



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

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DOCKET NO: H-02	BOARD MEETING: June 30, 2020	PROJECT NO: 19-059	PROJECT COST: Original: \$33,812,822
FACILITY NAME: The Quad Cities Rehabilitation Institute		CITY: Moline	
TYPE OF PROJECT: Substantive			HSA:X

PROJECT DESCRIPTION: The Applicants (The Quad Cities Rehabilitation Institute LLC Iowa Health System d/b/a Unity Point Health, Trinity Regional Health System Trinity Medical Center and Encompass Health Corporation) propose to establish a 40-bed freestanding comprehensive physical rehabilitation hospital in Moline, Illinois at a cost of \$33,812,822. The expected completion date is May 2, 2022.

EXECUTIVE SUMMARY

PROJECT DESCRIPTION:

- The Applicants (The Quad Cities Rehabilitation Institute LLC, Iowa Health System d/b/a Unity Point Health, Trinity Regional Health System, Trinity Medical Center and Encompass Health Corporation) propose to establish a 40-bed freestanding comprehensive physical rehabilitation hospital¹ in Moline, Illinois at a cost of \$33,812,822. The proposed hospital will be located on the Trinity Medical Center- Moline campus. The expected completion date is May 2, 2022.
- The Applicants state the free-standing 40-bed comprehensive physical rehabilitation hospital will provide intensive post-acute care services that treat patients with severe physical disabilities with a coordinated multidisciplinary approach. The Applicants will treat all diagnostic categories including spinal cord injury, brain injury, stroke, congenital deformity, amputations, major multiple trauma, polyarthritis, fractures of the femur, and neurological disorders.
- The proposed project will be a 50/50 joint venture between Trinity Medical Center and Encompass Health Corporation. Trinity Medical Center a co-applicant on this application will discontinue a 22-bed comprehensive physical rehabilitation unit at Trinity Medical Center – Rock Island should this project be approved (#E-010-20).

WHY THE PROJECT IS BEFORE THE STATE BOARD:

- This project is before the State Board because the Applicants are establishing a health care facility as defined by the State Board.

PUBLIC HEARING/COMMENT:

- There was no request for a public hearing and no letters of opposition were received by State Board Staff. Letters of support were received, and they are included at the end of this report.

NEED FOR THE PROJECT:

- The State Board's "*Inventory of Health Care Facilities and Services and Need Determinations*" has determined there is a **calculated excess of 11-comprehensive** physical rehabilitation beds in the **HSA X** comprehensive physical rehabilitation planning area (May 2020). HSA X includes the Illinois counties of Henry, Mercer, and Rock Island. The State Board's calculated use rate for this planning area is **.0178 patient days per 1,000 population which is 60% of the State's Use Rate of .0297 patient days per 1,000 population**. The Board estimated a population of 198,700 by 2022 and patient days of 3,536 in this Planning Area.
- In conjunction with this project, Trinity Medical Center-Moline-a co-applicant on this project, will discontinue the 22-bed comprehensive physical rehabilitation unit at the hospital. Trinity Medical Center – Moline is in the HSA X Health Service Area (#E-010-20).
- Should the Board approve this project (#19-059) and the discontinuation (#E-010-20) there will be **an excess of 29 comprehensive physical rehabilitation beds** in the HSA X Health Service Area.

SUMMARY

- As mentioned above the State Board has determined there is currently a calculated **excess of 11-comprehensive physical rehabilitation beds** in the HSA X comprehensive physical rehabilitation planning area.
- The Applicants have provided an alternative need methodology that estimated a need for 40 comprehensive physical rehabilitation beds in the planning area that is discussed in detail at 143-

¹Comprehensive Physical Rehabilitation Facility" means a distinct bed unit of a hospital or a special referral hospital that provides a program of comprehensive physical rehabilitation; that is designed, equipped, organized and operated to deliver inpatient rehabilitation services; and that is licensed by the Department of Public Health under the Hospital Licensing Act or is a facility operated or maintained by the State or a State agency. Types of comprehensive physical rehabilitation facilities include:

1. Freestanding comprehensive physical rehabilitation facility" means a specialty hospital dedicated to the provision of comprehensive rehabilitation; and
2. Hospital-based comprehensive physical rehabilitation facility" means a distinct unit, located in a hospital, dedicated to the provision of comprehensive physical rehabilitation.

145 of the Application for Permit. This methodology identified patients with rehab appropriate discharges for residents of the HSA X Comprehensive Planning Area for the most recent calendar year (CY 2018). The Applicants identified 7,294 HSA X residents with rehab appropriate discharges. Of this number the Applicants believe 8% (Encompass experience in the Central US market) will utilize inpatient rehab services or 584 residents. The Applicants believe there will be a 35% in-migration factor because Trinity Health cares for a number of patients outside the HSAX planning area (Iowa) or 898 patients. If these patients materialize ($584+898 = 1,482$ patients) the 40 rehab beds will be needed.

- Additionally, the Applicants provided referral letters stating there were 2,466 patients residing in the HSA X comprehensive physical rehabilitation planning area that would have benefited from comprehensive physical rehabilitation facility. Of these 2,466 patients the Applicants estimated 1,182 referrals to the proposed rehab facility each year after project completion which would justify the 40 beds being requested at the target occupancy of 85%.

CONCLUSIONS:

- The Applicants addressed a total of 19 criteria and have not met the following:

State Board Standards Not Met	
Criteria	Reasons for Non-Compliance
77 ILAC 1110.205 (b)(1) – Planning Area Need	There is a calculated excess of 11-comprehensive physical rehabilitation beds in the HSA X Planning Area. Physician referral letters support a 40-bed facility in this planning area. The Planning Area has one 22-bed hospital-based unit and no freestanding unit. Structural limitations at the existing 22-bed hospital-based unit supports the need for a more modern facility.
77 ILAC 1110.205 (f) – Performance Requirement-Bed Capacity	The Applicants are establishing a 40-bed comprehensive rehabilitation facility. The State Board Standard for these facilities is 100 beds. (see page 16 of this report)

STATE BOARD STAFF REPORT
The Quad Cities Rehabilitation Institute
Project #19-059

APPLICATION SUMMARY/CHRONOLOGY	
Applicants(s)	The Quad Cities Rehabilitation Institute LLC, Iowa Health System d/b/a Unity Point Health, Trinity Regional Health System Trinity Medical Center and Encompass Health Corporation
Facility Name	The Quad Cities Rehabilitation Institute LLC
Location	Intersection of 52nd Avenue and 7th Street, Moline, Illinois
Permit Holder	The Quad Cities Rehabilitation Institute LLC, Iowa Health System d/b/a Unity Point Health, Trinity Regional Health System Trinity Medical Center and Encompass Health Corporation
Operating Entity/Licensee	The Quad Cities Rehabilitation Institute LLC
Owner of Site	Trinity Medical Center
Gross Square Feet	31,454 GSF
Application Received	12/23/2019
Application Deemed Complete	12/24/2019
Financial Commitment Date	June 30, 2022
Anticipated Completion Date	May 2, 2022
Review Period Ends	April 22, 2020
Review Period Extended by the State Board Staff?	No
Can the Applicant request a deferral?	No

I. Project Description

The Applicants (The Quad Cities Rehabilitation Institute LLC, Iowa Health System d/b/a Unity Point Health, Trinity Regional Health System Trinity Medical Center and Encompass Health Corporation) propose to establish a 40-bed freestanding comprehensive physical rehabilitation hospital in Moline, Illinois at a cost of \$33,812,822. The expected completion date is May 2, 2022.

II. Summary of Findings

- A. State Board Staff finds the proposed project is **not** in conformance with all relevant provisions of 77 ILAC 1110 (Part 1110).
- B. State Board Staff finds the proposed project is in conformance with all relevant provisions of 77 ILAC 1120 (Part 1120).

III. General Information

The Applicants are Iowa Health System d/b/a Unity Point Health, Trinity Regional Health System, Trinity Medical Center and Encompass Health Corporation. Iowa Health System is an Iowa not-for-profit corporation formed in 1994 and operates 22 hospitals in Iowa, Illinois, and Wisconsin. Iowa Health System does business as Unity Point Health. Iowa Health System is the sole corporate member of Trinity Regional Health System and Trinity Regional Health System is the sole corporate member of Trinity Medical Center. Trinity Medical Center operates two hospitals in the Quad Cities;

- Trinity Medical Center – Rock Island a 327-bed hospital
- Trinity Medical Center – Moline a 39-bed hospital

Encompass Health Corporation is a for-profit Delaware corporation incorporated in 1984 and provides facility-based and home-based post-acute care services. Encompass owns one hospital in Illinois; Encompass' Van-Matre Rehabilitation Hospital – Rockford and has been approved to establish a 60-bed rehabilitation hospital in Libertyville, Illinois (Permit #19-036).

This project is a substantive project subject to a Part 1110 and Part 1120 review. Substantive projects are

1. *Projects to construct a new or replacement facility located on a new site; or a replacement facility located on the same site as the original facility and the costs of the replacement facility exceed the capital expenditure minimum.*
2. *Projects proposing a new service or discontinuation of a service, which shall be reviewed by the Board within 60 days.*
3. *Projects proposing a change in the bed capacity of a health care facility by an increase in the total number of beds or by a redistribution of beds among various categories of service or by a relocation of beds from one facility to another by more than 20 beds or more than 10% of total bed capacity, as defined by the State Board in the Inventory, whichever is less, over a 2-year period. [20 ILCS 3960/12]*

IV. Health Service Area

The proposed hospital will be in the HSA X Comprehensive Physical Rehabilitation Planning Area which includes the Illinois Counties of Henry, Mercer, and Rock Island. The State Board is estimating a decrease in the population in this planning area of approximately 6% from 2017 to 2022. However, the State Board is estimating an increase in the over 65 population in this three-county area of approximately 7% from 2017 to 2022. The Applicants state there is a “gap in care” for inpatient rehab services that exists for HAS X residents when compared to the state as a whole or the target national benchmark (13 discharges per 1,000 Medicare residents) is increasing due to the planning area's increasing population ages 65 and over.

TABLE ONE
Population in HSAX

Age Cohort	2017 Population	2022 Population	% Change
0-64	169,500	155,600	-8.20%
65-74	22,500	24,100	7.11%
75+	17,900	19,000	6.15%
Total	209,900	198,700	-5.34%
65+	40,400	43,100	6.68%

The Geographical Service Area (“GSA”) for this project is a 17-mile radius from the proposed site. There is a 22-bed comprehensive physical rehabilitation unit in this 17-mile

GSA at Trinity Medical Center-Moline-a co-applicant on this project. Should this project be approved the 22-bed unit would be discontinued (#E-010-20).

V. Project Details

The Quad Cities Rehabilitation Institute, LLC is a newly formed Delaware Corporation and is a joint venture with Trinity Medical Center owning 50% and Encompass Health Corporation the remaining 50%. The proposed 40-bed hospital will include all private rooms and will be the only rehab program in the HSA X Planning Area. The proposed 1-story Hospital will be located on a 6.77-acre vacant parcel of property on the southeastern corner of Trinity Medical Center-Moline hospital campus. The land parcel will be transferred to the joint venture. According to the Applicants the site is easily accessible for all HSA X residents and the greater Quad Cities area because of its proximity and easy access to Interstates 280, 80, 74, and 88 as well as Illinois State Roads 67 and 150.

VI. Project Uses and Sources of Funds

The total project cost estimate for the new 40-bed freestanding hospital is \$33,812,822. The project will be funded by Encompass Health, the co-applicant, with cash and equivalents. The land for the proposed hospital is owned by Trinity Medical Center and will be leased to The Quad Cities Rehabilitation Institute, LLC. The estimated start-up costs and deficit is \$1,958,117.

TABLE TWO
Project Uses and Sources of Funds

Project Uses	Reviewable	Non-Reviewable	Total	% of Total
Site Preparation	\$683,420	\$399,734	\$1,083,154	3.20%
New Construction	\$12,534,419	\$7,366,541	\$19,900,960	58.86%
Contingencies	\$1,133,975	\$628,129	\$1,762,104	5.21%
A&E Fees	\$1,079,431	\$597,916	\$1,677,347	4.96%
Consulting and Other Fees	\$453,590	\$251,252	\$704,842	2.08%
Movable Equipment	\$3,280,816	\$1,817,303	\$5,098,119	15.08%
Other Costs	\$2,321,533	\$1,264,764	\$3,586,297	10.61%
Total Costs	\$21,487,184	\$12,325,639	\$33,812,823	100.00%
Project Sources	Reviewable	Non-Reviewable	Total	% of Total
Cash	\$21,487,184	\$12,325,638	\$33,812,822	100.00%

VII. Background of the Applicants, Purpose of the Project, Safety Net Impact Statement, Alternatives to the Proposed Project

A) Criterion 1110.110 (a) - Background of the Applicants

The State Board requires the Applicants to demonstrate that they are fit, willing and able, and *have the qualifications, background and character to adequately provide a proper standard of health care service for the community*. Our review of the information provided by the Applicants as well as information maintained by the Illinois Department of Public Health show that there have been no adverse actions² three years prior to the filing of this Application for Permit. The Applicants have the qualifications, background and character to provide health care service to this community.

B) Criterion 1110.110 (b) – Purpose of the Project

The State Board requires the Applicants to document that the project will provide health services that improve the health care or well-being of the population to be served.

Trinity Regional Health System through Trinity Medical Center- Rock Island and Trinity Medical Center – Moline hospitals provide acute care services to this planning area and according to the Applicants is the market leader providing over 53% of the acute care services in this area. The Applicants believe the proposed project is needed to serve two categories of patients in need of intensive inpatient rehab services:

- HSA X residents in need of inpatient rehab care regardless of the general acute care hospital from which the patient is discharged, recognizing that most HSA X patients currently rely on Trinity hospitals for their health care needs; and,
- Trinity's existing in-migration patient population from outside HSA X, including patients from contiguous Iowa counties, who currently rely on Trinity hospitals for their health care needs.

Trinity Rock Island is the sole inpatient rehab provider in HSA X, with 22 rehab beds. According to the Applicants due to facility constraints (such as the lack of private rooms and overall age and limitations of a hospital unit originally designed to care for general medical/surgical patients), Rock Island operates significantly fewer inpatient rehab beds than for which it is licensed, which negatively impacts HSA X residents' accessibility to needed inpatient rehab services.

² "Adverse Action" means a disciplinary action taken by IDPH, CMMS, or any other State or federal agency against a person or entity that owns or operates or owns and operates a licensed or Medicare or Medicaid certified healthcare facility in the State of Illinois. These actions include, but are not limited to, all Type "A" and Type "AA" violations. As defined in Section 1-129 of the Nursing Home Care Act [210 ILCS 45], "Type 'A' violation" means a violation of the Nursing Home Care Act or of the rules promulgated thereunder which creates a condition or occurrence relating to the operation and maintenance of a facility presenting a substantial probability that risk of death or serious mental or physical harm to a resident will result therefrom or has resulted in actual physical or mental harm to a resident. As defined in Section 1-128.5 of the Nursing Home Care Act, a "Type AA violation" means a violation of the Act or of the rules promulgated thereunder which creates a condition or occurrence relating to the operation and maintenance of a facility that proximately caused a resident's death. [210 ILCS 45/1-129]

The Applicants believe there is a quantifiable **need for 40-comprehensive physical rehabilitation beds** in this 3-county planning area.

A) Criterion 1110.110 (c) - Safety Net Impact Statement

To demonstrate compliance with this criterion the Applicants must document that the project will provide health services that improve the health care or well-being of the market area population to be served.

This project is a new collaboration between Trinity Medical Center and Encompass Health. Projected Charity Care and Safety Net data for the first two years of operation are provided in Table Three. The Applicants provided a safety net statement on page 384-387 of the Application for Permit.

TABLE THREE	
The Quad Cities Rehab Institute	
Projected Charity Care	
CON	
Net Patient Revenue	\$18,333,300
Amount of Charity	\$333,606
Cost of Charity Care	\$184,318
Charity Care Cost% of Net Pat Rev	1.01%
Payor Mix	
Medicare	62.00%
Medicaid	11.50%
BCBS	8.00%
Managed Care	16.20%
Self-Pay/Other (incl. Charity) 2.3%	2.30%
Total	100.00%

B) Criterion 1110.110 (d) - Alternatives to the Project

To demonstrate compliance with this criterion the Applicants must document all alternatives to the proposed project that were considered.

The Applicants considered three alternatives:

- 1) Renovate in-hospital space at Trinity Rock Island to expand the footprint of the inpatient rehab unit to space previously used for skilled nursing services.

This alternative was considered but rejected because the modernization and expansion of the 5th floor of the patient hospital tower (a building that was originally designed and constructed for general medical/surgical patients more than 50 years ago) would be less efficient and more costly. The Applicants stated, *the use of renovated, outdated space to house specialty inpatient rehab services contrasts dramatically with the proposed construction of a new state-of-the-art freestanding rehab hospital designed and built solely to care for patients in need of inpatient rehab services. The potential impact or limitations on patient care, as well as the secondary impact of not being able to reallocate and utilize that space to meet other facility needs, undermined the attractiveness of this alternative. Additionally, the*

discontinuation of the 22-bed comp rehab unit would free up much needed space for the hospital to use as it modernizes and renovates its existing patient units, with the vacated rehab unit providing 'flex space' to temporarily house med/surg rooms during the hospital-wide renovation. for these reasons, this alternative was rejected.

2) Maintain Status Quo/Do Nothing

*The Applicants stated, "Maintaining the status quo does not improve access for patients currently foregoing rehab services post-discharge; choosing to utilize less intensive services such as skilled care facility in lieu of rehab, when needed; or traveling outside their home community for inpatient rehab care (either to distant Illinois rehab hospitals or out-of-state to Iowa). The abysmally low utilization of inpatient rehab services for HSA X residents compared to residents statewide was previously documented. Similarly, the benefits of inpatient rehab services compared to less-intensive SNF care was previously documented. In both instances, it is clear that HSA X residents and Illinois residents outside the HSA who depend on Trinity for their healthcare needs need access to, **and** will benefit from, the proposed project..*

3) Submit a CON Application for the Establishment of a Smaller Facility

The Applicants stated "the Applicants initially considered the establishment of a facility containing less than 40 beds but realized any facility under 40 beds would fail to meet the existing and predicted needs for rehabilitation services in the service area. Additionally, the applicants determined a 11-bed rehabilitation facility would be impractical, because a smaller facility would be cost prohibitive, and most likely result in a facility that lacks services required of a modern physical rehabilitation facility. Lastly, the applicants (Trinity Medical Center and Encompass Health), did not consider a facility with less than 40 beds as a viable option for services in the region. No project costs were identified with this alternative."

VIII. Project Scope and Size, Utilization and Unfinished/Shell Space

A) Criterion 1110.120 (a) - Size of Project

To demonstrate compliance with this criterion the Applicants must document that the proposed size of the project is in compliance with Part 1110 Appendix B.³⁴

³ Reviewable space refers to the Clinical Service Area that is defined as a department or service that is directly related to the diagnosis, treatment, or rehabilitation of persons receiving services from the health care facility [20 ILCS 3960/3]. A clinical service area's physical space shall include those components required under the facility's licensure or Medicare or Medicaid Certification, and as outlined by documentation from the facility as to the physical space required for appropriate clinical practice.

⁵ Non-reviewable space refers to a Non-clinical Service Area that is an area for the benefit of the patients, visitors, staff or employees of a health care facility and not directly related to the diagnosis, treatment, or rehabilitation of persons receiving services from the health care facility. "Non-clinical service areas" include, but are not limited to, chapels; gift shops; newsstands; computer systems; tunnels, walkways, and elevators; telephone systems; projects to comply with life safety codes; educational facilities; student housing; patient, employee, staff, and visitor dining areas; administration and volunteer offices; modernization of structural components (such as roof replacement and masonry work); boiler repair or replacement; vehicle maintenance and storage facilities; parking facilities; mechanical systems for heating, ventilation, and air conditioning; loading docks; and repair or replacement of carpeting, tile, wall coverings, window coverings or treatments, or furniture

The Applicants are proposing 40-rehab beds in 24,264 gross square footage (GSF) of space or 606.6 GSF per bed. The State Board Standard is 660 GSF per bed. Included in the reviewable areas of the proposed hospital is a large indoor therapy area, 2-dedicated bariatric rooms, dedicated isolation rooms, and a 4-station dialysis unit. The State Board does not have a standard for these areas. The Applicant has successfully addressed this criterion,

TABLE FOUR					
Size of the Project					
	Beds	Proposed		State Standard	
	#	Total	Per Bed	Total	Per Bed
Physical Rehab Beds	40	24,264	606.6	26,400	660
Pharmacy		884	No Standard		
PT/OT/ST		6,306			
Total Reviewable		31,454			
Non-Reviewable		16,368			
Total		47,822			

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION SIZE OF PROJECT (77 ILAC 1110.120 (a))

B) Criterion 1110.120 (b) – Projected Utilization

To demonstrate compliance with this criterion the Applicants must document that the proposed project will be at the target occupancy of 80% within two years after project completion.

The Applicants have based the projected utilization on a projected need for 40 additional beds in the service area, based on patient out-migration data, and physician referral letters contained in the application.

The Applicants are estimating 1,182 patients to be referred to the proposed facility two years after project completion. Using an ALOS of 14.1 days the Applicants can justify 54 beds, meeting the requirements of this criterion.

$$\begin{aligned}
 1,182 \text{ patients} \times 14.1 \text{ days} &= 16,666 \text{ days} \\
 16,666 \text{ days} \div 365 \text{ days} &= 45.7 \text{ ADC} \\
 45.7 \text{ ADC} \div 85\% &= 54 \text{ beds}
 \end{aligned}$$

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION PROJECTED UTILIZATION (77 ILAC 1110.120 (b))

C) Criterion 1110.120 (e) – Assurances

To demonstrate compliance with this criterion the Applicants must document that the proposed facility will be at target occupancy two years after project completion.

The Applicants provided the necessary assurance that they will be at target occupancy within two years after project completion. The Applicants have met this requirement. (See Application for Permit page 203)

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION ASSURANCES (77 ILAC 1110.120 (e))

VIII. Comprehensive Physical Rehabilitation

A) Criterion 1110.205 (b) - Planning Area Need

1. Calculated Need or Excess

The State Board's "*Inventory of Health Care Facilities and Services and Need Determinations*" has determined there is a **calculated excess of 11-comprehensive** physical rehabilitation beds in the **HSA X** comprehensive physical rehabilitation planning area (May 2020). HSA X includes the Illinois counties of Henry, Mercer, and Rock Island. The Board estimated a population of 198,700 by 2022 and patient days of 3,536 in this Planning Area.

The State Board's **calculated use rate** for this planning area is .0144 patient days per thousand population. To calculate the estimated need, the State Board uses the greater of the planning area use rate (.0144) or **60% of the State's Use Rate (.0178 patient days per 1,000 population)**. The State Use rate is .0297 per thousand population. The use rate in this planning area is lower than 60% of the State's Use Rate.

In response to this bed excess the Applicants have stated:

"The HFSRB methodology projects future need based solely on historical utilization of inpatient rehab beds in the state. Thus, the HFSRB bed need methodology understates actual demand for the service because there is no way for HFSRB to identify the "gap in care" that exists in each planning region. Rather, HFSRB relies on providers, with knowledge of the individual market dynamics, to determine if there is a gap in care, and if so, to quantify that gap in care. The gap in care for inpatient rehab services that exists for HSA X residents when compared to the state as a whole or the target national benchmark (13 discharges per 1,000 Medicare residents) is increasing due to the planning area's increasing population ages 65 and over." (Application for Permit page 135-136)

2. Service to the Planning Area Residents

The Applicants bed need methodology (summarized on page 144 of the Application for Permit) is estimating 7,294 HSA X Residents in 2018 had rehab - appropriate discharges from any hospital, regardless of the hospital location. The Applicants are estimating 65% of the patients will be residents of the HSA X Planning Area that will utilize the proposed hospital. This estimate is based upon a review of 2018 Comp Data.

The Applicants also note that Trinity Regional Health System operates four hospitals in the Quad Cities Area. The first three hospitals listed below are within a 10-mile radius of the proposed inpatient hospital.

- Trinity Rock Island (Illinois) - 327 beds
- Trinity Moline (Illinois) – 38 beds
- Trinity Bettendorf (Iowa) – 139 beds
- Trinity Muscatine (Iowa) – 80 beds

The Applicants note that because Trinity cares for a significant number of patients outside HSA X, including residents from Scott and Muscatine counties in Iowa where they have hospitals, an in-migration factor of 35% was used to determine total patients in need of rehab services. This in-migration factor is consistent with Trinity's CY 18 rehab-appropriate in-migration⁵ percentage.

The Board Staff also notes the Applicants provided 7 referral letters documenting 2,466 residents by zip code who resided in the Comprehensive Physical Rehabilitation Planning Area X (HSA X) that were patients discharged from UnityPoint's inpatient rehab care unit who received rehab care or patients who were discharged and were appropriate for rehab care (i.e. discharged home with no care, home with home health care, or to a skilled nursing facility). Of these 2,466 patients the Applicants estimated 1,182 referrals to the proposed rehab facility each year after project completion which would justify the 40 beds being requested at target occupancy of 85%.

Service Access

The Applicants are proposing to discontinue a 22-bed inpatient rehab unit at Trinity Medical Center – Rock Island and establish a 40-bed inpatient rehab hospital approximately 7-minutes from the Rock Island Hospital to the Trinity Medical-Moline Hospital campus. According to the Applicants this new location is easily accessible for all HSA X residents and the greater Quad Cities area because of its proximity and easy access to Interstates 280, 80, 74, and 88 as well as Illinois State Roads 67 and 150.

The Applicants also note that the proposed hospital will have 40 private rooms, while the current Rock Island unit consists of 8 private rooms and 7 semi-private rooms which creates placement issues related to patient gender as well as patient preference for private rooms. This layout has led to the 8 private rooms designated as the core bed capacity on the unit. The therapy gym, patient dining area, and support space are in former patient rooms and staff offices that have been redesigned to meet the unit's needs, limiting the amount of space available for any of these important components. Lack of available space also limits the variety of patient therapy equipment that can be utilized on the unit as well as the development of a full Activities of Daily

⁵ Note: The State Board's Comprehensive Physical Rehabilitation Bed Need Methodology does not take into consideration the in-migration or out-migration of patients in the 11 Comprehensive Physical Rehabilitation Planning Areas.

Living ("AOL") suite. The main hospital tower in which the inpatient rehab unit is located was originally built in the 1970s, therefore lacks many of the infrastructure upgrades found in newer facilities such as expanded electrical and technology networking capacity to meet the demands of patients and visitors. Also, community space, and family conference space, and waiting areas for family members are all limited within the confines of the former medical/surgical acute care floor.

It appears that this project will enhance access to inpatient rehabilitation services in this comprehensive physical rehabilitation planning area. The proposed project will replace a small hospital unit with a modern facility, meeting the current design standard for patient rooms. Its private room configuration will eliminate the need to delay or re-route rehabilitation patients because of difficulty in fully utilizing semi-private rooms. Additionally, the proposed facility will serve residents of this planning area.

3. Service Demand

The Applicants provided a demand forecast model at page 144 of the Application for Permit that estimated a need for 41 inpatient rehab beds in the HSA X Planning Area. Additionally, 7 referral letters were submitted that estimating 1,182 residents would utilize the proposed 40-bed facility within two years after project completion. There appears to be sufficient demand for the 40-bed facility.

4. Service Accessibility

There are no other inpatient comprehensive physical rehabilitation hospitals in this planning area. The closest Illinois rehab hospital is Van-Matre Encompass Rehabilitation Hospital (owned by Encompass) in Rockford, Illinois which is over an hour from the Moline campus. There is a 22-bed inpatient rehab unit at Trinity Medical Center – Rock Island that has averaged approximately 40% utilization over the past 5-years. There are a number of facility limitations have led to the measurable drop in in-patient admissions at this 22-bed unit. The unit is located on the 5th Floor of the main hospital tower in space originally designed and constructed for general medical/surgical patients. Moreover, the hospital itself was designed and constructed in the 1970's so is nearly 50 years old. The unit consists of 8 private rooms and 7 semi-private rooms which creates placement issues related 10 patient gender as well as patient preference for private rooms. This layout has led to the 8 private rooms designated as the core bed capacity on the unit. The therapy gym, patient dining area, and support space are located in former patient rooms and staff offices that have been redesigned to meet the unit's needs, limiting the amount of space available for any of these important components. Lack of available space also limits the variety of patient therapy equipment that can be utilized on the unit as well as the development of a full Activities of Daily Living ("ADL") suite.

As noted above, the main hospital tower in which the IRU is located was originally built in the 1970s, therefore lacks many of the infrastructure upgrades found in newer facilities such as expanded electrical and technology networking capacity to meet the demands of patients and visitors. Also, community space, and family conference space, and waiting areas for family members are all limited within the confines of the former medical/surgical acute care floor. This 22-bed unit will be discontinued should the Board approve this 40-bed hospital (#E-010-20).

TABLE FIVE
5-Year Utilization of 22-bed Unit

Year	Authorized Beds	Staff Beds	Admissions	Patients	ALOS	ADC	Occupancy
2018	22	22	145	2,123	14.64	5.82	26.44%
2017	22	22	209	3,028	14.49	8.30	37.71%
2016	22	22	211	3,270	15.50	8.96	40.72%
2015	22	22	240	3,378	14.08	9.25	42.07%
2014	22	22	279	4,105	14.71	11.25	51.12%
Average	22	22	217	3,181	14.68	8.71	39.61%

SUMMARY

There is a calculated excess of 11 rehab beds in this planning area. Physician referral letters support a 40-bed facility in this planning area. The Planning Area has one 22-bed hospital-based unit and no freestanding unit. Structural limitations at the existing 22-bed hospital-based unit supports the need for a more modern facility. The Medicare Payment Advisory Commission noted in 2018 that there are higher costs at hospital-based units when compared to freestanding units.

THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IS NOT IN CONFORMANCE WITH CRITERION 77 ILAC 1110.205 (b) (1) PLANNING AREA NEED.

B) Criterion 1110.205 (c)(1)(2)(3) – Unnecessary Duplication/Maldistribution of Service/Impact on Area Providers

For this criterion the geographical service area (GSA) is a 17-mile radius and the population within the 17-mile radius is 384,887. There are 22-comprehensive physical rehabilitation beds in the 17-mile GSA. There are 1,527 inpatient rehabilitation beds in the State of Illinois as of May 2020. The 2020 population in the State of Illinois is estimated at 13,129,233.

TABLE SIX
Ratio of Beds to Population

Area	Population	Beds	Ratio of Beds per 1,000 population
Illinois (2020 est.) ⁽¹⁾	13,129,333	1,527	0.1163
17-Mile GSA (2019) ⁽²⁾	384,887	22	0.0572

-
1. Source: Illinois Department of Public Health Office of Health Informatics
Illinois Center for Health Statistics.
 2. Claritas.
-

Based upon the above there is no surplus of beds in this 17-mile GSA. Additionally, in this 17-mile GSA the proposed project will not result in an unnecessary duplication of service.

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH UNNECESSARY DUPLICATION/MALDISTRIBUTION OF SERVICE/IMPACT ON AREA PROVIDERS CRITERIA (77 IAC 1110.205 (c) (1) (2)(3))

A) Criterion 1110.205 (e) - Staffing

The applicant shall document that relevant clinical and professional staffing needs for the proposed project were considered and that licensure and The Joint Commission staffing requirements can be met. In addition, the applicant shall document that necessary staffing is available by providing a narrative explanation of how the proposed staffing will be achieved.

The Applicants provided a narrative explaining how the proposed staffing will be achieved as required at pages 199-201 of the Application for Permit. The Applicants stated in part “Trinity Medical Center and Encompass Health currently employ innovative strategies to recruit and retain staff at their hospitals and anticipated using these for recruitment purposes at the proposed hospital. A combination of competitive compensation and benefits, a national recruitment strategy, and relationships with local colleges and universities present them with an adequate supply of well-qualified Applicants for positions they seek to fill. Trinity Medical Center and Encompass Health both have in place numerous innovative approaches to recruit and retain staff members at their hospital facilities, thus The Quad Cities Rehabilitation Institute does not anticipate having difficulty hiring the necessary resources for the proposed project. In fact, a distinct advantage that the proposed project has in terms of recruitment is the level of professional engagement, challenge, and satisfaction employees have working with other professionals across disciplines. Additionally, existing Trinity inpatient rehab unit staff will also have the opportunity to transition over to the new Quad Cities Rehabilitation Institute. Trinity's own College of Nursing and Health Sciences is a resource for developing and training clinical staff. Moreover, because of the significant resources associated with Trinity's affiliation with UnityPoint and Encompass' ability to recruit nationally, the proposed project will have no material impact on existing health care providers in the service area.”

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION STAFFING (77 ILAC 1110.205(e))

B) Criterion 1110.205 (f) - Performance Requirements – Bed Capacity Minimums

- 1) The minimum freestanding facility size for comprehensive physical rehabilitation is a minimum facility capacity of 100 beds.
- 2) The minimum hospital unit size for comprehensive physical rehabilitation is 16 beds.

The Applicants propose to establish a 40-bed comprehensive physical rehabilitation facility, in accordance with the bed need in the planning area. The Applicants have not met the requirements of this criterion.

State Board Staff Note: MedPAC⁶ did an analysis of the median cost per discharge for inpatient comprehensive physical rehabilitation service in their March 2018 report to Congress. Based upon this analysis the cost per discharge were higher in a hospital-based unit (\$16,406) than a free-standing for profit facility (\$13,315). Also, the cost per discharge per bed decreases as the number of beds increase.

TABLE SEVEN	
Median Standardized Cost per Discharge (2016 Data)	
ALL IRF's	\$15,494
Hospital based	\$16,406
Freestanding	\$11,796
Non-profit	\$16,311
For profit	\$13,315
Government	\$17,813
Urban	\$15,185
Rural	\$17,914
Number of Beds	
1 to 10	\$18,588
11 to 24	\$16,408
25 to 64	\$14,239
65 or more	\$12,103

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN NOT IN CONFORMANCE WITH CRITERION PERFORMANCE REQUIREMENTS (77 ILAC 1110.205(f))

E) Criterion 1110.205 (g) - Assurances

The applicant representative who signs the CON application shall submit a signed and dated statement attesting to the applicant's understanding that, by the second year of operation after the project completion, the applicant will achieve and maintain the occupancy standards specified in 77 Ill. Adm. Code 1100 for each category of service involved in the proposal.

The Applicants provided the necessary attestation as required at page 203 of the Application for Permit.

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION ASSURANCES (77 ILAC 1110.205(e))

⁶ The Medicare Payment Advisory Commission (MedPAC) is an independent congressional agency established by the Balanced Budget Act of 1997 (P.L. 105-33) to advise the U.S. Congress on issues affecting the Medicare program. In addition to advising the Congress on payments to health plans participating in the Medicare Advantage program and providers in Medicare's traditional fee-for-service program, MedPAC is also tasked with analyzing access to care, quality of care, and other issues affecting Medicare.

X. Financial Viability

A) Criterion 1120.120 – Availability of Funds

The Applicants are to document the sources of financing for this project.

The Applicants are funding this project with cash/securities in the amount of \$33,812,822. Based upon UnityPoint and Encompass Healthcare Corporation 2018 audited financial statements the Applicants have enough resources to fund this project. Below is a summary of the projected financial information for Rehabilitation Institute Inc. The assumptions used in preparing the projected information can be found at pages 378-379 of the Application for Permit.

TABLE EIGHT
Quad Cities Rehab Institute

	Year 1	Year 2
Cash	\$2,321,488	\$5,007,700
Current Assets	\$5,489,553	\$8,875,280
Total Assets	\$36,800,139	\$38,562,707
Current Liabilities	\$833,441	\$1,001,027
LTD	\$0	\$0
Total Revenue	\$22,272,200	\$29,742,600
Net Patient Revenue	\$13,766,000	\$18,333,300
Total Expenses	\$13,973,600	\$16,946,000
Total Income (Loss)	(\$207,600)	\$1,387,300

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION AVAILABILITY OF FUNDS (77 ILAC 1120.120)

B) Criterion 1120.130 – Financial Viability

The Applicants have qualified for the financial waiver as they have provided evidence that the funding for the project is from internal sources (cash). The applicant is NOT required to submit financial viability ratios if:

- 1) All project capital expenditures, including capital expended through a lease, are completely funded through internal resources (cash, securities or received pledges); or
HFSRB NOTE: Documentation of internal resources availability shall be available as of the date the application is deemed complete.
- 2) the applicant's current debt financing or projected debt financing is insured or anticipated to be insured by Municipal Bond Insurance Association Inc. (MBIA) or its equivalent; or
HFSRB NOTE: MBIA Inc. is a holding company whose subsidiaries provide financial guarantee insurance for municipal bonds and structured financial projects. MBIA coverage is used to promote credit enhancement as MBIA would pay the debt (both principal and interest) in case of the bond issuer's default.
- 3) The applicant provides a third-party surety bond or performance bond letter of credit from an A rated guarantor (insurance company, bank or investing firm) guaranteeing project completion within the approved financial and project criteria.

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION FINANCIAL VIABILITY (77 ILAC 1120.130)

XI. Economic Feasibility

A) Criterion 1120.140 (a) - Reasonableness of Financing Arrangements

B) Criterion 1120.140 (b) - Terms of Debt Financing

The Applicants are funding this project with cash/securities in the amount of \$33,812,822. No debt is being used to fund the project. Based upon the audited financial statements the Applicants have enough resources to fund this project (Application for Permit page 207-374).

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERIA REASONABLENESS OF FINANCING ARRANGEMENTS AND TERMS OF DEBT FINANCING (77 ILAC 1120.140 (a) (b))

C) Criterion 1120.140 (c) – Reasonableness of Project Costs

The costs listed below only relate to reviewable of clinical costs.

Site Preparation Costs are \$683,420 or 5.0% of new construction, and contingency costs. This appears reasonable when compared to the State Board Standard of 5.0%.

New Construction Costs are \$13,668,394 or \$434.55 per GSF. This appears reasonable when compared to the State Board Standard of \$400.74 per GSF (2020 construction mid-point).

Contingencies Costs are \$1,133,975 or 9.05% of new construction costs. This appears reasonable when compared to the State Board Standard of 10%.

Architectural and Engineering Costs are \$1,079,431 and are 7.90% of the new construction and contingency costs. This appears reasonable when compared to the State Board Standard of the 5.76% – 8.66%.

Consulting and Other Fees are \$453,590. The State Board does not have a standard for these costs.

Movable and Other Equipment are \$3,280,816. The State Board does not have a standard for these costs.

Other Costs to be Capitalized are \$2,321,533. The State Board does not have a standard for these costs.

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION REASONABLENESS OF PROJECT COSTS (77 ILAC 1120.140)

D) Criterion 1120.140 (d) – Projected Operating Costs

The applicant shall provide the projected direct annual operating costs (in current dollars per equivalent patient day or unit of service) for the first full fiscal year at target utilization but no more than two years following project completion. Direct costs mean the fully allocated costs of salaries, benefits and supplies for the service.

The operating costs per equivalent patient day is \$877.72. The State Board does not have a standard for these costs. The Applicants have met the requirements of this criterion.

TABLE NINE	
FY24 Operating Expenses:	
Salaries	\$7,721,900
Benefits	\$2,239,400
Supplies	\$944,300
Total	\$10,905,600
Projected Patient Days	12,425
FY 22 Operating costs per Projected Patient Days	\$877.72

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION PROJECTED OPERATING COSTS (77 ILAC 1120.140(d))

E) Criterion 1120.140 (e) - Total Effect of the Project on Capital Costs

The applicant shall provide the total projected annual capital costs (in current dollars per equivalent patient day) for the first full fiscal year at target utilization but no more than two years following project completion.

The total effect of the project on capital costs is \$134.67 per equivalent patient day. The State Board does not have a standard for these costs. The Applicants have met the requirements of this criterion.

TABLE TEN	
FY24 Capital Costs	
Depreciation	\$1,673,200
Total Capital Costs	\$1,673,200
Projected Patient Days	12,425
Capital Costs per Project Patient Day	\$134.67

STATE BOARD STAFF FINDS THE PROPOSED PROJECT IN CONFORMANCE WITH CRITERION TOTAL EFFECT OF THE PROJECT ON CAPITAL COSTS (77 ILAC 1120.140(e))



Juan Morado, Jr.
71 South Wacker Drive, Suite 1600
Chicago, Illinois 60606-4637
Direct Dial: 312.212.4967
jmorado@beneschlaw.com

March 12, 2020

RECEIVED
MAR 17 2020

HEALTH FACILITIES &
SERVICES REVIEW BOARD

VIA US MAIL

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: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
– Ryan Heur, Manager of Inpatient Therapy, UnityPoint Trinity Hospital**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from Ryan Heur, PT, DPT, Manager of Inpatient Therapy, UnityPoint Trinity Hospital

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

Juan Morado, Jr.

JM:ms
Enclosure

cc: George Roate, Project Reviewer



UnityPoint Health

UnityPoint Health™ - Trinity
Inpatient Rehab
2701 17th St
Rock Island, IL 61201
[Office: (309) 779-2015]
[Fax: (309) 779-3540]
unitypoint.org

March 9, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

I am writing to express my support for The Rehabilitation Institute, LLC's Certificate of Need application to build a comprehensive inpatient rehabilitation hospital in Rock Island County, IL. In my role as Manager of Inpatient Therapy Services for UnityPoint Health - Trinity, I am responsible for the management of physical, occupational and speech therapies for our existing Inpatient Rehab Unit.

I believe there are advantages to building a separate free-standing rehab hospital in Rock Island County at our Moline campus. This is a growing area of the community and the suburban location could draw from not only the Moline area, but also the entire Quad Cities region. Many patients do not wish to drive into or come to a large, intimidating campus like the one we currently have in Rock Island. Access and parking would be much easier for the families and friends of our patients.

With the expertise and experience Encompass rehabilitation hospitals are known for we should be able to provide a more robust marketing plan to drive referrals to our new free-standing rehab hospital. In combination with our talented clinical staff of inpatient physical, occupational, and speech therapists, I believe it would contribute more to its success if it had its own identity, separate from that of the main hospital at our Rock Island campus. Many people have remarked, after being patients in our hospital, they were not aware it existed.

There is also opportunity for rehab specific computer software more updated than our current product in regards to rehab specific requirements for reporting functional activity levels to CMS and other entities. This would allow for better efficiency and individual productivity if these processes could be streamlined into a product designed specifically for inpatient rehabilitation.

For these reasons, I hope you will seriously consider the granting of a Certificate of Need to The Quad Cities Rehabilitation Institute, LLC for an acute inpatient rehab hospital in Rock Island County. It would provide an expansion of our current

services with a larger footprint in a growing area of the community that would greatly benefit. Thank you so much.

Sincerely,

Ryan Heuer, PT, DPT

Ryan Heuer, PT, DPT
Manager Inpatient Therapies



Juan Morado, Jr.
71 South Wacker Drive, Suite 1600
Chicago, Illinois 60606-4637
Direct Dial: 312.212.4967
jmorado@beneschlaw.com

March 25, 2020

VIA US MAIL

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

MAR 30 2020

HEALTH FACILITIES &
SERVICES REVIEW BOARD

**Re: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
– Kimberly Dominguez, RN, BSN, Nurse Manager, Trinity Medical Center
Inpatient Rehabilitation Unit**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from Kimberly Dominguez, Nurse Manager, Trinity Medical Center Inpatient Rehabilitation Unit.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

Juan Morado, Jr.

JM:mls
Enclosure

cc: George Roate, Project Reviewer



UnityPoint Health
Trinity

RECEIVED

MAR 30 2020

HEALTH FACILITIES &
SERVICES REVIEW BOARD

March 9, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

I am writing to you today to express my support for The Quad Cities Rehabilitation Institute, LLC's certificate of need application to build a new, free-standing comprehensive inpatient rehabilitation hospital in Moline, Illinois. As the Nurse Manager of the Trinity Medical Center Inpatient Rehabilitation Unit I have firsthand knowledge of the importance of this request and the genuine need for this service for the patients we serve.

Currently our unit occupies a floor in our acute care hospital that is space constrained, houses mostly semi-private rooms, and has no capability to expand. Our hospital is in need to continuously refresh and remodel spaces to meet the needs of all of our patients and the space occupied by the rehab unit could easily be used to reach those goals for the organization. In addition, our patients desire and deserve private rooms and the gym space to accommodate the advances in rehabilitative therapy that Encompass Health is known to provide.

We experience increasing needs for inpatient rehabilitation that we currently are unable to support. While we have excellent rehab nurses, therapists and physicians we look forward to providing that excellent care in a new hospital setting. The advances in therapy technology, clinical/nursing protocols, and the rehab specific electronic medical record that Encompass Health brings to the partnership with UnityPoint Health -- Trinity will bring tremendous advantages for our staff and our patients.

For these stated reasons and many more, I highly recommend and support the approval of this Certificate of Need application to build a new 40-bed comprehensive rehabilitation hospital for the deserving citizens who need this level of care in the Quad Cities. Thank you for your consideration.

Trinity Rock Island
2701 17th Street
Rock Island, IL 61201-5393
(309) 779-5000
unitypoint.org

Trinity Moline
500 John Deere Road
Moline, IL 61265-6892
(309) 779-5000
unitypoint.org

Trinity Bettendorf
4500 Utica Ridge Road
Bettendorf, IA 52722-1626
(563) 742-5000
unitypoint.org

Trinity Muscatine
1518 Mulberry Avenue
Muscatine, IA 52761-3433
(563) 264-9100
unitypoint.org

Sincerely yours,

A handwritten signature in black ink that reads "Kimberly Dominguez BSN". The signature is written in a cursive, flowing style.

Kimberly Dominguez, RN, BSN

Nurse Manager, Trinity Medical Center Inpatient Rehabilitation Unit



Juan Morado, Jr.
71 South Wacker Drive, Suite 1600
Chicago, Illinois 60606-4637
Direct Dial: 312.212.4967
jmorado@beneschlaw.com

March 18, 2020

VIA US MAIL

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: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
–Dr. Tracy Poolevoerde, Chancellor, Trinity College of Nursing & Health
Sciences**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from Dr. Tracy Poolevoerde, Chancellor, Trinity College of Nursing & Health Sciences.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

A handwritten signature in black ink, appearing to read 'Juan Morado, Jr.', with a stylized flourish at the end.

Juan Morado, Jr.

JM:mls
Enclosure

cc: George Roate, Project Reviewer



**Trinity College of Nursing
& Health Sciences**
UnityPoint Health

10 March 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed
Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10**

Dear Ms. Avery:

I am writing today in my capacity as Chancellor, Trinity College of Nursing & Health Sciences, to express my support for The Quad Cities Rehabilitation Institute, LLC's certificate of need request to build a new, free-standing Comprehensive Physical Rehabilitation Hospital in Rock Island County. With a presence in the Quad Cities for 122 years, Trinity College has become the community leader in developing experienced and knowledgeable health professionals for our community and beyond. Through our affiliation with Trinity Regional Health System, our students learn using some of the most technologically advanced equipment in the medical field, in both simulated and clinical settings.

The health sciences programs at Trinity College, particularly our nursing and radiography programs, have a long standing reputation for graduating quality students who are highly educated and prepared to professionally perform in their respective fields. By providing students learning experiences in the live clinical setting, inclusive of inpatient rehabilitation, students are exposed to a diverse medical population which enriches their educational knowledge and clinical practice. The proposed partnership between Encompass Health and UnityPoint-Trinity to build a state-of-the-art free-standing rehabilitation hospital will further enhance our students' exposure and learning experience in this innovative interdisciplinary and advanced rehab specialty setting for patients needing this level of care.

For these reasons and many more, I hope you will seriously consider the granting of a Certificate of Need to The Quad Cities Rehabilitation Institute, LLC for a comprehensive physical rehabilitation hospital in Rock Island County, IL. Thank you for your time and attention.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "T. Poelvoorde".

Tracy L. Poelvoorde, PhD, RN
Chancellor



Juan Morado, Jr.
71 South Wacker Drive, Suite 1600
Chicago, Illinois 60606-4637
Direct Dial: 312.212.4967
jmorado@beneschlaw.com

March 16, 2020

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APR 14 2020

HEALTH FACILITIES &
SERVICES REVIEW BOARD

VIA US MAIL

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: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
– Congresswoman Cheri Bustos, United States House of Representatives,
17th District, IL**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from Congresswoman Cheri Bustos, United States House of Representatives, 17th District, Illinois.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

Juan Morado, Jr.

JM:mls
Enclosure

cc: George Roate, Project Reviewer

Congress of the United States
House of Representatives
Washington, DC 20515-1317

March 10, 2020

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

Re: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed
Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

I am writing to urge prompt consideration for the Quad Cities Rehabilitation Institute, LLC's Certificate of Need application to build an acute comprehensive inpatient rehabilitation hospital in Rock Island County, IL. I am a member in the United States House of Representatives, serving the 17th Congressional District in Illinois, inclusive of Rock Island, Mercer and Henry Counties which comprise Illinois' HSA10. I serve on a variety of congressional committees including the Appropriations Committee; the Labor, Health and Human Services, and Education Subcommittee; the Defense Subcommittee; the Military Construction and Veterans Affairs Subcommittee; and the House Committee on Agriculture. As a former City Councilwoman in East Moline, I have a vested interest in economic development, rural healthcare, and the safety and wellbeing of all the constituents in my district.

The population growth of citizens over 65 is projected to grow nearly 11% over the next five years in the three counties of HSA10, Rock Island, Mercer, and Henry Counties. This correlates to the need for more inpatient rehabilitation beds to meet the needs of those patients who would benefit from comprehensive inpatient rehabilitation. We are proud of the existing hospitals and health care services in our district however we must remain diligent to continuously assess the provision and access to appropriate services for all our citizens. The coordinated partnership effort between UnityPoint – Trinity and Encompass Health to provide advanced, comprehensive inpatient rehabilitation in a free-standing setting makes sense and will help serve the growing inpatient rehabilitation needs in the Quad Cities. This proposal further supports UnityPoint Health – Trinity Medical Center's needs to modernize and refresh their existing inpatient services by relocating their Inpatient Rehab Unit to the new free-standing hospital location.

With the State's approval of this CON application, the addition of The Quad Cities Rehabilitation Institute, LLC to the health care arena will greatly benefit the citizens they serve. Having this 40-bed free-standing comprehensive inpatient rehabilitation hospital in the Quad Cities will allow those patients to continue their post-acute care journey to recovery and opportunity to return to their prior level of independence, function, and activities of daily living close to home in the community in which they live.

As the healthcare landscape evolves, coordination and accountability across the continuum of care is becoming more and more prevalent. The Affordable Care Act promotes accountability between providers to drive down costs and improve quality through the provision of comprehensive treatment options. The excellent healthcare provided at UnityPoint Health – Trinity, in collaboration and partnership with Encompass Health's reputation for acute rehabilitation care, a nationally recognized leader and innovator for advanced, state of the art therapeutic modalities and excellent quality outcomes, would be a welcome addition to the healthcare services in my district.

For these reasons and many more, I ask for a favorable review of The Quad Cities Rehabilitation Institute, LLC's application for the Certificate of Need so that they can provide an independent acute comprehensive rehabilitation hospital in Rock Island County. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Cheri Bustos". The signature is written in a cursive, flowing style.

Cheri Bustos
Member of Congress

May 7, 2020

RECEIVED

MAY 11 2020

HEALTH FACILITIES
SERVICES REVIEW BOARD

VIA US MAIL

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: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
– James E. Teske, UPH/IRF patient**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from James E. Teske.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP



Juan Morado, Jr.

JM:mls
Enclosure

cc: George Roate, Project Reviewer

April 13, 2020

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

Re: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed
Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery:

I am writing to confirm my desire to have a Comprehensive Physical Rehabilitation Hospital in Rock Island County.

The year 2010 was not the finest of my life. I started in May with the diagnosis of Guillain-Barre Syndrome. Five months later, after quietly recovering from GBS, I broke my neck (C 3-4). After a rapid helicopter ride to St. Francis Hospital in Peoria for surgery, I returned to Rock Island for extensive PT and OT at Unity Point Hospital. I met this experience with apprehensive anticipation and an "I give up" outlook on life. (At the time of admission, I could only move my left thumb.)

Their educated and friendly staff soon remedied that and gave me a new, positive outlook on living. I learned that the staff, cleaning personnel, RN's, therapists, doctors, and helpers in all areas were there to help me. Without being demanding, they had me working from early morning through evening to show that I could improve, each in their own way as professionals. Approximately two months later, I was released to start out-patient therapy at their out-patient facility. During this therapy, I went from a wheelchair to a cane to walking on my own.

I was awarded the Rehabilitant of the Year at Unity Point Hospital and could present a multitude of happy events that occurred every day.

When I hear of other areas where they don't have what I had, it made me realize just how fortunate I was. I was so pleased I didn't have to travel 180 miles round trip to get PT and OT 3 to 5 times a week. At the time, I frankly could not have done it. A state-of-the art physical rehabilitation center would benefit so many people in this area and is so needed.

Thank you for your consideration and approval of the Quad Cities Rehabilitation Institute's request to build a Comprehensive Physical Rehabilitation Hospital in Rock Island County.

Sincerely,



JAMES E. TESKE
1 Wilderness Court
Moline, IL 61265

Phone: 309 912-4075



Juan Morado, Jr.
71 South Wacker Drive, Suite 1600
Chicago, Illinois 60606-4637
Direct Dial: 312.212.4967
jmorado@beneschlaw.com

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APR 20 2020

POST
SERVICES REVIEWED

April 15, 2020

VIA US MAIL

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: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
– State Representative Tony McCombie, 71st District**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from State Representative Tony McCombie, 71st District.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

Juan Morado, Jr.

JM:mls
Enclosure

cc: George Roate, Project Reviewer

District Office:
9317B IL Rte 84
Savanna, IL 61074
Phone: 815-632-7384
Fax: 815-280-0731



Springfield Office:
205A-N Stratton Office Building
Springfield, IL 62706
Phone: 217-782-3992
Fax: 815-280-0731

Tony McCombie
State Representative • 71st District

March 19, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

One of my priorities as Representative to the 71st district is to actively engage constituents to work together to solve challenges in our communities. One need regularly vocalized throughout my district is the provision of health services in rural communities where social determinant negatively impacts access and ongoing recovery.

I believe it is my duty and responsibility to represent every constituent in my district by ensuring access to rehabilitation services. In This letter of support of this application for a rehabilitation health is my way to demonstrate that commitment.

Traveling outside of our community health service does not meet the needs our area and only heighten awareness of the disparities evident in our State. Rather than simply ignoring this need, UnityPoint Health is following their vision of meeting the ongoing healthcare needs of our community by creating paths to better health. Thank you for considering application.

Respectfully,

A handwritten signature in black ink that reads "Tony M. McCombie". The signature is written in a cursive, flowing style.

Representative Tony McCombie

May 28, 2020

RECEIVED

JUN 01 2020

HEALTH FACILITIES &
SERVICES REVIEW BOARD

VIA US MAIL

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: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
– Mayor Mike Thoms**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from Mayor Mike Thoms.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP



Juan Morado, Jr.

JM:mls
Enclosure

cc: George Roate, Project Reviewer



Mayor Mike Thoms

March 23, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery:

It is with great enthusiasm that I provide this letter of support for the Certificate of Need being requested by The Quad Cities Rehabilitation Institute, LLC. I recently had the opportunity to learn more about the proposed partnership between Encompass Health and UnityPoint Health-Trinity to build a new free-standing comprehensive rehabilitation hospital in Rock Island County. The nearly 400,000 citizens within the Quad Cities deserve the very best health care services within the area and we are fortunate to have UnityPoint Health at the center of those services. Their continuous growth and expansion over the years has served us very well in Rock Island County and we are proud of their vision for health care, to provide the best outcome for every patient every time.

UnityPoint Health's partnership with Encompass Health, the nation's largest provider of comprehensive inpatient rehabilitation, will greatly enhance those post-acute rehab services to better meet the needs of patients who have suffered strokes, trauma, head injuries, and many more conditions. Their plans to relocate their existing internal rehab unit into a brand new hospital will allow our hospital, UnityPoint Health-Trinity in Rock Island, to refresh and modernize the vacated space. During construction of the new facility, new jobs for the local trades will be available, as well as several new jobs for the new hospital upon opening. This continuously feeds our economic development and growth in the Quad Cities for which we are

grateful and appreciative, as well as enhance the healthcare service landscape in our community.

There is an identified need for this facility, and it enjoys a wide range of community support, including key components of the local medical community. As a valuable addition to the healthcare options for our citizens, I urge you to give this application your favorable recommendation.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Mike Thoms". The signature is stylized with a large, sweeping initial "M" and a cursive "Thoms".

Mike Thoms
Mayor
City of Rock Island

May 30, 2020

RECEIVED

JUN 01 2020

HEALTH FACILITIES &
SERVICES REVIEW BOARD

VIA US MAIL

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: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
– Paul Rumler, President & CEO of Quad Cities Chamber**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from Paul Rumler, President & CEO of Quad Cities Chamber.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP



Juan Morado, Jr.

JM:mls
Enclosure

cc: George Roate, Project Reviewer



Stephanie Acri
Mayor

619 16th Street
Moline, Illinois 61265

Office: 309.524.2001
Fax: 309.524.2020

Email:
sacri@moline.il.us

May 25, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed
Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

As the Mayor of the City of Moline, I am pleased to express my support for The Quad Cities Rehabilitation Institute, LLC's certificate of need application to build a new comprehensive inpatient rehabilitation hospital in Moline, Illinois. Having lived in Moline since 1994, having been appointed to the City Council in 2001, and having been elected as the Mayor of the City of Moline, I have a vested interest in the overall health and wellbeing of our community.

The proposed development of a new acute rehabilitation hospital in Moline on the campus of UnityPoint Health-Trinity is a perfect location to provide this service. This park-like campus was designed to create a therapeutic healing environment which provides a variety of services for this community. In addition to a full service emergency department, cancer, wound care, birthing, surgical services and other outpatient diagnostic and treatment centers, it serves as a comprehensive healthcare delivery model for the future. By adding a comprehensive inpatient rehabilitation hospital to the campus it will further enhance the continuum of care for all patients in the Quad Cities who will benefit from the intensity of rehabilitation needed by so many of our citizens after having been in an acute care setting such as the hospital at UnityPoint-Trinity Rock Island Campus.

Adding to the healthcare array of quality services in Moline will add tremendous opportunity for new jobs, additional educational venues, and above all badly needed rehabilitation care for our seniors and others who will benefit from this level of care. The Encompass Health and UnityPoint Health partnership will bring excellent talented nurses, physicians and therapists to our community and will further enhance their existing reputation for high quality and therapeutic healing to those they will serve. I highly encourage the Health Facilities Review Board to approve the certificate of need for The Quad Cities Rehabilitation Institute, LLC's application to build this facility in our community. Thank you.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephanie Acri", is written over a horizontal line.

Stephanie Acri
Mayor of Moline

June 1, 2020

RECEIVED

JUN 02 2020

HEALTH FACILITIES &
SERVICES REVIEW BOARD

VIA US MAIL

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: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
– Stanley J. Mathew, M.D.**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from Stanley J. Mathew, M.D.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP



Juan Morado, Jr.

JM:mls
Enclosure

cc: George Roate, Project Reviewer



1026 A Avenue NE
P.O. Box 3026
Cedar Rapids, IA 52406-3026
(319) 369-7211

May 22, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

I am writing this letter today in support of the Certificate of Need application for The Quad Cities Rehabilitation Institute, LLC's proposal to build a comprehensive inpatient rehabilitation hospital in Rock Island County, Illinois.

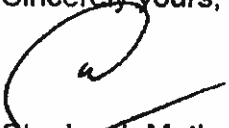
I am the Medical Director of the Inpatient Rehabilitation Unit at UnityPoint Health - St. Luke's Hospital in Cedar Rapids, IA. I also serve on the medical staffs of several UnityPoint Health hospitals, inclusive of UnityPoint Health - Trinity in Rock Island, IL. I have extensive experience and expertise in inpatient rehabilitation and work closely with my colleagues to oversee and manage my unit at St. Luke's as well as collaborate in the management of the unit at UPH-Trinity. I will be working very closely with the rehab team and the administration at UnityPoint Health-Trinity over the next several months to assure continuous compliance with all regulatory requirements, management of patient care activities, and participate in the interdisciplinary team planning and conferences.

Physical medicine and rehabilitation medicine is not only my chosen specialty but my passion for helping people overcome the physical and cognitive challenges they endure after a traumatic event, stroke, brain injury, spinal cord injury, amputation, and many other conditions. Facilitating and recognizing the patient's continuous progress towards full recovery and resumption of their activities of daily living is perhaps the rehabilitation professional's ultimate reward. Patients in every community deserve the advances in technology, clinical protocols and the opportunity to return home with the best functional and cognitive outcomes possible. That expectation can be best realized in a comprehensive inpatient rehabilitation hospital setting where the care is delivered by the talented interdisciplinary team of specifically trained rehab doctors, rehab nurses, physical, occupational and speech therapists, and many other professionals. The

inpatient rehabilitation unit at UnityPoint Health – Trinity provides that level of care and expertise but are limited in their space and ability to provide care for all patients who would benefit from this service. Partnering and collaborating with Encompass Health will undoubtedly unite two very strong comprehensive rehabilitation providers and will be a tremendous asset to the health care landscape and community at large in the Quad Cities.

I urge you to approve this CON application for The Quad Cities Rehabilitation Institute, LLC to build a new free-standing comprehensive inpatient rehabilitation hospital in Moline, IL. Thank you.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Stanley J. Mathew', written over the 'Sincerely yours,' line.

Stanley J. Mathew MD, FAAPMR
Board Certified in Physical Medicine and Rehabilitation
Board Certified in Chronic Pain Management
Board Certified by the American Academy of Disability Analysts

June 3, 2020

RECEIVED
JUN 05 2020
HEALTH FACILITIES &
SERVICES REVIEW BOARD

VIA US MAIL

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: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
– Stephanie Acri, Mayor of Moline**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from Stephanie Acri, Mayor of Moline.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP



Juan Morado, Jr.

JM:mls
Enclosure

cc: George Roate, Project Reviewer



Stephanie Acri
Mayor

619 16th Street
Moline, Illinois 61265

Office: 309.524.2001
Fax: 309.524.2020

Email:
sacri@moline.il.us

May 25, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

As the Mayor of the City of Moline, I am pleased to express my support for The Quad Cities Rehabilitation Institute, LLC's certificate of need application to build a new comprehensive inpatient rehabilitation hospital in Moline, Illinois. Having lived in Moline since 1994, having been appointed to the City Council in 2001, and having been elected as the Mayor of the City of Moline, I have a vested interest in the overall health and wellbeing of our community.

The proposed development of a new acute rehabilitation hospital in Moline on the campus of UnityPoint Health-Trinity is a perfect location to provide this service. This park-like campus was designed to create a therapeutic healing environment which provides a variety of services for this community. In addition to a full service emergency department, cancer, wound care, birthing, surgical services and other outpatient diagnostic and treatment centers, it serves as a comprehensive healthcare delivery model for the future. By adding a comprehensive inpatient rehabilitation hospital to the campus it will further enhance the continuum of care for all patients in the Quad Cities who will benefit from the intensity of rehabilitation needed by so many of our citizens after having been in an acute care setting such as the hospital at UnityPoint-Trinity Rock Island Campus.

Adding to the healthcare array of quality services in Moline will add tremendous opportunity for new jobs, additional educational venues, and above all badly needed rehabilitation care for our seniors and others who will benefit from this level of care. The Encompass Health and UnityPoint Health partnership will bring excellent talented nurses, physicians and therapists to our community and will further enhance their existing reputation for high quality and therapeutic healing to those they will serve. I highly encourage the Health Facilities Review Board to approve the certificate of need for The Quad Cities Rehabilitation Institute, LLC's application to build this facility in our community. Thank you.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephanie Acri", is written over a horizontal line.

Stephanie Acri
Mayor of Moline

June 5, 2020

RECEIVED

JUN 08 2020

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

VIA US MAIL

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: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
– Michael W. Halpin, State Representative, 72nd District**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from Michael W. Halpin, State Representative, 72nd District.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP



Juan Morado, Jr.

JM:mls
Enclosure

cc: George Roate, Project Reviewer

Illinois House of Representatives

District Office:
1504 3rd Ave.
Rock Island, IL 61201
(309) 558-3612



Springfield Office:
242A-W Stratton Building
Springfield, IL 62706
(217) 782-5970

Michael W. Halpin
State Representative • 72nd District

May 28, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

As an Illinois State Representative, I represent the 72nd District located in the Quad Cities and includes East Moline, Moline, Rock Island, Milan, Taylor Ridge and Andalusia. I am writing to express my support for The Quad Cities Rehabilitation Institute, LLC's Certificate of Need application to build an acute comprehensive inpatient hospital in Moline, Illinois.

As a resident of the Quad Cities, living in Rock Island, I have a vested interest in assuring the needs of our citizens are met across all industries, especially health care services. By having a free standing comprehensive inpatient rehabilitation hospital in this service area our citizens will have better and more convenient access to the resources they need when they need them.

As I understand, our major hospital provider, UnityPoint Health – Trinity in Rock Island in partnership with Encompass Health, plans to move their existing inpatient rehabilitation unit to the larger and more advanced proposed rehabilitation hospital in Moline. This provides two benefits: first to expand the overall capacity to 40 beds in a new free-standing hospital with all of the enlarged rehab spaces, advanced technologies and program advantages; and two, to open up much needed space within UnityPoint Health – Trinity hospital campus. This creates a win-win situation for all constituents, most importantly the many people who will greatly benefit from this level of care and service.

For these reasons, I encourage you to earnestly consider the granting of a Certificate of Need to the Quad Cities Rehabilitation Institute, LLC. for a comprehensive inpatient rehabilitation hospital in this community. Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael W. Halpin", with a horizontal line extending to the right.

Michael W. Halpin
State Representative
72nd District

June 4, 2020

RECEIVED

JUN 08 2020

**HEALTH FACILITIES
SERVICES REVIEW**

VIA US MAIL

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: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
– Senator Neil Anderson**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from Illinois Senator Neil Anderson, Assistant Republican Leader.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP



Juan Morado, Jr.

JM:mls
Enclosure

cc: George Roate, Project Reviewer

SPRINGFIELD OFFICE:
M103D CAPITOL BUILDING
SPRINGFIELD, IL 62706
PHONE: 217/782-5957

DISTRICT OFFICE:
1523 47th AVENUE, SUITE 2
MOLINE, IL 61265
PHONE: 309/736-7084

email: senatorneilanderson@gmail.com



NEIL ANDERSON
ASSISTANT SENATE REPUBLICAN LEADER
STATE SENATOR • 36TH SENATE DISTRICT

MINORITY SPOKESMAN
LICENSED ACTIVITIES

MEMBER:
• ENERGY & PUBLIC UTILITIES
• VETERANS AFFAIRS
• COMMERCE & ECONOMIC
DEVELOPMENT
• TRANSPORTATION

May 28, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

As an Illinois State Representative, I represent the 36th District located in the Quad Cities and includes East Moline, Moline, Rock Island, Milan, Taylor Ridge and Andalusia. I am writing to express my support for The Quad Cities Rehabilitation Institute, LLC's Certificate of Need application to build an acute comprehensive inpatient hospital in Moline, Illinois.

As a resident of the Quad Cities, living in Andalusia, I have a vested interest in assuring the needs of our citizens are met across all industries, especially health care services. By having a free standing comprehensive inpatient rehabilitation hospital in this service area our citizens will have better and more convenient access to the resources they need when they need them.

As I understand, our major hospital provider, UnityPoint Health – Trinity in Rock Island in partnership with Encompass Health, plans to move their existing inpatient rehabilitation unit to the larger and more advanced proposed rehabilitation hospital in Moline. This provides two benefits: first to expand the overall capacity to 40 beds in a new free-standing hospital with all of the enlarged rehab spaces, advanced technologies and program advantages; and two, to open up much needed space within UnityPoint Health – Trinity hospital campus. This creates a win-win situation for all constituents, most importantly the many people who will greatly benefit from this level of care and service.

For these reasons, I encourage you to earnestly consider the granting of a Certificate of Need to the Quad Cities Rehabilitation Institute, LLC. For a comprehensive inpatient rehabilitation hospital in this community. Thank you.

Respectfully,

A handwritten signature in black ink, appearing to read "Neil Anderson".

Senator Neil Anderson
Assistant Republican Leader
Illinois Senate



Juan Morado, Jr.
71 South Wacker Drive, Suite 1600
Chicago, Illinois 60606-4637
Direct Dial: 312.212.4967
jmorado@beneschlaw.com

June 9, 2020

VIA FEDERAL EXPRESS

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

JUN 10 2020

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

Re: The Quad Cities Rehabilitation Institute, Project #19-059 - Support Letters

Dear Ms. Avery:

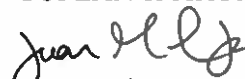
Enclosed please find support letters for The Quad Cities Rehabilitation Institute, Project #19-059 from the following:

Melissa Wood, DNP, VP Chief Nursing Executive of UnityPoint Health;
Paul Rumler, President & CEO of Quad Cities Chamber;
Stanley J. Mathew, M.D., Medical Director for Inpatient Rehab Unit of UnityPoint Health St. Luke's Hospital;
Mohammad Sajed, M.D. of UnityPoint Health Trinity - Neurology, Stroke and Neurocritical Care;
Steve Broomhead, D.O., Medical Director of the Trinity Trauma Program of UnityPoint Clinic;
Senator Neil Anderson, 36th Senate District, State of Illinois;
State Representative, Michael W. Halpin, 72nd District, State of Illinois;
Paula Maddox, R.N., Stroke and Sepsis Coordinator of UnityPoint Health Trinity;
Steven J. Arvanitis, M.D., Director of Inpatient Medicine of UnityPoint Health Trinity; and
Elizabeth Schupp, M.D., Pulmonary and Critical Care Medicine of UnityPoint Health Trinity.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP


Juan Morado, Jr.

JM:mls
Enclosures

cc: George Roate, Project Reviewer

www.beneschlaw.com

13522281 v1



1026 A Avenue NE
P.O. Box 3026
Cedar Rapids, IA 52406-3026
(319) 369-7211

May 22, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

I am writing this letter today in support of the Certificate of Need application for The Quad Cities Rehabilitation Institute, LLC's proposal to build a comprehensive inpatient rehabilitation hospital in Rock Island County, Illinois.

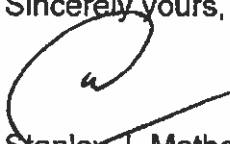
I am the Medical Director of the Inpatient Rehabilitation Unit at UnityPoint Health - St. Luke's Hospital in Cedar Rapids, IA. I also serve on the medical staffs of several UnityPoint Health hospitals, inclusive of UnityPoint Health - Trinity in Rock Island, IL. I have extensive experience and expertise in inpatient rehabilitation and work closely with my colleagues to oversee and manage my unit at St. Luke's as well as collaborate in the management of the unit at UPH-Trinity. I will be working very closely with the rehab team and the administration at UnityPoint Health-Trinity over the next several months to assure continuous compliance with all regulatory requirements, management of patient care activities, and participate in the interdisciplinary team planning and conferences.

Physical medicine and rehabilitation medicine is not only my chosen specialty but my passion for helping people overcome the physical and cognitive challenges they endure after a traumatic event, stroke, brain injury, spinal cord injury, amputation, and many other conditions. Facilitating and recognizing the patient's continuous progress towards full recovery and resumption of their activities of daily living is perhaps the rehabilitation professional's ultimate reward. Patients in every community deserve the advances in technology, clinical protocols and the opportunity to return home with the best functional and cognitive outcomes possible. That expectation can be best realized in a comprehensive inpatient rehabilitation hospital setting where the care is delivered by the talented interdisciplinary team of specifically trained rehab doctors, rehab nurses, physical, occupational and speech therapists, and many other professionals. The

inpatient rehabilitation unit at UnityPoint Health – Trinity provides that level of care and expertise but are limited in their space and ability to provide care for all patients who would benefit from this service. Partnering and collaborating with Encompass Health will undoubtedly unite two very strong comprehensive rehabilitation providers and will be a tremendous asset to the health care landscape and community at large in the Quad Cities.

I urge you to approve this CON application for The Quad Cities Rehabilitation Institute, LLC to build a new free-standing comprehensive inpatient rehabilitation hospital in Moline, IL. Thank you.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'S. Mathew', written over a horizontal line.

Stanley J. Mathew MD, FAAPMR
Board Certified in Physical Medicine and Rehabilitation
Board Certified in Chronic Pain Management
Board Certified by the American Academy of Disability Analysts



UnityPoint Health® – Trinity
2701 – 17th St.
Rock Island, IL 61201
(309) 779-5000
unitypoint.org

May 27, 2020

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: Quad Cities Rehabilitation Institute, HFSRB Project #19-059

Dear Ms. Avery,

Re: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

This letter is in support of the Certificate of Need application being submitted by the Quad Cities Rehabilitation Institute, LLC, to build a freestanding comprehensive inpatient rehabilitation hospital in Moline, IL. I am a board certified neurology physician and see hundreds of stroke patients annually in addition to other patients who have suffered from brain injuries and other neurologic conditions. All of these patients greatly benefit from advanced inpatient rehabilitation after their acute care stabilization whenever it is readily available.

Our patients' ability to achieve the highest possible physical and cognitive improvements are much more likely to occur when cared for by specifically trained rehabilitation specialists including physicians, nurses, and physical, occupational and speech therapists. We see these high level outcomes in our own rehab unit at UPH-Trinity, however there are many times patients are unable to get a bed due to capacity or lack of private rooms. The space is cramped with no room for expansion therefore it is imperative that we move to a new freestanding location. The proposed partnership with Encompass Health will bring tremendous resources and value to the healthcare services in the Quad Cities. I highly recommend your approval of this proposed new comprehensive inpatient rehabilitation hospital in our region. I greatly appreciate your consideration, thank you.

Sincerely yours,

A handwritten signature in black ink that reads "Md. Sajed" followed by a stylized flourish.

Mohammad Sajed, MD
Neurology, Stroke and Neurocritical Care.

Board Certified in Neurology, Stroke, Neurocritical Care and Headache Medicine.
UnityPoint Health-Trinity



UnityPoint Clinic

Surgery
600 John Deere Rd. Suite 301
Moline, IL 61265
Office: 309.779.4400
Fax: 309.779.4420
unitypoint.org

May 27, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

I am writing this letter of support today for the granting of the Certificate of Need for The Quad Cities Rehabilitation Institute, LLC's proposal to build a 40-bed comprehensive physical rehabilitation hospital in Rock Island County.

I am the Medical Director for UnityPoint Health – Trinity's Trauma program and I specialize in surgical critical care medicine. As such, the entire Trauma Team and I carry tremendous responsibility in securing the most comprehensive trauma care possible from every patient's initial admission all the way through rehabilitation and discharge home. We care for a great variety of traumatic injuries that require specific care management through the entire continuum of care. Most of our trauma patients require some level of rehabilitation, particularly those who suffer critical, life threatening injuries. Upon surgical intervention and stabilization patients often need the advanced technologies and rehab trained nursing and medical management, physical and occupational therapy that only comprehensive inpatient physical rehabilitation hospitals can provide.

The existing inpatient rehab unit staff within our hospital at UnityPoint Health – Trinity, provides excellent physical medicine and rehabilitation after the patient has been discharged from the acute care hospital by trained PM&R physicians, rehab nurses and PT and OT therapists. The unit however is very small, does not provide enough space to assure a private room for every patient, and is often unable to accept every patient that would benefit from this level of advanced care. Building a new free-standing inpatient rehabilitation hospital in partnership with Encompass Health, a nationally well-known rehabilitation hospital provider, will greatly benefit more patients and will have all the advanced technologies and services conveniently located in the Quad Cities.

I highly recommend and encourage the Health Facilities and Services Review Board to approve this Certificate of Need for The Quad Cities Rehabilitation Institute, LLC, to build a new comprehensive inpatient rehabilitation hospital in our community. This will be a tremendous advantage to achieve better outcomes, not only to our trauma patients but all patients who will benefit from this level of advanced rehabilitative care. Thank you

Respectfully yours,

Steve Broomhead, DO
Board Certified General Surgery
Medical Director UnityPoint Health – Trinity Trauma Program



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June 2, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

I am a board certified in critical care and pulmonary medicine and am writing in support of The Quad Cities Rehabilitation Institute, LLC's Certificate of Need proposal for an acute comprehensive inpatient rehab hospital in Rock Island County, HSA10. As a practicing physician specializing in Pulmonary and Critical Care providing intensivist services, I work in UnityPoint Health-Trinity Rock Island and UnityPoint Health-Trinity Bettendorf.

Approval of this CON will provide patients with diagnoses of stroke, hip fractures, brain injuries, multi-trauma and other neurological diagnoses with associated CHF, COPD, asthma, or other co-morbid conditions a cost effective, efficient comprehensive inpatient rehab hospital in the local area. In addition to their primary and secondary diagnosis, this patient population has many health problems including difficulty ambulating, fatigue, balance deficits, neuropathy, joint pain and stiffness. All of these conditions contribute to a decrease in their independence as this impacts their activities of daily living. Physical therapy in a skilled nursing facility may be helpful in some cases, but the patients we often care for are those instances that require intensive physical, occupational, and speech rehabilitation, rehab trained physicians and nurses to really assist the patient resume as much cognitive and functional independence as possible.

The challenge then becomes where to send the patient. From my experience, those who have gone to the UPH Trinity inpatient rehab unit, were able to return to home or other living situation quicker and achieved much better outcomes. The problem however, is the lack of enough beds within the existing unit due to space constraints and no private rooms. The existing space within our hospital could be far better utilized for other needs or services. This approval for a new, free-standing inpatient rehab hospital will allow patients to have their own private room, expanded and state of the art therapy equipment and gym, and participation of their own family support system in the local area.

For these reasons, I fully support and hope you will grant a Certificate of Need for the building of an acute comprehensive rehabilitation hospital in Rock Island County. The citizens of the Quad Cities that need this level of intense rehabilitative care will greatly benefit and have the best potential for achieving the highest level of functional outcomes and return to their activities of daily living. Thank you for your consideration.

Sincerely yours,

Elizabeth Schupp MD

Elizabeth Schupp, MD

Board Certified Pulmonary and Critical Care Medicine



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June 2, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed
Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10**

Dear Ms. Avery,

I am writing to express my support for The Quad Cities Rehabilitation Institute, LLC's Certificate of Need application to build a comprehensive inpatient rehabilitation hospital in Rock Island County, HSA-10. In my role as Director of Inpatient Medicine at UnityPoint Health Trinity Medical Center, I am responsible for coordinating the medical department of physicians and nurse practitioners that oversee care of the hospitalized patient.

The evidence speaks for itself. Intensive inpatient rehabilitation is the fastest and most cost-effective way to bring people back to becoming functional members of our society. Our citizens would benefit from such a hospital in our community. The resources we currently have are lacking. There are two hospitals in the Quad-Cities with small inpatient rehabilitation units that currently do not meet the needs of our region, both in size and with advanced state of the art technologies.

Some of the advantages such a free-standing hospital would bring include, intensive physical, occupational, and speech therapies that results in lower length of stay, improved functionality, returning faster to activities of daily living, inclusion of family participation in their rehabilitation, etc.

I would encourage you to approve the request for this Certificate of Need to the Quad Cities Rehabilitation Institute, LLC for an acute inpatient rehabilitation hospital in Rock Island County.

Sincerely,

Steve J. Arvanitis, M.D., F.H.M.
Director of Inpatient Medicine
UnityPoint Health - Trinity



Melissa Wood DNP, MBA, MBAH, RN
Vice President
Chief Nursing Executive
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Fax: 309-779-2399
E-Mail: Melissa.Wood@unitypoint.org

March 5, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

I am writing to express my support for The Quad Cities Rehabilitation Institute, LLC's Certificate of Need Application to build a Comprehensive Physical Inpatient Rehabilitation Hospital in Rock Island County. In my role as Chief Nursing Executive, I am responsible for patient care services at UnityPoint Health - Trinity, inclusive of our Bettendorf, Moline, and Rock Island campuses. I am extremely proud of our nursing services and their commitment to making a difference through compassionate care and improving the health and well-being of the people and communities we serve. In addition, UnityPoint Health – Trinity has been recognized by the American Heart Association/American Stroke Association's "Get With The Guidelines" – Stroke Silver Plus Quality Achievement Award.

One of the challenges that UnityPoint Health - Trinity encounters is the ability to move patients through the continuum of care timely and ensure the patients receive the appropriate level of care, in the right place at the right time. I am sure you would agree that placing patients in the appropriate level of care after an acute hospital stay is critical to the well-being of the patients and their families. Frequently, our hospital encounters challenges placing patients in the right level of care, including our own inpatient rehab unit, due to limited available beds in a private room. As a health care professional, my goal is to help our patients function at their highest level possible. Our plan and hopes to build a free standing comprehensive inpatient rehabilitation hospital, in partnership with Encompass Health, will help us achieve two goals. First and foremost, is the ability to place rehab appropriate patients in the right setting at the right time because adequate beds will be

available. Secondly, it will allow us to repurpose the vacated space currently occupied by our inpatient rehab unit for modernization and other necessary needs and services in the hospital.

For so many reasons, most importantly meeting the inpatient rehabilitation needs of our patients, I hope you will seriously consider the granting of a Certificate of Need to The Quad Cities Rehabilitation Institute, LLC's application for a comprehensive inpatient rehabilitation hospital in Rock Island County. It would provide a much-needed service to patients like those we see in our hospital, as well as, to the larger community.

Sincerely,

A handwritten signature in black ink that reads "Melissa Wood". The signature is fluid and cursive, with the first name "Melissa" and the last name "Wood" clearly distinguishable.

Melissa Wood DNP, MBA, MBAH, RN

Vice President
Chief Nursing Executive



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May 29, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed
Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

I am writing to express my support for The Quad Cities Rehabilitation Institute, LLC's Certificate of Need application to build an acute comprehensive rehabilitation hospital in Rock Island County. In my role as the stroke coordinator at UnityPoint Health-Trinity, I am involved in the continuum of care related to patients suffering from a stroke.

Often our own inpatient rehabilitation unit at Trinity Rock Island is at capacity or doesn't have a private room readily available for our stroke patients. As a result, these patients are forced to choose a facility farther away from their home to carry out the vital rehab that is needed to reintegrate them back into society. We have countless examples of the families of these patients being required to drive across the river into Iowa just to visit their loved ones that are placed in rehab facilities. Keep in mind that many of these family members are of advanced age which limits their ability to visit.

The patients we serve would be extremely deserving of an intensive inpatient rehabilitation hospital to serve our IL population. The benefits of the intensive physical, occupational and speech therapy are integral to the full recovery of patients who suffer strokes. The rehab process allows the patient to not only feel physically and mentally, better but equips them with the necessary skills to return as productive members of society after discharge.

For these reasons, as well as many more, I hope you will consider granting a Certificate of Need to The Quad Cities Rehabilitation Institute, LLC, to build a new free-standing comprehensive inpatient rehab hospital in Rock Island County. This would serve as our greatest resource for the post-acute rehab setting for our patients.

Sincerely,

Paula Maddox, RN, MSN, CCRN-K
Stroke and Sepsis Coordinator
UnityPoint Health - Trinity



May 20, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

I am writing today to express our support for the approval of the Certificate of Need application for The Quad Cities Rehabilitation Institute, LLC, to build a new comprehensive rehabilitation hospital in Rock Island County.

The provision of advanced, excellent healthcare services is critical to the well-being of 475,000 residents in the greater Quad Cities area. UnityPoint Health-Trinity's proposed partnership with Encompass Health's nationally recognized rehabilitation hospital provider will bring advanced comprehensive inpatient rehabilitation hospital services to our community, particularly to Rock Island, Mercer, and Henry counties in Illinois.

As a growing and thriving region we work collectively to move forward economically, to grow businesses, to create a quality place to live and prepare for the future. The Quad Cities Chamber is proud to lead a diverse network of influential business leaders in the region, which includes many highly ranked healthcare providers. We are committed to advancing the local economy and helping each other succeed. The provision of comprehensive healthcare services that meet the needs for the whole continuum of care for our people of all ages is vital to our existence. We are in full support of adding The Quad Cities Rehabilitation Institute, LLC, to our healthcare landscape within the Quad Cities community.

Thanks in advance for your full consideration of this proposal. Please feel free to reach out to me if you need anything further.

Sincerely,

A handwritten signature in blue ink, appearing to read 'PSJR', is written over a faint circular watermark.

Paul Rumler
President & CEO
Quad Cities Chamber

Quad Cities Chamber 1601 River Dr. Suite 310 Moline, IL 61265
563-322-1706



Juan Morado, Jr.
71 South Wacker Drive, Suite 1600
Chicago, Illinois 60606-4637
Direct Dial: 312.212.4967
jmorado@beneschlaw.com

March 9, 2020

RECEIVED

MAR 12 2020

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

VIA US MAIL

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: The Quad Cities Rehabilitation Institute, Project #19-059 - Letter of Support
– Lori Bahen, RN, MSN, CCM, Manager, Transitions in Care**

Dear Ms. Avery:

Enclosed please find a letter of support for The Quad Cities Rehabilitation Institute, Project #19-059 from Lori Bahen, the Manager for Transitions in Care at Trinity Hospitals.

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

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

Juan Morado, Jr.

JM:ms
Enclosure

cc: George Roate, Project Reviewer



UnityPoint Health Trinity

March 5, 2020

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: The Quad Cities Rehabilitation Institute, LLC's Proposal to Establish a 40-bed Comprehensive Physical Rehabilitation Hospital in Rock Island County, HSA10

Dear Ms. Avery,

I am writing to express my support for The Quad Cities Rehabilitation Institute, LLC's Certificate of Need application proposing to build an acute comprehensive inpatient rehabilitation hospital in Rock Island County, IL.

As the Manager of Case Management/Transitions in Care Services, I have responsibility and oversight of discharge planning in our UnityPoint Health – Trinity hospitals. I have been in this role for 10 years. As the largest hospital in the Quad Cities, we receive patients from all over central Illinois and eastern Iowa, many of whom have significant disease processes or emergent catastrophic health care events. We have significant need for more inpatient rehabilitation beds to refer these complex patients to in close proximity to our hospitals and often, their loved ones who provide the emotional support needed for these patients to return successfully to their daily lives. By partnering with Encompass Health, the country's largest inpatient rehabilitation provider and expanding our current capacity, we will be able to facilitate the transfer of more patients who meet the medical necessity criteria and would benefit from the intensity of three hours of therapy per day.

We have many patients who are post cardiac or neurological intervention who have the ability to participate in the intensive physical, occupational and speech therapies allowing them to maximize their recovery. Those patients with stroke, lower extremity amputations, hip fractures, and many other diagnoses will greatly benefit from the interdisciplinary team approach by our talented therapists as well as specifically trained rehabilitation nurses and physicians. There are frequent occasions where our unit is unable to accept those patients due to space constraints or lack of a private room. This new, enlarged hospital will also be able to foster more family participation in the patient's therapy and journey to recovery and transition to home.

I hope you will seriously consider granting this Certificate of Need to The Quad Cities Rehabilitation Institute, LLC. It would provide the additional support we need for the patients in our large community as well as for those who travel to us for the specialized tertiary services we provide. Thank you.

Sincerely yours,

Lori Bahen, RN, MSN, CCM
Manager, Case Management/Transitions in Care

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