

12-099

**Roate, George**

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**From:** Jack Axel [jacobmaxel@msn.com]  
**Sent:** Thursday, December 06, 2012 4:33 PM  
**To:** Roate, George  
**Subject:** Northwestern Medical Faculty Foundation Dialysis Center  
**Attachments:** scan276.pdf

George,  
Attached please find 4 revised/additional pages to the above-referenced application.  
Jack

Jacob M. Axel  
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**Flood Plain Requirements**

[Refer to application instructions.]

Provide documentation that the project complies with the requirements of Illinois Executive Order #2005-5 pertaining to construction activities in special flood hazard areas. As part of the flood plain requirements please provide a map of the proposed project location showing any identified floodplain areas. Floodplain maps can be printed at [www.FEMA.gov](http://www.FEMA.gov) or [www.illinoisfloodmaps.org](http://www.illinoisfloodmaps.org). **This map must be in a readable format.** In addition please provide a statement attesting that the project complies with the requirements of Illinois Executive Order #2005-5 (<http://www.hfsrb.illinois.gov>).

APPEND DOCUMENTATION AS ATTACHMENT -5, IN NUMERIC SEQUENTIAL ORDER AFTER THE LAST PAGE OF THE APPLICATION FORM.

**Historic Resources Preservation Act Requirements**

[Refer to application instructions.]

Provide documentation regarding compliance with the requirements of the Historic Resources Preservation Act.

APPEND DOCUMENTATION AS ATTACHMENT -6, IN NUMERIC SEQUENTIAL ORDER AFTER THE LAST PAGE OF THE APPLICATION FORM.

**DESCRIPTION OF PROJECT**

**1. Project Classification**

[Check those applicable - refer to Part 1110.40 and Part 1120.20(b)]

Part 1110 Classification:	Part 1120 Applicability or Classification: [Check one only.]
<input checked="" type="checkbox"/> Substantive	<input type="checkbox"/> Part 1120 Not Applicable
Non-substantive	<input type="checkbox"/> Category A Project
	<input checked="" type="checkbox"/> Category B Project
	<input type="checkbox"/> DHS or DVA Project

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UNNECESSARY DUPLICATION OF SERVICES  
MALDISTRIBUTION  
IMPACT ON OTHER PROVIDERS

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Attached are lists of all ZIP Code areas located within a 30-minute drive (per IHFSRB adjustment) of the proposed site, and all ESRD facilities located within that area.

The cumulative 2012 population of the identified area is 2,489,972 per 2012 ZIP Code-specific population estimates developed by Geolytics, Inc. There are 763 approved ESRD stations within the identified area, resulting in a population : station ratio of 3,511.9 persons per station. While the area-specific population : station ratio is slightly lower than that of the State as a whole, the proposed project differs from the existing ESRD providers because of the intended relationship between the hemodialysis program and the other patient care, teaching and research programs provided on the Northwestern Memorial Hospital campus, as discussed in ATTACHMENT 12.

The proposed dialysis center will not complete its second year of operation until mid-2018. As noted elsewhere in this application, the referring nephrologists are currently referring patients to two existing ESRD facilities. While it is anticipated that a number of patients will elect to transfer their care Northwestern Medical Faculty Foundation Dialysis Center, it is anticipated that many of the current ESRD patients will no longer be receiving hemodialysis by the 24<sup>th</sup> month of operation, and as a result, the

ATTACHMENT 26c1-3

impact on other providers will be limited. In addition, and central to the proposed establishment of Northwestern Medical Faculty Foundation Dialysis Center is the fact that the proposed center will provide ESRD patients with an alternative to Fresenius and DaVita-operated facilities, with those two providers currently operating 42 of the 51 ESRD facilities in the City of Chicago.

## SAFETY NET IMPACT STATEMENT

The establishment of the proposed ESRD facility will not have any impact on the provision of safety net services, in that hemodialysis is not considered to be a "safety net service." In addition, the proposed project will not have any impact on area acute care hospitals, because none of the downtown or near northside hospitals provide ESRD services.

It is the intent of the applicant to treat all medically qualifying patients, regardless of their ability to pay or their insurance coverage. A formal admissions policy and protocol will be developed approximately six months prior to the dialysis center's opening, and it is anticipated by the applicant that the policy will be modeled after the policies in place at Northwestern Memorial Hospital. The anticipated payor mix for the proposed facility is: 70-72% Medicare, 10-12% Medicaid, 15-16% Private Insurance, and 1-2% Self Pay.