

September 4, 2019

VIA FEDEX

Courtney Avery
Board Administrator
Health Facilities and Services Review Board
Illinois Department of Public Health
525 West Jefferson Street, Second Floor
Springfield, Illinois 62761

RECEIVED

SEP 04 2019

HEALTH FACILITIES &
SERVICES REVIEW BOARD

Re: The Rehabilitation Institute of Southern Illinois, Project #19-021- Letter in Response to State Board Staff Report

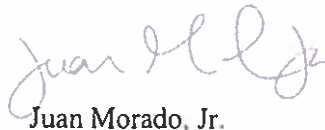
Dear Ms. Avery:

After reviewing the State Board Staff Report ("SBSR") for Project #19-021, we identified an inadvertent disconnect between the information we had submitted to support this project and the findings reflected in the SBSR. Specifically, the discrepancy related to the number of referrals submitted to support this project. The SBSR noted that there were 688 referrals to support this project and, based upon that number, concluded that we had failed to document the need for this project. However, there were an additional 450 referrals that were submitted by physicians from Washington University after the application was deemed complete but during the written comment period. They were noted as support letters, rather than referral letters, thus easily explaining why the additional referrals were not originally noted. However, with those referrals being included, it brings the total number of referrals for this project up to 1,138 referrals which is more than sufficient to meet the criteria evidencing the need for this project. We have discussed this matter with Board staff and concluded that this letter, along with the date-stamped copies of these referral letters (already posted on the HFSRB website) was the most efficient means to address this issue. Enclosed with this correspondence you will find copies of those previously submitted referral letters evidencing the additional 450 referrals.

If you have any questions or need any additional information regarding the project, please feel free to contact Mark J. Silberman or me. I can be contacted via phone at 312-212-4967 or via email at JMorado@beneschlaw.com and Mark via phone at 312-212-4952 or via email at MSilberman@beneschlaw.com.

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP



Juan Morado, Jr.

Enclosure
cc: George Roate, Project Reviewer



Washington University in St. Louis

SCHOOL OF MEDICINE

Department of Neurology

David M. Holtzman, MD

Andrew B. and Gretchen P. Jones Professor

Chairman of Neurology

Neurologist in Chief, Barnes Jewish Hospital

5-20-19

Courtney Avery
Board Administrator
Health Facilities and Services Review Board
Illinois Department of Public Health
525 West Jefferson Street, Second Floor
Springfield, Illinois 62761

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MAY 24 2019

HEALTH FACILITIES &
SERVICES REVIEW BOARD

Re: The Rehabilitation Institute of Southern Illinois, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in St. Clair County, HSA11

Dear Ms. Avery,

I am writing to express my support for The Rehabilitation Institute of Southern Illinois, LLC's Certificate of Need application to build a comprehensive inpatient rehabilitation hospital in St. Claire County, HSA11. In my role as the Chair of the Department of Neurology and overseeing Jin-Moo Lee, MD, PhD, head of our Division of Cerebrovascular Disease and Stroke and the Stroke Medical Director, I am responsible for the Department of Neurology's Stroke Program, supervising and continuously improving the provision of care, developing protocols, and meeting all of the clinically regulated standards.

In my capacity, I oversee many neurologists who see thousands of stroke patients annually in addition to patients with a variety of other neurological conditions and other medical problems. Many of these patients are in need of ongoing inpatient medical and nursing care, physical, occupational, and speech therapy after discharge from our hospital to help them recover from their acute illness and to improve the opportunity for them to return to as much independent functioning as they possibly can. We are in dire need of inpatient acute rehabilitation facilities east of the Mississippi river in Southern Illinois.

There are currently very few inpatient rehab beds in the greater metro east area, specifically St. Claire County and several of the surrounding counties. Our patients and families have to travel long distances from their homes to The Rehabilitation Institute of St. Louis which is where we refer most of our patients, however many of those patients prefer to be closer to their community for rehabilitation. Unfortunately they are not getting the intensity of services in the skilled nursing facilities compared to what they would receive in The Rehabilitation Institute of Southern Illinois.

The need for the proposed hospital is illustrated by the number of southern Illinois patients we care for each year. For example, in CY17 we cared for 658 neurology patients from the 4-county HSA11 area. Of course, when you consider the greater Southern Illinois area (counties such as Randolph, Perry, Washington, Jefferson, etc.) the number of patients who cross the river from East Metro in Missouri is far greater. Thus, of the patients we see annually from the 4-county HSA11 area plus the greater Southern Illinois area, I would expect that we will annually refer as many as 300 patients for intensive inpatient therapy, with the vast majority of

those patients being referred to the new hospital in Shiloh Illinois since that will be closer to their homes and offer the same high level of care currently offered at The Rehabilitation Institute of St. Louis here in Missouri.

For all of the reasons cited above, I strongly urge you to provide a Certificate of Need to The Rehabilitation Institute of Southern Illinois, LLC to allow them to start construction of this desperately needed hospital. I am certain it will have an immediate positive impact on our hospital's length of stay, on caregiver education, and patient integration back into the community.

Sincerely,

A handwritten signature in black ink, appearing to read "David M. Holtzman". The signature is fluid and cursive, with a prominent initial "D" and "H".

David M. Holtzman, MD
Professor and Chairman
Department of Neurology

SCHOOL OF MEDICINE

John T. Milliken Department of Medicine
Division of Hospital Medicine

June 10, 2019

Courtney Avery
Board Administrator
Health Facilities and Services Review Board
Illinois Department of Public Health
525 West Jefferson Street, Second Floor
Springfield, Illinois 62761

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JUN 21 2019

HEALTH FACILITIES &
SERVICES REVIEW BOARD

Re: The Rehabilitation Institute of Southern Illinois, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in St. Clair County, HSA11

Dear Ms. Avery,

I am a Board-certified Internal Medicine physician acting as Chief of Hospital Medicine at Washington University and Barnes-Jewish Hospital. The purpose of this letter is to ask that you approve the above-referenced project for the much-needed 40-bed inpatient rehab hospital to be located in and primarily serve residents from the four counties comprising Illinois HSA11.

Given my role and responsibilities at Barnes-Jewish Hospital, I have firsthand knowledge of the need for the proposed project that will benefit patients currently having to travel outside their community and home state to receive comprehensive, specialized inpatient rehabilitative care. I see the need on a daily basis for patients who have suffered a stroke, hip fracture, brain injury, and many other conditions to receive post-acute intensive inpatient rehabilitation to improve their functional and cognitive outcomes. The ability of these patients to receive their needed inpatient rehab close to home will ensure patients can achieve optimal outcomes for the highest quality of life possible.

In my role as the physician leader for the Hospitalist my work goes beyond supervising our program. Our service is growing rapidly and implementing protocols, processes, quality metrics and cutting edge technology that ensures the best possible physicians are providing the best possible treatment options and outcomes for our patients. Inpatient rehabilitation is critically important for the patient population that we see on a daily basis. The availability of advanced technology, advanced education and training for the physicians, nurses, and therapists and evidence-based rehabilitation medicine is paramount in the patient's road to optimal recovery and function.

Many of our patients live in Southern Illinois and travel great distances to receive their care at Barnes Jewish Hospital in St. Louis, Missouri. The patient's family and friends are challenged with visiting due to the difficulty of the drive to our hospital. It would be



Washington University in St. Louis

SCHOOL OF MEDICINE

tremendously helpful for the patient and their family to receive their post-acute rehabilitation in the community where they live, so family and/or caregiver participation in therapy can be achieved easily. As I'm sure you know, participation by the family member or caregiver in an inpatient's care enhances quality of care for the patient both during his/her hospital stay and when the patient returns home where the family member or caregiver assists the patient in his/her ongoing recovery. In short, involvement of family members/caregivers in the patient's care ultimately enhances patient outcomes, quality of care, and quality of life for the rehab patient.

Currently, when we consider patients at only three of our St. Louis hospital locations (Barnes Jewish Hospital, BJC West, and Christian Hospital), we are caring for over 1,000 patients annually who live in the four counties comprising HSA11 (St. Clair, Clinton, Madison and Monroe). Of course, that number rises when you consider our many patients from other parts of Southern Illinois.

A significant number of our patients would benefit from inpatient rehab services. However, many of our patients choose to receive post-acute care services closer to home, therefore often end up being discharged to a skilled nursing facility or home health care rather than to inpatient rehab when those services are most appropriate. Thus, if the proposed 40-bed rehab hospital in Shiloh is approved, I expect that approximately 150 or more patients annually could benefit from, and thus would receive inpatient rehabilitation in the proposed new hospital because it is closer to where they live.

The benefit of inpatient rehabilitation that is close, convenient for patients, families, and delivered by talented, trained clinicians that provide optimal outcomes and quality of life is so very important for the communities we serve. I urge you to support and grant approval for this CON application for The Rehabilitation Institute of Southern Illinois, LLC.

Thank you for your consideration.

Sincerely,



Mark Thaelke MD SFHM
Chief of Hospital Medicine
Professor of Medicine
Washington University School of Medicine