

FILED

JAN 31, 2014

Hearings Unit, OIC
Patricia D. Petersen
Chief Hearing Officer

STATE OF WASHINGTON
BEFORE THE WASHINGTON STATE
OFFICE OF THE INSURANCE COMMISSIONER

In the Matter of:

Seattle Children's Hospital Appeal of OIC's
Approvals of HBE Plan Filings.

Docket No. 13-0293

DECLARATION OF CAROL SUE
JANES IN SUPPORT OF SEATTLE
CHILDREN'S HOSPITAL'S MOTION
FOR PARTIAL SUMMARY
JUDGMENT

I, Carol Sue Janes, declare as follows:

1. I am an attorney with Bennett Bigelow & Leedom, P.S., counsel for Plaintiff Seattle Children's Hospital (SCH) in this matter. I make this declaration based on my personal knowledge and am competent to testify herein. This declaration supplements SCH's previously filed materials in support of its Motion for Partial Summary Judgment.

2. Attached hereto as **Exhibit A** is a true and correct copy of a Google Maps printout, showing that Snoqualmie Valley Hospital, 9575 Ethan Wade Way SE, Snoqualmie, WA 98065, is 27.5 miles from downtown Seattle.

3. Attached hereto as **Exhibit B** is a true and correct copy of a printout from the Snoqualmie Valley Hospital website, (<http://www.snoqualmiehospital.org/services/medical-providers/>), showing that the hospital has a total of one pediatrician on staff.

4. Attached hereto as **Exhibit C** is a true and correct copy of a printout from the Snoqualmie Valley Hospital website,

DECLARATION OF CAROL SUE JANES RE:
SEATTLE CHILDREN'S HOSPITAL'S
MOTION FOR PARTIAL SUMMARY JUDGMENT - 1
Docket No. 13-0293

LAW OFFICES
BENNETT BIGELOW & LEEDOM, P.S.
601 Union Street, Suite 1500
Seattle, Washington 98101
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(<http://www.snoqualmiehospital.org/about/critical-access-hospital/>), showing that Snoqualmie Valley Hospital is one of two Critical Access Hospitals in King County (the other in Enumclaw), with services provided to people in rural areas. It further reports that Snoqualmie Valley Hospital has no more than 25 acute care beds.

5. Attached hereto as **Exhibit D** is a true and correct copy of a printout from the Snoqualmie Valley Hospital website,

(<http://www.snoqualmiehospital.org/about/healthcare-treatment-coordination/>), reporting that “children with serious injuries and/or sudden onset sickness symptoms are generally transported directly to or transferred to Seattle Children’s Hospital. Hospitals around the Puget Sound area have followed that protocol for many years.”

6. Seattle Children’s Hospital’s staff have reported to me that, according to data derived from the publically available state hospital CHARS data, Snoqualmie Valley Hospital had no pediatric (ages 1-17) inpatient discharges in the hospital’s fiscal years 2011 or 2012.

I DECLARE, under penalty of perjury under the laws of the state of Washington, that the foregoing is true and correct.

Executed at Seattle, Washington this 31st day of January, 2014.


CAROL SUE JANES, WSBA # 16557

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of this document on all parties or their counsel of record on the date below by hand delivery on today's date addressed to the following:

Hearings Unit

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Office of the Insurance Commissioner
Hearings Unit
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Tumwater, WA 98501

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BridgeSpan Health Company

Timothy J. Parker
Carney Badley Spellman, P.S.
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701 Fifth Avenue, Suite 3600
Seattle, WA 98104-7010

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed at Seattle, Washington, this 31st day of January, 2014.



Julia Crippen
Legal Assistant

{0766.00018/M0959584.DOCX; 1}

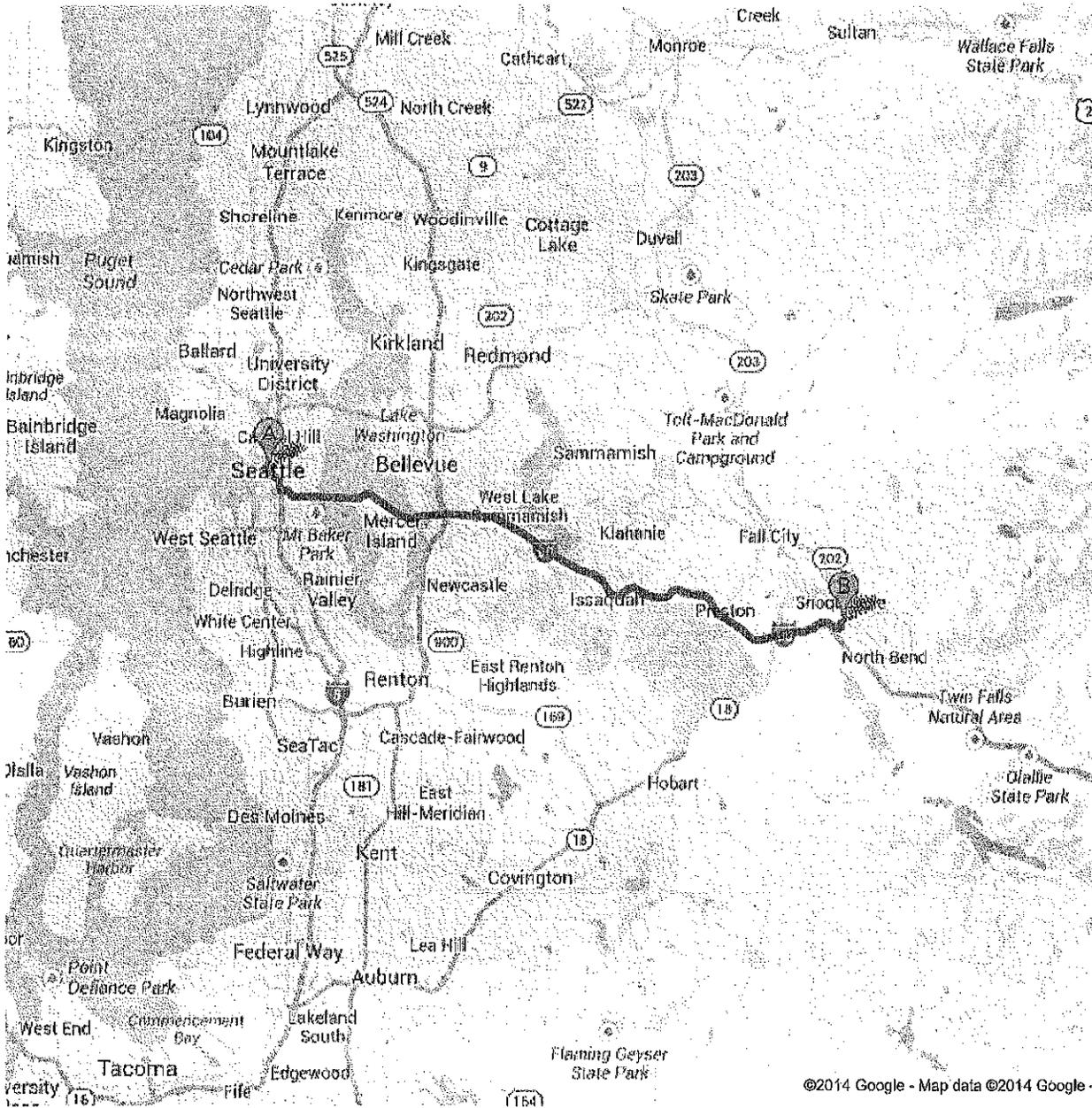
DECLARATION OF CAROL SUE JANES RE:
SEATTLE CHILDREN'S HOSPITAL'S
MOTION FOR PARTIAL SUMMARY JUDGMENT - 3
Docket No. 13-0293

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EXHIBIT A



Directions to 9575 Ethan Wade Way SE,
Snoqualmie, WA 98065
27.5 mi -- about 30 mins



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Seattle, WA

1. Head **southwest** on **Madison St** toward **4th Ave** go 197 ft
total 197 ft
-  2. Take the 1st right onto **4th Ave** go 305 ft
total 0.1 mi
-  3. Take the 1st right onto **Spring St** go 318 ft
total 0.2 mi
-  4. Take the 1st right onto **5th Ave** go 0.1 mi
total 0.3 mi
-  5. Turn left at the 2nd cross street onto **Marion St** go 285 ft
total 0.3 mi
-  6. Slight right onto **6th Ave** go 0.3 mi
total 0.6 mi
-  7. Take the ramp on the left to **Portland** go 0.5 mi
total 1.1 mi
-  8. Follow signs for **Interstate 90 E/Bellevue/Spokane** and merge onto **I-90 E** go 24.8 mi
total 25.8 mi
About 24 mins
-  9. Take exit **27** toward **Snoqualmie** go 0.1 mi
total 26.0 mi
-  10. Turn left onto **Winery Rd** go 0.1 mi
total 26.1 mi
11. Continue onto **SE North Bend Way** go 0.3 mi
total 26.4 mi
-  12. Slight right to stay on **SE North Bend Way** go 0.7 mi
total 27.2 mi
About 1 min
-  13. Turn left onto **Meadowbrook Way SE** go 249 ft
total 27.2 mi
-  14. Take the 2nd left onto **Ethan Wade Way SE** go 0.3 mi
total 27.5 mi
Destination will be on the left
About 1 min



9575 Ethan Wade Way SE, Snoqualmie, WA 98065

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

Map data ©2014 Google

Directions weren't right? Please find your route on maps.google.com and click "Report a problem" at the bottom left.

EXHIBIT B

Medical Providers

[Home](#) [Services](#) [Medical Providers](#)

Affordable Access Program

Anticoagulation Clinic

Clinics

Snoqualmie Ridge Medical Clinic

Snoqualmie Ridge Women's Clinic

Primary Care Clinic (In Hospital)

Snoqualmie Specialty Clinic

Endoscopy / Colonoscopy

Emergency Services

Infusion Therapy

Lab Services

Hospital Cafe

Hospital Patients & Families

Medical Imaging

Outpatient Rehabilitation

Primary Care for Senior Living

Rehabilitation Services

Specialty Services

Swing Bed Program

Transportation Services

Wound Care

Cardiology

Christopher M. Kozlowski, MD, FAAC, FSCAI

Emergency Medicine

William Korbonits, MD

Duane Anderson, MD

Karen Tom, MD

Alan Chock, MD

Jonathan Halper, MD

John Todd Huttenlocher, MD

Jason Rubin, MD

Family Practice

Tricia Nielsen, DO

Elsa Chan, MD

Joanna Hagen, MN, ARNP

Alan Johnson, MD

Rachel Robison, MN, ARNP

Karen LaJambe, ARNP

John M. Gray, MD

Gastroenterology

Raj C. Butani, MD, FACP

Geriatrics

Karen LaJambe, ARNP

Hospitalists

Dhirendra Kumar, MD

Noel Johnson, MD

Afshin Bidari, MD

Rick Pisani, MD

Kimberly Witkop, MD

Obstetrics/Gynecology

Macy Fox, DO

Orthopedics

Michael Battaglia, MD

Pain Management

Patricia Yetneberk, DNP, DAAPM

Pediatrics

Ronald Spiegel, MD

Primary Care for Senior Living

Elsa Chan, MD

Karen LaJambe, ARNP

Psychiatry

John C. Sindorf, MD

Rehabilitation

David Kim, MD

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EXHIBIT C

Critical Access Hospital

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Affordable Access Program

Anticoagulation Clinic

Clinics

Snoqualmie Ridge
Medical Clinic

Snoqualmie Ridge
Women's Clinic

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Hospital)

Snoqualmie Specialty
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Endoscopy / Colonoscopy

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Specialty Services

Swing Bed Program

Transportation Services

Wound Care

Critical Access Hospital

Definition – A small, generally geographically remote facility that provides outpatient and inpatient hospital services to people in rural areas. In 2011 there were 1327 Critical Access Hospitals in the US, 38 in WA, and 2 in King Co. (Enumclaw and Snoqualmie Valley). These hospitals are designated by the State and certified by Medicare.

The Critical Access Hospital Program was created in 1987 by the Federal government as a safety net device, to assure Medicare beneficiaries access to health care services in rural areas. It was designed to allow more flexible staffing options relative to community need, simplify billing methods and create incentives to develop local integrated health delivery systems, including acute, primary, emergency, and long-term care. No more than 25 acute care beds are allowed at any one time. Any of the 25 beds can be used to provide acute or sub-acute care (Swing Beds) dependent on patient need.

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EXHIBIT D

Healthcare Treatment Coordination

[Home](#) [About Us](#) Healthcare Treatment Coordination

Affordable Access Program

Anticoagulation Clinic

Clinics

- Snoqualmie Ridge Medical Clinic
- Snoqualmie Ridge Women's Clinic
- Primary Care Clinic (In Hospital)
- Snoqualmie Specialty Clinic

Endoscopy / Colonoscopy

Emergency Services

Infusion Therapy

Lab Services

Hospital Cafe

Hospital Patients & Families

Medical Imaging

Outpatient Rehabilitation

Primary Care for Senior Living

Rehabilitation Services

Specialty Services

Swing Bed Program

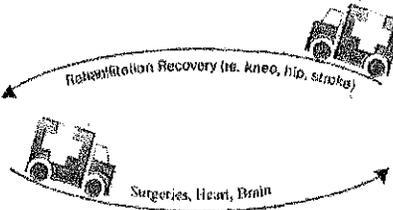
Transportation Services

Wound Care

Air Transfer when Needed



Snoqualmie Valley Hospital



Hospitals

- Seattle Children's Hospital
- Harborview Medical Center
- Overlake Hospital Medical Center
- Swedish Medical Center
- UW Medical Center
- Valley Medical Center

Healthcare System of Transfer

You might be wondering why patients are sometimes transferred from one hospital to another. You might be thinking, "Why can't they handle everything I need so my loved one or I don't need to be transferred anywhere?"

In Short

Emergency Medical Service (EMS) personnel will transport you to, or hospitals will transfer you to locations where you will get the optimal care you need. Every hospital cannot afford to have specialists in every category of healthcare. For example, your child would be transferred or taken straight to Seattle Children's Hospital if EMS or the doctor believes it is appropriate for him or her to see a specialist in children's knee surgery.

More Detail

Local Integrated Health delivery systems or "Coordination of Care" is a concept which has been utilized by Harborview Medical Center (UW Medicine) and Seattle Children's Hospital for many years. Fire Department personnel around King County have known for many years that accident victims with serious burns and/or head trauma are transported directly or transferred to Harborview. Similarly, children with serious injuries and/or sudden onset sickness symptoms are generally transported directly to or transferred to Seattle Children's Hospital. Hospitals around the Puget Sound area have followed that protocol for many years. King County Medic One System and Emergency Medical Service (EMS) are well known around the country for its high standards of training and education. This system integrates citizen participation, Enhanced 911, Basic Life Support (BLS), Advanced Life Support (ALS) into the overall EMS system which is a great model of "Coordination of Care", or Integrated Healthcare delivery system.

Many small hospitals serve as the "entry point" for larger, regional healthcare delivery systems. By the same token, Critical Access hospitals with Swing Beds, serve as an "exit point" for these larger healthcare systems, following surgery when longer term care is needed in a hospital environment.

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