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CLIENT/MATTER NUMBER
026141-0153

September 19, 2018

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

Mr. Mike Constantino
Supervisor, Project Review Section
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Re: Request for Expedited Review for CON Application
Silver Cross Structured Heart Program (New Lenox), Project No. 18-020

Dear Ms. Avery and Mr. Constantino:

We are counsel to Silver Cross Hospital and Medical Centers ("Silver Cross Hospital") and Silver Cross Health System (collectively with Silver Cross Hospital, the "Applicants") and are hereby requesting an expedited review of the Certificate of Need Application (the "CON Application") that we filed with the Illinois Health Facilities & Services Review Board (the "Review Board") on or about July 19, 2018, on behalf of the Applicants to establish an open heart surgery category of service (the "Project") at Silver Cross Hospital to address the increasing demand (and need) for advanced cardiac solutions on the Silver Cross Hospital campus. The CON Application was deemed complete by the Review Board on July 23, 2018. A public hearing was **not** requested for the Project.

In 2017, 3,514 diagnostic and interventional cardiac catheterizations were performed at Silver Cross Hospital, which was an eleven percent (11%) increase over the number of diagnostic and interventional cardiac catheterizations performed at Silver Cross Hospital in 2016 (i.e., 3,153). Although the 2017 Annual Hospital Questionnaire ("AHQ") is still not available, the 2016 AHQ data reveals that Silver Cross Hospital had the **ninth** largest cardiac catheterization program in the State of Illinois and that Silver Cross Hospital is the only hospital within the top 39 hospitals offering diagnostic and interventional cardiac catheterizations that did not have an open heart program. The lack of an open heart program has forced Silver Cross Hospital's patients to travel or to be transferred to other hospitals, thereby putting those patients at risk and resulting in disjointed care. In 2017 alone, at least 76 patients were directly transferred (by ambulance) to other hospitals for cardiac surgery after receiving a cardiac catheterization at Silver Cross Hospital. And at least another 112 patients had to be referred to

other hospitals for cardiac surgery after receiving a cardiac catheterization at Silver Cross Hospital in 2017. The average travel or transfer mileage for those 188 patients in 2017 was a shocking 19.0 miles. Of those 188 transferred and referred cardiac surgery patients in 2017, **64%** of those patients were sent to hospitals outside of Open Heart Surgery Planning Area HSA-09. The CompData tells a similar story. In 2017, **75%** of the residents located in Silver Cross Hospital's total service area had to seek cardiac surgery services outside of Open Heart Surgery Planning Area HSA-09. That level of outmigration is unacceptable. And because Silver Cross Hospital does not currently have an open heart program, high risk cardiac catheterizations are not even performed at Silver Cross Hospital. Thus, it is long past the time for Silver Cross Hospital to address the lack of advanced cardiac care on its campus so it can serve the patients residing in Open Heart Surgery Planning Area HSA-09.

To that end, the Applicants filed the CON Application with the expectation that the Applicants would be heard at the October 30, 2018 Review Board Hearing (i.e., 103 days after the CON Application was filed and 99 days after the CON Application was deemed complete by the Review Board) or the December 4, 2018 Review Board hearing (i.e., 138 days after the CON Application was filed and 134 days after the CON Application was deemed complete by the Review Board) and that the Applicants, if successful, could begin construction on the Project in the late fall (thereby avoiding the typical winter month construction delays). Any delays on the front end of the construction schedule will lead to delays on the back end of the construction schedule; which will then lead to additional delays on the timing of the Illinois Department of Public Health licensing process. As filed, the CON Application contemplated a project completion date of June 30, 2020. Any construction and licensing delays will push that completion date into the summer or fall of 2020. Given that the review process will ultimately exceed the review period for substantive projects, the Applicants are hereby requesting to be heard at the Review Board's hearing on either **October 30, 2018** in Bolingbrook, Illinois or **December 4, 2018** in Bolingbrook, Illinois. See 77 Ill. Admin § 1110.20(c) (120 day review period for substantive projects in general) and 77 Ill. Admin. § 1130.610(b) (60 day review period for substantive projects involving the establishment of a category of service).

Please call or write if you have any questions.

Sincerely,

Edward J. Green

cc: Ms. Ruth Colby and Ms. Mary Bakken, Silver Cross Hospital