

March 15, 2017

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0264141-0101**VIA EMAIL & FEDERAL EXPRESS**

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

Mr. Mike Constantino  
Supervisor, Project Review Section  
Illinois Health Facilities and Services Review  
Board  
525 West Jefferson Street, 2<sup>nd</sup> Floor  
Springfield, Illinois 62761

Re: Request for Expedited Review for CON Application  
Silver Oaks Hospital, Project No. 17-009

Dear Ms. Avery and Mr. Constantino:

We are counsel to Silver Oaks Behavioral LLC d/b/a Silver Oaks Hospital ("Silver Oaks Hospital"), Silver Oaks Behavioral Realty LLC ("Silver Oaks Realty"), New Lenox Behavioral Innovations LLC ("NLBI"), New Lenox Behavioral Innovations Realty LLC ("NLBI Realty"), US Healthvest LLC ("USHV"), and Silver Cross Hospital and Medical Centers ("Silver Cross Hospital," and collectively with Silver Oaks Hospital, Silver Oaks Realty, NLBI, NLBI Realty and USHV, the "Applicants"), and are hereby requesting an expedited review of the Certificate of Need Application (the "CON Application") that we filed with the Illinois Health Facilities & Services Review Board (the "Board") on behalf of the Applicants to establish a new behavioral health hospital (the "New Hospital") on the Silver Cross Hospital Campus (immediately west of Silver Cross Boulevard and south of Route 6) in New Lenox, Illinois (the "Project") to address the mental health crisis in Planning Area A-13.

The local, state and national behavioral health data demonstrates that this Project is desperately needed. According to the American Hospital Association, one in four Americans suffer from mental illness or substance abuse disorder each year, and the majority also have a comorbid physical condition. In addition, the entire nation is struggling with opiate addiction, heroin addiction and lack of services for individuals that are chemically dependent.

This mental health crisis is even more severe in Will County (the home of Silver Cross Hospital for the past 122 years), because Will County has seen explosive population growth in the past two decades and there are so few mental health providers relative to the number of residents. According to a report from the 2016 Robert Wood Johnson Foundation County Health Rankings, access to mental health services in Will County is among the worst in the country. More specifically, the top large counties in the United States have 1 mental health provider for every 370 residents. In Illinois, the average large county has 1 mental health provider for every 560 residents. In comparison, Will County only has 1 mental health provider for every 1,063



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residents. In other words, Will County only has 35% of the number of mental health providers that are needed.

Not only are mental health providers needed in Will County; but so are acute mental illness ("AMI") beds. Experts in the field of behavioral health recommend a range of 40 to 50 AMI beds per 100,000 residents. For example, in an article recently published by the Pew Charitable Trusts in August, 2016, Pew suggested that at least 40 AMI beds were needed per 100,000 residents. And in an article published by Modern Healthcare in November, 2013, the Treatment Advocacy Center recommended a minimum of 50 AMI beds per 100,000 residents.

The Illinois Department of Public Health's own data demonstrates this same glaring need for AMI beds in Will County (which is in Planning Area A-13). On average, in Illinois, there are 35 AMI beds per 100,000 residents. In Planning Area A-13, there are only 10.15 AMI beds per 100,000 residents. In other words, Planning Area A-13 only has 29% of the AMI beds that are needed. And while the AMI bed to population ratio is bad in Will County, it is even worse in Grundy County. Grundy County (which, along with Will County, comprises Planning Area A-13), has **NO** AMI beds.

The lack of adequate AMI beds have required the residents of Planning A-13 to either go without treatment or leave Planning Area A-13 for treatment. Accessing programs outside Planning Area A-13 presents obstacles for coordination of care and long travel times for family and support. In calendar year 2015, there were 7,260 AMI discharges associated with residents that live in Planning Area A-13. Of these, 61%, or 4,404 times, an individual was forced to leave to Planning Area A-13 to receive inpatient AMI services. This poses an undue burden on family members and other supporters who must travel long distances to visit and support their loved one. In addition, it complicates follow-up support services and adds to confusion and a disjointed approach to care. Having continuity of care for the patients with the same physicians and support staff are all important to bringing patients to stable status.

The overwhelming level of support for this Project, as witnessed by the 103 referral and support letters received to date, also highlights the lack of necessary behavioral health services in Planning Area A-13. Thus, this Project is desperately needed.

To that end, the Applicants filed the CON Application with the expectation that the Applicants could complete the Project by December 31, 2018. That December 31, 2018 completion date assumed no delays of any sort. Having reviewed the construction schedule for the Project in detail with the Applicants' general contractor, who raised the prospect of possible



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weather related and possible Board delays, the Applicants are very concerned that any delays in the start of the Project will push the Project completion date into 2019. Given the mental health crisis in Planning Area A-13, any such delays would seriously and negatively impact patient care in Planning Area A-13. For those reasons, we are requesting an expedited review of the CON Application in order to begin construction on the New Hospital no later than July 1, 2017. Thus, we are requesting to be heard at the Board's hearing on June 20, 2017 in Bolingbrook, Illinois.

Thank you for your consideration of this request and please feel free to contact me if you have any questions.

Sincerely,

Edward J. Green

EJG:src  
Enclosures

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