

# M Northwestern Lake Forest Hospital

March 25, 2010

Ms. Barbara Martin  
President & Chief Executive Officer  
CHS Vista Health System  
1324 North Sheridan Road  
Waukegan, Illinois 60085

Dear Ms. Martin:

I am writing in response to your letter received March 11, 2010, requesting information related to your intended filing of a Certificate of Need application to develop a Freestanding Emergency Center ("FEC") on Vista's Lindenhurst campus.

1. Northwestern Lake Forest Hospital has not experienced an average annual vacancy rate in excess of 10% for budgeted clinical FTEs.
2. The Emergency Department on at the Lake Forest campus has 17 treatment stations. The Grayslake Freestanding Emergency Center has 14 treatment stations.
3. The below table summarizes the number of patients treated in our Emergency Departments/Centers at the Lake Forest and Grayslake campuses over the past two years.

	2008	2009
Lake Forest ED	33,690	32,509
Grayslake FEC	0	7,674
<b>TOTAL</b>	<b>33,690</b>	<b>40,183</b>

4. The proposed project would have a significant, detrimental impact on utilization at our Grayslake Freestanding Emergency Center located just 5.75 miles to the southeast and less than 15 minutes<sup>1</sup> from your proposed site.

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<sup>1</sup> Source: Mapquest

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By way of background on November 8, 2008, the Planning Board granted our organization a permit to convert our acute care center located on our Grayslake campus in to a Freestanding Emergency Center. Designation of our center as an FEC was required in order for us to be able to accept ambulances at the site and meet the need for emergency services in the region. We obtained State licensure last fall and began operating the FEC on October 11, 2009.

Annualizing the most recent three months of patient volumes, we expect the Grayslake FEC to experience 27,132 patient visits in the first full year of operation, which is below the State standard of 2,000 treatments per station. Opening of another FEC less than fifteen minutes from our new facility would further suppress patient volumes below thresholds established by the Illinois Health Facilities and Services Review Board.

Sincerely,



Damon N. Havill  
Director, Planning and Business Development

cc: Mike Constantino, Illinois Health Facilities and Services Review Board