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**To:** Ms. Courtney Avery  
Illinois Health Facilities & Services Review Board

**Fax No.:** 217-785-4111

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**Date:** August 10, 2011

**No. of pages including cover sheet:** 8

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**From:** Susan Milford, Senior Vice President, Strategic Marketing, Planning & Wellness

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**Dept./Program:** Administration

**Facility:** Crystal Lake Corporate Offices

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**Address:** 385 Millennium Drive

**City:** Crystal Lake

**State:** IL

**Zip:** 60012

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Centegra Corporate Office  
385 Millennium Drive  
Crystal Lake, IL 60012  
815-788-5851

Susan Milford  
Senior Vice President  
Strategic Marketing, Planning and Wellness

**By Email and Facsimile Transmission**

August 10, 2011

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

**RE: Request for Public Hearing on Modified Application  
Mercy Crystal Lake Hospital & Medical Center, Crystal Lake  
Project No. 10-089**

Dear Ms. Avery:

I am the Senior Vice President Strategic Marketing, Planning and Wellness for Centegra Health System which is the sole corporate member of Centegra Hospital – Woodstock and Centegra Hospital – McHenry. On their behalf, I request a public hearing on Project No. 10-089, Mercy Crystal Lake Hospital & Medical Center, based on the modified application submitted by the applicants received by the State Board on July 27, 2011.

The modifications include a change in the categories of service which is a Type A modification and subjects the project to a public hearing under Section 1130.650(a)(5) of the State Board's rules. Specifically, the original application proposed a cardiac catheterization service as shown in the attached pages 71, 79, 124, 136 and 187 of the application prior to the latest modification. The modification received on July 27<sup>th</sup> contains no references to cardiac catheterization. Under the rules, a "change in the categories of service to be provided" constitutes a Type A modification. 77 Ill. Adm. Code 1130.650(a)(5). The applicants' modification is therefore subject to the public hearing process.

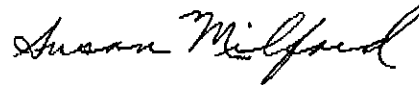
In addition and alternatively, the latest modification contains so many material changes to the project that a public hearing should be held in order to effect the purposes of the Illinois Health Facilities Planning Act to increase public participation in the CON process and to ensure the integrity of the process. See 20 ILCS 3960/2. Among other things, the applicants have reduced the proposed number of medical/surgical beds from 100 to 56, and the obstetric beds from 20 to 10. These changes violate the State Board's regulations that require new medical/surgical units to have a minimum of 100 beds and new obstetric units to have a minimum of 20 beds. The modified application directly attacks the State Board's regulations and is essentially a referendum on the reasonableness and validity of the State Board's adopted review criteria. The public and existing area hospitals should be allowed to participate in this process through the public hearing processes.

Finally, the applicants propose to obtain nearly 90% of their patient referrals for the proposed hospital from our two nearby hospitals, Centegra Hospital-Woodstock and Centegra

Hospital-McHenry, which are located within 1.4 and 2.6 miles, respectively, from Crystal Lake zip codes. As the primary provider of inpatient services to the Crystal Lake community, Centegra should be granted the opportunity to address the adverse impact of the applicants' material modifications at a public hearing.

Please advise as to the date, place and time of the public hearing. Thank you for your attention to this request.

Very truly yours,



Susan Milford  
Senior Vice President, Strategic Marketing,  
Planning and Wellness

cc: Mr. Michael Constantino

Square Footage Summary

Meroy  
Crystal Lake  
Medical Center

Source: 5/11/11  
All Departments

SPACE REQUIREMENTS

Departmental Summary

Room Name	Total DGSF	\$/SF	\$	Comments
<b>ICHP Reviewable Areas</b>				
1 Med/Surg Unit	61,790	\$320	\$19,778,800	
2 ICU	2,894	\$434	\$1,256,936	
3 Obstetric	16,865	\$320	\$5,396,800	
4 Newborn Nursery	3,888	\$315	\$1,204,478	
5 Labor-Delivery-Recovery Rooms	2,601	\$330	\$852,330	
6 Emergency	9,388	\$330	\$3,097,440	
7 Laboratory	4,876	\$338	\$1,641,444	
8 Imaging (Diagnostic Radiology)	9,752	\$338	\$3,291,296	
9 MRI	3,408	\$473	\$1,610,664	
10 <u>Cath Labs</u>	6,720	\$420	\$2,818,800	
11 Corbital Processing	4,200	\$408	\$1,725,600	
12 Surgical Suite	10,800	\$498	\$5,378,400	
13 Recovery	6,224	\$320	\$1,991,680	
14 Outpatient Surgery	19,888	\$320	\$6,364,160	
15 Otolary	8,724	\$473	\$4,108,452	
16 Pharmacy	1,688	\$291	\$491,118	
17 Respiratory Therapy	1,280	\$318	\$407,040	
18 Cardiac Rehabilitation	1,203	\$320	\$384,960	
19 Physical Therapy	2,388	\$310	\$740,280	
20 Occupational Therapy	480	\$300	\$144,000	
<b>ICHP Non Reviewable Areas</b>				
21 Building Systems	11,740	\$266	\$3,122,840	
22 Administration	6,820	\$328	\$2,226,960	
23 Public Circulation	23,788	\$228	\$5,423,544	
24 Materials Management	2,840	\$220	\$624,800	
25 Building Support	6,281	\$218	\$1,369,258	
26 Employee Facilities	6,110	\$246	\$1,503,060	
27 Medical Library	1,180	\$224	\$264,320	
28 Housekeeping	3,631	\$220	\$798,820	
29 Laundry Holding	1,661	\$206	\$340,166	
30 Morgue	288	\$224	\$64,312	
31 Medical Records	6,600	\$224	\$1,478,400	
32 Dining	6,480	\$310	\$2,008,800	
33 Yard Storage	800	\$145	\$116,000	
34 Human Resources	636	\$220	\$140,920	
35 Marketing	2,310	\$220	\$508,200	
36 Meeting Rooms	2,625	\$220	\$577,500	
37 Glass Shields	1,313	\$280	\$367,640	
38 Ambulance Garage	1,024	\$157	\$160,768	
39 Canopies	2,280	\$150	\$342,000	

Physician Clinic Summary

Department Name	Total DGSF		
1 Building Systems	5,728	\$320	\$1,834,560
2 Medical Records	12,284	\$224	\$2,751,416
3 Waiting	23,406	\$290	\$6,787,740
4 Public Circulation	4,680	\$210	\$982,800
5 Physician Offices	42,889	\$220	\$9,433,580

Blowwork (Included in bldg \$/SF)	1	\$4,000,000	\$4,000,000
Landscaping (Allowance)	1	\$200,000	\$200,000
<b>Subtotal</b>			\$4,380,000

Attachment 7: Project Costs and Sources of Funds

Mercy  
Crystal Lake  
Medical Center

Building Summary  
All Departments

SPACE REQUIREMENTS

Departmental Summary

Room Name	Total DGSF	B/SF	\$	Comments
<b>IDHP Reviewable Areas</b>				
1 Med/Surg Unit	61,790	\$320	\$19,776,800	
2 ICU	3,694	\$434	\$1,600,996	
3 Obstetrics	15,658	\$320	\$5,010,200	
4 Newborn Nursery	2,655	\$315	\$1,164,475	
5 Labor-Delivery-Recovery Rooms	2,501	\$390	\$928,330	
6 Emergency	8,388	\$390	\$3,291,440	
7 Laboratory	4,679	\$398	\$1,941,444	
8 Imaging (Diagnostic Radiology)	6,782	\$398	\$2,681,296	
9 MRI	3,408	\$473	\$1,610,664	
10 Cash Lvl.	6,729	\$423	\$2,840,587	
11 Central Processing	4,280	\$408	\$1,725,600	
12 Surgical Suite	10,880	\$498	\$5,398,900	
13 Recovery	5,234	\$320	\$1,671,680	
14 Outpatient Surgery	13,683	\$329	\$4,472,180	
15 Dietary	6,724	\$473	\$3,128,452	
16 Pharmacy	1,698	\$291	\$494,118	
17 Respiratory Therapy	1,290	\$315	\$406,350	
18 Cardiac Rehabilitation	1,290	\$320	\$414,960	
19 Physical Therapy	2,358	\$320	\$754,960	
20 Occupational Therapy	450	\$320	\$144,000	
<b>IDHP Non Reviewable Areas</b>				
21 Building Systems	11,748	\$250	\$2,937,000	
22 Administration	9,829	\$250	\$2,457,250	
23 Public Circulation	24,755	\$325	\$7,945,875	
24 Materials Management	2,840	\$220	\$624,800	
25 Building Support	6,291	\$215	\$1,352,565	
26 Employee Facilities	5,110	\$215	\$1,103,780	
27 Medical Library	1,160	\$324	\$376,800	
28 Housekeeping	3,631	\$220	\$798,820	
29 Laundry Holding	1,691	\$200	\$338,200	
30 Morgue	288	\$224	\$64,512	
31 Medical Records	5,500	\$224	\$1,232,000	
32 Clinic	8,460	\$310	\$2,622,600	
33 Yard Storage	600	\$185	\$111,000	
34 Human Resources	638	\$220	\$140,360	
35 Mortuary	2,310	\$225	\$519,750	
36 Meeting Rooms	2,525	\$220	\$555,500	
37 Sleep Studies	1,510	\$280	\$422,800	
38 Ambulance Garage	1,024	\$167	\$171,008	
39 Canopies	2,350	\$250	\$587,500	

Physician Clinic Summary

Department Name	Total DGSF		
1 Building Systems	6,729	\$220	\$1,482,380
2 Medical Records	12,284	\$224	\$2,751,136
3 Waiting	29,400	\$230	\$6,762,000
4 Public Circulation	4,680	\$210	\$982,800
5 Physician Offices	42,686	\$230	\$9,810,780

Sitework (Included in Bldg B/SF)	1	\$4,000,000	\$4,000,000
Landscaping (Allowance)	1	\$300,000	\$300,000
<b>Subtotal</b>			<b>\$4,300,000</b>

Attachment 9: Cost Space Requirements

**Mercy  
Crystal Lake  
Medical Center**

**Space Summary**  
All Departments

**SPACE REQUIREMENTS**

**Hospital Departmental Summary**

Department Name	Total GSF	Norm GSF	Notes/State Norms
<b>IDPH Reviewable Areas</b>			
1 Med. / Surg. Unit	51,769	40,100	401 GSF / Bed (100 Beds)
2 ICU	3,684	2,412	603 GSF / Bed (4 Beds)
3 Obstetrics	15,685	11,424	476 GSF / Bed (24 Beds)
4 Newborn Nursery	6,047	3,648	152 GSF / OB Bed (24 OB Beds)
5 Labor-Delivery-Recovery Rooms	2,501		1,875 GSF / Needed Delivery Room
6 Emergency	9,598		764.8 GSF / Treatment Room @ 2,000 per Rm per yr.
7 Laboratory	4,878	4,608	36 GSF / Bed (128 Beds)
8 Imaging (Diagnostic Radiology)	9,762		1,388 GSF / Procedure Rm
9 MRI	3,405	3,400	3,400 GSF / Unit @ 2,000 vials/unit
10 Cath Labs	6,729	3,192	1,596 GSF / Lab (2 Labs)
11 Central Processing	4,290	2,304	18 GSF / Bed (128 Beds)
12 Surgical Suite	19,550	20,078	2078 GSF / Operating Room (10 ORs)
13 Recovery	5,224	1,800	180 GSF / Recovery Station - max 4 per OR (1 PACU per 10 ORs)
14 Outpatient Surgery	19,668		
15 Dietary	8,724		
16 Pharmacy	1,688	1,536	12 GSF / Bed (128 Beds)
17 Respiratory Therapy	1,290	1,140	8.9 GSF / Bed (128 Beds)
18 Cardiac Rehabilitation	1,200		
19 Physical Therapy	2,355	2,300	23 GSF / M-S Bed (100 Beds)
20 Occupational Therapy	450	480	4.8 GSF / M-S Bed (100 Beds)
<b>IDPH Non Reviewable Areas</b>			
21 Building Systems	11,748		
22 Administration	6,829		
23 Public Circulation	23,756		
24 Materials Management	2,840		
25 Building Support	6,251		
26 Employee Facilities	5,110		
27 Medical Library	1,150		
28 Housekeeping	3,531		
29 Laundry Holding	1,861		
30 Morgue	288		
31 Medical Records	5,500		
32 Dining	5,490		
33 Yard Storage	500		
34 Human Resources	836		
35 Marketing	2,310		
36 Meeting Rooms	2,525		
37 Sleep Studies	1,313		
38 Ambulance Garage	1,024		
39 Canopies	2,250		

**Supplemental Hospital GSF** 267,348

**Physician Clinic Summary**

Department Name	Total GSF	Comments
1 Building Systems	5,726	
2 Medical Records	12,284	
3 Waiting	23,408	
4 Public Circulation	4,560	
5 Physician Offices	42,968	

**Total Clinic GSF** 89,946

**Total Building GSF** 858,173

**Mercy  
Crystal Lake  
Medical Center**

**Cath Labs**

**SPACE REQUIREMENTS**

**Prep/Recovery Zone**

Room Name		Total NSF	Required by:	Comments
1 Prep/Recovery	4 @ 108	432	AIA	1 Isolation/Quist
2 Handwashing	1 @ 5	5	IDPH, AIA	
3 Patient Toilet	4 @ 80	240	IDPH, AIA	
4 Nurse Station	1 @ 144	144	IDPH, AIA	
5 Clean Utility	1 @ 80	80	IDPH	
6 Soiled Utility	1 @ 100	100	IDPH	

**Subtotal Prep/Recovery Zone** 1,001

**Procedure Zone**

Room Name		Total NSF	Required by:	Comments
* 1 Cath Labs	2 @ 600	1,200	AIA	400 sf min clear
2 Computer Equipment	2 @ 100	200	AIA	
3 Control Room	2 @ 100	200	AIA	
4 Scrub Alcove	2 @ 25	50	AIA	
5 Stretcher Alcove	2 @ 30	60		
6 Equipment Storage	2 @ 150	300	AIA	
7 Clean Care/Work Area	1 @ 250	250	AIA	
8 Viewing Room	1 @ 80	80	AIA	
9 Server Room	1 @ 30	30	AIA	
10 Soiled Utility	1 @ 80	80	AIA	
11 Clean Utility	1 @ 120	120	AIA	
12 Anesthesia Work	1 @ 180	180	AIA	
13 Dictation	1 @ 60	60	AIA	
14 Housekeeping	1 @ 40	40	AIA	

**Subtotal Procedure Zone** 2,850

**Support Zone**

Room Name		Total NSF	Required by:	Comments
1 Women's Lockers	1 @ 180	180	AIA	Includes Toilet & Shower
2 Men's Lockers	1 @ 180	180	AIA	Includes Toilet & Shower
3 Control Desk	1 @ 120	120		
4 Crash Cart	1 @ 10	10		

**Subtotal Support Zone** 460

**Subtotal Cath Lab Suite (NSF)** 4,341

**Total Department Gross Square Feet (DGSF) @ 1.55** 6,729

IDPH Illinois Department of Public Health (77 ILL. ADM. CODE 250 Section 250.2440 - General Hospital Standards)

AIA AIA Guidelines for Design and Construction of Hospitals and Health Care Facilities - 2001 Edition

Corrected Page

**COST AND GROSS SQUARE FEET BY DEPARTMENT OR SERVICE**

	A	B	C	D	E	F	G	H	Total Cost (G + H)
<b>Hospital - All Departments</b>									
<b>IDPH Reviewable Areas</b>									
1 Med/Surg Unit	\$320		61,789				\$19,775,680		\$19,775,680
2 ICU	\$434		3,894				\$1,689,988		\$1,689,988
3 Obstetrics	\$320		16,685				\$5,019,200		\$5,019,200
4 Newborn Nursery	\$315		3,635				\$1,145,026		\$1,145,026
5 Labor-Delivery-Recovery Rooms	\$330		2,501				\$825,330		\$825,330
6 Emergency	\$330		9,368				\$3,091,440		\$3,091,440
7 Laboratory	\$398		4,878				\$1,941,444		\$1,941,444
8 Imaging (Diagnostic Radiology)	\$398		9,752				\$3,881,296		\$3,881,296
9 MRI	\$473		3,405				\$1,610,565		\$1,610,565
10 Cath Labs	\$423		6,729				\$2,846,367		\$2,846,367
11 Central Processing	\$406		4,250				\$1,725,500		\$1,725,500
12 Surgical Suite	\$498		19,550				\$9,735,900		\$9,735,900
13 Recovery	\$320		5,224				\$1,671,680		\$1,671,680
14 Outpatient Surgery	\$320		13,663				\$4,372,160		\$4,372,160
15 Dietary	\$473		8,724				\$4,126,452		\$4,126,452
16 Pharmacy	\$291		1,698				\$494,118		\$494,118
17 Respiratory Therapy	\$315		1,290				\$405,350		\$405,350
18 Cardiac Rehabilitation	\$320		1,203				\$384,960		\$384,960
19 Physical Therapy	\$320		2,355				\$753,600		\$753,600
20 Occupational Therapy	\$320		450				\$144,000		\$144,000
<b>IDPH Non Reviewable Areas</b>									
21 Building Systems	\$250		11,748				\$2,937,000		\$2,937,000
22 Administration	\$250		6,829				\$1,707,250		\$1,707,250
23 Public Circulation	\$225		23,755				\$5,344,875		\$5,344,875
24 Materials Management	\$220		2,840				\$624,800		\$624,800
25 Building Support	\$215		6,251				\$1,343,965		\$1,343,965
26 Employee Facilities	\$216		5,110				\$1,103,760		\$1,103,760
27 Medical Library	\$224		1,160				\$257,600		\$257,600
28 Housekeeping	\$220		3,531				\$776,820		\$776,820