

#17-070 Comment on SBSR



DIALYSIS CARE CENTER, LLC
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October 16, 2018

RECEIVED

VIA Federal Express

OCT 19 2018

Courtney Avery, Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd floor
Springfield, Illinois, 62761
Attn: Michael Constantino

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

Re: Project #17-070, Dialysis Care Center Rockford
Response to State Board Report

Dear Ms. Avery:

We are writing in response to the Illinois Health Facilities and Services Review Board's (State Board) findings on the proposed Dialysis Care Center Rockford application for permit. It has been determined that the State Board does not accept or recognize the therapy of Home Dialysis patients' data as historical referral data in support of CON applications in accordance with the following criteria 77ILAC 1110.234(B), 77 ILAC 1110.234(E) and 77ILAC 1110.1430(J) as stated on the state board reports.

Our Medical Director, Dr. Talal Mahmood and his partners, are strong supporters of **HOME THERAPIES PROGRAMS** in Rockford and the surrounding areas. As such, he has provided a list of home patients to be considered as a historical referral data (attached to this letter). By utilizing this data, it will justify the number of stations requested and support the target occupancy within two years of project completion.

According to Dr. Talal Mahmood, it is expected that most of these home patients would be referred to Dialysis Care Center Rockford for continuity of care in case these patients could no longer sustain the home dialysis therapy. Hence, it is important to have an alternative option of care for these patients.

Based on the Revised Need Determinations, dated 9/14/18, HSA 1 only has an excess of four stations. This excess calculation is based on three shifts on a 24-hours cycle. Utilizing this

#17-070 Comment on SBSR

method of calculation limits patients' flexibility and timing slots. This may result in missed treatments for patients that are not able to fit into either the first or third shift due to lack of flexibility. Missed treatments may lead to health complications such as cardiac arrest, worsening of anemia, fluid overload, cerebrovascular complications, and even death.

I therefore, respectfully request that you consider the attached home patients' data as a valid historical referral data in support of our CON application for Dialysis Care Center Rockford. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Asim M. Shazzad', with a large, stylized flourish extending to the right.

Asim M. Shazzad
Chief Operating Officer

#17-070 Comment on SBSR

Current Pre-ESRD Patient Kidney Care Center Rockford - 2017	
Zip Code	CKD Stage
60152	2
61008	41
61010	7
61016	7
61020	3
61032	2
61047	4
61054	2
61063	3
61065	6
61068	6
61071	2
61072	4
61073	5
61080	3
61084	5
61088	6
61101	25
61102	16
61103	27
61104	36
61107	38
61108	35
61109	43
61111	26
61114	20
61115	24
TOTAL	398

#17-070 Comment on SBSR

Dialysis Patient Census Kidney Care Center - Rockford 2016		
Zip Code of Patient	Name of Facility Referred	Number of Patients Referred
61073	Davita Machesney Park	1
61109	Davita Rockton	1
61104	Davita Roxbury	1
61104	Davita Stonecrest	1
61102	Davita Stonecrest	1
61008	Davita Rockford	1
TOTAL		6

#17-070 Comment on SBSR

Dialysis Patient Census Kidney Care Center - Rockford 2017		
Zip Code of Patient	Name of Facility Referred	Number of Patients Referred
61073	Davita Machesney	1
61102	Davita Rockton	2
61104	Davita Roxbury	1
60148	Davita Stonecrest	1
61102	Davita Stonecrest	1
61104	Davita Stonecrest	2
61108	Davita Stonecrest	1
TOTAL		9

#17-070 Comment on SBSR

New Patients Referred By Zip Code and Facility Kidney Care Center - Rockford 2018		
Zip Code of Patient	Name of Facility Referred	Number of Patients Referred
61108	Davita Belvedere	1
61107	Davita Churchview	1
61101	Davita Rockton	1
61107	Davita Roxbury	1
TOTAL		4

#17-070 Comment on SBSR

Home Dialysis Services Patient Census Kidney Care Center - Rockford 2016		
Zip Code of Patient	Name of Facility Referred	Number of Patients Referred
61008	Home Dialysis Services Rockford	3
61061	Home Dialysis Services Rockford	1
61065	Home Dialysis Services Rockford	1
61079	Home Dialysis Services Rockford	1
61101	Home Dialysis Services Rockford	2
61102	Home Dialysis Services Rockford	1
61103	Home Dialysis Services Rockford	1
61104	Home Dialysis Services Rockford	1
61108	Home Dialysis Services Rockford	4
61109	Home Dialysis Services Rockford	1
TOTAL		16

#17-070 Comment on SBSR

Home Dialysis Services Patient Census Kidney Care Center - Rockford 2017		
Zip Code of Patient	Name of Facility Referred	Number of Patients Referred
61008	Home Dialysis Services Rockford	3
61061	Home Dialysis Services Rockford	1
61065	Home Dialysis Services Rockford	1
61068	Home Dialysis Services Rockford	2
61073	Home Dialysis Services Rockford	1
61079	Home Dialysis Services Rockford	1
61101	Home Dialysis Services Rockford	2
61103	Home Dialysis Services Rockford	2
61104	Home Dialysis Services Rockford	2
61108	Home Dialysis Services Rockford	6
61109	Home Dialysis Services Rockford	3
61111	Home Dialysis Services Rockford	2
61114	Home Dialysis Services Rockford	1
TOTAL		27

#17-070 Comment on SBSR

Home Dialysis Services New Patients Referred By Zip Code and Facility Kidney Care Center - Rockford 2018		
Zip Code of Patient	Name of Facility Referred	Number of Patients Referred
60090	Home Dialysis Services Rockford	1
61065	Home Dialysis Services Rockford	1
61109	Home Dialysis Services Rockford	1
61008	Home Dialysis Services Rockford	2
61061	Home Dialysis Services Rockford	1
61065	Home Dialysis Services Rockford	1
61101	Home Dialysis Services Rockford	2
61102	Home Dialysis Services Rockford	1
61104	Home Dialysis Services Rockford	1
61105	Home Dialysis Services Rockford	1
61108	Home Dialysis Services Rockford	3
TOTAL		15