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Via Hand Delivery

April 30, 2018

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

**Re: Garfield Kidney Center (Proj. No. 18-001)
Additional Information**

Dear Ms. Olson:

Polsinelli represents DaVita Inc. and Total Renal Care, Inc. (collectively, the “Applicants”). In this capacity, we are writing to provide updated information regarding the population within the 30 minute geographic service area (“GSA”) of the proposed site for the relocation of Garfield Kidney Center (the “Project”). As this letter will not result in any modification listed in Section 1130.650(a) of the Illinois Health Facilities and Services Review Board (“State Board”) rules, it constitutes a Type B modification to the pending CON application for Garfield Kidney Center.

1. Maldistribution of Services

As we prepared to bring the Project forward to the June 5, 2018 meeting, we reviewed the ratio of stations to population of the GSA contained on pages 92-94 of the certificate of need permit application. In reviewing that data, we identified that numerous zip codes and their associated population had been excluded from the population calculation resulting in an error in the overall ratio to station population. This ratio is relevant for the determination of the Project’s compliance with Section 1110.230(c)(2)(A) of the State Board rules. The population of the relevant geographic service area is 46% higher than originally identified. We apologize for the data collection issue in the previously submitted information.

Enclosed please find the listing of zip codes that are within the adjusted 30-minute travel time market contour as identified by Microsoft’s MapPoint software. Please note that the drive time in Chicago is modified pursuant to the State Board rules to account for typical traffic congestion in the area and is 30 minutes/1.25 or 24 minutes. To properly calculate the zip code areas within the geographic service area, we pulled the 2010 US Census data and that information is also included herein. What this data shows is that there are 79 zip code areas within the travel time contour. Those 79 zip code areas have 2,932,452 residents within their

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boundaries. With the State Board's identified 695 dialysis stations, there is a ratio of 1 dialysis station to every 4,219 persons. This calculation shows that there are fewer stations per capita in the geographic service area of the Project than the State. See Table 1110.230(c)(2)(A). Additionally, it demonstrates that hemodialysis services in the Project's geographic service area are less accessible to the population to be served.

Table 1110.230(c)(2)(A) Ratio of Stations to Population				
	Population	Dialysis Stations	Stations to Population	Standard Met?
Geographic Service Area	2,932,452	695	1: 4,219	Yes
State	12,978,800	4,745	1: 2,735	

Thank you for your consideration of the updated population data for Garfield Kidney Center. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Anne M. Cooper

Attachments

Cc: Gaurav Bhattacharyya

Exhibit 1

Population by Zip Code Garfield Kidney Center 30 Minute GSA		
Zip Code	City	Population
60076	Skokie	33,415
60077	Skokie	26,825
60104	Bellwood	19,038
60126	Elmhurst	46,371
60130	Forest Park	14,167
60141	Hines	224
60153	Maywood	24,106
60154	Westchester	16,773
60155	Broadview	7,927
60160	Melrose Park	25,432
60162	Hillside	8,111
60163	Berkeley	5,209
60164	Melrose Park	22,048
60165	Stone Park	4,946
60171	River Grove	10,246
60181	Villa Park	28,836
60301	Oak Park	2,539
60302	Oak Park	32,108
60304	Oak Park	17,231
60305	River Forest	11,172
60402	Berwyn	63,448
60513	Brookfield	19,047
60521	Hinsdale	17,597
60523	Oak Brook	9,890
60526	LaGrange Park	13,576
60534	Lyons	10,649
60546	Riverside	15,668
60558	Western Springs	12,960
60601	Chicago	11,110
60602	Chicago	1,204
60603	Chicago	493
60604	Chicago	570
60605	Chicago	24,668
60606	Chicago	2,308
60607	Chicago	23,897
60608	Chicago	82,739
60609	Chicago	64,906

Population by Zip Code Garfield Kidney Center 30 Minute GSA		
Zip Code	City	Population
60610	Chicago	37,726
60611	Chicago	28,718
60612	Chicago	33,472
60613	Chicago	48,281
60614	Chicago	66,617
60615	Chicago	40,603
60616	Chicago	48,433
60618	Chicago	92,084
60619	Chicago	63,825
60620	Chicago	72,216
60621	Chicago	35,912
60622	Chicago	52,548
60623	Chicago	92,108
60624	Chicago	38,105
60625	Chicago	78,651
60629	Chicago	113,916
60630	Chicago	54,093
60631	Chicago	28,641
60632	Chicago	91,326
60634	Chicago	74,298
60636	Chicago	40,916
60637	Chicago	49,503
60638	Chicago	55,026
60639	Chicago	90,407
60640	Chicago	65,790
60641	Chicago	71,663
60642	Chicago	18,480
60644	Chicago	48,648
60646	Chicago	27,177
60647	Chicago	87,291
60651	Chicago	64,267
60653	Chicago	29,908
60654	Chicago	14,875
60656	Chicago	27,613
60657	Chicago	65,996
60659	Chicago	38,104
60660	Chicago	42,752
60661	Chicago	7,792
60706	Harwood Heights	23,134

Population by Zip Code Garfield Kidney Center 30 Minute GSA		
Zip Code	City	Population
60707	Elmwood Park	42,920
60712	Lincolnwood	12,590
60804	Cicero	84,573
Total		2,932,452

Source: U.S. Census Bureau, Census 2010,
American Factfinder *available at*
<https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml> (last visited April 30, 2018)