

**SAUL EWING
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May 23, 2019

Via Hand Delivery

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



Re: Riverside Ambulatory Surgery Center,
Project No. 19-009 (the "Project") Response to State Board Report

Dear Ms. Avery,

We appreciate the work on the State Board Report for the Riverside Ambulatory Surgery Center ("RASC") project reference above. RASC is a multi-specialty surgery center owned by Riverside Medical Center and area physicians. This Project would allow RASC to add an orthopedics specialty to its existing multi-specialty surgery center.

RASC concurs with the State Board Report and wants to respond to the negative finding relating to the physician referral letters. The SBR noted that the applicants had not included zip codes for the physician referrals and that the number of referrals did not reflect historical referrals. In our application, we noted that Riverside Medical Center had been fortunate to recently recruit five new orthopedic surgeons to the Kankakee area to become part of Riverside Medical Group. Our CON application noted that because the surgeons were new to the area historical referrals and patient zip code data was not available at that time.

We are pleased to report that new referral information is now available and shows that we would be in full compliance with the negative finding. Attached is an updated physician referral letter from Riverside Orthopedics Specialists. This letter shows that the new physicians have performed 320 procedures in only the short time they have been in the area. This now historical number exceeds the 275 projected referrals. All of these procedures were performed at Riverside Medical Center. The attached letter includes the zip code information for each of the patients.

We are pleased that the referrals we projected in our application have now been verified and exceeded. We want to share this information with Review Board in our presentation and

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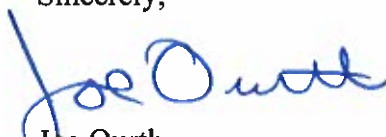
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Ms. Courtney Avery, Administrator
Illinois Health Facilities and Services Review Board
May 23, 2019
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wanted to provide this information to the Board and staff in advance of the Board meeting. We hope that this assists the Board and staff in the review of our project.

Sincerely,



Joe Ourth

JRO/eka

cc: Mike Constantino
Paula Jacobi

Enclosures



RIVERSIDE
MEDICAL GROUP

Via Hand Delivery

May 22, 2019

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

Re: Riverside Ambulatory Surgery Center (RASC)
Project 19-009
Response to State Board Report

Dear Ms. Avery:

We are providing this letter in response to the finding of the staff for criterion 77 ILAC 1110.235(c)(2)(b) and 77 ILAC 1110.235(c)(3). We include for the Board's information and consideration the attached surgical case volume by zip code for our group through May 15, 2019. Our group was newly formed in mid to late 2018, and as such, we do not have a full twelve months of practice history in the RASC service area.

Riverside Orthopedic Specialists is a group of orthopedic surgeons recently formed by five surgeons who are new to the Kankakee area as part of the Riverside Medical Group. Since formation, our group has performed 320 orthopedic procedures. All of our procedures have been performed at Riverside Medical Center and none of these procedures have been moved from any other facility.

Based upon the very positive growth in our practice experienced thus far, we estimate that our group will refer at least 275 cases annually to RASC by the end of the second full year of operation if this CON request is approved. We expect these cases to originate from the zip codes consistent with our experience in the Kankakee market. Attached is the list of zip codes for patients for procedures we have performed since becoming part of the Riverside Medical Group.


The information contained in this letter is true and correct to the best of our information and belief and has not been used in support of another project.

Sincerely,
Riverside Orthopedic Specialists


Jonathan Cotton, M.D.


Andrew Toftoy, M.D.


Joshua Miller, M.D.


Taruna Crawford, M.D.


Jessica Shin, M.D.

Given under my hand and official seal,

this 22 day of May 2019


Notary Public

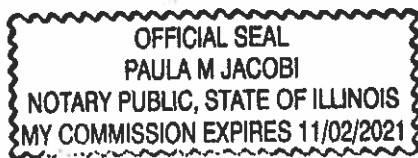


EXHIBIT A

Riverside Orthopedic Specialists Surgical Cases by Zip Code¹

Zip Code	Total	Percentage
60901	70	22%
60914	51	16%
60950	24	8%
60915	20	6%
60954	14	4%
60481	11	3%
60468	9	3%
60964	7	2%
60970	7	2%
60940	6	2%
60416	6	2%
60941	5	2%
60449	4	1%
60938	4	1%
60450	4	1%
60927	4	1%
60423	4	1%
60408	4	1%
60913	3	1%
60958	3	1%
60968	3	1%
60951	3	1%
60922	2	1%
60959	2	1%
60966	2	1%
60919	2	1%
60475	2	1%
60401	2	1%
60451	2	1%
60930	2	1%
60914-3734	2	1%
Other ²	35	9%
Grand Total	320	100%

¹ The above case data reflects activity for the following time periods at Riverside Medical Center:

Dr. Cotton: Jun 2018 – Apr 2019

Dr. Crawford: Oct 2018 – Apr 2019

Dr. Toftoy: Oct 2018 – Apr 2019

Dr. Shin: Oct 2018 – Apr 2019

Dr. Miller: Dec 2018 – Apr 2019

² Zip codes with a single case