February 27, 2025

Lisa Humphries
Plans Review Specialist, Heath Facilities Licensing & Certification Program
Facilities Planning & Safety
Oregon Health Authority
Public Health Division
Health Care Regulation & Quality Improvement

Reg: PeaceHealth Sacred Heart @ RiverBend Medical Center-Waiver Request

Dear Ms. Humphries,

We are writing to inform you PeaceHealth Sacred Heart RiverBend (SHRB) convened Incident Command in alignment with our Emergency Operations Plan on February 25, 2025, to help manage the capacity surge issues. The increase in the average daily patient arrivals to the SHRB Emergency Department (ED) reflects (i) approximately 16% higher volumes in the month of February than in any other month in the last year, and (ii) up to 25-30% above expected three-day volumes, without relief in sight.

Despite ongoing efforts to enhance timely inpatient throughput—resulting in an average length of inpatient stay of just 4.2 days—the ED is experiencing a concerning 80% increase in boarding hours this month compared to the previous 12 months. This situation is exacerbating pressures in the ED leading to several critical challenges.

PeaceHealth has been addressing emergency department boarding, EMS ambulance boarding, long waits and high patient volumes by taking a multifaceted approach, including balancing immediate needs with long-term strategic planning. Recognizing surges of volumes can be seasonal or situational we have developed both long-term strategic plans as well as immediate plans.

We are requesting a waiver for a duration of two years in order to implement the immediate strategic plan. The waiver could end earlier upon completion of the SHRB Emergency Department remodel.

The following items are alternative solutions to the proposed waivers which PeaceHealth plans to implement as part of its long-term strategic planning.

- Reducing the PeaceHealth Medical Group primary care waitlist which expanded due to the Oregon Medical Group (OMG) primary care provider reduction in April 2024. PeaceHealth has been able to onboard an estimated 2,000 OMG patients since April and are making efforts to support the remaining 6,500 patients waiting for primary care providers.

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- Collaborating with local colleges to increase nurse cohorts including joint facility partnerships. These partnerships have a proven success in enabling PeaceHealth to staff all acute hospital beds.
- Collaborating with Eugene Springfield Fire and Advanced Response Unit, which includes a dedicated paramedic and advanced practice clinician to treat at the scene or transport.
- Posting additional RN positions to support ED volume and seven additional Observations Beds anticipated to be available in July 2025.
- Stabilizing key inpatient specialties through collaboration with the PeaceHealth Medical Group.
- Submitting construction plans to the OHA for ED lobby redesign focused on improving patient flow and reducing wait times while also accommodating fluctuating volumes.
- Collaborating with Lane County to improve access to care for behavioral health patients by proposing co-location of the Lane Stabilization Center and an Inpatient Psychiatric Hospital.
- Opening an Inpatient Rehabilitation Hospital in July 2026.

For immediate strategic planning, a multidisciplinary team convened, including ED leadership and medical director, infection prevention, facilities, patient safety officer and other key stakeholders at the direction of incident command to develop a plan to optimize space, caregivers, supplies, and equipment to address the current surge in volumes. Additionally, the local Eugene/Springfield Fire Department has been engaged in surge planning efforts and the Eugene Springfield Fire Marshal toured the proposed space changes below.

Creating additional care space for patients in the ED improves timely access to care for all patients including, but not limited to individuals of color, individuals with limited English proficiency, people or households with lower incomes, and individuals who identify as lesbian, gay, transgender, queer, two-spirit, intersex, asexual, nonbinary, or another minority gender identity or another sexual orientation.

PeaceHealth proposes to reallocate space utilized as the Call Center #1 is located in Licensed Hospital/Outpatient space and the Family Room #2 and Vending Area #3 are located in designated Licensed Common Function. Spaces will be utilized in accordance with the medical center staffing plans.

Space/Current Use	**Space/Relocation**	**Purpose of use of conversion**	**Accommodations made to meet FGI guidelines**
#1 Call Center	**N/A**	#1 will be utilized to treat and evaluate lower acuity patients presenting to the emergency department.	Portable Hand washing station, portable suction, portable 02, individual supply carts placed in room. Downtime Nurse Call bell within listening range. Air exchanges meet the current code minimum or better. Room is approximately 110 sqft. Code carts & resuscitation carts are located in the department & accessible.
#2 Family Room	**#4** Moved to Conference Room A	**#2** will be utilized to treat and evaluate lower acuity patients presenting to the emergency department.	Portable Hand washing station, portable suction, portable 02, individual supply carts placed in room. Downtime Nurse Call bell within listening range. Air exchanges meet the current code minimum or better. Room exceeds 110 sqft. Code carts & resuscitation carts are located in the department & accessible.

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#3 Vending Room	Currently storing nursing scrub attire. Space was previously used as a vending room for patients prior to COVID.	**#3** will be utilized as a Fast Track, ESI level 4&5- primary care/urgent care.	Portable Hand washing station, portable suction, portable 02, individual supply carts placed in room. Downtime Nurse Call bell within listening range. Air exchanges meet the current code minimum or better. Room is more than 110 sqft. Code carts & resuscitation carts are in the department & accessible.

Please feel free to contact me if you have any questions.

With gratitude,

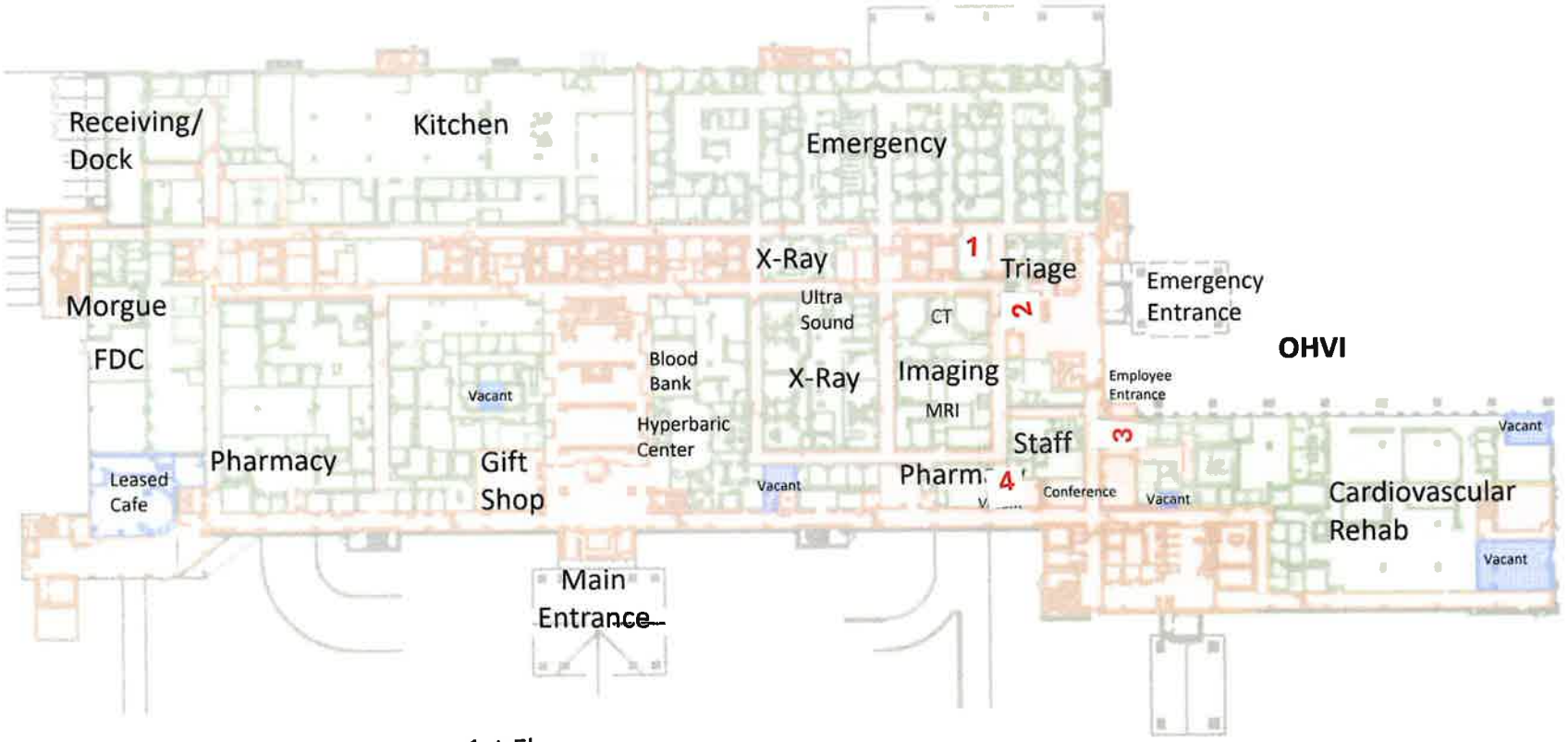
Alicia Beymer
Chief Administrative Officer
Sacred Heart RiverBend

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PeaceHealth
Sacred Heart Medical Center
Riverbend
3311/3333 Riverbend Drive
Springfield OR 97440

First Floor

Hospital



1st Floor

Key:
Separately Certified Rural Health Clinic =
Non- Licensed Function =
Licensed Common Function =
Licensed Hospital/Outpatient Function =

#1 Call Center





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#2 Family Room



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#3 Vending Room

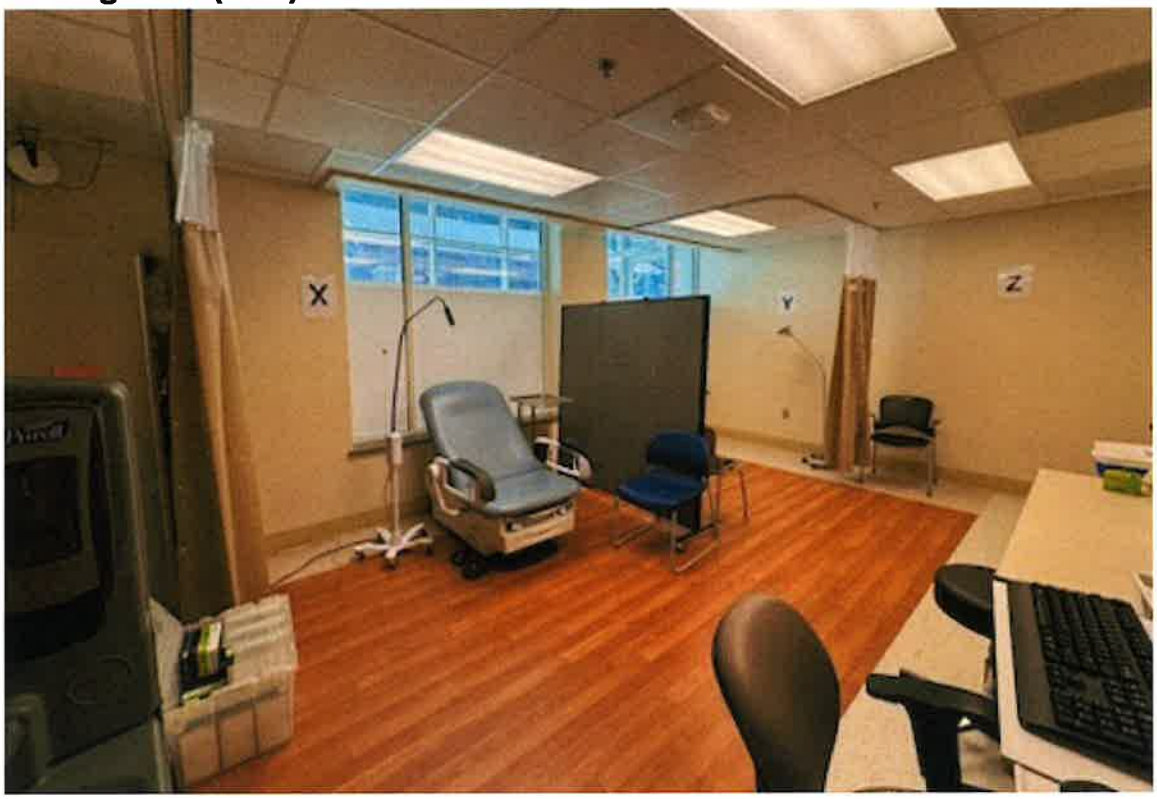






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Vending Room (cont.)



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PUBLIC HEALTH DIVISION, Center for Health Protection
Health Care Regulation and Quality Improvement Section
Tina Kotek, Governor

Oregon Health Authority

Health Facility Licensing & Certification Program

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Portland, OR 97232
Voice: (971) 673-0540
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REQUEST FOR WAIVER FROM STAKEHOLDER

OAR Rules 333, Divisions 27, 71, 76, 500 through 536, and 700
(This form is for Stakeholder use.)

PR # (if known): N/A
Facility/Agency: Sacred Heart RiverBend Hospital
Project Name: 3333 RiverBend Drive, Springfield, Or. 97477
Project Address: Initial

1. Individual requesting waiver:

Name: Alicia Beymer & Jim McGovern
Title: Chief Administrative Officer & Hospital Executive
Address: 3333 RiverBend Dr. Springfield, Or. 97477
Phone: N/A Cell: 541-870-1059
Email: abeymer@peacehealth.org

2. Oregon Administrative Rule(s) requesting to be waived:

Rule Number(s): FGI 1.1-2.3

Rule text: Change in Function in identified existing spaces.

3. Alternative solution proposed: (Please see instructions below.)

See Attached

4. **Narrative justification for the request.** This section must contain:
   - The special circumstances relied upon to justify the waiver;
   - What alternatives were considered, if any and why alternatives (including compliance) were not selected; and
   - Information demonstrating that the proposed waiver is desirable to maintain or improve the health and safety of the patients, to meet the individual and aggregate needs of patients, and shall not jeopardize patient health and safety.

   (attach additional pages as necessary)

   See Attached

5. **Equity Impacts (This question is only required for hospital requests and does not apply to Facilities Planning & Safety waiver requests)** This section must contain a description of:
   - Possible impacts that the proposed waiver may have on persons from different backgrounds and cultures, including but not limited to individuals of color, individuals with disabilities, individuals with limited English proficiency, people or households with lower incomes, and individuals who identify as lesbian, gay,

bisexual, transgender, queer, two-spirit, intersex, asexual, nonbinary, or another minority gender identity or another sexual orientation;
- How the impact was determined; and
- Proposed steps to mitigate the impact on disproportionately affected populations;

(attach additional pages as necessary)

See Attached

6. Proposed duration of waiver 2 years or upon completion of the SHRB ED Lobby project

7. Applicant's signature: (Applicant must have legal authority to sign on behalf of the facility/agency or project sponsor.)

Signature _____ **Date** 2/27/25

Printed Name Jim McGovern

Waiver Instructions

All requests for an exception to an Oregon Administrative Rule must be submitted in writing.

Submissions:

- New building construction and/or a remodeling projects:
  Facilities Planning and Safety
  mailbox.fps@odhsoha.oregon.gov.
  (503) 373-7201.

- All other requests:
  Health Facility Licensing & Certification
  mailbox.hclc@odhsoha.oregon.gov
  (971) 673-0540.

This office will respond in writing to all written *Requests for Waiver.* Please note that the applicable Oregon Administrative Rules are binding in full until and unless a written waiver has been granted by this office.