

W Brian Duffy MD

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HEALTH FACILITIES &
SERVICES REVIEW BOARD

March 5, 2013

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Service Review Board
525 West Jefferson 2 nd floor
Springfield Illinois 62761

Re: Opposition Project # 12-099, Northwestern Medical Faculty Foundation Dialysis Center

Dear Ms Avery,

I am writing to oppose the Certificate of Need application filed by Northwestern Medical Faculty Foundation, LLC to open a new 36 station dialysis facility only two blocks from the existing Fresenius Medical Care Northwestern dialysis facility. I have been the medical director of the Fresenius Medical Care Northwestern Facility since 2011, and I have been a medical director for 30 years and have supported several dialysis units providing both hemodialysis and peritoneal dialysis. These units included privately owned as well as several owned by large dialysis organizations. I am concerned that the proposed facility is duplicative of services already provided at the Fresenius Northwestern facility, and that the proposed facility does not serve patients' interests.

All of the NMFF physicians currently admit patients to the Fresenius Northwestern facility, where the patients receive high quality care through the physicians' oversight combined with the supportive staff and infrastructure provided by Fresenius Medical Care. The current standard mortality rate at Fresenius Northwestern is .55, an outcome achieved by few dialysis facilities. Contrary to NMFF's suggestion that it is limited by corporate protocols, my experience is that the support and tools offered by Fresenius Medical Care assist physicians to achieve quality outcomes but also allow physicians ample flexibility in the care of their patients.

The NMFF application touts that the care and services it will provide are distinguishable from existing facilities, including Fresenius Northwestern, because they envision a facility that will be fully integrated with other nephrology-related programs on the Northwestern Medical Campus and the proposed facility will support research and teaching commitments. The application does not explain why those goals cannot be achieved at the Fresenius Northwestern facility, and I believe they can.

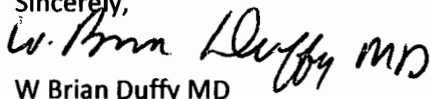
For example, since 2011, 22 patients from Fresenius Northwestern have received transplants at Northwestern Memorial Hospital, and there are currently 60 patients on the transplant list. It is the nephrologist's responsibility to refer appropriate candidates for transplant, and this consistently occurs at the Fresenius Northwestern facility. The facility staff assists in this process in any way possible.

There is no reason to believe the rate or success of transplants would improve at the proposed facility. The patients at Fresenius Northwestern have equal access to the Northwestern Memorial transplant program as the patients would have at the proposed facility, and the same NMFF nephrologists would be involved.

The Fresenius Northwestern facility also recognizes the benefits of, and need for, physicians to round with renal fellows, residents, medical students and other health professions students for educational purposes, and it has supported the NMFF physician's teaching commitments. In the past two years, six Northwestern nephrology fellows have received training at the Fresenius Northwestern facility, and the attending physicians are also free to have medical students accompany them on rounds at the facility. Allied health professionals, such as transplant surgeons or access surgeons, are also welcome to exercise clinical privileges at the facility, after being appropriately credentialed. During my tenure no one has applied.

In short, the existing Fresenius Northwestern facility can provide the same integrated approach advertised by NMFF for the proposed new facility. The new facility will duplicate services and not serve the patients' interests.

Sincerely,

Handwritten signature of W. Brian Duffy MD in black ink.

W Brian Duffy MD