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December 5, 2014

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HEALTH FACILITIES & SERVICES REVIEW BOARD

Via Overnight Courier

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

Re:

Advocate / NorthShore Change of Ownership Applications Projects: E-019-14 through E-037-14 (the "Project")

Response to State Agency Report

Dear Ms. Avery:

Advocate Health Care Network ("Advocate") and NorthShore University HealthSystem ("NorthShore") would like to briefly comment on the State Agency Report for the Change of Ownership Exemption applications referenced above. We appreciate the work that has gone into those reports and wish to comment on only two items.

Letters of Support

Page 1 of the State Agency Report notes that "no letters of support or opposition were received by the State Board Staff". We had submitted a package of letters of support for the Project, but it is likely that those support letters were received after the SAR had been initially drafted. On November 25 we submitted 41 letters of support from a broad spectrum of community and health care leaders. These letters were timely filed and are posted on the Board's web site. We acknowledge that these letters were received the day before the Thanksgiving holidays and that there was likely not time to reference those letters in the SAR. In the event that those support letters have not been made a part of the Board package we ask that those letters be provided to Board members and referenced at the Board meeting or in the SAR.

Recent Approval of Additional Project

Our second comment is similarly more of an update than correction. The SAR lists all of the open Advocate or NorthShore CON permits at that time the COE applications were filed. Since those applications were filed, the Board approved on November 7 an additional permit for the modernization of Advocate Good Samaritan Hospital as project number 14-037. As with the other open CON projects listed, the Advocate Good Samaritan project does not establish of a

Response to SAR Project #E-019-14 through E-037-14 December 5, 2014 Page 2

new facility or a new category of service. We believe that under the Board's rules that this permit is similarly eligible for transfer in connection with the proposed change of ownership.

Again, we appreciate the opportunity to comment on the State Agency Report.

Sincerely,

e Ourth

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