



Juan Morado, Jr.  
333 West Wacker Drive, Suite 1900  
Chicago, IL 60606  
Direct Dial: 312.212.4967  
Fax: 312.757.9192  
jmorado@beneschlaw.com

August 16, 2019

**VIA FEDEX**

Ms. Courtney Avery, Board Administrator  
Health Facilities and Services Review Board  
Illinois Department of Public Health  
525 West Jefferson Street, Second Floor  
Springfield, Illinois 62761

Re: Permit Renewal Request - Vascular Access Centers of Illinois, Chicago Project  
#17-047

Dear Courtney:

On January 9, 2018 the Illinois Health Facilities and Services Review Board (HFSRB) approved Project # 17-047 to establish a single specialty Ambulatory Surgical Treatment Center (ASTC) at 1701 W. Monterey Avenue in Chicago, Illinois. Chairwoman Olson approved our request for a permit renewal on February 27, 2018, that extended our project completion date to September 27, 2018. We requested and received a second permit renewal on October 31, 2018, and we requested and received a third permit renewal on April 30, 2019. The purpose of this letter is to request a Permit Renewal pursuant to Ill. Admin. Code 1130.740.

**Requested Project Completion Date**

The permit holder requests that the HFSRB grant a permit renewal that would establish June 30, 2020 as the project completion date for this project.

**Status of the Project**

The remaining project components include a post-construction survey and licensure of the facility by the Illinois Department of Public Health (IDPH). During the review process IDPH Division of Life Safety and Construction identified minor issues with the existing floor plan. We were informed by the building owner that the work addressing those issues would be completed by April 2019. That work was completed and a subsequent post-construction survey was scheduled with IDPH Division of Life Safety and Construction. The IDPH survey unit was not able to complete their survey of the facility for several weeks after work was already completed.

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During that post-construction survey, IDPH surveyors identified several new issues that were not previously raised during their plan review. Among the comments made by IDPH surveyors, one in particular will require additional time to complete. It relates to the width of the hallway between the operating room and the recovery area. IDPH regulations require an 8 foot clearance in that space and that facility does not currently meet that requirement.

Given the existing project completion date of September 30, 2019, we are filing this permit renewal request out of an abundance of caution. No project funds have been expended to date as the project's cost consist of leased equipment and rent for the leased space. Upon completion of the construction by the site owner, the permit holder will move forward with expending funds in accordance with the permit letter issued for this project.

#### **Statement Regarding Project Completion**

This project involves the establishment of an ASTC that will be dedicated to providing vascular access procedures for existing patients of Associates in Nephrology. These life-sustaining procedures are necessary for patient populations suffering from renal disease. The location of this project was chosen by the applicants as this area has been identified as having a substantial number of patients suffering from renal disease. At this time we have been able to continue serving our patient population in either our office based practices or in hospital surgical suites but each of those options has its own challenges. Completing this project would allow us to meet our commitment to the Board and importantly ensure that our patients are able to have procedures performed in a timely fashion and a cost efficient environment.

This project calls for the permit holder to lease space in an existing structure and for the space to be modernized consistent with IDPH ASTC building standards. Additionally, the permit holder will be required to pass a IDPH survey for the facility before a license will be issued. We continue to remain in contact with the IDPH Division of Life Safety and Construction regarding the project and the next steps to bring the facility into compliance with IDPH ASTC building standards.

This permit renewal request is being sought to allow for enough time for IDPH to schedule and complete their survey and issue the facility an ASTC license. The project size and cost will be in accordance with the permit letter issued by the HFSRB and we do not anticipate the need to alter the project in anyway.

#### **Confirmatory Evidence of Permit Compliance**

Attached is an affidavit from P. Kevin Flynn that confirms the permit holders are complying with the scope and costs of the project approved by the HFSRB pursuant to the permit letter issued for this project. Additionally, the aforementioned affidavit confirms that there are sufficient financial resources available to complete this project.

Courtney Avery  
August 16, 2019  
Page 3

If you have any questions or need any additional information regarding the project or this permit renewal request, please feel free to contact me at 312-212-4967. Very truly yours,

BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP



Juan Morado, Jr.

ENCLOSURES

JM:

**State of Illinois  
County of Cook**

**Verification Statement**

I, P. Kevin Flynn, being first duly sworn, on oath, depose and state as follows:

1. I serve as the Chief Financial Officer for the Vascular Access Center of Illinois at Morgan Park, LLC ("VACI").
2. The initial construction of the facility located at 1701 W. Monterey, Chicago, IL 60643 by the site owner took longer than expected. Our project cost for VACI will be in accordance with the permit issued by the Health Facilities and Services Review Board as Project #17-047.
3. Upon submission of our IDPH Project Submission form and review by the Division of Life Safety and Construction, issues were identified that required attention before a life safety survey could be conducted. The issues identified during the plan review have been completed.
4. A life safety survey was conducted by the IDPH Division of Life Safety and Construction and surveyors identified another issue related to width of the hallway between the operating room and the recovery area. We were informed that IDPH regulations for multi-specialty ASTCs require an 8 foot clearance between the operating room and the recovery area. The facility does not currently meet that requirement.
5. We have been informed by the site owner that the work associated with the new issue identified by IDPH during their recent survey is underway.

6. All funding expended for the VACI facility will be in accordance with the permit issued by the Health Facilities and Services Review Board as Project # 17-047.

7. Our initial application for the VACI facility underestimated the time necessary to schedule and complete the IDPH post-construction survey and licensure of the facility.

8. There are sufficient financial resources available to complete Project # 17-047.

Under penalties as provided by law pursuant to § 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Armen Popyan (signature)

8 / 16 / 2019 (date)