



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

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DOCKET NO: H-13	BOARD MEETING: September 26, 2017	PROJECT NO: 17-026	PROJECT COST: Original: \$0
FACILITY NAME: Elmhurst Foot & Ankle Surgery Center		CITY: Elmhurst	
TYPE OF PROJECT: Non-Substantive			HSA: VII

PROJECT DESCRIPTION: The applicants (TEC Surgical Properties, LLC and River North Surgical Suites, Inc. d/b/a Elmhurst Foot & Ankle Surgery Center) are proposing to add a surgical specialty to an existing limited specialty ambulatory surgical treatment facility (ASTC) in Elmhurst. There are no reported project costs, and the project completion date as stated in the application is November 30, 2017.

EXECUTIVE SUMMARY

PROJECT DESCRIPTION:

- The applicants (TEC Surgical Properties, LLC, and River North Surgical Suites, Inc. d/b/a Elmhurst Foot & Ankle Surgery Center) are proposing to add Orthopedic Surgery to its limited specialty ambulatory surgical treatment facility, located at a 340 West Butterfield Road, Elmhurst. There is no reported project cost, and the project completion date as stated in the application is November 30, 2017.
- The existing facility is a limited-specialty ASTC with one (1) operating room, and three (3) recovery stations. Elmhurst Foot & Ankle Surgery Center currently performs Podiatric surgical procedures exclusively.
- Dr. Thomas Carr, M.D., owner, proposes to add Orthopedic Surgery to its service complement.
- The proposed project is a non-substantive project with no costs, and subject to part 1110 review. If approved by the State Board, the ASTC will continue to be classified as a limited-specialty surgery center (providing one or two surgical specialties outlined in 77 IAC 1110 Appendix A).

WHY THE PROJECT IS BEFORE THE STATE BOARD:

- This project is before the State Board because the project proposes to add a surgical specialty to an existing limited specialty ASTS as defined by the Illinois Health Facilities Planning Act. (20 ILCS 3960/3)

PURPOSE OF THE PROJECT:

- The applicants stated:

“The proposed project will improve the health and well-being of the market area’s population by bringing outpatient orthopedic surgery services not previously accessible at Elmhurst Foot & Ankle Surgery Center to the ASTC. The goal of the project is to initiate orthopedic surgical services at the ASTC within 30 days of receipt of the requested CON permit.”(Application, p. 35)

PUBLIC HEARING/COMMENT:

A public hearing was offered in regard to the proposed project, but no public hearing was requested. No support or opposition letters were received by the Board Staff in regard to the proposed project.

SUMMARY:

- The State Board Staff reviewed the application for permit and additional information provided by the applicants and note the following:
- The proposed project is a request by the applicant to add a surgical specialty (Orthopedic Surgery), to an existing limited specialty ASTC, in Elmhurst.
- **Reviewer Note:** The request to add Orthopedic surgical services will not change the ASTC’s classification from limited to multi-specialty.
- **Reviewer Note:** Board rules 77 IAC 1110.1540 Defines the following types of ASTCs:
 - **Limited Specialty:** Providing one or two of the surgical specialties listed in 1110.1540(a)(1)
 - **Multi-Specialty:** Providing at least three of the surgical specialties listed in 1110.1540(a)(1)

The applicant addressed a total of eleven (11) criteria and was not compliant with the following:

Criteria	Reasons for Non-Compliance
77 IAC 1110.1540 g) - Service Accessibility	There is unused surgical capacity at both hospitals and ASTCs in the proposed geographical service area that would be able to absorb the workload of the proposed facility. (See Table One at the end of this report)
77 IAC 1110.1540 h) 1) – Unnecessary Duplication of Service/Maldistribution/Impact on Access	There are thirty-nine (39) hospitals within forty-five (45) minutes of the proposed project twenty-one (21) are not at target occupancy. Of the twenty-three (23) operating ASTCs within forty-five (45) minutes, eighteen (18) are not at target occupancy. (See Table One at the end of this report)

**Elmhurst Foot & Ankle Surgery Center, Elmhurst
STATE BOARD STAFF REPORT
Project #17-026**

APPLICATION CHRONOLOGY	
Applicants(s)	Tech Surgical Properties, LLC River North Surgical Suites, Inc. d/b/a Elmhurst Foot & Ankle Surgery Center
Facility Name	Elmhurst Foot & Ankle Surgery Center
Location	340 West Butterfield Road, Elmhurst, IL
Permit Holder	River North Surgical Suites, Inc. d/b/a Elmhurst Foot & Ankle Surgery Center
Operating Entity/Licensee	River North Surgical Suites, Inc. d/b/a Elmhurst Foot & Ankle Surgery Center
Owner of Site	TEC Surgical Properties, LLC
Application Received	June 21, 2017
Application Deemed Complete	June 23, 2017
Financial Commitment Date	Upon Permit Issuance
Anticipated Completion Date	November 30, 2017
Review Period Ends	August 22, 2017
Review Period Extended by the State Board Staff?	No
Can the applicants request a deferral?	Yes

I. Project Description

The applicants (TEC Surgical Properties, LLC, and River North Surgical Suites, Inc. d/b/a Elmhurst Foot & Ankle Surgery Center) are proposing to add one surgical specialty (Orthopedics), to an existing limited-specialty ambulatory surgical treatment facility, located at 340 West Butterfield Road, Elmhurst. There is no cost associated with this project. The project completion date is November 30, 2017.

II. Summary of Findings

- A. The State Board Staff finds the proposed project is not in conformance with all relevant provisions of Part 1110.
- B. The State Board Staff finds the provisions of Part 1120 are not applicable to this project.

III. General Information

The applicants are TEC Surgical Properties, LLC, and River North Surgical Suites, Inc. d/b/a Elmhurst Foot & Ankle Surgery Center. The proposed project is essentially the addition of a surgical specialty (Orthopedics), to an existing limited-specialty ASTC. Elmhurst Foot & Ankle Surgery Center is located at 340 West Butterfield Road, Elmhurst. The facility is currently a limited specialty ASTC providing Podiatric surgical services.

IV. Health Service Area/Health Planning Area

The proposed ASTC will be located in DuPage County in Health Service Area 07. HSA-07 includes DuPage and suburban Cook counties. There are fifty-six (56) Ambulatory Surgical Treatment Centers in HSA-07 per the 2015 Annual ASTC Survey, reporting to have performed 22,522 Orthopedic surgical procedures in 2015. There are thirty-one (31) hospitals in this HSA, reporting to have performed a total of 61,659 orthopedic procedures in the same year (Source: 2015 Annual Hospital/ASTC Questionnaire).

V. Project Description

Elmhurst Foot & Ankle Surgery Center is currently operating as a limited specialty ASTC performing podiatric procedures. The ASTC contains one surgical suite, 3 recovery stations, and reported having performed 83 (162 hrs) Podiatric procedures in 2015. The applicants propose to add Orthopedic surgery to its list of surgery specialties, with the addition of Dr. Daryl O'Connor, M.D., Orthopedic Surgeon, to its staff. There will be no additional surgery suites or any modernization occurring at the existing facility.

VI. Project Costs

The applicants report no project costs, outside of Certificate of Need fees. There will be no additional surgical space or modernization of existing space occurring at the facility.

VII. Purpose of the Project, Safety Net Impact Statement, Alternatives

A) Criterion 1110.230(a) – Purpose of the Project

The applicants are asked to:

1. *Document that the project will provide health services that improve the health care or well-being of the market-area population to be served.*
2. *Define the planning area or market area, or other area, per the applicant's definition.*
3. *Identify the existing problems or issues that need to be addressed, as applicable and appropriate for the project.*
4. *Cite the sources of the information provided as documentation.*
5. *Detail how the project will address or improve the previously referenced issues, as well as the population's health status and well-being.*
6. *Provide goals with quantified and measurable objectives, with specific timeframes that relate to achieving the stated goals as appropriate.*

The applicants stated: *“The proposed project will improve the health and well-being of the market area’s population by bringing outpatient orthopedic surgery services not previously accessible at Elmhurst Foot & Ankle Surgery Center to the ASTC. The goal of the project is to initiate orthopedic surgical services at the ASTC within 30 days of receipt of the requested CON permit.”(Application, p. 35).*

B) Criterion 1110.230(b) – Safety Net Impact Statement

The applicants are asked to document:

1. **The project's material impact, if any, on essential safety net services in the community, to the extent that it is feasible for an applicant to have such knowledge. The project's impact on the ability of another provider or health care system to cross-subsidize safety net services, if reasonably known to the applicant.**

The project is classified as non-substantive, therefore a Safety Net Impact Statement was not required. The applicants did not report any Charity care data for years preceding the filing of this application.

C) Criterion 1110.230(c) Alternatives to the Project

To demonstrate compliance with this criterion the applicants must document that the proposed project is the most effective or least costly alternative for meeting the health care needs of the population to be served by the project.

The applicants note the proposed project is limited to the addition of a surgical specialty at an existing Ambulatory Surgery Treatment Center, and viable alternatives to the proposed addition of a surgical specialty are non-existent, due to the limited nature of the project. [Application for Permit page 37]

VIII. Size of the Project, Projected Utilization of the Project, Assurances

A) Criterion 1110.234(a) – Size of the Project

To document compliance with this criterion the applicants must document that the proposed surgical rooms and recovery stations meet the State Board GSF Standard's in Section 1110.Appendix B.

The applicants are proposing one (1) surgical suite, in 1,089 GSF of clinical space. The State standard for ASTC rooms is 1600-2,200DGSF per room, and it appears the applicant has met the requirements of the criterion.

B) Criterion 1110.234(b) – Projected Utilization

To document compliance with this criterion the applicants must document that the proposed surgical/procedure rooms will be at target utilization or 1,500 hours per operating/procedure room by the second year after project completion. Section 1110.Appendix B

The State Board Standard is 1,500 hours per operating room. The applicants are projecting a total of 486 hours by the second year of operation, satisfying the requirements of this criterion (application, p. 38).

C) Criterion 1110.234 (e) – Assurances

To document compliance with this criterion the applicants must provide an attestation that the proposed project will be at target occupancy two years after project completion.

The applicants have provided the necessary attestation at page 60 of the Application for Permit.

THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERIA SIZE OF THE PROJECT, PROJECTED UTILIZATION, AND ASSURANCES (77 IAC 1110.234(a), (b), and (e))

IX. Expansion of an Existing ASTC Service

A) Criterion 1110.1540(b)(1) to (4) - Background of the Applicant

To demonstrate compliance with this criterion the applicants must provide documentation of the following:

- 1) Any adverse action taken against the applicant, including corporate officers or directors, LLC members, partners, and owners of at least 5% of the proposed healthcare facility, or against any health care facility owned or operated by the applicant, directly or indirectly, within three years preceding the filing of the application.
- 2) A listing of all health care facilities currently owned and/or operated by the applicant in Illinois or elsewhere, including licensing, certification and accreditation identification numbers, as applicable;
- 3) A letter from the Illinois Historic Preservation Agency or documentation that the proposed project is located in a flood plain zone is not required for this project because the proposed project:
 1. does not involve demolition of any structure; or
 2. does not involve the construction of new buildings; or
 3. does not involve the modernization of existing buildings.

River North Surgical Suites, Inc. is the parent corporation of and has sole ownership interest in Elmhurst Foot & Ankle Surgery Center. Dr. Thomas Carr, M.D., is the sole member of the surgery center. The applicant supplied proof of its Certificate of Good Standing, and licensure/accreditation information. The applicants supplied a letter permitting the State Board, and IDPH to verify any information contained in this application. [Source: Application for Permit pg. 34]

Upon permit approval, Dr. Daryl O'Connor, M.D. will begin referring patients for orthopedic surgery to the facility. Dr. O'Connor submitted a referral letter for the proposed number of patients to be referred for orthopedic surgical services. (application, p. 43)

THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION BACKGROUND OF THE APPLICANTS (77 IAC 1110.1540 (b) (1) to (3))

B) Criterion 1110.1540(c) (2) (A) and (B) – Service to GSA Residents

To demonstrate compliance with this criterion the applicants must provide a list of zip codes that comprise the geographic service area. The applicant must also provide patient origin information by zip code for the prior 12 months. This information must verify that at least 50% of the facility’s admissions were residents of the geographic service area.

1. By rule, Dr. Thomas Carr, provided information pertaining to the geographical service area for the ASTC, and Dr. O’Connor’s patient referrals in 2016, on pages 39-40 of the application for permit. In addition, Dr. Carr maintains that virtually all of the referral patients for the surgery center come from within the prescribed 45-minute service area.

Based upon the information provided in the application for permit and summarized above it appears that the proposed ASTC will provide services to the residents of the forty-five (45) minute geographic service area.

THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION GEOGRAPHIC SERVICE AREA NEED (77 IAC 1110.1540(c) (2) (A) and (B))

C) Criterion 1110.1540(d) (1) and (2) - Service Demand – Expansion of an ASTC Facility

To demonstrate compliance with this criterion the applicants must provide physician referral letters that attest to the total number of treatments for each ASTC service that was referred to an existing IDPH-licensed ASTC or hospital located in the GSA during the 12-month period prior to the application. The referral letter must contain:

1. Patient origin by zip code of residence;
2. Name and specialty of referring physician;
3. Name and location of the recipient hospital or ASTC; and
4. Number of referrals to other facilities for each proposed ASTC service for each of the latest two years;
5. Estimated number of referrals to the proposed ASTC within 24 months after project completion
6. Physician notarized signature signed and dated; and
7. An attestation that the patient referrals have not been used to support another pending or approved CON application for the subject services.

By rule the referrals to a proposed ASTC must be from IDPH licensed ASTC or hospitals. The applicant submitted a referral letter attesting to Dr. O'Connor's referral of approximately 200 patients to nearby Elmhurst Memorial Hospital and Gottlieb Memorial Hospital. The referral letter also states that if the proposed facility was licensed appropriately in 2016, 175 patients would have been referred to Elmhurst Foot & Ankle Surgery Center, with 98% of those referrals originating from zip codes within the geographical service area.

Service Dates 4/30/2016 - 4/30/2017			
Zip Code	City	Number of Cases	%
60126	Elmhurst	54	26.8%
60164	Elgin	23	11.6%
60160	Melrose Park	20	9.8%
60707	Elmwood Park	20	9.8%
60148	Lombard	18	8.9%
60104	Bellwood	16	8.0%
60171	River Grove	14	7.1%
60181	Villa Park	14	7.1%
60106	Bensenville	11	5.4%
60131	Franklin Park	11	5.4%
		200	

THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IS IN CONFORMANCE WITH CRITERION SERVICE DEMAND (77 IAC 1110.1540(d) (1) and (2))

D) Criterion 1110.1540(f) (1) and (2) - Treatment Room Need Assessment

To document compliance with this criterion the applicants must provide the projected patient volume or hours to justify the number of operating rooms being requested. The applicants must document the average treatment time per procedure.

1. State Board Staff notes Elmhurst Foot & Ankle Surgery Center will have only one operating room, which absolves the applicants from achieving the prescribed minimum utilization standards for an ASTC (1,500hrs/room). Elmhurst Foot & Ankle Surgery Center reported having performed 145 podiatric procedures in 2016, and anticipate this number to occur in the coming years. The applicants anticipate an additional 175 orthopedic cases to be performed once approval is granted by the State Board. These 320 cases are projected to result in a minimum of 486 registered surgical hours by the second year, using an estimated 1.34 hours per procedure

THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION TREATMENT ROOM NEED ASSESSMENT (77 IAC 1110.1540(f) (1) and (2))

E) Criterion 1110.1540 (g) - Service Accessibility

To document compliance with this criterion the applicants must document that the proposed ASTC services being established is necessary to improve access for residents of the GSA by documenting one of the following:

1. There are no other IDPH-licensed ASTCs within the identified GSA of the proposed project;
 2. The other IDPH-licensed ASTC and hospital surgical/treatment rooms used for those ASTC services proposed by the project within the identified GSA are utilized at or above the utilization level specified in 77 Ill. Adm. Code 1100;
 3. The ASTC services or specific types of procedures or operations that are components of an ASTC service are not currently available in the GSA or that existing underutilized services in the GSA have restrictive admission policies;
 4. The proposed project is a cooperative venture sponsored by two or more persons, at least one of which operates an existing hospital. Documentation shall provide evidence that:
 - A) The existing hospital is currently providing outpatient services to the population of the subject GSA;
 - B) The existing hospital has sufficient historical workload to justify the number of surgical/treatment rooms at the existing hospital and at the proposed ASTC, based upon the treatment room utilization standard specified in 77 Ill. Adm. Code 1100;
 - C) The existing hospital agrees not to increase its surgical/treatment room capacity until the proposed project's surgical/treatment rooms are operating at or above the utilization rate specified in 77 Ill. Adm. Code 1100 for a period of at least 12 consecutive months; and
 - D) The proposed charges for comparable procedures at the ASTC will be lower than those of the existing hospital.
1. There are existing ASTCs in the identified GSA. [See Table One at the end of this report.]
 2. There are underutilized ASTC and hospital surgical/treatment rooms in the identified GSA. [See Table One at the end of this report]
 3. The proposed surgical services are available in the GSA, and the applicants realize that Orthopedics is a commonly-provided procedure in both inpatient and outpatient facilities.
 4. The State Board Staff does not consider the proposed project a cooperative venture with one of the persons operating an existing hospital.

Table One shows that there are existing ASTCs and hospitals in the service area with surgical services functioning beneath the State Board standard. The applicant has not met the requirements of this criterion.

THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT NOT IN CONFORMANCE WITH CRITERION SERVICE ACCESSIBILITY (77 IAC 1110.1540(g))

F) Criterion 1110.1540(h) (1), (2), and (3) - Unnecessary Duplication/Mal-distribution/Impact on Other Providers

1. To demonstrate compliance with this criterion the applicants must provide a list of all licensed hospitals and ASTCs within the proposed GSA and their historical utilization (within the 12-month period prior to application submission) for the existing surgical/treatment rooms.
- 2) To demonstrate compliance with this criterion the applicants must document the ratio of surgical/treatment rooms to the population within the proposed GSA that exceeds one and one half-times the State average.
- 3) To demonstrate compliance with this criterion the applicants must document that, within 24 months after project completion, the proposed project:
 - A) Will not lower the utilization of other area providers below the utilization standards specified in 77 Ill. Adm. Code 1100; and
 - B) Will not lower, to a further extent, the utilization of other GSA facilities that are currently (during the latest 12-month period) operating below the utilization standards.

The applicants stated the following to address this criterion:

State Board Staff identified a general service area (GSA), extending 45 minutes in all directions from the site of the proposed ASTC. This GSA includes zip codes outside of Cook and DuPage counties, and the 2015 population estimates for this GSA is 7,671,497, per Nielsen Pop-Facts.

The applicants identified a total of thirty-nine (39) hospitals and twenty-three (23) ASTCs in the identified 45-minute service area. [See Table One at the end of this report].

1. Unnecessary Duplication of Service

1. ASTC:

There are twenty-three (23) ASTCs within forty-five minutes, with five (5) facilities are at target occupancy. Twelve (12) of the nineteen (19) facilities did not provide Medicaid services in CY 2015. **Reviewer Note:** A limited specialty ASTC would have to submit an application for a certificate of need to add the specialty proposed by this project.

2. Hospitals

There are thirty-nine (39) hospitals within the proposed 45-minute GSA, eighteen (18) hospitals are at the target occupancy of 1,500 hours per surgery/procedure room.

2. Mal-Distribution

According to the applicants, the proposed ASTCs geographic service area has an estimated population of 7,671,497. The number of operating/procedure rooms within this area is approximately 739 operating/procedure rooms. That equates to one (1) operating/procedure room per every 10,381 individuals. The State of Illinois estimated population for 2015 is 12,900,879. The number of operating/procedure rooms in the State of Illinois is 3,054 rooms. The ratio of population to operating/procedure rooms is one (1) operating/procedure room per every 4,224 individuals. Based upon this analysis it does not appear there is a surplus of operating/procedure rooms in this forty-five

minute geographical service area.

Reviewer Note: A surplus is defined as the ratio of operating/procedure rooms to the population within the forty-five (45) minute GSA [GSA Ratio], to the State of Illinois ratio that is 1.5 times the GSA ratio.]

3. Impact on Other Facilities

The applicants acknowledge that orthopedic surgical service are commonplace in the service area, and that there are underperforming facilities in the service area that offer this service.

The applicant has not met this requirement because there are number of existing ASTCs and hospitals currently underutilized in the proposed GSA.

THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IS NOT IN CONFORMANCE WITH CRITERION UNNECESSARY DUPLICATION OF SERVICE, MALDISTRIBUTION/ IMPACT ON OTHER FACILITIES (77 IAC 1110.1540 (h) (1), (2), and (3))

G) Criterion 1110.1540 (i) - Staffing

To demonstrate compliance with this criterion, the applicants must provide documentation that relevant clinical and professional staffing needs will be met and a medical director will be selected that is board certified.

To address this criterion the applicant provided attestation on page 49 of the application that no additional staff outside of Dr. O'Connor will be added to the facility, and that Dr Yvonne Bennett will remain in her current position of Medical Director.

THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION STAFFING (77 IAC 1110.1540(i))

H) Criterion 1110.1540 (j) - Charge Commitment

To document compliance with this criterion the applicants must provide the following:

- 1) A statement of all charges, except for any professional fee (physician charge); and
- 2) A commitment that these charges will not be increased, at a minimum, for the first two years of operation unless a permit is first obtained pursuant to 77 Ill. Adm. Code 1130.310(a).

The applicants supplied a statement of charges (application, pgs 51-59), and attestation that the identified charges will not increase for at least the first two years after project completion (application, pg. 50).

THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION CHARGE COMMITMENT (77 IAC 1110.1540(j))

I) Criterion 1110.1540 (k) - Assurances

To demonstrate compliance with this criterion the applicants must attest that a peer review program will be implemented and the proposed ASTC will be at target occupancy two years after project completion.

The applicants provided certified attestation (see project file), that Elmhurst Foot & Ankle Surgery Center will continue to maintain quality patient care standards, and meet or exceed the utilization standards specified in 77 IAC 1100, by the second year of operation.

THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION ASSURANCES (77 IAC 1110.1540 (k))

TABLE ONE

Facilities in the 45 Minute Travel Radius of Proposed Facility

Facility	City	Type	Time	OR/Procedure Rooms	Hours	Medicaid	Medicare	Met Standard?
ASTC								
Elmhurst Outpatient Surgery Ctr	Elmhurst	Multi	2	4/4	1,855/1,476	N	Y	N
Loyola Amb. Surgery Ctr. Oak Brook	Oak Brook	Multi	6	3	2,465	Y	Y	N
DMG Surgery Ctr.	Lombard	Multi	8	5/3	9,844/6,892	N	Y	Y
Hinsdale Surgical Ctr.	Hinsdale	Multi	9	4/2	5,316/371	N	N	Y/N
Oak Brook Surgical Ctr.	Oak Brook	Multi	10	5/1	2,090/717	Y	Y	N
Salt Creek Surgery Ctr.	Westmont	Multi	11	4	3,573	N	Y	N
Midwest Ctr. for Day Surgery	Downers Grove	Multi	12	5	3,433	N	Y	N
Loyola University Amb. Surgery Ctr.	Maywood	Multi	15	3	2,465	Y	Y	N
The Center for Surgery	Naperville	Multi	21	8/3	3,714/491	Y	Y	N
Cadence Ambulatory Surgery Ctr.	Warrenville	Limited	22	4	4,341	Y	Y	N
Novamed Surgery Ctr. of Oak Lawn	Oak Lawn	Multi	22	4	1,589	Y	Y	N
Palos Hills Surgery Ctr.	Palos Hills	Limited	22	2	1,670	Y	Y	Y
Northwest Community Day Surgery	Arlington	Multi	26	10/1	9,620/9	Y	Y	N
Northwest Surgicare HealthSouth	Arlington	Multi	26	4/2	2,394/122	N	Y	N
Palos Surgicenter, LLC	Palos Heights	Multi	28	3/2	2,524/528	N	Y	N
IL Sports Medicine & Ortho Surgery	Morton Grove	Multi	29	4/1	2,885/559	Y	Y	Y
Rush Surgicenter Prof. Building	Chicago	Multi	29	4	6,254	N	Y	Y
Dreyer Ambulatory Surgery Ctr.	Aurora	Multi	32	4/6	3,041/4,934	Y	Y	N/N
Preferred Surgicenter	Orland Park	Multi	32	4/1	154/94	Y	Y	N/N
Naperville Surgical Centre	Naperville	Multi	35	3	1,664	N	Y	N
Castle Surgicenter	Aurora	Multi	36	2	1,473	N	Y	N
Hoffman Estates Surgery Ctr.	Hoffman Estates	Multi	36	3/1	4,752/857	N	Y	Y/Y
Edward Plainfield Surgery Ctr.	Plainfield	Multi	39	3/1	2,129/371	N	Y	N/Y
Total				123	96,666			

**TABLE ONE (continued)
HOSPITALS WITHIN 45-MINUTES OF PROPOSED PROJECT**

Facility	City	Time	OR/Procedure Rooms	Hours	Medicaid	Medicare	Utilization Met?
Elmhurst Memorial Hospital	Elmhurst	2	14	25,128	Y	Y	Y
Adventist Hinsdale Hospital	Hinsdale	12	12	19,172	Y	Y	Y
Advocate Good Samaritan	Downers Grove	12	15	23,181	Y	Y	Y
Loyola University Foster McGaw	Maywood	13	28	59,391	Y	Y	Y
Adventist LaGrange Hospital	LaGrange	18	11	12,846	Y	Y	N
VHS Westlake Hospital	Melrose Park	19	6	2,674	Y	Y	N
Rush Oak Park Hospital	Oak Park	19	12	9,232	Y	Y	N
Alexian Brothers Medical Ctr.	Elk Grove Village	21	14	21,164	Y	Y	Y
Loretto Hospital	Chicago	22	5	707	Y	Y	N
MacNeal Memorial Hospital	Berwyn	23	18	18,148	Y	Y	N
Gottlieb Memorial Hospital	Melrose Park	24	9	10,360	Y	Y	N
Adventist Glen Oaks Med. Ctr.	Glendale Heights	26	5	3,015	Y	Y	N
VHS West Suburban Med. Ctr.	Oak Park	28	12	17,023	Y	Y	Y
Adventist Bolingbrook Hospital	Bolingbrook	30	6	7,138	Y	Y	N
Central DuPage Hospital	Winfield	31	32	50,055	Y	Y	Y
Palos Community Hospital	Palos Heights	32	14	20,009	Y	Y	Y
Advocate Christ Hospital	Oak Lawn	33	39	72,429	Y	Y	Y
Presence Resurrection Med. Ctr.	Chicago	33	13	11,958	Y	Y	N
St Alexius Med Ctr.	Hoffman Estates	33	20	27,603	Y	Y	Y
Edward Hospital	Naperville	34	25	30,427	Y	Y	N
Stroger Hospital Cook County	Chicago	34	28	43,907	Y	Y	Y
Glenbrook Hospital	Glenview	34	16	28,871	Y	Y	Y
Silver Cross Hospital	New Lenox	35	16	27,575	Y	Y	Y
Mount Sinai Hospital	Chicago	36	13	13,890	Y	Y	N
St. Anthony Hospital	Chicago	36	5	3,547	Y	Y	N
Presence Mercy Med. Ctr.	Aurora	37	14	6,806	Y	Y	N

**TABLE ONE (continued)
HOSPITALS WITHIN 45-MINUTES OF PROPOSED PROJECT**

Facility	City	Time	OR/Procedure Rooms	Hours	Medicaid	Medicare	Utilization Met?
MetroSouth Med. Ctr.	Blue Island	37	15	11,456	Y	Y	N
Ingalls Memorial Hospital	Harvey	37	13	10,660	Y	Y	N
Rush Copley Memorial Hosp.	Aurora	39	16	22,775	Y	Y	Y
Rush University Med. Ctr.	Chicago	40	42	74,205	Y	Y	Y
Little Company of Mary Hosp.	Evergreen Park	40	16	13,312	Y	Y	N
St. Elizabeth's Hospital	Chicago	40	6	939	Y	Y	N
Advocate South Suburban	Hazel Crest	41	11	16,379	Y	Y	Y
University of Illinois Hosp.	Chicago	41	27	50,645	Y	Y	Y
Adventist Bolingbrook Hosp.	Bolingbrook	41	12	11,287	Y	Y	N
Northwest Community Hosp.	Arlington Heights	42	23	33,399	Y	Y	Y
Norwegian American Hosp.	Chicago	44	7	2,818	Y	Y	N
St. Mary of Nazareth Hosp.	Chicago	44	13	13,348	Y	Y	N
Franciscan St. James Hospital	Olympia Fields	44	13	6,023	Y	Y	N
Total			616	833,502			

Travel time determined using formula in 77IAC 1100.510 (d)
 Data taken from CY 2015 Hospital/ASTC Profiles
 NA – information not available

17-026 Elmhurst Foot & Ankle Surgery Center - Elmhurst

