



FAMILY COUNCIL
St. Luke's Sub-Acute & Skilled Nursing Facility

February 6, 2018

Via Email and U.S. Mail

Sarah Krevans
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Sutter Health
2200 River Plaza Drive
Sacramento, CA 95833

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RE: St. Luke's Sub-Acute and Skilled Nursing Unit

Dear Ms. Krevans and Dr. Browner:

The residents and families at St. Luke's Subacute Unit now have five months before the proposed move to the Davies Campus in June 2018. Communication regarding these plans has been non-existent. This inadequate communication is the cause of stress and trauma to those involved, and erodes trust in CPMC's proposal to relocate residents. In this letter, we ask specific questions relating to CPMC's plans to ensure:

- The safety of residents (especially during relocation)
- The minimization of transfer trauma
- Continuance of care to meet the resident's needs

1. What is the plan to make the existing skilled nursing facility at Davies subacute ready by the June 30th deadline?

Regarding licensing and compliance:

We are aware that California State Law and Title 22 require that these beds must be contiguous within a wing that is clearly defined as a subacute unit, and be cared for by trained nursing staff assigned to subacute residents alone. Please supply in writing the following:

- Copies of any correspondence with the licensing authorities and forms regarding licensing application
- Clarification as to whether you intend to accommodate both subacute and SNF residents within the Davies unit and how this will be managed given licensing requirements

Regarding availability of beds:

Given that all the beds at Davies SNF are currently occupied, we need to understand what the plan is to accommodate 19 subacute residents by June 30th. Please supply, in writing, details of:

- How and when these 19 beds will be emptied
- Whether subacute residents will be moved as beds become available between now and June, or all at one time
- Whether the deadline of June 30th is a real goal for transfer or a soft date

Regarding the plan for environmental modifications

We are aware that significant modifications will have to be made to the rooms to install treatment and monitoring equipment needed for the subacute residents. This will require re-engineering of the post-acute SNF unit at the Davies campus. We are aware that for approval of a subacute unit, certain OSHPD criteria also must be met. Please supply, in writing, details of:

- The modifications that will be required for this subacute population
- What the timeline for these environmental modifications are

2. What is the plan for transferring residents?

Given the complex needs of this fragile population, our expectation is that a patient-centered detailed plan for transfer will be written at least one month in advance. Please supply in writing, a copy of this plan. We expect such a plan to include details of:

- Transport to be used
- Who will travel with residents:

- Staffing: critical care nurse/staff known to resident
- Family member – with the provision of adequate notice (5 working days) of time/date of transfer
- Translators to be supplied as necessary
- How many residents will be transferred at a time and over what duration
- Staffing at each facility during transfer including how many, what level, staff familiar to residents wherever possible, and nurse-to-nurse handovers
- A written plan of care for each resident for use during transfer, available to resident, family and healthcare providers involved in transfer

3. What is the plan for minimizing transfer trauma, preparing residents for the transition, and welcoming them at Davies?

As frail and vulnerable people, the forthcoming transfer of these subacute residents is a potentially traumatic experience. We require that everything will be done to minimize trauma. This we believe can be achieved by excellent communication and preparation including many of the points already made in this letter. In addition however, we need information regarding details of how plans will be communicated to include:

- Individual multi-disciplinary family conferences for each resident to discuss plans and potential risks of transfer
- Weekly bulletins provided to residents and families summarizing developments. All communications should meet literacy levels of 8th grade and below, be made available in English and the recipients' first language, and conveyed by hand, mail or email as preferred
- Preparation, orientation, familiarization and welcoming residents and families to the new environment. This should include information about location, transport routes, tours of the facility and introductions to new staff
- Maintenance of current roommate relationships as requested

4. How will CPMC assure continuity of care for subacute residents?

We ask that the standard of care provided to our residents will not suffer, and that it will include familiar, consistent, trained and oriented caregivers. We ask that you supply in writing details of:

- How you will incentivize current staff familiar with these residents to transfer

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- Plans for staff recruitment, orientation and training
- A guarantee that CPMC's own subacute staffing guidelines will continue to be met

We hope that you will work with us to alleviate the stress and anxiety that this anticipated move has caused residents and families by addressing all of the concerns mentioned above. Please provide a written response to this letter within 10 working days (Health & Safety Code Section 1418.4).

Sincerely,



Raquel Rivera
Family Council Coordinator
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cc: Mayor Mark Farrell
SF Board of Supervisors
SF Health Commission
Director Barbara Garcia, Department of Public Health
Benson Nadell, Ombudsman
Scott Ciesielski
Liz Cong
Jim Macksood
Melissa White
Susan Bumatay
Josh Anderson
Austin Ord

References:

1. See following citations regarding transportation of ventilator patients:
[http://journal.chestnet.org/article/S0012-3692\(15\)46080-5/pdf](http://journal.chestnet.org/article/S0012-3692(15)46080-5/pdf)
<http://accessmedicine.mhmedical.com/content.aspx?bookid=520§ionid=41692269>
2. Citations of title 22 and related codes:
Subacute Care Unit, Title 22 § 51215.5
3. See following citations regarding transportation of ventilator patients:
[http://journal.chestnet.org/article/S0012-3692\(15\)46080-5/pdf](http://journal.chestnet.org/article/S0012-3692(15)46080-5/pdf)
<http://accessmedicine.mhmedical.com/content.aspx?bookid=520§ionid=41692269>