

Development of Satellite / Off-Campus Emergency Departments

Public Health and Health
Planning Council
Educational Session
May 9, 2024

History

Definition:

- Hospital-sponsored Off-Campus Emergency Department means an Article 28 emergency department that is owned by a general hospital and geographically removed from the general hospital's inpatient campus.

History & Reason for:

- Increase the availability of emergency care in more convenient and readily accessible settings.
- Relieve overcrowding of hospital-based emergency departments.
- Operate with faster throughput, resulting in reduced patient wait times and increased patient satisfaction.
- More economical and efficient than constructing new hospitals.
- Fill health care voids in under-served regions.

New York State Law

- New York State allowed for the operation of hospital-sponsored Off-Campus Emergency Department's (OCED) and relied on Centers for Medicare & Medicaid Services (CMS) and existing state regulations to govern ownership and operation.
- Regulatory Modernization Initiative (RMI) in 2017.

Regulatory Modernization Initiative (RMI) Workgroup

- Originally intended to provide emergency medical services in rural communities where there were no acute care hospitals and the distance to travel to an emergency department was too great.
- Expansion into urban and suburban areas where population rapidly expanded.

Regulatory Modernization Initiative (RMI)

Workgroup Recommendations:

- New York State should continue to allow only those Off-Campus Emergency Departments affiliated with a hospital or hospital system.
- Not necessary to create a new need methodology.
- Demonstrate need for services, value to community, impact on surrounding emergency departments.
- Allow flexibility to account for unique local factors in the decision-making process.

Regulatory Requirements:

- Adhere to 10NYCRR Part 405 regulations including but not limited to –
 - 405.2 Governing Body
 - 405.3 Administration
 - 405.4 Medical staff
 - 405.5 Nursing services
 - 405.6 Quality assurance program
 - 405.7 Patient rights
 - 405.8 Adverse event reporting
 - 405.10 Medical records
 - 405.11 Infection control
 - 405.12 Surgical services
 - 405.13 Anesthesia services
 - 405.14 Respiratory care services
 - 405.15 Radiologic and nuclear medicine services
 - 405.16 Laboratory services
 - 405.17 Pharmaceutical service
 - 405.19 Emergency services
- Comply with PHL 2805-t

New York State Locations

Facility	Licensed as	Beds	Location	Date
Montefiore Medical Center - Montefiore Westchester Square	Hospital	0	Bronx	2013
URMC Strong West (Strong Memorial)	Hospital	0	Brockport	2014
Adirondack Medical Center-Lake Placid Site (closed)	Hospital	0	Lake Placid	2014
NYU Langone Hospital - Joseph S. and Diane H. Steinberg Ambulatory Care Center	Hospital	2	Brooklyn	2014
South Nassau Communities Hospital Off-Campus Emergency Department	Hospital	0	Long Beach	2015
Lenox Health Greenwich Village	Hospital	2	New York	2017
A.O. Fox Memorial Hospital - Tri-Town Campus	Hospital	0	Sidney	2019
The University of Vermont Health Network - Elizabethtown Community Hospital Moses Ludington	Primary Care Hospital - Critical Access Hospital	0	Ticonderoga	2019
Maimonides Health Bay Ridge Emergency Department	Off-Campus Emergency Department	0	Brooklyn	2023
DeGraff Medical Park (Kaleida)	Off-Campus Emergency Department	0	Tonawanda	2023
Stony Brook / Southampton	Off-Campus Emergency Department	0	East Hampton	Under Construction Since 2/1/23

Guest Speakers

- **Northwell – Lenox Hill Greenwich Village**

Tracy Feiertag, MS, DHA Deputy Executive Director at Northwell Health
Lenox Health Greenwich Village

Tucker Woods, MD Chair of the Emergency Department & Associate
Medical Director of Lenox Health Greenwich Village

- **NYU Langone Hospital – Joseph S. and Diane H Steinberg Ambulatory Care Center**

Nancy Conroy, MD, FAAEM Chief of Service, NYU Langone Health - Cobble Hill
Emergency Department

Amy Horrocks Vice President, Hospital Operations

- **The University of Vermont Health Network -Elizabethtown Community Hospital Moses Ludington**

Robert Ortmyer President, The University of Vermont Health Network
Elizabethtown Community Hospital

Discussion: Implications for The Future