



FRESENIUS KIDNEY CARE

Fresenius Kidney Care

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May 24, 2018

RECEIVED

MAY 25 2018

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

Kathryn Olson
Chairwoman
Illinois Health Facilities and Services Review Board
525 W. Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Comment on Board Staff Report - Project #17-043, DaVita Romeoville
Omissions in Board Staff Report

Ms. Olson,

On behalf of Fresenius Medical Care, which has opposed this project, we would like to draw the Board's attention to omissions in the Board Staff Report (BSR). We do note, however, that the BSR correctly determines that the project fails to meet conformance with Part 1100 of its rules. Specifically, it does not meet 77 ILAC 1430(c) - Planning Area Need and 11 ILAC 1430(d)(1) Unnecessary Duplication of Services. Omissions, noted below, will further support this finding.

- Table Four on page 13 of the BSR shows incorrect station counts for three facilities and omits 2 newly approved facilities. Given the positive BSR for #17-014, DaVita Rutgers Park, Woodridge, it will likely gain approval and should also be included in the 30-minute radius when that project is being presented.
 - Fresenius Naperbrook should be 24 stations not 18 (6 new stations certified effective 2/8/18)
 - Fresenius Joliet should be 18 stations not 16 (2 new stations certified effective 10/6/2017)
 - Fresenius Plainfield should be 16 stations not 10 (no recent new stations – error)
 - Fresenius New Lenox (12 stations) was approved 4/17/18 and is 21 minutes away from DaVita Romeoville
 - DaVita Hickory Creek, Joliet, (12 stations) was approved 4/17/18 and is 20 minutes away from DaVita Romeoville
 - **If approved**, #17-014, DaVita Rutgers Park, Woodridge (which meets all criteria and will be heard before DaVita Romeoville) will add 12 more stations to the 30-minute travel radius. It is only 15 minutes away from DaVita Romeoville. (MapQuest travel times attached)

**ALL CLINICS WITHIN 30 MINUTES TRAVEL TIME (ADJUSTED)
UPDATED FROM BOARD REPORT TO INCLUDE OMISSIONS**

**TABLE FOUR
Facilities within 30 minutes of the Proposed Project**

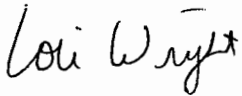
Name	City	H S A	Actual Stations	Adjusted Time	Utilization	Star Rating	Meets Standard?	As reported in BSR
USRC Bolingbrook	Bolingbrook	9	13	8.05	80.77%	2	Yes	
FMC Bolingbrook	Bolingbrook	9	24	11.5	82.64%	4	Yes	
FMC Naperbrook	Naperbrook	9	24	18.4	70.83%	5	No	18 stations
FMC Joliet	Joliet	9	18	19.5	62.96%	3	No	16 Stations
FMC Willowbrook	Willowbrook	7	20	19.5	60%	3	No	
DaVita New Lenox	New Lenox	9	19	20.7	96.49%	3	Yes	
DaVita West Joliet	Joliet	9	29	20.7	68.39%	4	No	
FMC Plainfield	Plainfield	9	16	21.8	77.08%	5	No	10 Stations
USRC Oak Brook	Downers Grove	7	13	23	80.77%	2	Yes	
FMC Downers Grove	Downers Grove	7	16	25.3	66.67%	3	No	
FMC Orland Park	Orland Park	7	18	26.4	60.19%	4	No	
DaVita Sun Health	Joliet	9	17	26.4	61.76%	5	No	
Fox Valley	Aurora	8	29	28.7	83.91%	5	Yes	
DaVita Palos Park	Palos Park	7	12	28.7	73.61%	2	No	
FMC Mokena	Mokena	9	14	29.9	69.05%	3	No	
Total Stations/Average Utilization			282		73.01%			% Unchanged
FMC New Lenox	New Lenox	9	12	20.7	0%	N/A	N/A	Not listed in BSR
DaVita Hickory Creek	Joliet	9	12	19.55	0%	N/A	N/A	Not listed in BSR
FMC Lemont (Completion 5/2016)	Lemont	7	12	11.5	34.72%	N/A	N/A	
FMC Woodridge(Completion 3/2019)	Woodridge	7	12	16.1	0%	N/A	N/A	
FMC Plainfield North	Plainfield	9	10	20.7	58.33%	3	N/A	
FMC Summit(Completion 141/2016)	Summit	7	12	28.75	47.22%	N/A	N/A	
Total Stations/Average Utilization			352		58.83%			Utl Down 6.19%
DaVita Rutgers Park (if approved)	Woodridge	7	12	14.95	0%	N/A	N/A	
Total Stations/Average Utilization			364		56.15%			Utl Down 16.86%

The chart above shows that the actual station count of all facilities within 30-minutes travel time of DaVita Romeoville is 21 (not 19) with an overall utilization rate of 58.83% (not 65%). Of the 21, the utilization of the clinics **not** in ramp-up phase remains the same while the utilization of all clinics decreases 6.19%.

Due to the positive BSR for #17-014, DaVita Rutgers Park, Woodridge, which will also be heard on June 5th, it has been included in the table to show travel radius utilization (If #17-014 is approved) by the time the DaVita Romeoville project is presented at the hearing. At this point, the average utilization of all clinics within 30 minutes of DaVita Romeoville will be only 56% calculated on 22 facilities.

For appropriate review all approved clinics should be included for each project. This lower average area utilization further supports the Board's findings.

Thank you for the opportunity to provide comment.



Lori Wright
Senior CON Specialist

cc: Clare Connor

YOUR TRIP TO:



698 Cedar Crossings Dr, New Lenox, IL, 60451-5200

16 MIN | 13.8 MI **Est. fuel cost: \$1.77**

Trip time based on traffic conditions as of 11:14 AM on May 23, 2018. Current Traffic: Light



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To Fresenius New Lenox from DeVita Romeoville

1. Start out going **south** on Woodward Ave toward 87th St.

Then 0.35 miles 0.35 total miles

2. Turn **right** onto E Boughton Rd.*If you reach Union St you've gone about 0.1 miles too far.*

Then 0.42 miles 0.77 total miles

3. Merge onto I-355 S/Veterans Memorial Tollway S via the ramp on the **left** toward **South Suburbs** (Portions toll).*If you reach N Janes Ave you've gone about 0.2 miles too far.*

Then 12.46 miles 13.23 total miles

4. Take the **US-6/Southwest Hwy** exit, EXIT 1.

Then 0.37 miles 13.60 total miles

5. Keep **left** at the fork in the ramp.

Then 0.04 miles 13.64 total miles

6. Stay **straight** to go onto Cedar Crossings Dr.

Then 0.16 miles 13.80 total miles

7. 698 Cedar Crossings Dr, New Lenox, IL 60451-5200, 698 CEDAR CROSSINGS DR is on the **right**.*Your destination is just past Silver Crossing Dr.**If you reach the end of Cedar Crossings Dr you've gone about 0.1 miles too far.*Use of directions and maps is subject to our [Terms of Use](#). We don't guarantee accuracy, route conditions or usability. You assume all risk of use.

YOUR TRIP TO:

214 Collins St

**17 MIN | 8.8 MI** **Est. fuel cost: \$1.16**

Trip time based on traffic conditions as of 4:35 PM on May 22,
2018. Current Traffic: Moderate



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To DaVita Hickory Creek, Joliet From DaVita Romeoville



1. Start out going **south** on N Independence Blvd/IL-53 toward Juliet Ave.
Continue to follow IL-53.

Then 7.51 miles 7.51 total miles



2. Turn **left** onto Ruby St/IL-53. Continue to follow IL-53.
IL-53 is just past Granite St.

If you reach Marble St you've gone a little too far.

Then 0.39 miles 7.90 total miles



3. Stay **straight** to go onto N Chicago St.

Then 0.13 miles 8.04 total miles



4. Take the 2nd **left** onto E Jackson St.
E Jackson St is just past Clay St.

If you reach W Crowley Ave you've gone a little too far.

Then 0.48 miles 8.51 total miles



5. Turn **right** onto Collins St/US-6 W.
Collins St is just past Herkimer St.

If you reach Parks Ave you've gone about 0.1 miles too far.

Then 0.24 miles 8.75 total miles



6. 214 Collins St, Joliet, IL 60432-2919, 214 COLLINS ST is on the **left**.
Your destination is 0.1 miles past E Benton St.

If you reach E Cass St you've gone a little too far.

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YOUR TRIP TO:

8455 Woodward Ave

**13 MIN | 7.5 MI** **Est. fuel cost: \$0.99**

Trip time based on traffic conditions as of 4:44 PM on May 22,
2018. Current Traffic: Moderate



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HUM vehicle diagnostics (800) 906-2501

To DaVita Rutgers Park, Woodridge From DaVita Romeoville



1. Start out going **south** on N Independence Blvd/IL-53 toward Juliet Ave.

Then 0.05 miles

0.05 total miles



2. Make a **U-turn** at Juliet Ave onto IL-53.

If you reach W Romeo Rd you've gone about 0.1 miles too far.

Then 2.03 miles

2.08 total miles



3. Stay **straight** to go onto Joliet Rd.

Then 2.27 miles

4.35 total miles



4. Take the ramp toward **I-355/Tollway/Suburbs**.

Then 0.51 miles

4.86 total miles



5. Merge onto I-355 N/Veterans Memorial Tollway N via the ramp on the **left**
toward **Northwest Suburbs** (Portions toll).

Then 1.60 miles

6.46 total miles



6. Merge onto E Boughton Rd toward **Woodridge**.

Then 0.54 miles

7.00 total miles



7. E Boughton Rd becomes 87th St.

Then 0.14 miles

7.14 total miles



8. Turn **left** onto Woodward Ave.

If you are on 87th St and reach Havens Dr you've gone about 0.2 miles too far.

Then 0.36 miles

7.50 total miles



9. 8455 WOODWARD AVE is on the **right**.

If you reach 83rd St you've gone about 0.2 miles too far.

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