



*Excellence Through Leadership & Collaboration*

May 5, 2017

The Honorable Diane Burgis, Chair  
The Honorable Karen Mitchoff, Vice Chair  
Contra Costa County Board of Supervisors' Legislation Committee  
651 Pine Street, Room 101  
Martinez, CA 94553

Dear Supervisors Burgis and Mitchoff:

The Hospital Council of Northern and Central California is writing to share our opposition to SB 687 (Skinner), which your Committee is reviewing on Monday.

The bill would require a nonprofit hospital to provide a 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. The Attorney General would then 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. Further, the Attorney General would have the discretion to consent, give conditional consent, or not consent to any elimination or reduction of emergency services.

Hospital 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, it is due to financial stress as we know how valuable emergency services are to the communities we serve. Forcing hospitals to keep emergency departments open during a review by the Attorney General, could adversely impact the entire hospital and all its services to the community.

In addition, there are already existing procedures in place that require hospitals to notify the California Department of Public Health and counties prior to downgrading 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. Adding a statutory layer of oversight for the Attorney General is unnecessary, duplicative, and inefficient.

For these reasons, we respectfully request that the Legislation Committee recommend an oppose position on SB 687.

Sincerely,

A handwritten signature in black ink that reads 'Rebecca Rozen'.

Rebecca Rozen  
Regional Vice President