

John C. Sheehan, FACHE

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September 5, 2019

Karen Singer, RN, BSN
Division Chief, Division of Health Care Facilities and Programs
Illinois Department of Public Health
525 W. Jefferson St., 4th Floor
Springfield, IL 62761

RE: Discontinuation of a Category of Service Exemption

Exemption # E-028-19 - Trinity Medical Center - Rock Island

This letter is in response to your correspondence received Aug. 30, 2019 regarding the discontinuation of the 29-bed long term category of service at Trinity Medical Center – Rock Island (Trinity), 2701 – 17th Street, Rock Island, Illinois. Trinity received an e-mail notification on August 21, 2019 that the approved Certificate of Exemption (COE) #E-028-19 was deemed complete by the Illinois Health Facilities and Services Review Board (IHFSRB) in compliance with Section 1130.570 based on our August 16, 2019 Project Completion notice to the IHFSRB. Copies of the various notification letters are attached for your reference.

Trinity Medical Center – Rock Island submitted the COE application which was received by the IHFSRB on July 1, 2019. While, Trinity Medical Center in Rock Island has provided quality long-term nursing care services to its patients for many years, the 29-bed long-term nursing care unit has realized declining patient volumes over the recent past. Employee retention and recruitment challenges have made it difficult to maintain appropriate staffing levels – capping patient capacity to 17 of its existing 29 licensed beds. During the calendar year 2018, the unit operated at a 33.3% occupancy rate with a total of 241 admissions. The long-term nursing care unit also has experienced several leadership transitions during this time and has had difficulty in obtaining leaders with expertise in skilled nursing operations and regulations.

Our case management team worked with referring physicians to transfer patients to other long-term care providers in the community prior to discontinuing the service. There are many facilities in the Illinois and Iowa Quad-Cities region that provide long-term care and the overall trend is for hospitals to focus on acute care services versus general skilled nursing beds. Other skilled nursing facilities in the area have adequate capacity to provide this service to the community. In Illinois, there is an excess of long-term care beds in the community (86 in Rock Island County and 198 in Health Service Area 10). Based on the 2017 IHFSRB Inventory of Health Care Facilities and Services and Need Determinations for the General Long-Term Care Category of Services (the "Inventory"), in Rock Island County alone there are 1,219 general nursing care beds at facilities other than Trinity Medical Center. In the Iowa Quad-Cities there are ten (10) long-term care facilities with a total of 1,090 beds.

As a requirement of the COE process, Trinity Rock Island submitted a public notice in the local media and sent letters to long term care / skilled nursing providers in the Health Planning Service area. Copies of the letters and notifications as well as the completed COE application may be found on the IHFSRB website located at:

https://www2.illinois.gov/sites/hfsrb/Projects/ProjectDocuments/Exempt/E-028-19/2019-07-01%20E-028-19%20Application.pdf

Since submitting the COE application and complying with the public notice requirements, Trinity experienced a decline in patient referrals. Due to the proposed discontinuation of the long-term care beds, Trinity received a significant number of resignations from clinical staff. With the limited availability of clinical staff to care for patients, it was determined that Trinity would not have sufficient clinical staff to appropriately care for patients after Friday, August 16, 2019. The effective closure date of the long term care skilled nursing unit was August 16, 2019.

Therefore, Trinity Medical Center – Rock Island discharged its last long term acute care patient on August 14, 2019 and thereby discontinued the service. Furthermore, all medical records are being retained according to federal and state laws. There were no capitalized project costs associated with the discontinuation and no modifications to the facility. Trinity Medical Center – Rock Island is in full compliance with the approved permit. At this time, Trinity has not yet determined the use of the space that has been vacated as a result of the discontinuation. We have notified Illinois Department of Public Health's Design and Construction Division and a copy of the letter has been attached for your reference.

If we can provide any further information, please contact Pamela Samuelson, Director of Business Planning and Development at UnityPoint Health – Trinity, at (563) 742-2616 or pamela.samuelson@unitypoint.org.

Sincerely,

John Sheehan President/CEO

Enclosures:

1. IHFSRB Approval Letter

2. UnityPoint Health Trinity Rock Island Completion Letter

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- 3. IHDRB Completion Approval Letter
- 4. IDPH Design and Construction Notification Letter



STATE OF ILLINOIS HEALTH FACILITIES AND SERVICES REVIEW BOARD

525 WEST JEFFERSON ST. ● SPRINGFIELD, ILLINOIS 62761 ●(217) 782-3516 FAX: (217) 785-4111

TRANSMITTED ELECTRONICALLY

August 7, 2019

Ginger Renkiewicz Executive Vice President, Chief Operating Officer Trinity Medical Center 2701 17th Street Rock Island. IL 61201

RE: Discontinuation of a Category of Service Exemption

Exemption # E-028-19 - Trinity Medical Center - Rock Island

Exemption Holder: Iowa Health System, Trinity Regional Health System

Dear Ms. Renkiewicz:

On August 6, 2019 the Illinois Health Facilities and Services Review Board (State Board) approved your request for the discontinuation of the 29-bed long term care category of service at Trinity Medical Center, Rock Island, 2701 17th Street, Rock Island, Illinois. The approval was based upon the application's compliance with applicable provisions of 77 IAC 1130.500 and 77 IAC 1130.525. At the conclusion of this transaction our records will show that the Hospital has 202 medical surgical beds, 54 acute mental illness beds, 20 intensive care beds, and 22 comprehensive physical rehabilitation beds for a total of 298 acute care beds. The expected completion date is October 1, 2019.

You are reminded that this exemption is for the discontinuation of a category of service, and that you are to provide the State Board with a notice of the completion of the transaction no later than 90 days following the project completion date. Failure to provide the required notification shall subject the exemption holder to the sanctions provided under Section 14 of the Illinois Health Facilities Planning Act.

The State Board's approval does not exempt the transaction from any other regulatory, certification or licensure requirements that may be applicable. The exemption will be invalid should the facility for which the change of ownership was granted cease to be an existing health care facility as defined in 77 IAC 1130.140.

Should you have any questions or concerns please contact Mike Constantino or George Roate of my staff at Mike.Constantino@illinois.gov or George.Roate@illinois.gov or 217.782.3516.

Sincerely,

Courtney Avery, Administrator

Courtrey Avery

Illinois Health Facilities and Services Review Board



Ginger Renkiewicz, RN, BSN, MSBA

Executive Vice President Chief Operating Officer 2701 17th Street Rock Island, IL 61201 309-779-5020

Fax: 309-779-2399
E-Mail: Ginger.Renkiewicz@unitypoint.org

August 16, 2019

Ms. Courtney Avery, Administrator Illinois Health Facilities and Services Review Board 525 W. Jefferson St., 2nd Floor Springfield, IL 62761

RE: Discontinuation of a Category of Service Exemption

Exemption # E-028-19 - Trinity Medical Center - Rock Island

Exemption Holder: Iowa Health System, Trinity Regional Health System Project completion notification in compliance with Section 1130.770

Dear Ms. Avery:

In compliance with Section 1130.770, this letter is to notify you of our project completion to discontinue the 29-bed long term category of service at Trinity Medical Center – Rock Island (Trinity), 2701 – 17th Street, Rock Island, Illinois. Trinity received an e-mail notification on August 7, 2019 that the Certificate of Exemption (COE) #E-028-19 was approved by the Illinois Health Facilities and Services Review Board at its meeting on August 6, 2019.

Since submitting the COE application on June 28, 2019 and complying with the public notice requirements, Trinity has experienced a decline in patient referrals. Due to the proposed discontinuation of the long-term care beds, Trinity has received a significant number of resignations from clinical staff. With the limited availability of clinical staff to care for patients, it has been determined that Trinity would not have sufficient clinical staff to appropriately care for patients after Friday, August 16, 2019.

Therefore, Trinity Medical Center – Rock Island discharged its last long-term acute care patient on August 14, 2019 and thereby discontinued the service. Furthermore, all medical records are being retained according to federal and state laws. There were no capitalized project costs associated with the discontinuation and no modifications to the facility. Trinity Medical Center – Rock Island is in full compliance with the approved permit.

If we can provide any further information related to the COE, please contact Pamela Samuelson, Director of Business Planning and Development at UnityPoint Health – Trinity, at (563) 742-2616 or pamela.samuelson@unitypoint.org.

Sincerely,

Ginger Renkiewicz, RN, BSN, MSBA

Executive Vice President Chief Operating Officer

Singer Kenkiewiez

cc: Mike Constantino

Janet Scheuerman

ELECTRONICALLY TRANSFERRED

August 21, 2019

Ginger Renkiewicz Executive Vice President Chief Operating Officer 2701 17th Street Rock Island, Illinois 61201

Re:

77 ILAC 1130.570 - Completion of Exemption

Exemption#: E-028-19- Unity/Point Health Trinity Medical Center-Rock Island

Dear Ms. Renkiewicz:

On August 21, 2019 we received the notice of completion for the discontinuation of the 29-bed long term care category of service at Trinity Medical Center, 2701 17th Street, Rock Island, Illinois. Our records will show that the discontinuation of the category of service was completed on August 16, 2019. No further action by the exemption holders is required for this project in relationship to the Illinois Health Facilities Planning Act.

If you should have any questions please contact Mike Constantino or George Roate at 217.782.3516 or Mike.Constantino@illinois.gov or George.Roate@illinois.gov

Sincerely,

Courtney Avery, Administrator

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Illinois Health Facilities and Services Review Board



525-535 West Jefferson Street · Springfield, Illinois 62761-0001 · www.dph.illinois.gov

September 3, 2019

Ginger Renkiewicz, Exective Vice President Trinity Rock Island 2701 17th Street Rock Island, IL 61201-

Re:

Trinity Rock Island

Rock Island

Discontinuation of 29 bed long term category of service

Dear Ms. Renkiewicz:

We are in receipt of your letter dated 8/27/19, regarding the discontinuation of 29-bed long term category of service. With the suspension of services in this area of the hospital and the undecided replacement for these beds, it will be required that all Life safety Code features in this area will be maintained. The facility is responsible for maintaining compliance with all required exits and exit paths, sprinkler system maintenance and testing and all fire alarm maintenance and testing.

When a decision has been made, please submit a narrative and sketch to Design and Construction Section, 525 W. Jefferson Street, 4th Floor, Springfield, IL 62761. Once we have reviewed the narrative and sketch, we will be able to determine if the proposal meets the licensing requirements.

If you have any questions regarding this matter, contact our office at 217-785-4247. The Department's TTY number is 800-546-0477, for use by the hearing impaired.

Sincerely.

Dennis Schmitt, Supervisor

Design and Construction Section

Division of Life Safety and Construction