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June 19, 2018

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Via Federal Express

Ms. Kathryn J. Olson, Chair
IL Health Facilities & Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

**Re: DaVita North Dunes Dialysis (Proj. No. 17-066) (“Proposed Clinic”)
Submission of Additional Information**

Dear Ms. Olson:

Polsinelli represents DaVita Inc. and Botkins Dialysis, LLC (collectively, the “Applicants”) in the above-referenced proposal to establish a 12-station dialysis clinic in Waukegan, Illinois (the “Proposed Clinic”). In this capacity, we are writing to provide additional information subsequent to the Illinois Health Facilities and Services Review Board’s (the “State Board”) June 5, 2018 meeting where the Proposed Clinic received four favorable votes but did not pass. Pursuant to Section 1130.670 of the State Board’s Procedural Rules, the Applicants respectfully submit supplemental information regarding the Proposed Clinic.

As the Applicants have previously described and as further discussed in this submission, the need for additional dialysis services in Waukegan is compelling. That need, however, was unfortunately overshadowed at the last meeting by the technical excess of dialysis stations in the planning area that is largely accounted for by the expansion of services in the Elgin area, roughly 90 minutes away. As we also detail in this submission, the need for dialysis services in HSA 8 is understated and there is an actual need for dialysis stations in the Planning Area (Lake County specifically), not an excess of stations.

Waukegan is located in a large and diverse planning area comprised of three of the collar counties of the Chicago metropolitan area (Kane, McHenry and Lake County). Despite 470 stations either operating or approved in the larger planning area, according to the most recently published State Board data, there are only 10 dialysis clinics operating in Lake County where over 700,000 people reside including in Waukegan which is the largest city in Lake County. Despite having close to the combined population of the two other planning area counties, the three CON permit applications approved by the Board for the planning area since the last

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inventory update was published have all been in Kane County in the Elgin area. These permits covered a total of 31 stations for FMC-South Elgin, (17-038), DCC-Elgin (17- 061) and FMC-Elgin (18-004). As they are all approximately 90 minutes away, none of these additional dialysis services are available for patients with kidney disease who reside in Waukegan.

After considering that data at a macro level, it is essential to carefully assess the target area to be served for a better understanding of the clear health planning rationale for the establishment of the Proposed Clinic. The key points of this submission are summarized as follows:

- As it is targeting Waukegan, a highly populated area, which is one of the most population dense areas of the planning area, the addition of the Proposed Clinic will help to properly distribute needed stations in the planning area.
- The Proposed Clinic would not create a maldistribution of stations based on the high utilization of existing providers and the total population to be served.
- There is a need for 94 more dialysis stations than the current Need Determination of State Board identifies (43 station excess) and, conservatively, a need for 43 stations in Lake County
- The growth rate of ESRD patients in the patient service area far outpaces growth of ESRD patients in the State of Illinois as a whole and also outpaces growth in the HSA and Lake County
- The rapid increase in utilization of dialysis clinics in the patient service area indicates that the average utilization of those clinics will well exceed 80% in 2020 when this clinic will come online
- Recognizing the demand for additional services, the Proposed Clinic is well supported by community stakeholders including by Vista Health System, which operates the only acute care hospital in Waukegan; Erie Family Health Centers, a leading provider of free health clinics in the Chicago area including Waukegan; State Rep. Rita Mayfield and Waukegan Mayor Sam Cunningham; and numerous physicians and business leaders

As discussed below, DaVita's primary competitor's business partner, the Fresenius affiliated nephrologists who are part of Nephrology Associates of Northern Illinois and Indiana, provided misleading comments in opposition to the Proposed Clinic. As you will see from the data provided in this letter, however, the project is fully justified by patient demand and will address one of the most significant and growing needs for additional dialysis services in the State of Illinois.

1. Proposed Clinic is well placed to meet Planning Area Demand

The planned site for the Proposed Clinic has extremely high population density when compared to other parts of the HSA 8 planning area. As shown in the table below, a substantial majority of the population of HSA 8 resides in Lake County. More specifically, Waukegan is among the most densely populated areas in Lake County.

HSA 8 Population Density			
	2017 Population Estimate ¹	% HSA 8 Population	Pop. per Square Mile
HSA 8	1,547,309		424
Lake County	703,520	45.5%	1,585
Waukegan	87,729	5.7%	3,724
Kane County	534,667	34.5%	1,028
McHenry County	309,122	20.0%	513

As you can see, Waukegan is nearly nine times denser from a population perspective than the planning area as a whole, so it is no surprise that the need for additional services would be focused in Lake County and Waukegan specifically.

Waukegan lies 40 miles north of Chicago, on the coast of Lake Michigan in Lake County. Over the past 40 years, Waukegan has seen a sharp decline in its manufacturing sector. In 1972, Waukegan had 10,100 manufacturing jobs; approximately 15.5% of its total work force. By 2002, manufacturing employment numbers had dropped down to 4,780, making up only about 5% of Waukegan's work force. Such economic changes have meant, not only diminished employment opportunities, but stresses on the local tax base to finance school and municipal services. At the same time, public service requirements have grown along with the city's swelling population. Waukegan's population expanded by 27% in the 1990s decade alone. The most significant change has been the rapid growth of its foreign-born population, which increased 148% between 1990 and 2000.

Unlike other towns in Lake County, Waukegan has not enjoyed rising prosperity. From 2000 to 2016, the median family income in Lake County increased 27% (from \$76,424 to \$97,079) whereas the median family income in Waukegan increased 12% (from \$47,341 to

¹ Source: U.S. Census Bureau, Census 2010, American Factfinder available at <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml> (last visited June 14, 2018)

\$52,872).² As discussed further in the Applicants' February 28, 2018, income disparities create systematic health inequities. As a result, more individuals in Waukegan lack timely access to physicians and experience higher rates of hypertension and diabetes than other areas of Lake County. Importantly, hypertension and diabetes are two leading causes of kidney disease. The Proposed Clinic will be well-positioned to meet the growing need for dialysis services in Waukegan.

2. Need for Dialysis Clinic in Waukegan

In the June 2018 State Board Report, the Proposed Clinic received a single negative finding for Planning Area Need, but the reality is there is a need for 51 stations in HSA 8 and 43 stations in Lake County. Further, the State Board's new need numbers are not projected to be released until late summer/early fall of 2019. As discussed more fully below, there is an acute need for dialysis stations in Waukegan today. Patients should not have to wait two years for improved access to dialysis, particularly an economically challenged community like Waukegan that has more barriers to access health care than other more affluent communities.

a. Medically Underserved Area and Health Professional Shortage Area

As noted in the Proposed Clinic's certificate of need application, Waukegan is federally designated as *both* a Health Professional Shortage Area ("HPSA") and a Medically-Underserved Area ("MUA") by the Health Resources and Services Administration. Residents suffer from health inequities – differences in population health status and health conditions that are systemic, patterned, and actionable. Given the high rates of poverty and the high Hispanic population in Waukegan, these federal designations become even more concerning because many area residents lack the ability to travel elsewhere for care and face other issues, including language barriers, that further limit their access to health care services.

b. High Rates of Poverty/Disease Incidence

Waukegan has the highest number of persons living in poverty in Lake County and the poverty rates are worsening. From 2009 to 2016, the number of persons living below the Federal Poverty Level increased nearly 50%. Additionally, the percentage of Waukegan residents living in poverty³ is over twice the percentage of Lake County as a whole and 1.5 times greater than the State. The Lake County Health Assessment found a correlation between educational attainment and household income and overall rates of hypertension, obesity and diabetes – all three of

² U.S. Census Bureau, American Fact Finder, Selected Economic Characteristics (Employment, Commute, Income, Health Insurance, Poverty) *available at* https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml# (last visited Jun. 16, 2018).

³ These individuals live below 150% of the Federal Poverty Level, the metric frequently used to determine eligibility for government assistance programs and low-income data.

which are precursors to kidney disease. The application also cited higher rates of kidney disease incidence in the community due to the fact that a vast majority of the population, 71.3% is Hispanic or African-American. This high disease incidence is also reflected in the demographic mix of the two existing Waukegan clinics. Of 290 patients between the two clinics, 85% were either Hispanic or African-American.⁴

c. Waukegan Clinics are Highly Utilized

Both DaVita and Fresenius' existing clinics in Waukegan operate in excess of 90% utilization. As noted in the June 2018 State Board Report, the four fully operational clinics within 30 minutes of the Proposed Clinic are operating at 84.81%, well above the State Board Standard. The State Board Report appropriately concluded that the Proposed Clinic would not cause unnecessary duplication of services.

d. Planning Area Need

Based on the June 11, 2018 update to the inventory of hemodialysis stations, the State Board calculated an excess of 43 stations in HSA 8. As discussed more fully in the Applicants' April 30, 2018 submission, due to significant growth in patient census over the past four years and insufficient capacity among existing clinics within the North Dunes 30 minute GSA, there is a need for 51 dialysis stations in HSA 8, and more specifically 43 dialysis stations in Lake County. See Attachment – 1.

3. Response to Opposition

a. Existing Clinics are Underutilized

Several commenters at the June 5, 2018 State Board meeting claimed existing facilities within the 30 minute geographic service area (“GSA”) are underutilized and adding stations would negatively affect existing clinics. As of March 31, 2018, there are five clinics within 30 minutes of the Proposed Clinic. As shown in the table on the following page, average utilization of the existing clinics was 74%; excluding Fresenius Medical Care Zion (“FMC Zion”), which is currently under construction, average utilization is 85%. Among the existing and approved clinics in the GSA, there is insufficient capacity to accommodate all of Dr. Omar Dalloul's projected patients. The two dialysis clinics in Waukegan are operating well over 90%, with the Applicant's clinic operating 4 shifts to accommodate patient need. Further, the other two operational dialysis clinics in the GSA will likely reach target utilization by the time the Proposed Clinic is operational. Finally, FMC Zion is not a viable option for patients whose kidneys fail. First, it is a 12 station dialysis clinic and can only accommodate 72 patients. Importantly, these stations are committed to a different patient base. Specifically, Dr. Omaiam

⁴ See IDPH End Stage Renal Dialysis 2016 Profiles for DaVita Waukegan and Fresenius Medical Care Waukegan.

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Degani certified 69 of her chronic kidney disease patients would initiate dialysis by the second year of operation.⁵ Dr. Dalloul has identified 60 patients, so this clinic does not address his patients' needs. Finally, Fresenius Medical Care certified FMC Zion would achieve and maintain average utilization of 80% by the second year of operation.⁶ Accordingly, additional stations are needed to maintain access to life sustaining dialysis services in Waukegan.

North Dunes GSA Utilization							
Facility	Ownership	City	Distance	Adjusted Time	Number of Stations 03/31/18	Number of Patients 03/31/18	Utilization % 03/31/18
FMC Zion	Fresenius	Zion	3.0	5.8	12	-	0.00%
Waukegan Renal Center	DaVita	Waukegan	5.0	5.8	24	145	101%
FMC Waukegan Harbor	Fresenius	Waukegan	4.0	12.7	21	115	91 %
FMC Gurnee	Fresenius	Gurnee	6.5	18.4	24	97	67%
FMC Lake Bluff	Fresenius	Lake Bluff	11.4	27.6	16	75	78%
Total					97	432	74%
Total Facilities Operational > 2 Years					85	432	85%

Additionally, the Proposed Clinic's GSA experienced significant growth over the past four years. From March 2014 to March 2018, the Proposed Clinic's GSA experienced 32% growth (or 104 net patients). See Attachment – 2. This amounts to a compound annual growth rate (“CAGR”) of 7.1% in this area during that four year period. If the current trend continues, the Applicants project there will be 496 in-center hemodialysis patients by Q1 2020 when the Proposed Clinic becomes operational, and the 97 existing and approved stations will operate at 85% utilization.

Finally, within the Proposed Clinic's smaller patient service area, which is an approximate 10 mile radius around the Proposed Clinic and aligns with the State Board's new travel radius rules, the growth is more pronounced than in either the 30 minute geographic service area or HSA 8. As shown in Attachment – 3, patient census at the clinics within 10 miles

⁵ See FMC Zion Application for Permit pp 66, 69-77 available at <https://www2.illinois.gov/sites/hfsrb/Projects/ProjectDocuments/2015/15-036/2015-07-30%2015-036%20APPLICATION.pdf> (last visited Jun. 16, 2018).

⁶ *Id.* at 94.

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of the Proposed Clinic grew by 40% from March 2014 to March 2018, which is a compound annual growth rate of 8.7%. Applying the 8.7% growth rate to the March 2018 patient census, the Applicants project there will be 422 dialysis patients in the 10 mile patient service area by Q1 2020, which will result in average utilization of 86.7% for the existing and approved clinics.

Importantly, this data shows there is an acute need for stations in Waukegan, where the Proposed Clinic will be located.

b. Excess Stations in HSA 8

One commenter stated the Proposed Clinic was not needed to due to an excess of stations in HSA 8. While there may be a technical excess of stations, the need calculation does not always accurately portray the need for dialysis stations or lack thereof, in all areas of an HSA, particularly those vastly populated over large geographic areas like HSA 8. HSA 8 encompasses 3 counties, totaling 1,567 square miles. It is important to understand the need calculation is largely based upon the ratio of dialysis patients to total population and assumes the dialysis stations are uniformly distributed throughout the HSA. When a maldistribution occurs, a calculated excess of stations may exist despite an actual need in some communities.

c. Fresenius Submitted Its Application Before DaVita

One commenter noted Fresenius submitted its application prior to DaVita, implying the Fresenius project should be approved over the Proposed Clinic. The Applicants have not yet opposed the Fresenius Waukegan Park project, but if the State Board members believe only one project should be approved, the Applicants believe their application is better positioned to address the need for dialysis services in Waukegan.

As shown in the table on the following page, there are 10 approved and operational clinics within the Waukegan Park GSA, compared to five clinics within the Proposed Clinic's GSA. Average utilization of the existing and approved clinics is 68% in the Proposed Clinic GSA, compared to 74% in the Proposed Clinic's GSA. Excluding FMC Zion, which is currently under construction, the Proposed Clinic's GSA utilization is significantly higher than the proposed Waukegan Park GSA utilization (85% to 73%). Further, the existing clinics in the Waukegan Park GSA, excluding FMC Zion, can accommodate 112 patients before reaching the State Board's 80% utilization standard, well above Dr. Nino Alapishvili's 61 projected patients. Finally, the 4 year CAGR is higher in the Proposed Clinic's GSA than the Waukegan Park GSA (7.1% to 6.1%). Applying the respective CAGRs to these proposed projects, the Proposed Clinic's GSA is projected to reach 85% by Q1 2020 whereas the Waukegan Park GSA will achieve 77% utilization, below the State Board's 80% utilization standard. Accordingly, the need for additional stations is more acute in the Proposed Clinic's GSA than Waukegan Park.

FMC Waukegan Park GSA Utilization							
Facility	Ownership	City	Time	Distance	Number of Stations 03/31/18	Number of Patients 03/31/18	Utilization % 03/31/18
Waukegan Renal Center	Davita	Waukegan	4	2.0	24	145	101%
FKC Waukegan Harbor	Fresenius	Waukegan	5	2.2	21	115	91%
FKC Gurnee	Fresenius	Gurnee	6	2.5	24	97	67%
FKC Lake Bluff	Fresenius	Lake Bluff	11	7.0	16	75	78%
FKC Deerfield	Fresenius	Deerfield	19.2	25.0	12	26	36%
Lake County Dialysis Center	Davita	Vernon Hills	21	13.8	16	66	69%
FKC Highland Park	Fresenius	Highland Park	21	14.0	20	49	41%
FMC Zion ¹	Fresenius	Zion	22	10.4	12	-	0.00%
FKC Round Lake	Fresenius	Round Lake	22	11.9	16	79	82%
FKC Mundelein	Fresenius	Mundelein	22	15.0	14	64	76%
Total					175	716	68%
Total Facilities Operational > 2 Years					163	716	73%

¹December 31, 2018 project completion date

4. Response to Other State Board Member Comments

a. Dialysis Government Coverage

Board members inquired as to whether age was a factor in Medicare eligibility for patients diagnosed with end-stage renal disease (“ESRD”). Most patients qualify for insurance coverage whether through an employer, Medicare or Medicaid. Medicare is the primary payor of dialysis, covering nearly 80% of ESRD patients.⁷ As discussed at the June 5, 2018, people of any age diagnosed with ESRD who need a transplant or dialysis, including children, may qualify for Medicare coverage, provided one of the following requirements is met:

⁷ United States Renal Data System. 2017 USRDS annual data report: Epidemiology of kidney disease in the United States 437. National Institutes of Health, National Institute of Diabetes and Digestive and Kidney Diseases, Bethesda, MD, 2017 available at https://www.usrds.org/2017/download/v2_c09_MedExp_17.pdf (last visited Jun. 18, 2018).

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- Worked the required amount of time under Social Security,⁸ the Railroad Retirement Board (RRB), or as a government employee;
- Receiving or eligible for Social Security or Railroad Retirement benefits; or
- Spouse or dependent child of a person who meets either of the requirements listed above.

Patients who do not qualify for Medicare and are not covered by commercial insurance can generally obtain health benefits coverage through Medicaid. In Illinois, the Illinois State Chronic Renal Disease program assists Illinois residents diagnosed with ESRD and requiring a regular course of dialysis to maintain life. The program is for patients with chronic renal disease who require lifesaving care and treatment, but do not qualify for Medicaid or All Kids or cannot meet the spend down requirements.⁹

b. Home Support

At least one Board member inquired as to whether a technician could be provided by a dialysis provider to assist ESRD patients with home dialysis as a method of encouraging the home modality. Unless a patient pays separately for such service, under current federal law, this type of arrangement constitutes a beneficiary inducement is prohibited for Medicare and Medicaid patients who receive dialysis. Section 1128A(a)(5) of the Social Security Act provides for the imposition of civil monetary penalties against any person who offers or transfers remuneration to a Medicare or State health care program (including Medicaid) beneficiary that the provider knows or should know is likely to influence the beneficiary's selection of a particular provider, practitioner, or supplier of any item or service for which payment may be made, in whole or in part, by Medicare or a State health care program (including Medicaid). The provision of a technician to assist patients with home dialysis constitutes an impermissible beneficiary inducement as it could influence an ESRD patient's choice of dialysis provider. As such home support would provide ongoing one-to-one assistance, if it were integrated into payment program benefits, it does not appear to be a method that would generally reduce the cost of care compared to that provided in an in-center, staff-assisted setting where a higher ratio of patients' care can be overseen more cost effectively.

While the Applicants are prohibited from providing patient technicians from assisting patients with home dialysis, the Illinois Department of Human Services administers the Home Services Program, which provides services to individuals with severe disabilities so they can

⁸ Generally, 40 credits are required to qualify for Social Security disability benefits. Social Security work credits are based on total yearly wages or self-employment income. Individuals can earn up to four credits each year. See Social Security Administration, *How You Qualify* available at <https://www.ssa.gov/planners/disability/qualify.html#anchor2> (last visited Jun. 18, 2018).

⁹ See Department of Healthcare and Family Services, *State Chronic Renal Disease Program* available at <https://www.illinois.gov/hfs/medicalclients/renal/Pages/default.aspx> (last visited Jun. 18, 2018).



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remain in their homes and be as independent as possible.¹⁰ Patients, who are eligible for this program,¹¹ may be able to obtain assistance with their home dialysis. The policy objective here is likely to reduce nursing home costs.

Thank you for your consideration of the additional information for North Dunes Dialysis. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Anne M. Cooper".

Anne M. Cooper

Attachments

Cc: Gaurav Bhattacharyya

¹⁰ Illinois Department of Human Services, Home Services Program *available at* <http://www.dhs.state.il.us/page.aspx?item=29738> (last visited Jun. 18, 2018).

¹¹ Eligibility criteria for the Home Services Program are: (1) Be under age 60 at the time of application unless in the AIDS or Brain Injury Medicaid Waiver Program; (2) Have a significant disability lasting 12 months or longer, or for the duration of life; (3) Be at imminent risk of nursing facility placement; (4) Have applied, cooperated and obtained a decision on Medicaid eligibility unless already on Medicaid or spend-down; (5) Require services in the home costing the same or less than nursing facility costs; (6) Be a State of Illinois resident with U.S. citizenship or show proof of legal entry into the United States; (7) Have assets under the asset limit which is different for individuals under age 18 and those 18 and older; (8) Have a physician's approval of the initial plan of care; and (9) Score the required points on the Determination of Need (DON). *See* Illinois Department of Human Services, Home Services Program *available at* <http://www.dhs.state.il.us/page.aspx?item=60122> (last visited Jun. 18, 2018).

Attachment – 1

	HSA 8	Kane County	Lake County	McHenry County
Population - 2015 ^{12,13}	1,540,100	525,044	702,017	313,039
In Station ESRD Patients - 2017	1,710	709	801	200
Use Rate 2017	1.11	1.35	1.14	0.64
Planning Area Population - 2020 (Est) ¹⁴	1,692,900	583,386	764,458	345,056
Projected Patients - 2020	1,880	788	872	220
Adjustment	1.33	1.33	1.33	1.33
Patients Adjusted	2,500	1,048	1,160	293
Projected Treatments - 2020	389,991	163,449	180,973	45,740
Existing Stations ¹⁵	470	177	199	94
Stations Needed - 2020	521	218	242	61
Number of Stations Needed	51	41	43	(33)

¹² Illinois Health Facilities and Services Review Board, Inventory of Other Healthcare Services (Sep. 27, 2017) available at <https://www2.illinois.gov/sites/hfsrb/InventoriesData/HealthCareFacilities/Documents/Other%20Services%20Inventory%202017.pdf> (last visited Apr. 30, 2018).

¹³ Illinois Health Facilities and Services Review Board, 12/31 ESRD Utilization Data.

¹⁴ Illinois Health Facilities and Services Review Board, Inventory of Other Healthcare Services (Sep. 27, 2017) available at <https://www2.illinois.gov/sites/hfsrb/InventoriesData/HealthCareFacilities/Documents/Other%20Services%20Inventory%202017.pdf> (last visited Apr. 30, 2018).

¹⁵ Illinois Health Facilities and Services Review Board, Update to Inventory of Other Health Services (includes ASTC, ESRD and Alternative Models) (Jun. 11, 2018) available at <https://www2.illinois.gov/sites/hfsrb/InventoriesData/MonthlyHCFInventory/Documents/OTHER%20SERVICES%20INVENTORY%20UPDATE%20June%2011%202018.pdf> (last visited Jun. 16, 2018).

North Dunes 2020 Projected Utilization

Facility	Ownership	Address	City	Distance	Adjusted Time	Number of Stations 03/31/18	Number of Patients 03/31/18	Utilization % 03/31/18
FMC Zion	Fresenius	1920 North Sheridan	Zion	3.0	5.8	12	-	0.00%
Dialysis Center of America - NCDC	Davita	1616 North Grand Avenue	Waukegan	5.0	5.8	24	145	100.69%
Fresenius Medical Care Waukegan Harbor	Fresenius	110 N. West Street	Waukegan	4.0	12.7	21	115	91.27%
Neomedica - Gurnee	Fresenius	40 Tower Court in Gurnee	Gurnee	6.5	18.4	24	97	67.36%
Fresenius Medical Care of Lake Bluff	Fresenius	101 Waukegan Road	Lake Bluff	11.4	27.6	16	75	78.13%
Total						97	432	74.23%
Total Facilities Operational > 2 Years						85	432	84.71%

March 2014 to March 2018 31.7%

4 Year CAGR 7.1%
 2019 Projected Patients 463
 2020 Projected Patients 496
 2020 Projected Utilization 85.2%

North Dunes 2020 Projected Utilization

Facility	Ownership	Address	City	Distance	Adjusted Time	Number of Stations 03/31/18	Number Patients 03/31/18	Utilization % 03/31/2018
FMC Zion	Fresenius	1920 North Sheridan	Zion	3.0	5.8	12	-	0.00%
Dialysis Center of America - NCDC	Davita	1616 North Grand Avenue	Waukegan	5.0	5.8	24	145	100.69%
Fresenius Medical Care Waukegan Harbor	Fresenius	110 N. West Street	Waukegan	4.0	12.7	21	115	91.27%
Neomedica - Gurnee	Fresenius	40 Tower Court in Gurnee	Gurnee	6.5	18.4	24	97	67.36%
Total						81	357	73.46%
Total Facilities Operational > 2 Years						69	357	86.23%

March 2014 to March 2018 39.5%

4 Year CAGR 8.7%
 2019 Projected Patients 388
 2020 Projected Patients 422
 2020 Projected Utilization 86.7%