



December 7, 2018

Julie Kotchevar, Ph.D, Secretary  
Nevada State Board of Health  
Nevada Division of Public and Behavioral Health  
4150 Technology Way, Suite 303  
Carson City, NV 89706

Dear Dr. Kotchevar:

Dignity Health–St. Rose Dominican Neighborhood Hospitals would like to offer the following comments on the proposed regulation R-133-18, and the provisions addressing hospital licensure therein.

In less than a year, more than 50,000 patients received treatment in our four neighborhood hospitals in southern Nevada, where they were seen by an ER physician on average within 15 minutes or less and completed their visits within 90 minutes or less. As we continue to grow, we remain committed to providing world-class health care, especially to underserved parts of the Las Vegas valley.

Among the features that set these neighborhood hospitals apart: They are fully accredited and licensed hospitals, open 24/7, part of an integrated health care delivery system, and they treat all patients regardless of ability to pay. Indeed, we have had the privilege of treating a large number of Medicaid and Medicare patients in our one year serving the community.

While we appreciate the Division's work to address hospital licensure as new models come to market, we don't think the regulation goes far enough to ensure that hospitals coming into Nevada are meeting community need. We strongly believe that hospitals need to be CMS-certified and therefore bound by EMTALA to take all patients, including our state's most vulnerable citizens. We are therefore in support of the efforts planned by the Nevada Hospital Association to seek a possible legislative solution.

Sincerely,

Laura Hennum  
Regional CEO  
Dignity Health–St. Rose Dominican  
Neighborhood Hospitals

Eugene Bassett  
SVP of Operations  
Dignity Health Nevada

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