

[Letterhead of Advocate Sherman]

July 7, 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 Block Time Utilization

Dear Ms. Avery:

At the hearing on May 4, the Applicants repeatedly stated that they believed their Project was needed because they experienced difficulties obtaining surgical block time at area hospitals. Following that hearing we have undertaken an analysis of surgical times at Advocate Sherman. We closely monitor surgical suite utilization to make surgical times and staffing efficient for both the patient and physician.

Surgical procedure scheduling is primarily a combination of two forms. In a traditional scheduling system a physician would request time to perform a specific procedure on a specific patient and the hospital would schedule the time. This form presently accounts for approximately 20% of the surgical time at our hospital. In the other scheduling form a physician receives a specified block of time to use for his or her patients and controls how time in that block used. For example a physician may have Tuesdays 7:30 to 3:30 and another block of time on a different day.

Surgical Time Analysis Shows OI Physician Use only 62% of Their Block Time

All of the OrthoIllinois physician investors for the Project who practice as our hospital have regular Block Time at Advocate Sherman. The Table Below shows utilization data for each physician. We have not wanted to make the Project personal so have not identified the physicians my name. You will see the amount of block time and out of block time each physician receives. The column Percentage Block Time shows the amount of allotted time actually used. You can see that on average OrthoIllinois physicians don't use almost 40% of their block time.

January to May 2021

Block Holder	% Blk Util	Avail Min	In Blk Min	Out Blk Min	Rel Min	Unused Min	In BlkCases
OrthoIllinois Physicians	62%	62,651	39,083	12,207	4,999	23,568	402
Physician A	63%	900	566	0	0	334	4
Physician B	75%	3480	2605	107	0	875	24
Physician C	54%	1320	709	602	0	611	9

Block Holder	% Blk Util	Avail Min	In Blk Min	Out Blk Min	Rel Min	Unused Min	In BlkCases
Physician C	47%	1320	621	386	0	699	11
Physician D	68%	1260	852	480	0	408	9
Physician D	68%	1020	695	465	0	325	8
Physician E	69%	540	373	294	0	167	5
Physician F	63%	2880	1813	182	0	1067	16
	62%	12720	8234	2516	0	4486	86

I don't have access to block time utilization data for the other hospital in Elgin, St. Joseph. We note, however, that St. Joseph operated at only 32% of the target utilization established by the Review Board. There is clearly excessive capacity available at that hospital and likely unused block time as well. More fully utilizing St. Joseph's surgical suites seems much more consistent with Planning Act regulations than building an entire new facility.

Review Board Standards for Surgical Utilization

The Review Board has established by regulation the target occupancy for surgery centers and hospital surgical suites and sets this standard as 1500 hours of surgical time (which includes prep and clean up) per operating room. Applicants have suggested that because Advocate Sherman operated at 5% above target utilization it is operating at "capacity". It is important to note that this number is not maximum capacity.

The Board's regulations on computation of the utilization standard is at 1100.640(c) and states:

*"Utilization Target
 ASTCs surgical or treatment rooms should be utilized at a minimum of 80% occupancy. The 80% occupancy equates to 1,500 hours of use per room per year (including setup and cleanup time) and is based upon treatment room availability of 7.5 hours per day times 250 days per year."*

Thus, doing the math would be:

$$7.5 \text{ hours} \times 250 \text{ days} = 1800 \text{ hours} \times .80\% \text{ target} = 1500 \text{ hours}$$

1500 hour standard set by the Review Board is based up on an assumption that a surgery center or hospital operates 7.5 hour/day, 5 days a week. The rules state the 1500 standard is the minimum, anticipating that facilities can and should operate above that level. Advocate Sherman makes its operating rooms available 10 hours per day and, for the convenience of patients, is also open on Saturday. Even with these extra hours and Saturdays, we average 1,575 hour per operating room. We are certainly not operating at "maximum" capacity.

We detail the background of the Board state standard because it impacts not only our hospital and this Project, but the integrity of the Board's rules. Advocate Sherman is operating at a utilization

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level that the Board, through its regulations, states is the target. If the Board were to approve a new surgery center because it thought there was insufficient block at a hospital operating at target utilization, it would essentially be saying the rule is established is incorrect. If the Board wants facilities to operate at the Board's target utilization, as to we, we suggest we should not be punished for doing so.

I wanted to provide the Review Board with actual facts regarding utilization of our operating rooms and particularly the availability of Block Time. Please do not grant a permit for a new facility based upon any perceived lack of available Block Time.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Athena Pawlasi". The signature is written in a cursive, flowing style.