



**National Nurses
Organizing
Committee**



E-016-19

OAKLAND	CHICAGO
155 Grand Avenue	850 W Jackson Boulevard
Oakland CA 94612	Suite 750
phone: 800-504-7859	Chicago IL 60607
fax: 510-663-1625	phone: 312-491-4900
	fax: 312-491-9614

A Voice for Nurses. A Vision for Healthcare.

May 14, 2019

Courtney Avery, Administrator
Illinois Health Facilities and Services Review Board
525 W. Jefferson St., Second Floor
Springfield, IL 62761

Re: Jackson Park Hospital Exemption Application

Dear Ms. Avery:

Thank you for the opportunity to provide our comments on the above-referenced petition to reduce necessary services now before you. National Nurses Organizing Committee/National Nurses United (NNOC/NNU) represents more than 155,000 Registered Nurses (RNs) in every state, more than 6,000 of whom reside in Illinois. In congruence with our right and duty of patient advocacy, we are compelled to strongly oppose the closure of labor and delivery services at Jackson Park Hospital (JPH).

After careful review of the petition submitted by JPH, its own Community Health Needs Assessment, as well as other publicly available data related to the health and safety of mothers and infants in the region that is served by JPH, it is clear that the health needs of the community demand expansion of perinatal services rather than elimination of vital safety-net care. Through this careful evaluation, NNOC/NNU has concluded that elimination of obstetric services at Jackson Park Hospital does not serve the health, welfare, and safety interest of the public and patients in this vulnerable community.

The following are issues of concern to the NNOC/NNU:

- 1) **Priority Area of Community Need:** Elimination of obstetric services will endanger an already vulnerable population. According to the Community Health Needs Assessment performed by Jackson Park Hospital was adopted by the JPH Board of Directors in June of 2018-one of the priority areas of community need identified was maternal and child health. The decision to discontinue labor and delivery services at the hospital is in direct conflict with its own assessment.
- 2) **Poverty:** The community served by JPH has household poverty rates that range from 11.5% to 56.6% of households, with the majority of community areas experiencing higher household poverty rates than the Chicago average of 18.9%. Elimination of labor and delivery services will have a disproportionate impact on these families.
- 3) **Racial Health Disparities:** Elimination of services will further exacerbate racial health care disparities. Currently, ninety-nine percent of mothers who delivered at JPH were black. "There are substantial differences in the infant mortality rates for Illinois babies of different racial/ethnic groups. The IMR for non-Hispanic Black infants is consistently more than double that of the other three racial/ethnic groups. On average, between 2000 and 2015, the infant mortality rate decreased about 1.9% per year for Non-Hispanic White infants, 1.6% per year for Non-Hispanic Black infants, and 0.8% per year for Hispanic infants, with no significant change over time for Asian infants. The significantly higher IM rate in Non-Hispanic Black infants highlights the need for targeted interventions".
- 4) **Prenatal Care:** The JPH community service area has low rates of mothers who receive early and adequate prenatal care. "In the community areas served by Jackson Park Hospital, between 52%

RECEIVED

MAY 16 2019

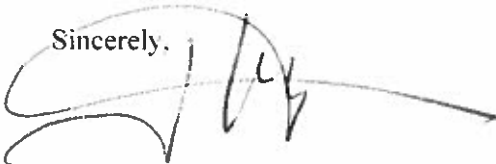
**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

(Riverdale) and 80.2% (Hyde Park) of mothers receive early and adequate prenatal care, with all but one community area having a lower rate of early and adequate prenatal care than the Chicago average of 73.6%ⁱⁱⁱ.

- 5) Infant Mortality: The communities surrounding JPH have been the target of state and national efforts to reduce infant mortalityⁱⁱⁱ. "There are high rates of infant mortality in the Jackson Park Hospital service area. All but one community area has a higher rate of infant mortality than the Chicago average of 7.1 deaths per 1,000 live births. Avalon Park has the highest infant mortality rate with 24.5 deaths per 1,000 live births"^{iv}.
- 6) Disruption to the IDPH Perinatal Care Network: While JPH claims in its application that there are nineteen acute care hospitals that can provide obstetric care to patients, many of those hospitals are in a different perinatal care network than the Stroger Perinatal Network. A reevaluation of the State of Illinois Perinatal Care Network must be conducted before any services are eliminated at JPH.
- 7) Wasted investment of taxpayer money intended to improve and expand healthcare delivery to infants and women in the JPH service area. The Illinois Department of Health through the Hospital Capital Investment Fund has awarded millions of dollars to the hospital over the past decade in a concerted effort to improve care delivery provided by this safety net hospital. Grant awards include but are not limited to:
 - \$7 million dollars to renovate space for women's health services^v
 - \$3.5 million dollars to renovate space for women's health services^{vi}

Given these substantial concerns, the NNOC/NUU strongly opposes approval of this application for elimination of necessary services and strongly encourages all available action to prevent the danger presented to the community served by Jackson Park Hospital and Medical Center.

Sincerely,



Joe Barrios
Labor Representative
National Nurses Organizing Committee
National Nurses United

ⁱ Illinois Infant Mortality Data Report; January 2018 www.dph.illinois.gov

ⁱⁱ Jackson Park Community Health Needs Assessment; March 2018

ⁱⁱⁱ Illinois Department of Public Health; Infant Mortality; www.dph.illinois.gov

^{iv} Illinois Department of Public Health; Infant Mortality; www.dph.illinois.gov

^v "Quinn awards nearly \$50 million to Chicago-area hospitals"; Crain's Chicago Business; August 8, 2013

^{vi} IDPH Hospital Capital Investment Program Report for 2016; www.dph.illinois.gov