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Chief Executive Officer

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Secretary to the Health Commission  
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To Whom It May Concern:

California Pacific Medical Center (CPMC) intends to realign our skilled nursing facility ("SNF") services to better serve patients needing this level of care. The realignment will maintain sufficient capacity to care for the same number of patients who are now being served.

CPMC welcomes the opportunity to address any questions the Commission may have concerning the realignment, but we do not view this realignment as triggering requirements under Proposition Q. While we are changing the locations of SNF beds within our existing facilities and reducing the aggregate number of potential SNF beds (from 99 on three campuses to 75 on two campuses), we are not reducing the volume or level of actual SNF services we have been or will be providing. CPMC will continue to be able to serve the same number and types of patients as we do currently. Additionally, "skilled nursing facility services" are not covered by Proposition Q.

CPMC, however, does not want to enter into a legal debate. Without waiving or conceding a legal point and without prejudice to its rights now or in the future, CPMC is voluntarily providing the notices and information required by Proposition Q.

Because of healthcare reform, changes in the marketplace, and improvements in the delivery of care, fewer of our patients are being referred to our SNF beds. This reduced volume of patients can be better and more cost efficiently served by expanding capacity at the SNF units at our Davies and St. Luke's campuses, and discontinuing the provision of SNF services at our California campus. There are presently 46 SNF beds at the Cal campus, though our average daily census there has been substantially below that capacity. Following realignment, the SNF beds at the Cal campus will be suspended, and the numbers of SNF beds at our Davies and St. Luke's campuses will be increased (from 34 to 38 at Davies, and from 19 to 37 at St. Luke's). This will more than accommodate our current total average daily census of 68 SNF patients. That census is stable and there is no reason to believe that the census would increase above the number of beds that will remain available.

No patients will be adversely affected by this change. Patients who would have used the SNF beds at the Cal campus will be accommodated at either St. Luke's or Davies.

We anticipate that some CPMC employees will be reassigned from the Cal campus to one of our other campuses (mostly St. Luke's), and we are in the process of discussing those changes with their union representatives. A small number of employees (eight or fewer) at the Cal campus may not be offered new positions.

Sincerely yours,

Warren Browner, MD, MPH

cc: Office of the Mayor, San Francisco  
Members, SF Board of Supervisors  
SF Office of Economic and Workforce Development

enc: copy of Public Notice May 1, 2014