



August 25, 2016

Ms. Jana Fussell
Certificate of Need Coordinator
Oregon Health Authority
800 NE Oregon Street, Suite 305
Portland OR 97232

Dear Ms. Fussell:

RE: Responses to a Public Comment Provided by the Oregon Health Authority August 23, 2016 Regarding NEWCO's Request to Establish a 100-Bed Inpatient Psychiatric Hospital in Washington County (CN #675)

On behalf of Fairfax Behavioral Health and Universal Health Services, I am pleased to provide a response to an e-mail comment received by the Oregon Health Authority ("OHA") August 18, 2016. This particular comment, which was unsigned, stated the following:

FYI. Many employees have expressed concern that Fairfax Hospital in Kirkland and Everett can't seem to staff their current facilities with the 70% turnover rate over the last few years.

Now it seems as if they want to go ahead and open a facility in Thurston County and Spokane. Dangerous conditions exist at these current hospitals here in the Seattle area.

It is not wise to allow Fairfax to open any other facility in the near future. Look up their parent company UHS. You will find a pattern of poor performance with UHS behavioral hospitals. Not to mention dangerous working environments.

I find it disingenuous and disturbing that an unnamed person or organization would allege these "poor performance" and "dangerous working environments" with absolutely no supporting documentation or facts. Typically, we would not respond to such unsupported allegations from unnamed sources, but we are very concerned these innuendos will cause the OHA to reach erroneous conclusions regarding our pending application for a 100-bed psychiatric hospital, proposed for Wilsonville Oregon in terms of our commitment, performance and high quality care. As the Chief Executive Officer of Fairfax Behavioral Health, I can state unequivocally, these allegations are false.

Regarding anonymous criticisms such as the one received by OHA, we believe such comments are part of a national strategy by a large labor organization's ongoing campaign to force Fairfax and UHS nationally, to capitulate, and allow this labor group to unionize all of our hospitals. For the record, let me state the following facts regarding UHS and Fairfax that unequivocally refute these accusations of poor performance and poor quality¹.

Nationally

- UHS is the largest provider of behavioral health services in the country with over

¹ Please note that some of this information was included in our June 28, 2016 responses to the OHA.



- 217 facilities currently providing excellent clinical care to our communities.
- For 37 years, UHS facilities have provided compassionate and high quality care to millions of patients. Our longevity and success is due to our unwavering commitment to provide the highest quality healthcare to our patients.
- As a result of the dedication of the hardworking employees, medical professionals and administration at our facilities, over the past 4 years, 83 UHS facilities (both acute care and psychiatric) have been designated Top Performers in Key Quality Measures by The Joint Commission. This list includes 19 UHS facilities in Texas that received this esteemed designation. The Joint Commission bestows such high recognition to facilities that attain excellence based on accountability measured performance. In our Behavioral Health Division, over half of our eligible facilities have received this distinguished recognition. The percentage of UHS BH facilities comprising the total Top Performers nationwide over the past 4 years is more than double the percentage of Top Performer facilities of UHS competitors.
- In addition, UHS Behavioral Health facilities exceed the national average in HBIPS (Hospital-Based Inpatient Psychiatric Services) core measure scores. HBIPS are evidence based measurements of processes and practices at inpatient psychiatric hospitals that affect the course of a patient's hospitalization.
- In 2015, UHS Behavioral Health facilities underwent 75 Joint Commission surveys with a 100% success rate for re-accreditation. In the history of UHS, it has never had a facility fail to be re-accredited by The Joint Commission.
- In addition to strong performance on evidence based, industry wide clinical quality metrics, UHS' patients in our behavioral health division also consistently report high levels of satisfaction with the care they receive at UHS facilities. Last year, our patient satisfaction grand mean score – on a 1-5 scale – was 4.5. Our patient satisfaction scores have risen every year over the past five years due to the commitment of resources and attention to enhancing the patient experience at UHS facilities. In addition, these surveys illustrate a substantial increase in patient satisfaction scores at facilities UHS acquired from previous owners.
- In 2015, UHS Behavioral Health facilities treated almost 450,000 patients amounting to over 5.8 million patient days. The rate of grave incidents at UHS facilities was 0.0031%. Although verifiable data is not publicly available to compare our low incident rates to other providers, we believe based upon our experience in the industry that our grave incident rate is much lower than our competitors or other comparable behavioral health facilities or systems serving similar patient populations.
- All health care facilities in the U.S. are routinely subject to inspections that can result in deficiency statements and plans of correction as a part of the comprehensive regulatory system. While our facilities are constantly striving for excellence in all aspects of their operations, we are mindful that over the course of treating approximately 2.5 million patients per year (acute and behavioral), irregular and unpredictable events occasionally occur including instances of alleged non-compliance with regulatory



requirements. Due to the large number of UHS facilities, we are subject to hundreds of surveys per year by regulatory agencies. The overwhelming majority of those surveys result in determinations that those facilities are in compliance with all conditions of participation. In the small minority of situations where surveys have alleged non-compliance with conditional level regulations, we devote the necessary resources to remediating any deficiencies with a goal of sustained compliance.

- The UHS Behavioral Health Division is a national partner of the National Action Alliance for Suicide Prevention. Presently, 11 UHS BH facilities serve as pilot sites for the *Zero Suicide* initiative, an evidence-based risk assessment and education model for community based suicide prevention that will be made available to the entire BH Division by the end of 2016. Our local outreach efforts include the development of suicide prevention resources such as presentations geared toward primary care physicians, school personnel and emergency department staff. The UHS behavioral health facilities are using these tools to educate their communities on this critical issue.
- In specific clinical metrics that are tracked by governmental or other accrediting organizations, UHS outperforms the industry – often by significant margins. For example, the area of restraint and seclusion, the hours per physical restraint or seclusion at UHS Behavioral Health facilities is substantially superior to the national data from The Joint Commission or CMS. Based upon data reported to CMS as determined by the Inpatient Psychiatric Facility Quality Reporting Program (IPFQR), the national rate for physical restraint use was 0.41 per 1000 patient hours. UHS's rate for 2014 was 0.08 – 5 times better than the national rate. (2014 is the most recent year for which statistics are available.) The CMS IPFQR national rate for seclusion was 0.21 per 1000 patient hours. UHS's rate was 0.09 – far surpassing the national rate by over 100%. When compared to The Joint Commission's data on physical restraint and seclusion, UHS's rates exceed the national averages by similar margins. Despite UHS's notable accomplishments in these areas compared to other providers, we have devoted substantial effort, resources and energy to successfully reducing our restraint and seclusion usage over the past few years.
- In addition to these recognitions, UHS has also received the following accolades:
 - In 2015, for the 3rd year in a row, UHS was listed among Fortune's World's Most Admired Companies – ranking 2nd in the healthcare sector.
 - PayScale/*Business Insider* named UHS one of the top 30 Most Meaningful Companies to Work For.

Washington State

- Fairfax Behavioral Health has an outstanding reputation and strong regulatory compliance record. It has been in continuous operation for 85 years.
- Fairfax operates a 157-bed psychiatric hospital in Kirkland Washington, and is, by far the largest behavioral health provider in the state of Washington. It also operates the largest number of ITA (involuntary treatment admission) beds and treatment days in the state, and is a very important part of the community's safety net and continuum of care.



- Fairfax was approved for new psychiatric facilities in Everett, Monroe, and very recently, in Spokane Washington, as part of a joint venture with Providence Health & Services. The newest approval was for a new 100-bed psychiatric hospital. The Washington Department of Health undertook considerable due diligence before awarding Fairfax the right to establish and operate these additional psychiatric facilities.
- Fairfax was named by US News and World Report one of the best Psychiatric Hospitals in the US in 2010.
- In regards to the turnover and staffing concerns raised by the anonymous person (SEIU) we believe it is SEIU making these false and misleading claims hiding behind anonymity to force Fairfax (& UHS) into capitulation to allow our facilities to be unionized by their labor union. It is another of the many unethical business practices they routinely engage in. They are one of the largest Unions at Western State Hospital, which is working off of its fourth CMS decertification letter, and is currently being fined daily for numerous other safety violations. OSHA has deemed them to be one of the most unsafe work environments in the state.
- Our turnover rate for the trailing 12 months is consistent with the regional averages given the significant RN shortage all providers are experiencing in the PNW and nowhere near the 70% number used by the anonymous complainant.
- Fairfax and all of its licensed program services are currently in good standing with the Joint Commission, CMS, DOL, DOH, DBHR (Involuntary Treatment). We have passed all regulatory surveys in 2015 and 2016 and are in compliance with all regulatory agencies who survey healthcare and behavioral health facilities.

I would be happy to answer any questions you have on the above responses. I can be reached at ron.escarda@uhsinc.com or at 425.821.2000, extension 1500.

Yours Truly,

A handwritten signature in blue ink that reads "Ron Escarda".

Ron Escarda
Group Director, Northwest Region-UHS, and CEO, Fairfax Behavioral Health