	259	
95444	18:30	4:42	6:17	10:12	1:35	MEDICARE	11:47	707	
95495	22:56	17:19	18:19	18:19	1:00	CHARITY	19:19	1,159	
95518	7:09	11:20	12:22	4:11	1:02	BCBS	5:13	313	
95530	6:55	21:05	22:26	14:10	1:21	IDPA	15:31	931	
95539	10:00	13:25	18:09	3:25	4:44	IDPA	8:09	489	
95788	4:52	10:00	11:10	5:08	1:10	IDPA	6:18	378	
95810	13:03	16:30	17:29	3:27	0:59	SELF PAY	4:26	266	
95481	7:52	0:30	1:29	15:38	0:59	SELF PAY	16:37	997	
95815	7:50	11:16	12:14	3:26	0:58	MEDICARE	4:24	264	
95893	16:03	1:30	2:35	9:27	1:05	SELF PAY	10:32	632	
95914	18:18	20:35	21:50	2:17	1:15	IDPA	3:32	212	
96023	22:03	3:58	5:30	5:55	1:32	MEDICARE	7:27	447	
96043	20:00	6:02	6:38	10:02	0:36	ILLINICARE	10:38	638	
96064	8:05	12:09	13:10	4:04	1:01	IDPA	5:05	305	
96080	11:00	18:50	19:50	7:50	1:00	ILLINICARE	8:50	530	
96176	18:47	1:40	2:53	30:53	1:13	SELF PAY	32:06	1,926	
96299	23:32	15:05	16:44	15:33	1:39	IDPA	17:12	1,032	
96342	13:46	17:35	19:27	16:33	1:52	SELF PAY	18:25	1,905	
96344	14:07	16:45	18:34	17:33	1:49	COUNTY CARE	19:22	1,162	
96520	20:29	4:16	5:46	7:47	1:30	HARMONY HMO	9:17	557	
96834	10:34	15:58	16:40	5:24	0:42	IDPA	6:06	366	
96936	18:25	2:31	3:16	8:06	0:45	COUNTY CARE	8:51	531	
								16,006	23
5/18-5/24									
97066	17:16	2:47	3:58	9:31	1:11	IDPA	10:42	642	
97135	8:49	21:41	23:03	12:52	1:22	IDPA	14:14	856	

