



**Missouri Department of Health and Senior Services**

P.O. Box 570, Jefferson City, MO 65102-0570 Phone: 573-751-6400 FAX: 573-751-6010  
RELAY MISSOURI for Hearing and Speech Impaired and Voice dial: 711

**Paula F. Nickelson**  
Acting Director



**Michael L. Parson**  
Governor

September 21, 2022

Melissa Upshaw, VP Development  
Platinum Medical Management  
[m.upshaw@platinummm.com](mailto:m.upshaw@platinummm.com)

RE: Variance for Platinum Health Systems Audrain, dba Audrain Community Hospital

Dear Ms. Upshaw,

The Missouri Department of Health and Senior Services (DHSS), Section for Health Standards and Licensure (HSL) has **approved** your request for a variance to Missouri Code of State Regulations (CSR) **19 CSR 30-20.015(12)(D)**, which limits DHSS from granting more than one (1) suspension to a hospital's licensed operator within any twelve (12) month period for Audrain Community Hospital.

With the approval of the variance request, the Department grants an additional suspension request under **19 CSR 30-20.015(12)** for a period of **90 days** from the date of this letter to coincide with the approved 90 day variance period. As requested, this license suspension will allow the facility additional time necessary to complete a construction project in the emergency room area of the hospital. **Please note: DHSS will not consider future requests for licensure suspension from Platinum beyond the 90 days this notice provides.**

Additionally, the Department expects that the plan submitted by Platinum and approved by the Department on June 23, 2022, regarding the security and preventive maintenance measures used to assure that all equipment will be kept in good working order, will continue throughout this approved variance period.

The DHSS may revoke the granted variance if the DHSS determines that (1) the change in conditions detrimentally impact the health, safety, and the welfare of the patients, staff, or public; (2) the facility is not in full compliance with applicable rules; or (3) the facility failed to adhere to all conditions of the variance.

Should you have any questions regarding this correspondence, please contact our office at 573-751-6303.

Sincerely,

William Koebel, Section Administrator  
Section for Health Standards and Licensure  
Missouri Department of Health and Senior Services

cc: Amy O'Brien, CEO

**HEALTHY MISSOURIANS FOR LIFE**

The Missouri Department of Health and Senior Services will be the leader in promoting, protecting and partnering for health.

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER: Services provided on a nondiscriminatory basis.



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Melissa Upshaw, VP Development  
Platinum Medical Management  
[m.upshaw@platinummm.com](mailto:m.upshaw@platinummm.com)

RE: Variance for Platinum Health Systems Callaway, dba Callaway Community Hospital

Dear Ms. Upshaw,

The Missouri Department of Health and Senior Services (DHSS), Section for Health Standards and Licensure (HSL) has **approved** your request for a variance to Missouri Code of State Regulations (CSR) **19 CSR 30-20.015(12)(D)**, which limits DHSS from granting more than one (1) suspension to a hospital's licensed operator within any twelve (12) month period for Callaway Community Hospital.

With the approval of the variance request, the Department grants an additional suspension request under **19 CSR 30-20.015(12)** for a period of **90 days** from the date of this letter to coincide with the approved 90 day variance period. As requested, this license suspension will allow the facility additional time necessary to complete a critical repair to the plumbing that supports the hot water boiler and HVAC systems. **Please note: DHSS will not consider future requests for licensure suspension from Platinum beyond the 90 days this notice provides.**

Additionally, the Department expects that the plan submitted by Platinum and approved by the Department on June 23, 2022, regarding the security and preventive maintenance measures used to assure that all equipment will be kept in good working order, will continue throughout this approved variance period.

The DHSS may revoke the granted variance if the DHSS determines that (1) the change in conditions detrimentally impact the health, safety, and the welfare of the patients, staff, or public; (2) the facility is not in full compliance with applicable rules; or (3) the facility failed to adhere to all conditions of the variance.

Should you have any questions regarding this correspondence, please contact our office at 573-751-6303.

Sincerely,

William Koebel, Section Administrator  
Section for Health Standards and Licensure  
Missouri Department of Health and Senior Services

cc: Jeff Stone, CEO

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September 21, 2022

Steve Bollin, Director  
Division of Licensure and Regulation  
Missouri Department of Health and Senior Services  
P.O. Box 570  
Jefferson City, MO 65102-0570

Please accept this letter as an official request for a variance of MO 19 CSR 30-20.015(12)(D) of the Missouri Register for DHSS License #565.

**MISSOURI CODE OF STATE REGULATIONS**

**Title 19—DEPARTMENT OF HEALTH AND SENIOR SERVICES**

**Division 30—Division of Regulation and Licensure Chapter 20—Hospitals**

**Chapter 20.015 - Administration of the Hospital Licensing Program**

**Section 12: Requested Suspension of License.** If any hospital wishes to cease operation for a period of time but retain its current hospital license, the Department of Health and Senior Services, upon written request from the licensed operator, may grant approval for suspension of the hospital's license for a specified time.

(D) The suspension of a hospital's current license shall not exceed ninety (90) days beyond the date of cessation of patient services for ownership transfer. The suspension of a hospital's current license shall not exceed one hundred eighty (180) days beyond the date of cessation of patient services for renovation construction. The department may not grant more than one (1) suspension to a hospital's licensed operator within any twelve-(12-) month period and shall grant no suspension for a period of more than one hundred eighty (180) days from the date of cessation of inpatient services.

**Specific reason for variance request:**

Platinum Health System Audrain, formerly Noble Health Audrain, Inc dba Audrain Community Hospital, has a voluntary suspension expiring on September 21, 2022, and we are not eligible for an additional extension. Compliance with the rule will create an undue hardship on the

hospital as we need to complete a construction project in the Emergency Room area of the hospital.

We have received a bid for the project totaling \$8,965.66. The materials will take 5-6 weeks to arrive.

**Extenuating factors:**

The extenuating factors surrounding the situation occurred when a local citizen drove through the patient drop off area and shot three large windows out with a pistol. The windows are currently covered with plywood, and need to be repaired prior to re-opening the Emergency Room area to allow the registration staff full view of vehicles arriving on site.

Making sure staff have the ability to visually see vehicles arriving at the emergency department provides a higher sense of security for the employees and also allows staff to alert the emergency department team if a patient is having trouble getting from their car to enter the building.

**Specific scope of work and concern:**

The scope of work includes installation of one 249"W x 122"H Aluminum Storefront Window. The frame will be a Tubelite T14000 Series with center set insulated glass and will have a painted bone white finish.

The frame will be divided in four sections and will be glazed with bronze tempered insulated glass that has energy advantage low-E.

Price includes the removal and disposal of the existing frames and glass that will be replaced.

**Variance request:**

Please consider a ninety (90) day variance of MO 19 CSR 30-20.015(12)(D) of the Missouri Register for DHSS License #565.

Please reach out with any questions or additional information you may need for approval.

Respectfully Submitted,



Melissa Ann Upshaw  
Platinum Medical Management  
V P Development



**PLATINUM**  
HEALTH SYSTEMS CALLAWAY

September 20, 2022

Steve Bollin, Director  
Division of Licensure and Regulation  
Missouri Department of Health and Senior Services  
P.O. Box 570  
Jefferson City, MO 65102-0570

Please accept this letter as an official request for a variance of MO 19 CSR 30-20.015(12)(D) of the Missouri Register for DHSS License #563.

**MISSOURI CODE OF STATE REGULATIONS**

**Title 19—DEPARTMENT OF HEALTH AND SENIOR SERVICES**

**Division 30—Division of Regulation and Licensure Chapter 20—Hospitals**

**Chapter 20.015 - Administration of the Hospital Licensing Program**

**Section 12: Requested Suspension of License.** If any hospital wishes to cease operation for a period of time but retain its current hospital license, the Department of Health and Senior Services, upon written request from the licensed operator, may grant approval for suspension of the hospital's license for a specified time.

(D) The suspension of a hospital's current license shall not exceed ninety (90) days beyond the date of cessation of patient services for ownership transfer. The suspension of a hospital's current license shall not exceed one hundred eighty (180) days beyond the date of cessation of patient services for renovation construction. The department may not grant more than one (1) suspension to a hospital's licensed operator within any twelve-(12-) month period and shall grant no suspension for a period of more than one hundred eighty (180) days from the date of cessation of inpatient services.

**Specific reason for variance request:**

Platinum Health System Callaway, formerly Noble Health Fulton Inc dba Callaway Community Hospital, has a voluntary suspension expiring on September 21, 2022, and we are not eligible for an additional extension. Compliance with the rule will create an undue hardship on the hospital as we need to complete a critical repair necessary to the plumbing that supports the hot water boiler and HVAC system.

A new pump and piping are required to be replaced in the closed system in order for the system to be fully operational. To replace the pump, replumb the boiler fill lines, and replace the tube bundle, it is estimated to be a cost of \$20,000 - \$25,000 for labor and materials.

**Extenuating factors:**

The materials are currently unavailable and the contracted skilled labor is in high demand preventing an immediate repair. It is estimated that the materials would be available between two to five weeks from ordering at the earliest. Scheduling the skilled labor is approximately the same additional amount of time following the materials being secured. Once materials and labor are secured and scheduled, the onsite project time for the repair and replacement is two to three weeks.

**Specific scope of work and concern:**

The recirculation pump keeps the hot water circulating through the building and the systems at all time. This continual circulation and availability of hot water on demand provides plumbing and environmental control for heat in individual patient rooms and patient care areas. It also provides for proper water temperature for infection control and prevention through sanitation of hands, bodies, dietary equipment and items, and housekeeping equipment and resources. If the system does not function appropriately and adequately, would place the patients at risk of unsanitary situations and colder environmental temperatures. The repairs must be made prior to reopening and season changes. Weather below freezing will place the building's water system in jeopardy of freezing in place.

The feed water lines that fill the two boilers need replaced as they have developed leaks causing a continuous flow of water out of the system. The De-Airation (DA) tank removes air from the water lines with heat to keep gas bubbles out of the boilers. The water line leakage is therefore keeping the DA tank temperatures low, thus rocking thermo shock to the boilers.

There are approximately 75 – 80 feet of one and one-half inch (1½ inch) which must be replaced before patients are to be allowed back in the building.

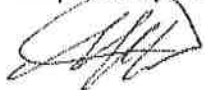
The heat exchanger #1 has a leak in the tube bundle coils rendering it useless in trying to heat the building. This is preventing the patient care areas to reach optimal comfortable temperatures and placing a strain on the entire system.

**Variance request:**

Please consider a ninety (90) day variance of MO 19 CSR 30-20.015(12)(D) of the Missouri Register for DHSS License #563.

Please reach out with any questions or additional information you may need for approval.

Respectfully Submitted,



Melissa Ann Upshaw  
Platinum Medical Management  
V P Development