



June 28, 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 Oregon Health Authority Questions 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 additional responses to the Oregon Health Authority ("OHA") questions included in your letter to me dated April 26, 2016.

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 black ink that reads "Ron Escarda". The signature is written in a cursive style.

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

- 1. OAR 333-535-0061(4) requires psychiatric patient care rooms to comply with the requirements of OAR 333-535-0025 with a number of stated exceptions. Under this standard child, adolescent and adult rooms must have a minimum of 100 square feet of clear floor areas per bed in multiple bedrooms. (Geriatric rooms require at least 80 square feet of clear floor space per patient.) In reviewing the plans submitted with your application, it appears all 36 non-geriatric rooms fail to meet this standard, as each is a double room featuring 187 square feet. How will this situation be remedied? The floor plan will need to be reworked to accommodate this requirement. Will this require that you drop the number of beds proposed for the facility? How will it impact construction costs? Please provide a detailed discussion.**

Please see Appendix One. It includes a detailed memorandum from SRG ("SRG") Partnership, the architectural firm UHS has engaged for the Wilsonville hospital project. That memorandum provides detailed responses to this question. Please see response #1 of that SRG memorandum.

Please also note we have provided revised single line drawings with our responses that reflect the revisions as identified by SRG.

- 2. Have you developed the Patient and Staff Safety Assessment referenced in OAR 333-535-0061 yet? If so, please provide a copy.**

We have not yet created the Patient and Staff Safety Assessment, but do plan on completing this once the Certificate of Need process is complete. This assessment will be submitted with the construction documents in accordance with OAR 333-535-0061.

See the following requirements below:

2) Patient and Staff Safety Assessment. The hospital psychiatric care staff and the hospital administration, in consultation with the project architects, shall develop a Patient and Staff Safety Assessment that addresses security and safety design features and devices. A copy of this Assessment shall accompany construction documents submitted to the Licensing Plans Review Program. The Patient and Staff Safety Assessment shall include at least the following elements:

(a) A statement explaining the psychiatric population groups served;

(b) A discussion of the capability for staff visual supervision of patient ancillary areas and corridors;

(c) A discussion of the risks to patients, including self-injury, and the project solutions employed to minimize such risks;

(d) A discussion of building features and equipment, including items which may be used as weapons, that is intended to minimize risks to patients, staff and visitors;

(e) A statement explaining how potentially infectious patients will be managed; and

(f) A discussion of outdoor areas used by patients. Discussion must include, but is not limited to, the number of patients each outdoor area will serve at one time, staffing, security and shifts.

- 3. Nationally there have been concerns about “dangerously poor care and unsafe conditions” at Universal Health Services (“UHS”) facilities around the country. Please see “Danger in the Psych Ward, Safety issues plague a chain of mental health hospitals in Texas and across the United States” published in the Dallas Morning News on March 18, 2016. For your convenience here is a link to that article: <http://interactives.dallasnews.com/2016/danger-in-the-psych-ward/>**

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