



KIDNEY CARE CENTER

812 Campus Drive • Joliet, IL 60435
Tel.: (815) 741-6830 • Fax: (815) 741-6832

Junji Alausa, M.D.
Diplomat of American
Board of Nephrology

Diplomat of American
Board of
Internal Medicine

A.S. Shafi, M.D.
Diplomat of American
Board of Nephrology

Diplomat of American
Board of
Critical Care Medicine

Diplomat of American
Board of
Internal Medicine

VIA Overnight Mail/Fax/ E-mail

June 7, 2011

Mr. Mike Constantino
Project Review Supervisor
Illinois Health Facilities and Services Review Board
525 West Jefferson
Springfield, Illinois 62761

Re: Opposition to DaVita Crest Hill Dialysis, Project NO. 11-004

Dear Mr. Constantino:

I am writing on behalf of Kidney Care Center in opposition to the Application for permit filed by DaVita for Crest Hill Dialysis (the "Applicants") to establish a 12 station in-center hemodialysis facility to be located at 20660 Caton Farm Road, Crest Hill, Illinois 60403 (the "Project"). As Discussed in detail in this letter, there is more than sufficient capacity among the existing facilities to accommodate all of the projected end stage renal disease ("ESRD") referrals to the proposed facility. In addition the Applicants failed to include any information on the new dialysis facilities that were recently approved by the CON board that are in the immediate vicinity, not to mention the many others within the 30-mile radius.

1. Joliet Dialysis (Project Number #10-066) which was approved by the CON board on March 21, 2011.
2. Silver Cross renal center (Project Number #09-066) which was approved by the CON board on July 27, 2010.
3. Bolingbrook Dialysis, (Project Number #10-043, expansion project) which was approved by the CON board on September 3, 2010.

It is to my understanding that the above facilities have either been completed or will be completed by next year. Accordingly, there is no need for this 12-station in-center hemodialysis facility ~~proposed by the Applicants.~~

On the Applicants application its states that there is an **excess of 51 dialysis stations in HSA 9**. On May, 20, 2011, the states board's most recent inventory calculation shows an **excess of 67 dialysis stations in HSA 9** (Attachment 1), please note within the few months of the applicants submittal of the proposed project excess stations in the HSA 9 service area have increased by an additional 16 station's. This fact contradicts the applicant's statement of a need of another ESRD facility in HSA 9 service area. HSA 9 service area could support an additional **402 ESRD** patients with the existing facilities it currently



KIDNEY CARE CENTER

812 Campus Drive • Joliet, IL 60435
Tel.: (815) 741-6830 • Fax: (815) 741-6832

has. In the applicants application it states that they plan on referring a total of 84 patients within the next 2 years to an ESRD facility. The applicant's referrals of ESRD patients could easily be supported with pre-existing facilities, as per the applicant's data. HSA 9 has the highest excess stations for ESRD in the entire state, not to mention this number does not include any recent approvals (last 2-3 years) that the Illinois Health Facilities and Services Review Board has approved but are not yet operational. This will create an even higher number of excess stations and in return will lower utilization rate in the facilities that are within a few minutes from the applicants proposed project.

According to the data that the applicant has provided there are two existing, operational facilities within a 4 mile radius (5-10 minutes) that are operating at a very low utilization rate. The first ESRD facility Sun Health which is operating at a 60% utilization rate, which has been at a similar or lower utilization rate consistently for the last years and the second ESRD facility Fresenius Plainfield at a 50% utilization rate. Two Facilities both within a 4 mile distance from the proposed applicants site are significantly operating under the State Boards utilization standard of 80%. In addition both of these facilities utilization rate will drop significantly with the already approved but not yet operational ESRD facilities in the immediate vicinity.

The applicant also states on their application that they are proposing to provide Nocturnal dialysis. I have talked to pre-existing dialysis facilities in the area, Fresenius- Plainfield and Fresenius-Joliet. They also have agreed to offer Nocturnal Dialysis at their ESRD facilities, in the near future.

The research that the Illinois Health Facilities and Services Review Board has done with the applicants data shows there is no need for another ESRD facility within an HSA 9 area. For these reasons, I strongly oppose the applicant's proposed project due to the fact that there is no data that the applicant provided to support their proposed project.

Finally, I affirmatively state that I am familiar with the various rules and regulations concerning the submission of accurate materials and information to the board and the statements contained in this letter are true and correct to the best of my knowledge and belief.

Sincerely,

Asim M Shazzad
Chief Operating Officer

SUBSCRIBED AND SWORN
To before me this 7th day
Of June, 2011.

Notary Public





KIDNEY CARE CENTER

812 Campus Drive • Joliet, IL 60435
Tel.: (815) 741-6830 • Fax: (815) 741-6832

Attachment 1

REVISED NEED DETERMINATIONS

5/20/2011

ESRD STATIONS

ESRD SERVICE AREAS	APPROVED EXISTING STATIONS	CALCULATED STATION NEED	ADDITIONAL STATIONS NEEDED	EXCESS ESRD STATIONS
HSA 1	131	134	3	0
HSA 2	145	149	4	0
HSA 3	155	142	0	13
HSA 4	156	164	8	0
HSA 5	175	142	0	33
HSA 6	1,030	1,083	53	0
HSA 7	1,060	1,068	8	0
HSA 8	330	295	0	35
HSA 9	229	162	0	67
HSA 10	86	56	0	30
HSA 11	153	155	2	0
ILLINOIS TOTAL	3,650	3,550	78	178