

# US HealthVest

August 28, 2019

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HEALTH FACILITIES  
SERVICES REVIEW BOARD

## VIA HAND DELIVERY

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: MIRA Neuro Behavioral Health Center for Children & Adolescents, Tinley Park, Project #19-014**

Dear Ms. Avery:

US HealthVest submits this letter in opposition of Project #19-014, Mira Neuro Behavioral Health Center. Our opposition is not because we oppose expansion of access to quality mental health care, and certainly not because we do not believe in the need for access to mental health care for children and adolescents. Our opposition is because any expansion needs to take place in an organized and thoughtful manner, be consistent with this Board's rules, and should be focused on increasing *access* to quality care - rather than advancing the interests of any particular group of practitioners.

We know of what we speak when it comes to evaluating the landscape of Acute Mental Illness ("AMI") treatment in Illinois, as no other provider has more experience in rescuing providers who had the best of intentions but were ill equipped to provide this type of specialized care. Moreover, we maintain real world boots on the ground experience providing AMI care to Illinois' residents. We have, three times, appeared before the Health Facilities and Services Review ("HFSRB") board and obtained approval to establish AMI hospitals in the area.

US HealthVest first entered Illinois in 2016 to keep Maryville Behavioral Health Hospital, who had already filed a notice of discontinuation, from closing (see E-16-14). When we took over Maryville it had a census of less than five patients, despite having 125 beds. Since that time, we have had to twice increase the bed compliment, now up to 145 beds to allow us to meet the needs of the community. The relevance of this point is that *knowing how to provide inpatient mental health treatment is as important as the desire or willingness to do so*. The Catholic Archdiocese clearly had the resources and interest in providing this care - but it took the expertise of an enterprise like US HealthVest to convert the desire to provide care into meaningful access to care.

Since that time, US HealthVest purchased the Vista West Campus, is currently operating the existing 46 AMI beds while building a brand new 146 bed state-of-the-art AMI hospital in Waukegan, Illinois. This is another example where an experienced provider with a dedication and commitment to meeting the mental health needs of the community was simply unable to maintain a viable presence in the community sufficient to allow ongoing access to care. Had it not been for US HealthVest stepping in to purchase and modernize this facility, this community would have lost access to these vital services.

Silver Oaks Behavioral Hospital opened earlier this year and has capacity to treat children and adolescents; it has not yet reached a level of utilization that would justify the establishment of another new facility within the service area providing the same services. Chicago Behavioral Hospital and Lake Behavioral Hospital currently both have capacity to treat adolescents. Furthermore, once the expansion is complete at Lake Behavioral next year, that hospital will have even more capacity to treat adolescents.

The most likely response is that this is a facility dedicated to children and adolescents, thus reflecting a different need. ***This is simply untrue.*** US HealthVest facilities are architecturally and programmatically designed to allow independent and isolated units to be established and maintained to avoid the comingling of disparate patient populations (e.g. age, gender, diagnosis, treatment needs, etc.). This degree of flexibility which runs through the entirety of the facilities operated by US HealthVest is what allows us to meet the needs of an entire community. Moreover, the project as proposed seems to have some concerns with regards to its dedicated commitment to providing AMI care - as the project includes a multitude of other service that, while certainly possess potential to generate revenue for the owners - are not consistent with the establishment of a facility dedicated to meeting the needs of an AMI population requiring hospitalization. It is not the role of the HFSRB to advance the private market needs of any provider - rather to assess the need for service within a geographic service area. Two lesser utilized facilities provide more of a liability than does the maintenance of one properly utilized facility.

Moreover, it is important to note that ***US HealthVest maintains an open staff policy.*** Every one of these physicians would be able to provide care for their proposed patients at any one of our facilities, including the one located in the exact same geographic area. There are no questions as to the access or availability of this care - we are there, in this community, already providing this care to this patient population.

The Adolescent Units at our hospitals provide therapeutic environment for teens ages 13-17 utilizing evidence-based treatment modalities. This mental health program fosters honesty, integrity, and empathy. We believe this accelerates the development of open communication through which teens can grow in self-awareness, assisting at-risk teens developing the skills necessary to participate as responsible citizens in the community at large.

The enhancement of family relationships, as well as between patients and their peers, is an essential component of our behavioral treatment. We are committed to this goal and that commitment is reflected in all of the care we provide. Our treatment process utilizes individual, group, and family therapy, both within the community groups and within the unit. The daily

scheduled activities provide opportunities for positive outcomes of working within a group experience.

The adolescent mental health program provides treatment for the following mental health disorders:

- Depression
- Anxiety
- ADHD
- Impulse control
- Self-injury
- Anger
- Bipolar disorder
- Suicidal thoughts
- Trauma-related conditions

These are the same conditions and the same patient population proposed to be treated by this application. One of the major goals of our programs is to assist the patient to grow to reach their potential. This is accomplished through utilizing personal strengths and creativity in order to achieve success at both short term and long term goals. We accomplish this by working with the patient individually, in the family and as a member of the treatment community.

***We commend the applicants for the care they provide and invite them to join our efforts.*** However, there can be no doubt that these services exist - are already being provided by a world-class provider - and the capacity exists to meet this need. ***Unless and until the data justifies the establishment of a new facility,*** the HFSRB should be cautious to approve the establishment of a new facility duplicating these services in a community that already has access to this care.

Very truly yours,



Martina Sze  
Chief Development Officer  
US HealthVest, LLC