



Lawnwood Medical Center v. Lawnwood Medical Center Medical Staff, 990 So.2d 503 (Fla. 2008)

Topics Covered: Medical Staff, Hospitals

Outcome: Very Favorable

Issue

The issue in this case was whether a Florida statute, which provided that in St. Lucie County, Florida (but not in the rest of the state), hospital board bylaws would prevail over medical staff bylaws in the event of a conflict, was constitutional.

AMA Interest

The AMA supports the self-governance of organized medical staffs. The AMA also supports the enforceability of medical staff bylaws.

Case Summary

Lawnwood Regional Medical Center & Heart Institute ("the hospital"), the largest hospital in St. Lucie County, Florida, had a long-running battle with its medical staff regarding enforcement of the medical staff bylaws. Over the course of several years, the hospital would violate the medical staff bylaws by removing elected medical staff officers and by suspending physicians on the medical staff without due process. Each time, the medical staff was able to defeat these attempts in court.

Pursuant to the hospital's lobbying efforts, the Florida legislature enacted a law known as the "St. Lucie County Hospital Governance Law" (the "Governance Law"), which applies only to hospitals within St. Lucie County. This law essentially undid the earlier court decisions by providing that "in the event of a conflict between bylaws of a hospital corporation's board of directors and a hospital's medical staff bylaws, the hospital board's bylaws shall prevail with respect to medical staff privileges, quality assurance, peer review, and contracts for hospital-based services."

Following enactment of the Governance Law, the hospital board attempted to impose changes to the medical staff bylaws in areas delineated in the Governance Law. The medical staff and the hospital then sued each other, with the principal issue being the constitutionality of the Governance Law.

Eventually, the trial court held in favor of the physicians, finding that the Governance Law violated the Florida Constitution. Both the District Court of Appeal and the Florida Supreme Court affirmed the trial court's holding of unconstitutionality.

Litigation Center Involvement

The Litigation Center contributed financially toward the medical staff's litigation expenses. It also filed amicus curiae briefs in the District Court of Appeal and the Florida Supreme Court to support the medical staff. Further, the Litigation Center attorney presented a portion of the oral arguments in the Florida District Court of Appeal and in the Florida Supreme Court.

District Court of Appeal amicus brief

Florida Supreme Court amicus brief