

July 6, 2021

Via Electronic Delivery

Ms. Courtney Avery

Administrator

Illinois Health Facilities and Services Review Board
525 West Jefferson Street

2nd Floor

Springfield, IL 62761

Re: OrthoIllinois Surgery Center Elgin, LLC, Project No. 20-040
Analysis of Complication and Quality Issues

Dear Ms. Avery:

It was disappointing to hear the Applicants at the May 4 meeting argue their center would be “safer” because their Rockford surgery center had a lower complication rate than Advocate Sherman. As the Director of Clinical Excellence and Regulatory Compliance for Advocate Sherman I was surprised to hear Applicant’s claim relating to safety and quality Those safety claims are clearly misleading (at best). As our awards will show, we take quality and clinical excellence seriously and it is disconcerting to have someone wrongly disparage our clinical excellence. We hope to set the record straight.

OrthoIllinois Applicants claimed that their Rockford surgery center had a complication rate of 1%. They never stated the source of this information or provided any verification. Applicants then claimed that Advocate Sherman had a orthopedic complication rate of 2.4%. Once again, they never explained to the Board the source or methodology. Since that hearing we have investigated the claims and believe the Board and the staff deserve to hear the facts.

Surgical Complication Rates

First, hospitals see more complex cases and patients with co-morbidities and health risks than surgery centers, making the assertion an “apples to oranges” comparison at best. We discovered that the 2.4% complication rate OrthoIllinois cited was Center for Medicare and Medicaid Services (CMS) data for comprehensive Hip and Knee procedures at Advocate Sherman on Medicare patients. This is not an overall complication rate that can be compared to a surgery center for the following reasons:

- The CMS complication rate is only for Medicare patients, which means that all of those patients are over age 65, not younger healthier patients typically seen at a surgery center.
 - The 2.4% rate data applies only to Medicare patients admitted to the hospital (inpatients).
 - The 2.4% rate was only for comprehensive Hips and Knees, the most likely procedures to have complications because it can include mechanical failures with prosthesis.
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- Because the CMS rate applies only to a smaller number of complex procedures for older patients, the total complications totaled 10. Only two of these complications involved an infection, unlike the dramatic picture portrayed on infections.

If the Board wants to compare complication rates, it should compare comparable procedures (and comparable co-morbidities in patients). OrthoIllinois lists the top 5 procedures they expect to perform by volume. These five procedures are:

Code No.	Procedure
27447	Total Knee Arthroplasty
64721	Carpal Tunnel Surgery
29827	Rotator Cuff Repair
22551	Anterior Cervical Fusion with Interbody Fusion

29881

Knee Arthroscopy, Meniscectomy v, Medial OR Lateral

I have subsequently reviewed our complication rate for the OrthoIllinois top 5 procedure. We found not a single instance of a complication for these procedures. This results in our having a 0.0% complication rate for the type of procedures OrthoIllinois does most.

Advocate Sherman Quality Distinctions and Awards

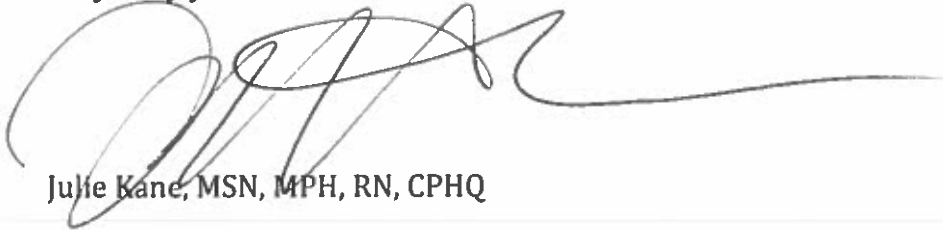
As I mentioned earlier, Advocate Sherman takes seriously its clinical performance and evaluations. Because Applicants raised the spectre that the new facility would result in greater clinical quality, we want to note the recent prestigious awards that dispel that argument.

- CMS 5 Star: 2018, 2019, 2020 (looks at: Mortality, Readmission, Safety of Care, Patient experience, Efficient use of imaging, Timeliness of care, Effectiveness of Care)
- HealthGrade-Patient Safety Excellence Award 2021
- Watson health Top 100: 2018*, 2019*, 2020 (Looks at: Morality, HAI, LOS, ED Throughput, influenza immunization, Case-Mix & Wade Adjusted IP expense per discharge; HCAHPS)
 - *Everest Award (along with Watson health top 100)
- Magnet Designation
- ILPEX Silver 2019 (Measured against nationally recognized Baldrige Standards for improved performance and better health outcomes)

I hope that this letter has provided the Review Board with actual facts regarding the complication rate comparison between Advocate Sherman and OrthoIllinois. Regrettably, this misinformation was cited by one Board member as the reason for voting for the Project. Please do not grant a permit for a new facility based upon any

perceived view that a new OrthoIllinois facility will improve quality or decrease complications.

Very truly yours,



Julie Kane, MSN, MPH, RN, CPHQ

Interim-Director, Clinical Excellence and Regulatory Compliance

Advocate Sherman Hospital