

Constantino, Mike

From: Orth, Bridget [borth@nmh.org]
Sent: Friday, January 25, 2013 9:06 PM
To: Avery, Courtney; Constantino, Mike
Subject: Response to SAR for Project #12-081
Attachments: Vista SAR Response_NLFH.pdf

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JAN 28 2013

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

Hi Courtney and Mike,

Attached please find Northwestern Lake Forest Hospital's comments on the State Staff Report for the Vista Lindenhurst project (#12-081). Thanks!

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If you want to learn more about Northwestern Memorial Hospital,
please visit our Web site at www.nmh.org

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M Northwestern Lake Forest Hospital

January 25, 2013

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

**Re: Response to State Staff Report
Vista Medical Center Lindenhurst
Project #12-081**

Dear Ms. Avery:

This letter is provided in response to the State Staff Report prepared for Lindenhurst Illinois Hospital Company, LLC and Community Health Systems, Inc.'s proposed new hospital in Lindenhurst.

Northwestern Lake Forest Hospital (NLFH) agrees with the findings of the State Staff that the proposed project does not meet several important review criteria, especially those criteria which point out the excess of beds in the planning area and the underutilization of several services within the planning area. NLFH would like to however respectfully point out the following corrections to the Staff Report for this project:

1. Cardiac Catheterization (Staff Report pages 25-27)

NLFH was omitted from Table Ten on page 26 which lists all facilities which provide cardiac catheterization services in the planning area.

TABLE TEN Facilities within HSA 08			
Facility	City	Number of Labs	2011 Number of Procedures
Advocate Condell Medical Center	Libertyville	3	2,214
Advocate Good Shepherd Hospital	Barrington	2	1,512
Delnor Community Hospital	Geneva	1	426
Highland Park Hospital	Highland Park	2	1,252
Centegra Hospital – McHenry	McHenry	3	1,921
Provena Mercy Center	Aurora	3	1,416
Provena Saint Joseph Hospital	Elgin	4	1,086
Rush Copley Memorial Hospital	Aurora	3	1,459
Sherman Hospital	Elgin	6	2,624
Vista Medical Center East	Waukegan	3	1,096
Northwestern Lake Forest Hospital	Lake Forest	1	349

(continued)

Similarly, comments from the impact letter submitted by NLFH dated January 10, 2013 were not summarized on the bottom of page 26 as were the letters from Centegra and Advocate Condell.

The State Staff Report stated that "there are ten hospitals located within the cardiac catheterization planning area and that all cardiac cath services in the planning area are at the 400 procedures annually." However, as shown in the corrected Table Ten above, as well as documented in the above mentioned letter, NLFH performed less than 400 cardiac cath procedures in 2011. Therefore, the State Agency's finding that the project appears to be in conformance with Review Criterion 77 IAC 1110.1330(b) is not correct.

Northwestern Lake Forest Hospital continues to believe the addition of this service will have a negative impact on the cardiac catheterization services at NLFH as well as the other providers in Lake County.

2. Safety Net/Charity Care Case (Staff Report pages 10 and 39-40)

In the Safety Net Impact Statement provided by the applicant, claims are made that the proposed project will not have an impact on other providers. Additionally, public comment included in the Staff Report pages 39-40 makes unfavorable references to the charity care provided by other Lake County Providers. Public hearing, testimony and written public comment challenged that assertion and showed actual numbers on indigent care. We believe it appropriate to include the following comparison as part of the SAR in response to that inclusion.

**Comparison of Safety Net Services
Vista East, Condell and Lake Forest**

	Vista East	Advocate Condell	Northwestern Lake Forest
Charity Care \$	\$3.5 Million	\$9.5 Million	\$10.2 Million
Charity Care % Revenue	2.0%	3.0%	4.6%
Number of Charity Care Patients (Inpatients)	261	560	284
Number of Charity Care Patients (Outpatient)	997	5,334	2,596
Medicaid Patients (Inpatient & Outpatient)	41,662	43,147	19,084
Licensed Beds	336	273	205* (117 acute care)

(continued)

In addition, in FY12, NLFH provided \$11.98 million of underfunded Medicaid services (as reported in the Annual Non-Profit Hospital Community Benefits Plan Report files with the Attorney General). The amount of underfunded Medicaid was not obtained for Vista East due to the fact that they are a for-profit institution and are not required to file a report with the Attorney General.

We appreciate the opportunity to comment upon the State Staff Report.

Sincerely,

A handwritten signature in cursive script that reads "Marsha L. Oberrieder".

Marsha L. Oberrieder
Vice President