

September 10, 2020

Foley & Lardner LLP Attn: Ed Green. Esq. 321 North Clark Street, Suite 300 Chicago, Illinois 60654

SENT VIA EMAIL: egreen@foley.com

RE: RESPONSE TO NOTICE OF DISCONTINUATION OF HEALTHCARE FACILITY (MERCY HOSPITAL & MEDICAL CENTER) DATED AUGUST 27, 2020

Dear Mr. Green:

In response to your letter dated August 27, 2020 requesting the following information, please see Saint Anthony Hospital's (SAH) responses below:

QUESTION: SAH's assessment of the impact (if any) the discontinuation may have on SAH.

ANSWER: Any closure of any primarily Medicaid/Self-Pay facility highlights the underfunding of services for these patients. SAH's mission is to provide care for this population. However, to the extent these funding issues are addressed as a result of such closures, SAH and other providers will be in a much better position to transition the care of Mercy's patients.

QUESTION: SAH's capacity to accommodate all, or a portion of, the patient population historically served by Mercy Hospital.

ANSWER: SAH has the capacity to accommodate all the patient population historically served by Mercy Hospital, *except for the following*: (1) Patients in need of Cardiac Catherization Services; and (2) Patients in need of Inpatient Rehabilitation Services.

QUESTION: An explanation of any conditions, restrictions or limitations that would prevent SAH from serving the patient population historically served by Mercy Hospital.

ANSWER: SAH can serve the patient population traditionally served by Mercy without conditions, restrictions or limitations, except for the following two (2) exceptions as referenced above:

- (1) While SAH does not have a Cardiac Cath Lab, SAH's Emergency Department is experienced in providing comprehensive cardiac emergency services. SAH has an Agreement with the University of Illinois at Chicago (UIC) to transfer SAH's Emergency Department patients in need of cardiac catherization services, including STEMIs and MIs; and
- (2) While SAH does not have an Inpatient Rehabilitation Unit, SAH provides outpatient rehabilitation services at multiple locations throughout SAH's primary and secondary service areas.



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Please feel free to contact me anytime at the number below if you have any questions or wish to further discuss.

Sincerely,

Kimberly Chmura, General Counsel and Vice President of Administration

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Email: kchmura@sahchicago.org

cc: Guy A. Medaglia, President and Chief Executive Officer

Bob Enkema, Chief Financial Officer Romeen Lavani, MD, Chief Medical Officer Eden Takhsh, MD, Chief Quality Officer