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June 10, 2020

Via E-Mail

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

Re: Opposition to Dialysis Care Center Chicago Heights (Proj. No. 19-015)

Dear Ms. Avery:

Polsinelli PC represents DaVita Inc. (“DaVita”) and, on behalf of DaVita, writes this letter as an update to its July 15, 2019 letter, which documented DaVita’s objection to the above referenced Dialysis Care Center (“DCC”) Chicago Heights facility proposal (the “Proposed Facility”). Since DaVita submitted the July 15, 2019 letter, a few key factors have changed that further demonstrate that a new DCC dialysis facility in Chicago Heights is not warranted.

- On September 18, 2019, the Illinois Health Facilities and Services Review Board (“State Board”) released its 2019 Inventory for the In-Center Hemodialysis Category of Service. Importantly, the number of excess stations increased by nearly 125% from the prior month (from an excess of 57 stations as of August 8, 2019, to an excess of 127 stations as of September 18, 2019).
- There is no need for the Proposed Facility in the DCC Chicago Heights geographic service area or in the planning area as a whole. HSA 7 has an excess of 128 stations as of March 5, 2020, the largest excess in the State. Of the ten dialysis facilities within five miles of the proposed facility site, only one exceeds State Board’s target utilization of 80%.

There is no need for the Proposed Facility in the DCC Chicago Heights geographic service area. Of the ten dialysis facilities located within that five mile area, only one facility exceeded the Board’s target utilization of 80% as of March 31, 2020. See Table 1. Further, 45 of the excess stations in HSA can be attributed to the nine underutilized facilities in the DCC Chicago Heights geographic service area. Adding 14 stations will reduce utilization of existing facilities and increase the excess of stations in the geographic service area.



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Table 1 March 31, 2020 Utilization of Existing Facilities within 5 Miles				
Facility	Straight-Line Distance (Miles)	Number of Stations 03/31/2020	Number of Patients 03/31/20	Utilization % 03/31/20
Chicago Heights Renal Care	0.68	16	56	58.3%
Fresenius Medical Care South Suburban	1.86	27	97	59.9%
Fresenius Medical Care Chicago Heights	1.90	12	50	69.4%
Dialysis Care Center of Olympia Fields	2.05	12	70	97.2%
RCG Hazel Crest	3.01	20	77	64.2%
Fresenius Medical Care Hazel Crest	3.39	16	68	70.8%
Dialysis Care Center Hazel Crest	3.49	12	31	43.1%
Olympia Fields Dialysis Center	3.98	24	80	55.6%
DaVita - Harvey Dialysis	4.23	18	46	42.6%
Fresenius Medical Care Steger	4.38	18	46	42.6%
Total		175	621	59.1%

In sum, based on the foregoing DaVita opposes the Proposed Facility to establish a 14 station dialysis facility in Chicago Heights, Illinois, which is not needed as multiple other dialysis facilities within the service area are under-utilized. Current patient needs do not merit additional stations.

Sincerely,

Anne M. Cooper