



McKenzie-Willamette
MEDICAL CENTER

July 23, 2023

Matt Gilman, Program Manager
Oregon Health Authority
Public Health Division
800 NE Oregon Street, Suite 465
Portland, OR 97232
Via email: Matt.S.GILMAN@oha.oregon.gov

Dear Mr. Gilman:

McKenzie-Willamette Medical Center provides a comprehensive level of services to Lane County and surrounding communities. Among other services, we provide critical care, heart, lung, vascular, neurology, orthopedics, pulmonary and wound care.

Especially for our elderly patients, the complexity of their diagnosis, coupled with co-morbidities, means that a consistent and growing percentage need post-acute rehabilitation services. I have reviewed the Certificate of Need proposal of PeaceHealth Riverbend, LLC and concur that there is need for more acute rehabilitation beds in the region.

I also want to support the data they shared in the application from the Oregon Association of Hospitals & Health Systems (OAH&HS) demonstrating the significant increase in the average length of stay (ALOS) for acute care patients with a discharge to post-acute care over the past few years. Per the data from OAH&HS, the ALOS for residents in our region, pre-COVID, was about 4.2 days. By 2022 it was approaching 4.9. The McKenzie-Willamette experience has been similar, and we know that increasing ALOS is directly related to challenges we are experiencing discharging patients to post-acute settings. Our region simply does not have enough post-acute services to timely and safely discharge all patients in need.

At the local level, our experience is that the Oregon Rehabilitation Center at PeaceHealth University District does not have enough beds or enough physical space and equipment to admit all the acute rehabilitation eligible patients we request admission for. The new hospital will mitigate these issues and the proposed addition of a dedicated brain and spinal cord injury program is a highly welcomed addition. The new hospital holds great promise for improving access.

Thank you for the opportunity to provide this comment.

Sincerely,

Desi Shubin, RN, MSN
Chief Nursing Officer