



3075 Highland Parkway, Suite 600 || Downers Grove, Illinois 60515 || T 630.572.9393 || advocatehealth.com

January 19, 2015

Via Overnight Courier

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

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**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

Re: Advocate Christ Medical Center
Projects No. 14-057 (the "Project")
Response to State Board Report

Dear Ms. Avery:

Advocate Christ Medical Center ("ACMC") would like to comment on the State Agency Report for the Project referenced above. We appreciate the work that has gone into this report and wish to comment only briefly.

Compliance with Contingency State Standard

Page 5 of the State Agency Report notes in summary that the Project "exceeded calculated State Board Standards for Modernization and Proportionate Contingencies". We acknowledge that the construction costs for modernization exceeds the state standard and had tried to address those reasons in the application. We believe that the amounts for contingency, however, comply with state standards. Page 18 of the SBR makes a positive finding on the contingency costs. We know that there had been an earlier question about this issue and believe it may have been revised on Page 18, but not on Page 5.

Clarification of ED Bed Complement

We also wish to clarify the bed complement numbers on Page 3. ACMC currently has 42 emergency stations (26 adult and 16 pediatrics) plus 8 trauma stations. As proposed the project has 70 emergency stations (52 adult and 18 pediatric) plus 12 trauma stations.

Clinical Areas with no State Standards

Page 14 of the SBR addresses the utilization for trauma, where it notes that there are no state standards for trauma. We raise whether the last sentence on page 14 may be misplaced where the sentence addresses the emergency department utilization, for which there is a state standard, rather than the trauma beds for which there is no state standard.

Recently Available 2014 Utilization Data Shows Compliance

Our final comment is similarly more of an update than correction. The permit application and SBR were understandably based upon 2013 utilization data, which was the most recently available information. With the close of 2014 calendar year we have now been able to project Emergency Department utilization based on the 2014 data. As the chart below shows, emergency department utilization increased drastically during the last year. Similarly, the hours on by-pass and the number of patients who left without being treated or seen similarly increased dramatically.

Had the full 2014 data been available for the application and SBR, based upon the same methodology included in the application, our calculations show that projected utilization would meet state standards. Although this new data can likely not change the SBR formally, we believe this information is important for the Board and staff to have available.

	Historical Utilization			% Change 2012-2014
	CY 2012	CY 2013	CY 2014	
Emergency Dept.	93,119	91,901	99,170	6.5%
Hours on Bypass	647.3	1,029	1682.5	160%
LWOT/LWOB	6,005	5,450	7,483	24.6%

Again, we appreciate the opportunity to comment on the State Agency Report.

Sincerely,



Wendy Mulvihill
Planning Manager
Advocate Health Care

cc: Mike Constantino