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November 24, 2021

VIA E-MAIL

Courtney Avery
Board Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, Second Floor
Springfield, Illinois 62761

Re: NANI Sycamore Dialysis, Project #21-019

Dear Ms. Avery:

We represent the Applicants, Sycamore Renal Care, LLC and Nephrology Associates of Northern Illinois, Ltd. ("NANI") in regards to Project #21-019, for the NANI Sycamore Dialysis ESRD facility. The purpose of this letter is to address the updated Health Facilities Services and Review Board ("HFSRB") Inventory of Health Care Facilities and Services and Need Determinations released on October 27, 2021 which reflects a need for 9 additional stations in Health Service Area ("HSA"). The updated inventory released by the Board reflects the need that the Applicants saw in this community when they submitted this application and appreciate the Board's methodology showing a substantial increase in the need for additional dialysis stations in the HSA where the NANI Sycamore Dialysis is proposed.

The proposed project seeks to establish an in-center hemodialysis facility with 10-stations in Sycamore, Illinois. The Applicants believe a 10-station facility is appropriate for the HSA based on current patient trends in the geographic service area, and recent consolidations in the area. NANI as an independent physician practice group is uniquely qualified to assess the current need for additional stations on the ground. NANI physicians currently serve as medical directors for many existing ESRD facilities in the geographic service area for multiple large dialysis organizations. NANI physicians treat patients in various stages of chronic kidney disease at all of the hospitals in the geographic service area, and are keenly aware of the capacity at existing incenter and home dialysis programs. As this Board is aware and as applicants have previously demonstrated we are agnostic with regards to large dialysis organizations. We work with all of them with our only focus being the best interest of our patient population. The HFSRB's recently released inventory confirms the need for 9 additional dialysis stations within the HSA. We understand that our project proposes to establish 10 stations, but as explained below and throughout the application we believe this to be an appropriate number of stations.

As the Staff Report reflects, there are two existing ESRD facilities within the geographic service area that are not currently at the state's target utilization. However, a deeper dive into numbers shows that the Sycamore Dialysis facility is a mere 2 patients away from being fully utilized and the Timber Creek Facility will be fully utilized with another 16 patients. While that number may seem large, we are confident that the Board will take notice and consider that NANI physicians have documented a total of 831 patients in various stages of chronic kidney disease. While not all of the patients will require dialysis treatment in the future, it is an unfortunate certainty that more than enough patients will require dialysis sufficient to see all the facilities in the geographic service area fully utilized.

If you have any questions, please contact me at 312-212-4967 or via email at jmorado@beneschlaw.com or my colleague Mark J. Silberman at 312-212-4952 or via email msilberman@beneschlaw.com.

Very truly yours,

BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP

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