



150 N. Riverside Plaza, Suite 3000, Chicago, IL 60606 • (312) 819-1900

September 3, 2021

Anne M. Cooper
312.873.3606
312.276.4317 Fax
acooper@polsinelli.com

Via Email

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

**Re: NorthShore Glenbrook Hospital (Proj. No. 21-016)
Technical Comment to State Board Report**

Dear Ms. Avery:

Polsinelli PC represents NorthShore University HealthSystem (the “Applicant”). In this capacity, we are writing in response to the Illinois Health Facilities and Services Review Board’s (“HFSRB”) findings (“State Board Report”) on the Applicant’s application for permit to establish open heart surgery category of service and expand cardiac catheterization services at NorthShore Glenbrook Hospital (the “Project”) and requesting that the State Board Staff Report be updated to reflect a fully positive report based on information already provided and with the basis for such information more fully described below. What the Applicant generally understands from reviewing the State Board Report is that in order to make a positive finding on this criteria, HFSRB staff sought detail on how the procedure time was calculated and that detail is included here. The cardiovascular surgery times noted in the Applicant’s 2019 IDPH data profiles includes operating room time for a material volume of cardiovascular procedures that are not part of the Open Heart Category of Service, and we believe that clarification supports a fully positive State Board Staff Report.

1. Projected Utilization

This criterion requires an applicant “document that, by the end of the second year of operation, the annual utilization of the clinical service areas or equipment shall meet or exceed the utilization standards specified in Appendix B.” (77 Ill. Admin. Code § 1110.120(b)). The Applicant demonstrated utilization would exceed the HFSRB standard of 1,500 hours per operating room. As noted in the Applicant’s application for permit, the Project involves

polsinelli.com

Atlanta Boston Chicago Dallas Denver Houston Kansas City Los Angeles Miami Nashville New York
Phoenix St. Louis San Francisco Seattle Silicon Valley Washington, D.C. Wilmington
Polsinelli PC, Polsinelli LLP in California

79697880.5

centralization of open-heart surgery and other cardiovascular services at NorthShore Glenbrook Hospital, which will require the addition of six operating rooms at NorthShore Glenbrook Hospital (3 open-heart and 3 vascular). As detailed in the application, upon the Project completion, the Applicant will discontinue open-heart surgery at NorthShore Evanston Hospital and transition those cases along with a portion of the NorthShore Highland Park Hospital open-heart surgery cases to NorthShore Glenbrook Hospital.

Importantly, the open-heart operating rooms will be dedicated solely to open-heart procedures, no other cardiovascular procedures will be performed in these operating rooms. To document the need for the three open-heart operating rooms, the Applicant relied on historical volumes and surgical hours. As shown in the table below, NorthShore Evanston Hospital averaged 8.2 hours per open-heart surgery case (6.7 hours plus room set up and clean up). Importantly, as cardiac surgery continues to evolve, patients requiring open heart surgery are sicker and those cases are more complex, resulting in longer case times. Further, set up for these procedures takes one hour, which includes instrument prep, equipment setup, suture prep, priming heart lung machine, etc., and 30 minutes for clean-up. Using an average case time of 8.2 hours for open-heart surgery, the Applicant projects 1,713.8 surgical hours for open heart surgery. As noted in the Applicant's August 13, 2021 response to HFSRB questions, in order to safely and efficiently operate an open-heart surgery program, it is essential an operating room be available at all times for urgent and emergent cases, hence the need for the 3 open-heart operating rooms.

Procedure	Number of Procedures; Room Duration (Minutes)	Average Procedure Time (Minutes)	Average Procedure Time (Hours)
Aortic Valve Replacement	15/5,544	369.6	6.2
Aortic Valve Replacement With Maze/Ablation Procedure	4/1,584	396.0	6.6
Cabg With Aortic Valve Replacement	7/3,247	463.9	7.7
Cabg With Maze/Ablation Procedure	4/1,932	483.0	8.1
Cabg With Mitral Valve Repair Or Replace	8/3,453	431.5	7.2
Coronary Artery Bypass Graft (CABG)	91/36,777	404.1	6.7
Hvad	1/590	590.0	9.8
Mitral Valve Repair Or Replace	20/7,033	351.7	5.9
Mitral Valve Repair Or Replace With Maze/Ablation Procedure	9/3,869	429.9	7.2

Procedure	Number of Procedures; Room Duration (Minutes)	Average Procedure Time (Minutes)	Average Procedure Time (Hours)
Redo Sternotomy Cabg	1/420	420.0	7.0
Redo Sternotomy Avr	6/2,907	484.5	8.1
Redo Sternotomy Mvr	6/2,382	397.0	6.6
Repair, Ascending Aortic Aneurysm	10/4,889	488.9	8.1
Repair, Atrial Septal Defect	1/331	331.0	5.5
Repair, Post-Op Bleeding Heart	6/692	115.3	1.9
Right Thoracotomy, Mitral Repair / Replacement, Possible Sternotomy	1/422	422.0	7.0
Septal Myectomy	1/370	370.0	6.2
Sternotomy, Median	1/292	292.0	4.9
Tricuspid Valve Repair Or Replace	2/719	359.5	6.0
Grand Total	194/77,452	399.2	6.7

As previously documented, the NorthShore hospitals collectively performed 752 vascular surgery cases in 2019. As NorthShore Medical Group has hired two additional vascular surgeons, the Applicant anticipates vascular surgery volumes will increase 33 percent by the second year after Project completion (or 1,001 cases) and this is consistent with experience to date. Based on an average of 4.0 surgical hours per case, including prep and clean-up, the Applicant projects 4,000 surgical hours of vascular surgery, which justifies the three vascular surgery operating rooms planned for the Project.

2. Service Modernization – Surgery - 77 Ill. Admin. Code § 1110.270(c)

This criterion requires a service or facility to meet or exceed the HFSRB utilization standards, specified in Appendix B. As noted in the application for permit, the Applicant proposes the addition of six operating rooms (for a total of 14 operating rooms) to centralize cardiovascular services at NorthShore Glenbrook Hospital. The centralization of cardiovascular services will include the transfer of the open-heart program from NorthShore Evanston Hospital to NorthShore Glenbrook Hospital along with a portion of open-heart cases from NorthShore Highland Park Hospital and transfer of the vascular surgery program to NorthShore Glenbrook Hospital.



Ms. Courtney Avery
September 3, 2021
Page 4

Accordingly, the historical surgical hours from these hospitals must factor into the determination of the number of operating rooms justified based on historical volumes. As shown in the table below, the additional operating rooms proposed for NorthShore Glenbrook Hospital are justified based upon historical utilization and the planned transfers.

	2019
Glenbrook Surgical Hours	15,100
Add: Open-Heart Hours from Evanston Hospital	399
Add: Open Heart Hours from Highland Park Hospital	213
Add: Vascular Surgery from Evanston Hospital	2,528
Add: Vascular Surgery from Highland Park Hospital	388
Add: Vascular Surgery from Skokie Hospital	88
Total Historical Surgical Hours	20,736
Operating Rooms Justified	14

Thank you for consideration of the Applicant's response to the State Board Report.

Sincerely,

A handwritten signature in blue ink that reads "Anne M. Cooper".

Anne M. Cooper

cc: Mr. Michael Constantino
Ms. April Simmons