

July 2, 2020

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

Mr. Mike Constantino
Supervisor, Project Review Section
Illinois Health Facilities and Services Review
Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Re: Request for Expedited Review for CON Application
Silver Cross Observation Unit (New Lenox), Project No. 20-023

Dear Ms. Avery and Mr. Constantino:

We are counsel to Silver Cross Hospital and Medical Centers ("Silver Cross Hospital") and Silver Cross Health System (collectively with Silver Cross Hospital, the "Applicants") and are hereby requesting an expedited review of the Certificate of Need Application (the "CON Application") that we filed with the Illinois Health Facilities & Services Review Board (the "Review Board") on or about May 28, 2020, on behalf of the Applicants to (a) construct a dedicated sixteen (16) bed observation unit (the "Observation Unit") on the first floor of Silver Cross Hospital (the "Hospital"); and (b) reduce the square footage on pending Project 18-020 by 8,146 feet and reduce the costs on pending Project 18-020 by \$1,073,250. The CON Application was deemed complete by the Review Board on June 2, 2020. A public hearing was **not** requested for the Project.

The Observation Unit will occupy 8,146 feet of space and is replacing 8,146 feet of administrative/office space that was originally included on the Applicants' Certificate of Need Application to establish an open heart surgery program and to expand the Hospital's foot print by 32,020 feet ("Project No. 18-020"). Project No. 18-020 is still under construction, with a projected completion date of June 30, 2021.

As set forth in the CON Application, the Applicants filed the CON Application to address the increasing demand for observation beds at the Hospital. Since the Hospital moved from Joliet to New Lenox, the Hospital's observation days have increased by **69 percent** from 5,924 in 2013 to 10,011 in 2019. During this same time period, the Hospital's inpatient med/surg admissions have also increased by nearly 17 percent (from 12,293 in 2013 to 14,364 in 2019)

Ms. Courtney Avery

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and the Hospital's inpatient med/surg days have increased by 10 percent (from 48,865 in 2013 to 53,792 in 2019). In order to meet the rising demand for inpatient med/surg beds and observation beds, the Hospital has added 22 inpatient med/surg beds to its inventory since 2013. But the Hospital has still hit 100% census levels on its med/surg floors, which then requires the Hospital to temporarily board patients in the Hospital's Emergency Department and the Hospital's Procedural Care Unit until a med/surg bed opens on a floor. This, in turn, has led to more hours of bypass for the Emergency Department and significant use of overflow areas in the Emergency Department and the Procedural Care Unit. The creation of the dedicated 16 bed observation unit (located between the Hospital's Emergency Department and the Hospital's Cardiac Testing Department) set forth in this Application will relieve that burden. The Project will also decompress the Hospital's inpatient med/surg units by adding observation beds.

The COVID 19 pandemic has further highlighted the immediate need for additional observation beds at the Hospital. The Hospital was one of the original 395 COVID 19 "hot spot" hospitals and has been planning for the next, anticipated COVID 19 wave in Illinois. There is also talk of a heavy flu season in the infectious disease literature. Thus, it is imperative that the Hospital begin construction on the Observation Unit as soon as possible (so the Hospital can complete the Observation Unit as soon as possible).

For all of the above reasons, and because the Project is a non-substantive project, we are asking that the CON Application be considered at the Review Board's hearing on August 11, 2020, or that the CON Application be approved by the Board Chair without the need for a full hearing.

Please call or write if you have any questions.

Sincerely,



Edward J. Green

cc: Ms. Ruth Colby and Ms. Mary Bakken, Silver Cross Hospital