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HEALTH FACILITIES &
SERVICES REVIEW BOARD

Courtney Avery
 Administrator
 Illinois Health Facilities & Services Review Board
 525 W. Jefferson St., 2nd FL
 Springfield, IL 62761

**RE: #11-024 - US Renal Care Oak Brook
 #11-025 - US Renal Care Bolingbrook**

Dear Ms. Avery:

After reading the applications to establish new dialysis facilities in Downers Grove and Bolingbrook, I was struck by the similarity of the supporting patient data and the use of the same patients to justify need in both locations. I not only felt that the projections were exaggerated, but also that the claimed referrals were misleading. According to the notarized statements in both applications, the nephrologists claim to have referred 221 patients from 2008-2010. Fresenius could only identify 31 current patients of Drs. Rauf and Ahmed (Advanced Renal Care) in 11 of their dialysis units. What happened to the other 86%? Did they die or get transplanted? – highly unlikely. The following table indicates their patients in the 11 closest Fresenius units. A more likely explanation is that many of these patients would never have dialyzed in Downers Grove especially those who live far away like Alton, Illinois or out of state like Mishawaka, Indiana.

Facility	Dr. Rauf and Dr. Ahmed's In-Center Hemodialysis Patients
Fresenius Bolingbrook	9
Fresenius Downers Grove	6
Fresenius Elk Grove	0
Fresenius Glendale Heights	4
Fresenius Hoffman Estates	0
Fresenius Naperville North	1
Fresenius Plainfield	1
Fresenius Rolling Meadows	0
Fresenius Villa Park	1
Fresenius Westchester	4
Fresenius Willowbrook	5
Totals	31

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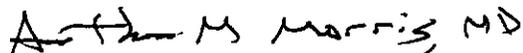
The two closest dialysis units to the proposed Downers Grove unit are the unit in Good Samaritan Hospital Professional Building, 1.46 miles (2 minutes) and Lombard 1.67 miles (4 minutes). They are approved for 31 stations and are currently dialyzing 116 patients – a 62% utilization. Clearly another dialysis unit is not needed in this area. It has been suggested that choice is important for patients. As indicated on attachment 26 of the Downers Grove application, there are 45 other dialysis facilities operated by 11 different dialysis providers within a 30 minute drive. All of the Fresenius and DaVita facilities are open to all qualified nephrologists, so their ability to follow their patients is not hindered. All of the local hospitals (Good Sam, Elmhurst, Edward, LaGrange, and Hinsdale) have nephrologists from multiple groups, again choice of nephrologist is preserved.

The above comments also apply to the US Renal Bolingbrook Application. In their own application, they acknowledge an excess of 67 ESRD stations in HSA 9 and proposing a new facility just a few hundred yards away from an existing facility seems illogical. Although Fresenius is the dominant provider (with 37%), patients have a choice of at least 4 other providers in the area.

Criticism of the Fresenius admission process deserves comment. As a nephrologist, I have been referring patients to their facilities for over 10 years and have not experienced the delays described in these applications. Fresenius has accepted my indigent patients and continues to provide treatment for many of them despite losing money on each treatment. Fresenius is held up as the gold standard in the dialysis industry and the quality of care provided is unquestioned.

In summary, I urge you to look at the numbers more closely and not approve unnecessary facilities.

Sincerely,



Arthur M. Morris, M.D.
President,
Nephrology Associates of Northern IL

AMM:cp