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January 8, 2007

Steven D. Chickering
Western Consortium Survey and Certification Officer
Division of Survey and Certification
San Francisco Regional Office
75 Hawthorne Street, 4th Floor
San Francisco, CA 94105

**Re: Contra Costa Regional Medical Center
Provider No. 05-0276**

Dear Mr. Chickering:

Contra Costa Regional Medical Center ("CCRMC" or the "Hospital") submits the enclosed Plan of Correction for your review and as our credible allegation of compliance. This is in response to the Statement of Deficiencies that the Hospital received on December 18, 2006, with a letter dated December 15, 2006, from the Centers for Medicare and Medicaid Services ("CMS").

Without conceding that the events for which the Hospital was cited occurred or that the Hospital was out of compliance with the Medicare Conditions of Participation, the Hospital welcomes this opportunity to improve its systems to serve its patients and to ensure continued compliance with Medicare's requirements. We believe that after a review of the attached Plan of Correction, you will agree that our actions will demonstrate compliance with the Conditions of Participation. We are confident that when CMS resurveys CCRMC, it will conclude that the Hospital is in compliance.

As instructed in CMS's letter, we have included discussion detailing the actions taken regarding correction of each alleged deficiency, the title or position of the person responsible for implementing the corrective action, and a description of how the process is monitored to prevent recurrence. In this letter, we briefly summarize our corrective actions for the three Conditions cited in the December 15 letter. In brief, the core of those actions include (1) a significant redesign of the psychiatric services the hospital provides to the community; (2) close monitoring by a care facilitation team to reinforce compliance; and (3) a completely redesigned quality assessment and performance improvement ("QAPI") program, developed with assistance from a nationally recognized healthcare consulting firm.



- 42 C.F.R. 482.12 Governing Body

The Hospital has taken actions to clarify the governing body's accountability. The Executive Director has the appropriate authority to manage CCRMC, making certain that peer review is performed regularly on all categories of Medical Staff members, and promoting a safe environment through both an effective QAPI program and by regular monitoring of compliance. For monitoring, the Hospital has deployed a dedicated "care facilitation" team consisting of four registered nurses who will provide a layer of safety as they monitor clinical systems and reinforce required processes with staff members.

- 42 C.F.R. 482.13 Patients' Rights

CCRMC is dedicated to ensuring that patients receive care in a safe environment. As noted above, the Hospital is accomplishing this through both an effective QAPI program and by regular monitoring of compliance. The Hospital also is providing additional training to staff to ensure appropriate competencies and ability to respond to patient needs.

- 42 C.F.R. 482.21 Quality Assessment and Performance Improvement

CCRMC has engaged The Greeley Company, a nationally recognized healthcare consulting firm, to assist the Hospital in redesigning its entire QAPI program to ensure that the program is effective, ongoing, hospital-wide, and data driven. The Hospital is taking aggressive steps to make sure that the QAPI program is a meaningful process that results in quality improvement. This includes actions that are designed to quickly identify and analyze adverse events; to collect and study important clinical quality indicators; to make prompt, effective, and prioritized improvement actions; and to assure appropriate oversight by the medical staff and governing body.

* * *

Along with the actions outlined in our Plan of Correction, we have taken specific steps designed to improve the services we provide to patients with psychiatric needs. On the basis of an in-depth and historical review of Hospital and patient information, the Hospital directed resources into expanding the availability of outpatient and subacute resources and, at the same time, limited our inpatient census to ensure the appropriate level of qualified and dedicated staff. We also have engaged new leadership for our inpatient psychiatric unit and are actively recruiting additional psychiatrists and leaders for the unit. We expect our community-based approach to allow patients to remain in the community, in a normalized, less restricted environment, and to be at less risk of requiring inpatient psychiatric treatment.

Other recent improvement efforts have resulted in measurable advancements. In 2005, we created the System Redesign Team, which, working with the Performance Improvement Committee, has helped to create structures and processes that systematically minimize or eliminate error. The foundations of this transformation are methodologies drawn from the sciences of change management and process design, in addition to the science of medicine. These methodologies are becoming embedded in our everyday work.

We also are in the vanguard of clinical and safety improvements and have noted several significant accomplishments: we significantly reduced the number of resuscitations outside critical care by implementing a medical rapid response teams (the number of non-critical care resuscitations was reduced by 80%, with no in-hospital deaths following resuscitation), virtually eliminated ventilator-associated pneumonias; reduced wound infections following surgery; successfully implemented processes proven to save the lives of heart attack victims; mentored other hospitals in successful approaches to reducing adverse medication events; and significantly reduced in-hospital deaths.

CCRMC is a valuable and unique asset to the community that it serves. As the only Medi-Cal disproportionate share hospital in Contra Costa County, it provides much needed and readily available patient care services to a wide community. We look forward to the continued improvements in our systems and care management that our Plan of Correction will promote. We view this Plan of Correction as a unique opportunity to improve, just as we have successfully responded to industry-wide movements toward improvement in the past.

If there are any questions or comments, please feel free to contact me at (925) 370-5100.

Very truly yours,



Jeffrey Smith, M.D., J.D.
Executive Director

Enclosures

cc: Department of Health Services,
Contra Costa District Office

