



May 16, 2017

The Honorable London Breed  
Member and President, Board of Supervisors  
City and County of San Francisco, City Hall  
1 Dr. Carlton B. Goodlett Place, Room 244  
San Francisco, CA 94102

**Subject:** Board of Supervisors agenda item 53 (170566) on Senate Bill 687 (Skinner) -  
Emergency Service Levels at Health Facilities

Dear Supervisor Breed:

On behalf of the S.F. Section of the Hospital Council of Northern and Central California and the California Hospital Association, this letter respectfully requests that the Board does not adopt the above referenced resolution in support of SB 687. The hospital community is **OPPOSED** to SB 687.

SB 687 purports to protect emergency department services, but it does not. Rather, it adds a duplicative and costly layer of approval, thus increasing healthcare costs and frustrating a hospital's ability to provide care.

If passed, SB 687 would require a nonprofit hospital to provide written notice to the Attorney General no later than 90 days prior to a planned reduction in the level of emergency services or an elimination of those services. Then, the Attorney General would conduct public meetings to hear comments from interested parties and may hire experts or consultants to assist in reviewing the proposed changes - *with the costs charged to the hospital*.

After the hearings, the Attorney General would have the discretion to consent, give conditional consent, or not consent to any elimination or reduction of emergency services.

SB 687 ignores that emergency departments are the most expensive setting to provide care because of the staffing and clinical expertise required, as well as ancillary and other services that must be available. Typically, if a hospital is planning to reduce or eliminate emergency services (a decision not taken lightly by a hospital), it is due to financial stress (often in rural communities in the state). Forcing hospitals to keep emergency departments open during an Attorney General review will adversely impact the entire hospital operations and the services to the community.

Further, adding this statutory layer of oversight is unnecessary and duplicative.

There are already existing procedures in place that require hospitals to notify the California Department of Public Health and counties prior to altering or closing emergency services.

Once notice is given, the local Emergency Medical Services Agency conducts an evaluation and holds a public hearing to assess the impact of the changes on the local community.

We strongly urge the Board to not adopt the resolution in support of SB 687 as it presents multiple problems to the hospitals and health systems of California.

Sincerely,



David Serrano Sewell  
Regional Vice-President, San Francisco  
Hospital Council of Northern and Central California

cc: Honorable members of the Board of Supervisors  
Honorable Edwin M. Lee, Mayor