



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

525 WEST JEFFERSON ST. • SPRINGFIELD, ILLINOIS 62761 • (217) 782-3516 FAX: (217) 785-4111

DOCKET NO: H-02	BOARD MEETING: December 13, 2022	PROJECT NO: 22-028	PROJECT COST:
FACILITY NAME: Advocate South Suburban Hospital		CITY: Hazel Crest	Original: \$21,068,968
TYPE OF PROJECT: Substantive			HSA: VII

DESCRIPTION: The Applicants (Advocate Health and Hospitals Corporation d/b/a Advocate South Suburban Hospital, Advocate Health Care Network, Advocate Aurora Health, Inc. and Advocate Health, Inc.) propose to establish a 27-bed acute mental illness category of service at a cost of \$21,068,968. The expected completion date is February 29, 2024.

The purpose of the Illinois Health Facilities Planning Act is to establish a procedure (1) which requires a person establishing, constructing or modifying a health care facility, as herein defined, to have the qualifications, background, character and financial resources to adequately provide a proper service for the community; (2) that promotes the orderly and economic development of health care facilities in the State of Illinois that avoids unnecessary duplication of such facilities; and (3) that promotes planning for and development of health care facilities needed for comprehensive health care especially in areas where the health planning process has identified unmet needs. Cost containment and support for safety net services must continue to be central tenets of the Certificate of Need process. (20 ILCS 3960/2)

The Certificate of Need process required under this Act is designed to restrain rising health care costs by preventing unnecessary construction or modification of health care facilities. The Board must assure that the establishment, construction, or modification of a health care facility or the acquisition of major medical equipment is consistent with the public interest and that the proposed project is consistent with the orderly and economic development or acquisition of those facilities and equipment and is in accord with the standards, criteria, or plans of need adopted and approved by the Board. Board decisions regarding the construction of health care facilities must consider capacity, quality, value, and equity. "Construction" or "Modification" means the establishment, erection, building, alteration, reconstruction, modernization, improvement, extension, discontinuation, change of ownership of or by a health care facility, or the purchase or acquisition by or through a health care facility of equipment or service for diagnostic or therapeutic purposes or for facility administration or operation or any capital expenditure made by or on behalf of a health care facility which exceeds the capital expenditure minimum.

Information received by the State Board regarding this project can be found at:
<https://www2.illinois.gov/sites/hfsrb/Projects/Pages/22-028.aspx>

EXECUTIVE SUMMARY

PROJECT DESCRIPTION:

- The Applicants (Advocate Health and Hospitals Corporation d/b/a Advocate South Suburban Hospital, Advocate Health Care Network, Advocate Aurora Health, Inc. and Advocate Health, Inc.) propose to establish a 27-bed acute mental illness category of service at a cost of \$21,068,968. The expected completion date is February 29, 2024.
- In conjunction with this project the Applicants have applied to discontinue the 39-bed acute mental illness category of service at Advocate Christ Medical Center (#E-051-22). As part of that discontinuation exemption the Applicants are proposing to add 20-medical surgical beds to Advocate Christ Medical Center.
- The Applicants consider this project a relocation of acute mental illness service from Advocate Christ Medical Center to Advocate South Suburban Hospital. The Hospitals are approximately 12 miles and 30 minutes apart. Both Hospitals are in Hospital Planning Area A-04. The State Board does not have rules regarding the relocation of an Acute Mental Illness Category of Service from one Hospital to another. Therefore, this project is being reviewed as an establishment of Acute Mental Illness Service at Advocate South Suburban Hospital.
- This Application was modified on November 14, 2022, to add Advocate Health, Inc. as an Applicant.

BACKGROUND

- In 2018 the State Board approved Advocate South Suburban Hospital to construct a 2-story structure housing the surgery suite connected to the main hospital. Permit #18-022 approved the Hospital to add an additional cardiac catheterization lab, endoscopy procedure rooms, and Phase I and Phase II recovery rooms. The total cost of the project was \$83.2 million.

WHY THE PROJECT IS BEFORE THE STATE BOARD:

- This project is before the State Board because the project proposes to establish a category of service.

PURPOSE OF THE PROJECT:

- According to the Applicants this project is being proposed to improve access to mental health services while also improving access to tertiary and other critical care services for patients at Advocate Christ Medical Center. The Applicants believe it is essential to convert the 39-bed acute mental illness category of service at Advocate Christ Medical Center to medical surgical beds. According to the Applicants the only viable option is to discontinue the acute mental illness category of service at Advocate Christ Medical Center and convert 20 of those beds to a medical/surgical unit and establish a 27-bed acute mental illness service at Advocate South Suburban Hospital.

PUBLIC HEARING/COMMENT:

- No public hearing was requested. The State Board received 14 letters of support and one letter of opposition and are included at the end of this report.

CONCLUSION:

- There is a calculated excess of 59 AMI beds in HSA 6-7 A-04 AMI Hospital Planning Area. Should the State Board approve this project as well as the discontinuation of the 39-bed Acute Mental Illness Category of Service at Advocate Christ Medical Center there will be a calculated excess of 47 AMI beds in the A-04 AMI Planning Area. There are three hospital AMI units within the 10-mile radius of Advocate South Suburban Hospital with a 148 AMI beds. None of these hospitals

are at the target utilization of 85% and based upon their 2021 utilization could accommodate the patients projected to utilize the proposed 27-bed unit at Advocate South Suburban Hospital by 2025.

State Board Standards Not Met	
Criteria	Reasons for Non-Compliance
77 ILAC 1110.210 (b) – Planning Area Need	The HSA 6 & 7 A-04 Acute Mental Illness Planning Area has a calculated excess of 59 AMI Beds.
77 ILAC 1110.210 (c)(7) – Unnecessary Duplication/Maldistribution	There are 148 authorized AMI beds within 10-miles of Advocate South Suburban Hospital with a CY 2021 average daily census of 59.2 patients and a utilization of approximately 40%.
77 ILAC 1120.140 (c) – Reasonableness of Project Costs	Modernization and contingency costs are \$11,618,050 and are \$576.66 per GSF. This appears high when compared to the State Board Standard of \$565.58 a difference of \$11.08.

**Advocate South Suburban Hospital
STATE BOARD STAFF REPORT
Project #22-028**

APPLICATION/CHRONOLOGY/SUMMARY	
Applicants	Advocate Health and Hospitals Corporation d/b/a Advocate South Suburban Hospital, and Advocate Health Care Network, Advocate Aurora Health, Inc. and Advocate Health, Inc.
Facility Name	Advocate South Suburban Hospital
Location	17800 South Kedzie Avenue, Hazel Crest
Permit Holder	Advocate Health and Hospitals Corporation d/b/a Advocate South Suburban Hospital, and Advocate Health Care Network, Advocate Aurora Health, Inc. and Advocate Health, Inc.
Operating Entity	Advocate Health and Hospitals Corporation d/b/a Advocate South Suburban Hospital
Owner of Site	Advocate Health and Hospitals Corporation
Application Received	August 8, 2022
Application Deemed Complete	August 15, 2022
Review Period Extended by the State Board Staff?	No
Can the Applicants request a deferral?	Yes

I. Project Description

The Applicants (Advocate Health and Hospitals Corporation d/b/a Advocate South Suburban Hospital, Advocate Health Care Network, Advocate Aurora Health, Inc. and Advocate Health, Inc.) propose to establish a 27-bed acute mental illness category of service at a cost of \$21,068,968. The expected completion date is February 29, 2024.

II. Summary of Findings

- A. State Board Staff finds the proposed project is **not** in conformance with the provisions of 77 ILAC 1110 (Part 1110).
- B. State Board Staff finds the proposed project is **not** in conformance with the provisions of 77 ILAC 1120 (Part 1120).

III. General Information

Advocate Aurora Health, Inc., a Delaware nonprofit corporation, is the sole corporate member of Advocate Health Care Network, an Illinois not-for-profit corporation ("Advocate") and Aurora Health Care, Inc., a Wisconsin nonstock not-for-profit corporation ("Aurora"). Advocate Aurora Health, Inc. is comprised of not-for-profit and for-profit entities, the primary activities are the delivery of health care services and the provision of goods and services ancillary thereto. Advocate Aurora Health, Inc. is comprised of 24 acute care hospitals (nine hospitals in Illinois), an integrated children's hospital and a psychiatric hospital, primary and specialty physician services, outpatient centers, physician office buildings, pharmacies, and rehabilitation and home health and hospice care in northern and central Illinois and eastern Wisconsin (Source: Audited Financial Statements). Advocate Aurora Health Inc. and Atrium Health Inc. were approved

by the State Board to enter into a joint operating agreement on November 14, 2022. The joint operating agreement is known as Advocate Health, Inc. The table below shows the nine hospitals in Illinois owned by Advocate Health, Inc. the city and the number of beds at each hospital.

TABLE ONE		
Advocate Aurora Health Inc. Hospitals in Illinois		
Hospital Facility	City	Beds
Advocate Christ Hospital & Medical Center	Oak Lawn	802
Advocate Condell Medical Center	Libertyville	275
Advocate Good Samaritan Hospital	Downers Grove	293
Advocate Good Shepherd Hospital	Barrington	176
Advocate Illinois Masonic Hospital	Chicago	326
Advocate Lutheran General Hospital	Park Ridge	651
Advocate Sherman Hospital	Elgin	255
Advocate South Suburban Hospital	Hazel Crest	217
Advocate Trinity Hospital	Chicago	205
	Total	3,200

The project is subject to a Part 1110 and Part 1120 review. Financial Commitment will occur after permit approval. The Applicants noted the financial commitment “*status may change if the Advocate Aurora Health Master Agreement is completed prior to permit approval.*”¹ Target occupancy for acute mental illness service is 85%. Below is the Advocate South Suburban Hospital 2021 Utilization.

¹ **The Applicants Response:** *The reference to a Master Agreement relates to plans to execute a master design and construction agreement ("Master Agreement") which will occur shortly and likely no later than early October 2022. At the time that the CON permit application was filed, such Master Agreement had not been completed and this is the basis for the footnote. By way of background, MH utilizes an integrated project delivery ("IPD") contracting approach for design and construction activities. This IPD method has become a standard method for contracting in the construction industry including for health care facilities. IPD allows for greater collaboration between the architects and the general contractor, shorter timelines and provides for a more nimble design and construction process. Instead of working separately, everyone from architects to trade partners and contractors work from a single model, providing real-time cost and constructability feedback. This allows for the most efficient use of resources and eliminates the need for costly and time-intensive design iterations. In effect, it allows the architects to design projects that will be on budget based on the amount of approved capital and based on the anticipated CON permit amount. Note that while the IPD model accelerates AAH construction timeline by allowing its architects and contractors to collaborate on the project design and finalize the architectural plans, so they may be submitted to IDPH immediately after CON approval, AAH will not commence demolition or construction of the new acute mental illness unit until it receives both HFSRB and IDPH approval. Importantly, the costs incurred during the design phase will not exceed the capital expenditure minimum, and the Master Agreement is terminable at AAH's convenience, in the event the CON permit application is not approved. Therefore, the commencement of these preconstruction services complies with the HFSRB's regulations governing project expenditures.*

TABLE TWO Advocate South Suburban Hospital 2021 Utilization								
	Authorized	Staffed	Adm	Days	ALOS	ADC	Authorized	Staffed
Medical/Surgical	197	190	7,467	40,351	5.40	110.6	56.12%	58.18%
Obstetrics ⁽¹⁾	16	16	899	2,153	2.39	5.9	36.87%	36.87%
Intensive Care	20	20	1,281	5,378	4.20	14.7	73.67%	73.67%
Total	233	226	9,647	47,882	4.96	131.18	56.30%	58.05%

1. The State Board approved the discontinuation of obstetric services at the Hospital as Exemption #E-036-22 on July 2, 2022. The Hospital stated the reason for the obstetric discontinuation "At a national level, birth rates have declined over 9% since 2015, while Illinois births have declined at a steeper rate of 18%. In the South Chicagoland service area, births have declined by 19% since 2015, however births at Advocate South Suburban Hospital have declined 40% during that same time period. Advocate stated that Advocate Trinity Hospital and Advocate Christ Medical Center are both within 30 minutes of Advocate South Suburban Hospital and can accommodate the obstetric patients.

IV. Health Service Area

Advocate South Suburban Hospital is in Health Service Area VII and Hospital Planning Area A-04. The A-04 Hospital Planning Area includes the City of Chicago Community Areas of West Pullman, Riverdale, Hegewisch, Ashburn, Auburn Gresham, Beverly, Washington Heights, Mount Greenwood, and Morgan Park; Cook County Townships of Lemont, Stickney, Worth, Lyons, Palos, Calumet, Thornton, Bremen, Orland, Rich, and Bloom. There are seven acute care hospitals in the A-04 Hospital Planning Area and one psychiatric hospital. The A-04 Hospital AMI Planning Area includes three hospitals with AMI hospital units and one psychiatric hospital in this AMI planning area. There is currently a **calculated excess of 59 AMI beds** in the A-04 Hospital Planning Area.

TABLE THREE Hospitals in the AMI Planning Area			
Hospitals	City	Total Beds	AMI Beds
Adventist LaGrange Memorial Hospital	Lagrange	186	
Advocate Christ Hospital & Medical Center	Oak Lawn	802	39
Advocate South Suburban Hospital	Hazel Crest	217	
Franciscan St. James Health-Olympia Fields	Olympia Fields	214	
Ingalls Memorial Hospital	Harvey	485	78
OSF Healthcare Little Company of Mary Med. Ctr.	Evergreen Park	274	
Palos Community Hospital	Palos Heights	425	40
MIRA Neuro Behavioral Health Center ⁽¹⁾	Tinley Park	0	30
	Total	2,603	187

1. Hospital is not yet operational.

V. Project Details

The Applicants propose to establish a 27-bed acute mental illness category of service at Advocate South Suburban Hospital. The Applicants consider this a relocation of acute mental illness service from Advocate Christ Medical Center to Advocate South Suburban Hospital. According to the Applicants the Advocate South Suburban behavioral health program will be a contemporary state of the art program encompassing 27 bed single

occupancy rooms, living environment promoting safety and ligature risk mitigation strategies, evidence-based color design themes promoting holistic healing, and the latest technology platforms for therapeutic environment. The Applicants state the shift to a single room occupancy care delivery model will enhance team members' ability to address the unique needs of each patient, while promoting a safe and private environment for patients. The Applicants plan to expand behavioral health services in and around Advocate South Suburban Medical Center to include:

- Partial Hospitalization Program, which helps patients reduce or stabilize symptoms while living at home and among family.
- Intensive Outpatient Program, which can be utilized as a step-down from partial Hospitalization.
- Electroconvulsive Therapy, which is a specialized procedure that uses electricity to treat severe depression and other psychiatric illnesses.
- Esketamine Therapy², which is administered intranasally under the supervision of a health care provider and used in conjunction with oral antidepressants.
- Expansion of the crisis worker coverage via in-person and/or telehealth consults.
- Complementing Services are Being Developed in AMG Primary Care Clinics.
(See Application for Permit pages 81 and 82)

Over a 7-year period Advocate Christ Medical Center's Acute Mental Illness Category of Service had an average daily census of 23 patients which would justify 27 acute mental illness beds at the State Board's target occupancy of 85%.

TABLE FOUR								
Historic Utilization of AMI Unit at Advocate Christ Medical Center								
	2015	2016	2017	2018	2019	2020	2021	Ave
Auth. Beds	39	39	39	39	39	39	39	39.0
Staffed Beds	35	34	35	35	35	34	21	32.7
Adm	1,466	1,349	1,459	1,394	1,192	749	770	1,197
Days	10,475	10,133	9,616	9,535	8,172	4,531	5,051	8,216
ALOS	7.15	7.51	6.59	6.84	6.86	6.05	6.56	6.8
ADC	28.70	27.76	26.35	26.12	22.39	12.41	13.84	22.5
Occ	82.00%	81.65%	75.27%	74.64%	63.97%	36.51%	65.90%	69%

² Esketamine is made from a drug called ketamine, an anesthetic that has also been used for many years to treat depression. But it wasn't until recently that esketamine, a more potent version of ketamine, earned FDA approval specifically for use as a nasal spray for those with treatment-resistant depression. Esketamine is derived from part of the ketamine molecule. Because it's more potent, you can use it at a lower dose and theoretically have fewer side effects. Esketamine, like ketamine, has the potential to distort your perception during the first two hours after treatment, so it has to be administered in a clinic setting. Treatment for esketamine nasal spray is done on an outpatient basis. With the nasal spray, you give yourself three doses, spaced five minutes apart, under doctor supervision. You remain in the clinic under doctor observation until potential side effects have passed. Esketamine must be used in conjunction with a conventional antidepressant. The intention is that esketamine provides rapid relief from depression symptoms until the other medication takes effect. (Source: John Hopkins Medicine)

VI. Project Uses and Sources of Funds

The Applicants are funding this project with cash/securities of \$3,461,841, and Bond Issues totaling \$17,607,127. The Applicants provided proof of an AA/Stable bond rating from Fitch’s Ratings Service (dated August 2021), AA/Stable bond rating from Standard & Poor’s Ratings service (dated September 2021), an Aa3/Stable bond rating from Moody’s Investor’s Service (dated August 2021) and Audited Financial Statements for years ending December 2020/2021. Estimated start-up costs and operating deficit cost is \$4,350,643.

TABLE FIVE				
Project Uses and Sources of Funds				
Project Uses and Sources of Funds	Reviewable	Non-reviewable	Total	% Of Total
Preplanning Costs	\$228,224	\$31,776	\$260,000	1.23%
Modernization Contracts	\$10,689,411	\$1,488,285	\$12,177,696	57.80%
Contingencies	\$928,639	\$129,294	\$1,057,933	5.02%
Architectural/Engineering Fees	\$1,023,550	\$142,509	\$1,166,059	5.53%
Consulting and Other Fees	\$1,219,245	\$169,755	\$1,389,000	6.59%
Movable or Other Equipment	\$1,127,955	\$157,045	\$1,285,000	6.10%
Bond Issuance Expense	\$193,191	\$26,898	\$220,089	1.04%
Net Interest Expense During Construction	\$314,415	\$43,776	\$358,191	1.70%
Other Costs to Be Capitalized	\$2,769,415	\$385,585	\$3,155,000	14.97%
Total Uses of Funds	\$18,494,045	\$2,574,923	\$21,068,968	100.00%
Source Of Funds				
Cash and Securities			\$3,461,841	16.43%
Bond Issues (project related)			\$17,607,127	83.57%
TOTAL USES OF FUNDS			\$21,068,968	100.00%

VII. Costs Space Requirements

The Applicants are proposing to modernize 23,680 dgsf for this project. Table Six delineates between clinical (20,147gsf), and non-clinical (3,533gsf) spatial considerations.

TABLE SIX				
Cost/Space Requirements for Construction				
Reviewable/Clinical	Cost	Proposed	Modernized	% of Total
AMI Patient Care (27 beds)	\$13,758,724	14,809	14,809	60.6%
Consultation (3 rooms)	\$268,504	289	289	1.2%
individual Therapy (6 rooms)	\$657,788	708	708	2.9%
Group Therapy (2 rooms)	\$387,426	417	417	1.7%
Dining/Activities/Lounge	\$780,426	840	840	3.4%
ECT/Esketamine treatment (2 rooms)	\$2,641,178	3,084	3,084	12.7%
Subtotal Clinical	\$18,494,045	20,147	20,147	82.5%
Non-Clinical	\$2,574,923	4,274	4,274	17.5%
Grand Total	\$21,068,958	24,421	24,421	100.00%

VIII. Background of the Applicants, Purpose of the Project, Safety Net Impact Statement, Alternatives to the Proposed Project

A) Criterion 1110.110 (a) - Background of the Applicants

The Applicants attest there have been no adverse actions against any facility owned and/or operated by Advocate Health and Hospitals Corporation, Advocate Health Care Network, Advocate Aurora Health, Inc. and Advocate Health, Inc. as demonstrated by compliance with the CMS conditions of Participation with Medicare and Medicaid, during the three years prior to the filing of this application. The Applicants also authorize the Health Facilities and Services Review Board and the Department of Public Health to access information to verify any documentation or information submitted in response to the requirements of this Application for Permit. Advocate South Suburban Hospital has a Medicare four-star rating. It appears the Applicants have the qualifications, background, and character to adequately provide a proper standard of health care service for the communities served.

These three criteria below are informational only.

- A) Criterion 1110.110 (b) – Purpose of the Project
- B) Criterion 1110.110 (c) – Safety Net Impact Statement
- C) Criterion 1110.110 (d) – Alternatives to the Proposed Project

B) Purpose of the Project

According to the Applicants, this project is being proposed to improve access to mental health services while also improving access to tertiary and other critical care services for patients at Advocate Christ Medical Center. The Applicants believe it is essential to convert the 39-bed acute mental illness category of service at Advocate Christ Medical Center to medical surgical beds. The establishment of the acute mental illness service is essential due to physical plant limitations at Advocate Christ Medical Center. According to the Applicants the only viable option is to discontinue the acute mental illness category of service at Advocate Christ Medical Center and convert 20 of those beds to a medical/surgical unit and establish the acute mental illness service at Advocate South Suburban Hospital.

C) Safety Net Impact Statement

The Applicants provided a safety net impact statement at pages 152-154 of the Application of Permit. At the end of this report is the Charity Care and Medicaid information for the years 2018 thru 2020 for Advocate South Suburban Hospital.

D) Alternatives to the Proposed Project

The Applicants considered two alternatives to the proposed project:

- Doing nothing
- Establish a free-standing psychiatric hospital
- Establish AMI Services from Advocate Christ Medical Center to Advocate South Suburban

1. The do-nothing alternative was rejected according to the Applicants because Advocate Christ Medical Center needs additional medical surgical beds due to its tertiary and Level I trauma status. The Applicants state Advocate Christ Medical Center admits the most critically ill patients and continually operates above the State Board's medical surgical utilization standard. According to the Applicants Advocate Christ Medical Center anticipates an average of 30 medical/surgical beds will be needed on an ongoing basis to treat COVID-19 patients.
2. The Applicants considered the option of building a stand-alone psychiatric hospital but rejected that option because the cost to build and operate a stand-alone behavioral health hospital would be higher than a unit within the hospital and the projected utilization of the GSA can be accommodated in the 27-bed Hospital unit. The Applicants stated if inpatient behavioral health volumes increase in the coming years, such that capacity in the planned acute mental health unit needs to be expanded, the Applicants will re-evaluate this option. The cost of this alternative is estimated as \$116.3 million.
3. As discussed throughout the application, Advocate Christ Medical Center (ACMC) is a tertiary referral center, a teaching hospital, and the only Level I trauma center in the South Chicagoland service area. The recent pandemic has exacerbated the need for Med/Surg beds at ACMC, and the Applicants decided to relocate its AMI services from Oak Lawn to Hazel Crest/Advocate South Suburban Hospital (ASSH), in an effort to better serve the programmatic needs of the immediate service areas surrounding these hospitals. The option chosen will address both programmatic needs at the two facilities, with the most prudent use of existing resources. Cost of chosen option: \$21,068,968.

IX. Size of the Project and Project Utilization

- A) Criterion 1110.120 (a) - Size of the Project
- B) Criterion 1110.120 (b) - Projected Utilization

A) Size of the Project

The Applicants are proposing 14,809 GSF or 549 GSF per bed. The State Board Standard for Acute Mental Illness Beds is 560 GSF per bed. The Applicants have met the requirements of the State Board.

B) Projected Utilization

The Applicants are projecting 9,107 days by 2025 or an ADC of 25 patients. The State Board's Target Occupancy for AMI service is 85%. The Applicants have met the requirement of this criterion.

X. Acute Mental Illness

1110.210	(b)(1)	Planning Area Need – 77 Ill. Adm. Code 1100 (formula calculation)
	(b)(2)	Planning Area Need – Service to Planning Area Residents
	(b)(3)	Planning Area Need – Service Demand – Establishment of AMI
	(b)(5)	Planning Area Need – Service Accessibility
	(c)(1)	Unnecessary Duplication of Services
	(c)(2)	Maldistribution
	(c)(3)	Impact of Project on Other Area Providers
	(e)	Staffing Availability
	(f)	Performance Requirements
	(g)	Assurances

A) Planning Area Need

There is a calculated excess of 59 acute mental illness beds in the A-04 Hospital Planning Area. Should the State Board approve the discontinuation of the 39 acute mental illness beds at Advocate Christ Medical Center and approve the proposed project there will be a calculated excess of 47 acute mental illness beds in the HSA 6&7 A-04 Hospital Planning Area.

	Approved Beds	Calculated Bed Need	#E-051-22	#22-028	Excess Beds
Dec-02	183	124			59
#E-051-22			-39		
Upon Approval of #E-051-22	144	124			20
#22-028				+27	
Upon Approval of #22-028	171	124			47

B) Service to Planning Area Residents

For projects located in Cook County the **geographical service area (GSA)** is a 10-mile radius from the proposed site (77 ILAC 1100.510 (d)). The population in this 10-mile GSA is approximately 758,000 residents. A review of the referral letter referenced in the application (Application for Permit page 101) indicated that **231 patients** resided in the 10-mile GSA of Advocate South Suburban Hospital and received care at Advocate Christ Medical Center’s acute mental illness unit. Of the 770 referrals approximately 30% came from the 10-mile GSA (231 patients ÷ 770 patients = 30%).

The Applicants also provided the number of referrals to psychiatric facilities that Advocate Christ Medical Center (1,812 referrals), Advocate South Suburban Hospital (1,060 referrals) and Advocate Trinity Hospital (742 referrals) made over the past two years. [see Table at the end of this report]

C) Service Demand – Establishment of AMI

The Applicants based upon the utilization of the Advocate Christ Medical Center AMI unit believe the proposed 27-bed unit will have an average daily census of 23 patients similar to the 7-year average at Advocate Christ Medical Center’s 39-bed AMI Unit. A referral letter was provided from the Medical Director of Emergency Services of Advocate Christ Medical Center. The Medical Director stated:

“Advocate Christ Medical Center (“ACMC”) has the busiest Level I Trauma Center in Illinois with a trauma surgery team available on site, around the clock and a dedicated inpatient trauma unit. The patients who present in the emergency department who are experiencing mental health crisis are in need of immediate care with dedicated behavioral health resources. The medical needs of these patients are typically of a different nature than those of the critically ill patients requiring our trauma care resources and of other patients we serve in the emergency department. Realigning the location of the inpatient behavioral health unit between our hospital locations will better allow our staff to focus on the discrete needs of our different types of patients continuing our mission to provide the highest quality of care to all of our patients.With the relocation of behavioral health services, patients who present to the ACMC emergency department requiring inpatient behavioral health services will be transferred to Advocate South Suburban Hospital. As one might imagine, we currently accept transfers from other Advocate area hospitals that don't currently operate an AMI unit-Advocate South Suburban Hospital (ASSH) and Advocate Trinity Hospital. As such, the patient transfers to ASSH will be similar to those we currently accept from these other area hospitals.”

D) Service Accessibility³

There are three hospital units located within 30-minutes of Advocate South Suburban Hospital with a total of 148 acute mental illness beds. The three Hospital units are underutilized. There is no absence of AMI service in the 10-mile GSA and no restrictive admission policies of existing providers have been identified. The proposed AMI Unit will be in a Mental Health Professional Shortage Area as are the three hospitals identified below.

³ A federal shortage designation is a way for communities and health care facilities in to establish a need for additional health care professionals and resources. The overall purpose is to identify areas of greatest need, so that limited resources can be prioritized and directed to the people in those areas. This need is evaluated based on criteria set forth by two federal shortage designation programs: **Health Professional Shortage Areas** and **Medically Underserved Areas/Populations**. The designations provide both **federal and state government grant/program benefits** for communities, health care facilities, and providers. Health Professional Shortage Area (HPSA), and Medically Underserved Area (MUA) / Medically Underserved Population (MUP) designations are administered by the federal Health Resources and Services Administration’s (HRSA) Shortage Designation Branch. More than 37 federal programs depend on the shortage designation to determine eligibility or funding preference as a way to increase the number of physicians and other health professionals who practice in those designated areas. **Mental Health:** Identifies an area’s access to either psychiatrists only, or core mental health professionals (CMHPs) which include psychiatrists, clinical psychologists, clinical social workers, psychiatric nurse specialists, and marriage and family therapists. Similar to Primary Care and Dental HPSAs, a population-to-provider ratio is used to help determine eligibility. Several different population-to-provider ratios (psychiatrists and/or core mental health professionals) are available for consideration. In Illinois as of June 2022 there are 223 mental health HPSA’s.

TABLE EIGHT						
Hospitals with AMI beds within 10-miles of Advocate South Suburban Hospital (CY 2021)						
Hospital	City	Miles	Authorized Beds	Staff Beds	Authorized Bed Utilization	Staff Bed Utilization
Ingalls Memorial Hospital	Harvey	3.35	78	45	39.00%	86.80%
Roseland Community Hospital	Chicago	9.46	30	30	47.00%	47.00%
Palos Community Hospital	Palos Heights	9.47	40	36	31.00%	34.44%
Total			148	111		

E) Unnecessary Duplication/Maldistribution

There are 34 zip codes within the 10-mile GSA with a population of approximately 758,000 residents. There is 1 acute mental health bed for every 5,121 residents in the 10-mile GSA. In the State of Illinois there is 1 acute mental health bed for every 3,045 residents. Based upon the ratio of beds to population in the 10-mile GSA compared to the ratio of beds to population in the State of Illinois there is not a surplus of acute mental health beds in this 10-mile GSA.

Currently there are 183 authorized acute mental beds in this Planning Area. As can be seen in the table above there are hospitals with excess capacity than can accommodate the patients to be referred to Advocate South Suburban Hospital proposed 27-bed unit.

The Applicants stated *“the planned project will transition behavioral health services (also known as acute mental illness services) from Advocate Christ Medical Center to Advocate South Suburban Hospital. Patients to be served at Advocate South Suburban Hospital would historically receive inpatient acute mental illness services at Advocate Christ Medical Center. Accordingly, this Project will not lower the utilization of other area hospitals below the State Board’s occupancy standards. The planned project is the relocation of AMI services from Advocate Christ Medical Center to Advocate South Suburban Hospital. Patients to be served as Advocate South Suburban Hospital would historically receive inpatient acute mental illness services at Advocate Christ Medical Center. Accordingly, this Project will not lower, to a further extent, the utilization of other area hospitals below the State Board’s occupancy standards.”*

F) Staffing Availability

The Applicants stated Advocate South Suburban Hospital has evaluated the staffing needs and does not expect any issues meeting the licensure and accreditation staffing requirements as a result of the proposed project. According to the Applicants the hospital’s ability to attract and place nurses has historically been strong. The Applicants state Advocate Aurora Health offers a competitive salary and benefits package for its clinicians and other support staff and also has a dedicated team of Recruiters and Sourcing Specialists. According to the Applicants, if there is a significant staff need anywhere in the system, resources are shifted quickly to address the situation. The staffing consultants at Advocate Aurora Health work in a collaborative manner. The Applicants state an additional source for Hospital’s applicant pool comes from active partnerships with local

nursing programs. According to the Applicants the Hospital has continually benefited from the strong reputation of Advocate Aurora Health as an excellent place of employment, as evidenced by consistently being named as one of the Top 100 Places to work in Illinois.

The proposed 27-bed unit will be staffed as follows:

- Physicians
 - Psychiatrist (1 FTE)
 - PRN⁴ Psychiatrist
- Advanced Practice Nurse (1 FTE)
- RN Leads/CPS = 4.6 FTEs
 - 2 Day Shift Leads (1.8 FTEs)
 - 2 Night Shift Leads (1.8 FTEs)
 - 1 CPS⁵ (1.0 FTE)
- RN Total = 33.5 FTEs
 - RN Day Shift = 17.0 FTEs (7 RNs per shift – 1 charge nurse, 1 ITU, 4 floor nurses)
 - RN Night Shift = 16.5 FTEs (7 RNs per shift – 1 charge nurse, 1 ITU, 4 floor nurses)
- MHC/CIMS = 19.1 FTEs (4 total per shift – 2 floor, 1 CIMS, 1 ITU)
- UMS = 2 FTEs
- Social Worker/Clinical Therapist = 3.8 FTEs
- ECT = 3.3 FTEs

G) Performance Requirements – Bed Capacity Minimums

The minimum unit size for a new AMI unit within an MSA is 20 beds. The Applicants are proposing a 27-bed unit at Advocate South Suburban Hospital. The Applicants have successfully addressed this criterion.

H) Assurances

By the signatures on the Certification pages, the applicants attest that by the second year of operation after project completion the ASSH acute mental illness unit will achieve and maintain the occupancy standards specified in 77 Ill. Adm. Code 1100.

⁴ Pro re nata” (PRN) psychotropic medications are frequently prescribed in mental health management for various reasons such as insomnia, agitation, in occasions of violence, symptom distress, and aggression

⁵ CPS - certified peer specialist

MHC - Mental Health Counselor

CIMS - Patient Care Information Associate

UMS - Utilization Manager

ECT - Electroconvulsive Therapy.

XI. Financial Viability

- A) Criterion 1120.120 - Availability of Funds
- B) Criterion 1120.130 - Financial Viability

The Applicants are funding this project with cash in the amount of \$3,461,841 and bond proceeds of \$17,607,127. Estimated start-up costs and operating deficit cost is \$4,350,643. The Applicants have provided evidence of an “A” or better bond rating and their audited financial statement for 2021. The Applicants have sufficient resources to fund this project.

TABLE NINE		
Advocate Aurora Health, Inc.		
Years ended December, 2021,2020		
(in thousands)		
Audited		
	2021	2020
Cash	\$703,725	\$998,878
Current Assets	\$3,407,129	\$3,379,077
Total Assets	\$23,138,561	\$21,449,643
Current Liabilities	\$3,713,295	\$3,319,862
LTD	\$3,298,508	\$3,310,401
Total Liabilities	\$8,807,582	\$9,049,599
Net Patient Revenue	\$11,702,581	\$10,216,386
Total Revenues	\$14,062,132	\$13,132,189
Income from Operations	\$593,552	\$212,967
Net Income	\$1,922,253	\$608,125

XII. Economic Feasibility

- A) Criterion 1120.140 (a) - Reasonableness of Financing Arrangements
- B) Criterion 1120.140 (b) - Terms of Debt Service
- C) Criterion 1120.140 (c) - Reasonableness of Project Costs
- D) Criterion 1120.140 (d) - Direct Operating Cost
- E) Criterion 1120.140 (e) - Effect of the Project on Capital Costs

- A) Reasonableness of Financing Arrangements**
- B) Terms of Debt Service**

The Applicants provided a letter signed by Mr. William Santulli, Chief Operating Officer, that Advocate Aurora Health, Inc. attests to the fact that the selected form of debt financing for the Advocate South Suburban Hospital project will be the lowest net cost available, or if a more costly form of financing is selected, that form is more advantageous due to such terms as prepayment privileges, no required mortgage, access to additional debt, term financing costs, and other factors.

C) Reasonableness of Project Costs

Only clinical (reviewable cost) are reviewed under this criterion.

1. **Preplanning Costs** are \$228,224 and are 1.79% of modernization and contingency and moveable equipment cost of \$12,746,005. This appears reasonable when compared to the State Board Standard of 1.8%.

2. **Modernization and contingency costs** are \$11,618,050 and are per \$576.66 per GSF. This appears high when compared to the State Board Standard of \$565.58.
3. **Contingency costs** are \$928,639 or 8.69% of modernization costs. This appears to reasonable when compared to the State Board Standard of 10-15%.
4. **Architectural and Engineering Fees** are \$1,023,550 and are 8.81% of modernization and contingency costs. This appears reasonable when compared to the State Board Standard of \$11.69%.

Consulting and Other Fees	\$1,219,245
Movable or Other Equipment	\$1,127,955
Bond Issuance Expense (project related)	\$193,191
Net Interest Expense During Construction	\$314,415
Other Costs to Be Capitalized	\$2,769,415

D) Direct Operating Costs

E) Effect of the Project on Capital Costs

The Applicants are estimating \$1,472.82 in operating expenses per day and capital costs per day of \$179.84. The State Board does not have standards for these costs.

Acute Mental Illness Bed Need Methodology

A bed need of .11 beds per 1,000 projected population is established in each planning area as the minimum bed need.

Calculate the planning area's experienced use rate by dividing the number of patient days in the base year by the base year population in thousands. Multiply the experienced use rate by the population estimate in thousands to obtain estimated patient days. Divide the estimated patient days by the number of days in the population projection (which is five years from the base year) to determine the projected average daily census (ADC). Divide the estimated ADC by .85 (85% occupancy factor) to obtain a projected bed need in the planning area.

When the projected bed need is less than the minimum bed need, the minimum bed need is the projected bed need. When the estimated bed need is greater than the minimum bed need, the estimated bed need is the projected bed need.

Calculate the number of additional beds needed in each area by subtracting the number of existing beds from the projected bed need.

Subtract the number of existing beds in the planning area from the projected planning area bed need to determine the projected number of excess (surplus) beds or the projected need for additional beds (deficit) in the area.

TABLE TEN			
Safety Net Information			
Advocate South Suburban Hospital			
Net Patient Revenue	\$223,593,781	\$220,604,105	\$216,138,790
CHARITY CARE			
Charity (# of patients)	2018	2019	2020
Inpatient	130	118	148
Outpatient	1,891	2,574	2,498
Total	2,021	2,692	2,646
Charity (cost in dollars)			
Inpatient	\$1,280,000	\$2,221,000	\$760,000
Outpatient	\$2,057,000	\$4,777,000	\$1,430,000
Total	\$3,337,000	\$6,998,000	\$2,190,000
	1.49%	3.17%	1.01%
MEDICAID			
Medicaid (# of patients)			
Inpatient	1,867	2,200	2,183
Outpatient	35,197	29,765	38,131
Total	37,064	31,965	40,314
Medicaid (revenue)			
Inpatient	\$12,649,045	\$20,438,168	\$20,132,313
Outpatient	\$11,050,140	\$12,451,445	\$15,996,654
Total	\$23,699,185	\$32,889,613	\$36,128,967
	10.60%	14.91%	16.72%

TABLE ELEVEN	
Itemization of Project Costs	
Preplanning Costs	\$260,000
Concept and Programming	\$185,000
Pre-Construction Services	\$75,000
Modernization Contracts	\$12,177,696
Construction	\$11,109,456
General Conditions/Temporary Utilities	\$960,000
Insurance	\$108,240
Contingencies	\$1,057,933
Architectural/Engineering Fees	\$1,166,059
Consulting and Other Fees	\$1,389,000
CON Application & Fees	\$100,000
Post Project Audit	\$75,000
IDPH Plan Review	\$24,000
Commissioning	\$45,000
Building Inspections	\$20,000
Permits/Testing	\$300,000
Project Management	\$210,000
Medical Equipment Planning	\$225,000
Low Voltage Design	\$75,000
Other	\$315,000
Moveable and Other Equipment	\$1,285,000
Major Medical	\$105,000
Minor Medical	\$520,000
IS/Telecommunications	\$85,000
Television System	\$25,000
Security System	\$200,000
Other	\$350,000
Bond Issuance Expenses	\$220,089
Net Interest Expense During Construction	\$358,191
Other Costs to be Capitalized	\$3,155,000
Furnishings	\$215,000
Signage	\$35,000
Artwork	\$50,000
Electrical Distribution – Life Safety	\$425,000
Window Replacement	\$325,000
Radiant Heating Panel System	\$275,000
Owner Project Contingency	\$1,830,000
Total	\$21,068,968

TABLE TWELVE

Top Ten AMI Referrals by the Three Advocate Hospitals for the past two years.

Advocate Christ Medical Center		Advocate Trinity Hospital		Advocate South Suburban Hospital	
October 2020 - September 2022		January 2021 - September 2022		December 2020 - September 2022	
Hospital	# Of Referrals To		# Of Referrals To		# Of Referrals To
Riveredge Hospital	263	Hartgrove Hospital	182	Hartgrove Hospital	290
Chicago Behavioral Hospital	215	Chicago Behavioral Hospital	56	Riveredge Hospital	112
Hartgrove Hospital	145	Madden Mental Health Center	53	Advocate Christ Medical Center	72
Madden Mental Health Center	109	Jackson Park Hospital	52	Chicago Behavioral Hospital	61
Silver Oaks Hospital	108	Advocate Christ Medical Center	48	Silver Oaks Hospital	55
Streamwood Hospital	102	St. Anthony Hospital	48	Streamwood Hospital	51
Advocate Lutheran General Hospital	94	Riveredge Hospital	44	Ingalls Memorial Hospital	45
St. Anthony Hospital	89	Kindred Hospital Chicago North	28	Madden Mental Health Center	36
Methodist Hospital of Chicago	64	Humboldt Park Health	25	Methodist Hospital of Chicago	36
Ascension Saint Elizabeth Hospital	64	Advocate Illinois Masonic Medical Center	24	Garfield Park Hospital	29
Total	1,812	Total	742	Total	1,060

22-028 Advocate South Suburban Hospital Hazel Crest





GRAND PRAIRIE SERVICES
INTEGRATED HEALTHCARE

www.gpsbh.org

**Access Department
Call
1-866-GPS-TODAY
1-866-477-8632
Fax (708) 596-6517**

Administrative Center
17746 S. Oak Park Avenue
Tinley Park, IL 60477
Phone (708) 444-1012
Fax (708) 614-7831
Fax (708) 614-9449

Maurice Fitts Page
**Whole Health & Wellness
Health Center**
450 West 14th Street
Chicago Heights, IL 60411
Phone (708) 985-3040
Fax (708) 474-8144

James Williams
Specialized Clinical Services
450 West 14th Street
Chicago Heights, IL 60411
Phone (708) 503-9670
Fax (708) 503-1218

Dr. Joseph Lassner
**Family & Individual
Service Center and
Screening Assessment
Support Services (SASS)**
19530 Kedzie Avenue
Flossmoor, IL 60422
Phone (708) 799-2200
Fax (708) 799-2711

Dr. Sonya Monroe
**Health Promotion
and Prevention Services**
16278 Prince Drive
South Holland, IL 60473
Phone (708) 754-8815
Fax (708) 798-1315

**Emergency Behavioral
Healthcare Center (EBHC)**
67 East 34th Street
Steger, IL 60475
Phone (708) 331-0500
Fax (708) 331-7590

**Developmental Training
Tinley Park**
17746 South Oak Park Avenue
Tinley Park, IL 60477
Phone (708) 444-1150
Fax (708) 444-1156

August 17, 2022

Debra Savage
Chairwoman
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield Illinois 62761

Dear Chairwoman Savage:

I write to you today to share my concern about the plan proposed by Advocate South Suburban Hospital and Advocate Christ Medical Center to transition Adult In-Patient Psychiatric Services to Hazel Crest Illinois and to suggest an alternative. The opinions addressed in this letter are also endorsed by the Board of Directors of Grand Prairie Services.

As you know, those experiencing mental health crisis across the country has significantly increased. Federal and local governments have demonstrated commitment to those suffering with mental illness. However, the plan to build a 23-bed in-patient mental health hospital for adults and transition all adult in-patient mental health services to Hazel Crest Illinois can have potentially devastating consequences for individuals and families in need, especially for communities traditionally marginalized as it pertains to health care, among many other disparities.

Potential barriers to the proposed plan include the following: Lack of capacity to manage the patient population, lack of adequate transportation, housing resources, available resources for well and follow-up care, resources to address social determinants of health (access to food, shelter, clothing, specialty care, transportation), to name a few. All of which has been shown to result in an early mortality rate of 25-30 years for the identified population.

It must be noted that I agree with the proposed plan to build a mental health in-patient and outpatient facility. However, for children and their families. The proposed twenty-three beds are not adequate to provide services for the number of adults transitioning from Christ Hospital inpatient unit nor those currently seeking in-patient mental health services. However, can be a lifesaving resource desperately needed by the children and families who otherwise do not have access to quality inpatient and prevention services.





Debra Savage, Chair
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

RE: Documentation of Projected Referrals to Advocate South Suburban Hospital for Establishment of Acute Mental Illness (AMI) Unit

Dear Ms. Savage:

I am the Medical Director of Emergency Services at Advocate Christ Medical Center (“ACMC”) and this letter documents the historical case volume of patients who have presented at the Emergency Department of APMC and who were admitted for inpatient care at APMC for treatment of their acute mental health needs and which we would expect to be admitted to the planned AMI unit planned for Advocate South Suburban Hospital (“ASSH”), our nearby affiliated hospital. Relatedly, this letter expresses my support of the Certificate of Need permit application to the Illinois Health Facilities and Services Review Board (“HFSRB”) for the relocation of the APMC inpatient behavioral health services from APMC to ASSH. This shift in the inpatient behavioral health program will improve the ability of our health system to meet the ongoing needs of the communities we serve.

Notably, APMC operates a Level 1 Trauma Center – the highest-level designation possibly by the State of Illinois. This designation is based on our state-of-the-art emergency services with strong resources and the high number of patients we treat. APMC has the busiest Level I Trauma Center in Illinois with a trauma surgery team available on site, around the clock and a dedicated inpatient trauma unit. The patients who present in the emergency department who are experiencing mental health crisis are in need of immediate care with dedicated behavioral health resources. The medical needs of these patients are typically of a different nature than those of the critically ill patients requiring our trauma care resources and of other patients we serve in the emergency department. Realigning the location of the inpatient behavioral health unit between our hospital locations will better allow our staff to focus on the discrete needs of our different types of patients continuing our mission to provide the highest quality of care to all of our patients. I support this plan and look forward to elevating our service levels especially in the face of new mental health challenges many of our community members face with the problems the pandemic brought home.

From January 1, 2020 to December 31, 2020, APMC admitted 749 patients to its inpatient behavioral health unit. From January 1, 2021 to December 31, 2021, 770 patients were admitted to the APMC inpatient behavioral health unit. A list of those patients who received inpatient behavioral health care at APMC by zip code of residence is attached hereto as

Debra Savage
August 17, 2022
Page 2:

Children have been significantly adversely impacted by trauma experienced during this unprecedented time. The number of children who have attempted and successfully ended their life by suicide has increased exponentially. Children of color who previously rarely died by suicide are dying at an alarming rate. Furthermore, children are being traumatized by gun violence, poverty, and threats to their safety at an unprecedented rate. Parents often lack the skills, knowledge, and resources to ensure that their children have access to adequate care. A mid-size organization like Grand Prairie Services responds to 200-300 crisis calls involving children monthly. In a community that has three major hospital systems only one has an inpatient unit and follow-up care for children. It is not unusual for children and their families to wait 2 to 3 days on an adult emergency unit to be transferred to a hospital located on the northside of Chicago to receive services (due to lack of resources for children in the southland community). Furthermore, the only hospital that provides specialty care for children does not accept Medicaid as a source of payment.

As a country, we must provide our children with the resources and tools to live a long and healthy life. The provision of excellent quality services provided by an excellent team of professionals is a great start.

Thank you for your consideration,

Sharronne Ward

Sharronne Ward, M.S., M.A.R., Ed.D.
President & Chief Executive Officer

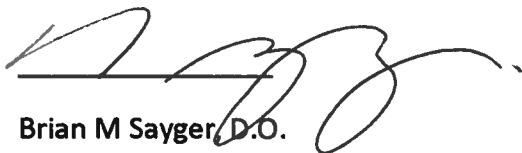
Attachment – 1. With the relocation of behavioral health services, patients who present to the ACMC emergency department requiring inpatient behavioral health services will be transferred to ASSH. As one might imagine, we currently accept transfers from other Advocate area hospitals that don't currently operate an AMI unit-ASSH and Trinity. As such, the patient transfers to ASSH will be similar to those we currently accept from these other area hospitals.

Consistent with Section 1100.360 of the HFSRB rules, the new AMI unit at ASSH will provide contemporary facilities in accord with all recognized standards of design, construction, operation and which represent the best alternative for the provision of quality care. In the context of inpatient behavioral health services, this provides for state-of-the-art practices for the elimination of ligature risks as well as for a therapeutic, healing environment.

These patient referrals have not been used to support another pending or approved certificate of need application. The information in this letter is true and correct to the best of my knowledge.

I support the proposed establishment of inpatient acute mental illness services at ASSH.

Sincerely,



Brian M Sayger, D.O.

Medical Director

Department of Emergency Medicine

Advocate Christ Medical Center

4440 West 95th Street

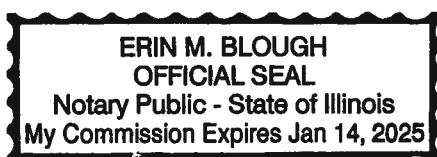
Oak Lawn, Illinois 60453

Subscribed and sworn to me

This 18th day of July, 2022



Notary Public





1130 E. 154th St.
South Holland, IL 60473
E: info@covucc.org
P: (708) 333-5955

August 6, 2022

Debra Savage
Chairwoman
Illinois Health Facilities and Services Review Board
525 W. Jefferson St., 2nd Floor
Springfield, Illinois 62761

Re: Advocate South Suburban Hospital Behavioral Health Services Project

Dear Chairwoman Savage,

My name is Patrick Daymond and I serve as the Senior Pastor for the Covenant United Church of Christ (Covenant UCC) in South Holland.

Covenant UCC's vision is to be the realization of a multi-generational beloved community – connecting cultural affirmation, love of God and neighbor, justice for the poor, healing for the hurting, and liberation for the oppressed – for the betterment of the world and the promotion of God's kingdom (*Luke 4:18*).

Covenant UCC believes in the benefits of behavioral health care and supports the theory that religion and spirituality can have a positive impact on mental health. In fact, research suggests that religiosity reduces suicide rates, alcoholism and drug use.

Our Pastoral Care program offers spiritual, emotional and religious support, including counseling, guidance and support for our parishioners. From our experience, we see firsthand that religion provides structure and offers the ability to connect and realize when we need professional help.

Advocate will be investing in a \$21 million contemporary inpatient unit for crisis intervention and is expanding outpatient mental health services to fill a critical gap in our community to screen and intervene for behavioral health problems in the primary care setting. Early intervention will include emotional wellness coaching, care navigation and community referrals. We believe these services align with our pastoral outreach, and we believe that the south suburbs will benefit from this collaborative relationship.

We ask of you and your fellow members of the Illinois Health Facilities and Services Review Board to please approve this application for the good of our community.

I thank you for your support and may God continue to bless us all.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick L. Daymond".

Reverend Dr. Patrick L. Daymond
Senior Pastor



DEBBIE MEYERS-MARTIN
STATE REPRESENTATIVE • 38TH DISTRICT

STATEREPCODEMM@GMAIL.COM

REPDEBBIEMEYERSMARTIN.COM

DISTRICT OFFICE:
813 SCHOOL AVE.
MATTESON, IL 60443
P: 708.833.7010
F: 708.248.5346

SPRINGFIELD OFFICE:
237-E STRATTON BUILDING
SPRINGFIELD, IL 62706
P: 217.558.1007

August 5, 2022

Debra Savage, Chairwoman

Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Re: Advocate South Suburban Hospital – CON to Establish Behavioral Health Inpatient Beds

Dear Chairwoman Savage,

I, State Representative Debbie Meyers-Martin on behalf of my constituents, ask for your support to establish acute mental health services at Advocate South Suburban Hospital. A trusted health care provider and community partner, this hospital is located in the 38th House District, which I have had the pleasure of representing since January 2019, after serving as past village president and trustee of Olympia Fields.

The proposed new unit will involve a significant capital investment in our community, including a state-of-the-art 27-bed facility with private rooms, as well as innovative outpatient services that provide early screening to identify behavioral health services needs and potential crisis interventions.

These investments will surely help the communities I represent, providing greater access to services for my constituents within a designated mental health professional shortage area.

Therefore, I strongly support this Certificate of Need application and urge the shared support of the Illinois Health Facilities and Services Review Board.

I thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Meyers-Martin".

Debbie Meyers-Martin
Illinois State Representative for the 38th District

8/8/2022

Debra Savage
Chairwoman
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Re: Support Letter for Establishment of AMI Category of Service at South Suburban Hospital

Dear Chairwoman Savage:

I am Elizabeth Gawne, a native of Chicago and the surrounding suburbs and a Psychiatric Mental Health Nurse Practitioner (PMHNP) affiliated with Advocate Christ Medical Center, which I'm proud to say is my first place of professional employment after receiving my nurse practitioner credentials. I am writing to urge your support to establish a 27-bed Acute Mental Illness Category of Service at Advocate South Suburban Hospital.


I began my formal education at Saint Louis University, School of Nursing, and worked for six years on inpatient behavioral health units in Illinois and Ohio. I continued my graduate studies and earned a Master of Science in Nursing from Eastern Kentucky University. Over the course of my training, I discovered a great passion for meeting the needs of patients with behavioral health needs. I also have a strong desire to give back to my community, which is why I returned to the Chicagoland area from Ohio, to work in psychiatry.

I believe Advocate's new inpatient behavioral health unit will deliver important benefits to our patients with its therapeutic and dignified care environment, which is the cornerstone of psychiatric nursing.

Along with my colleagues, I commend Advocate Aurora Health's support and investment in this project. I cannot express how eager we are to come to work at Advocate South Suburban and to bring our care and compassion to the residents in the south suburbs.

On behalf of us all who do this critical work, I urge a favorable vote. Thank you.

Sincerely,



Elizabeth A. Gawne, PMHNP, MS

THE LINK & OPTION CENTER, INC.

Empowering Minds | Linking You With Options

OFFICERS

Board Chairman

Joseph G. Bertrand, Jr.
Executive Director
Hazel Crest Park District

Board Chair Emeritus

Harold Murphy
Retired State Representative

Vice Chairman

William C. Green
Primerica Financial Services

Treasurer

Rita Lane
Loyola University
Medical Center

Secretary

Teena Judge
Consultant

MEMBERS

Dr. A. Edward Davis, Jr.
St. John M.B. Church

Tyrone D. Ward

Former Mayor, Village of Robbins

Jackie Glass

Community Relations,
Legislative Affairs Manager

Twin D. Green, Ph.D

Founder/President & CEO

August 16, 2022

Debra Savage
Chairwoman

Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Re: Advocate South Suburban Hospital Behavioral Health Services Project

Dear Chairwoman Savage:

On behalf of Dr. Green, The Link & Option Center, Inc. (TLOC) is writing in support and asks the Illinois Health Facilities and Services Review Board to approve the establishment of an inpatient acute mental illness program at Advocate South Suburban Hospital. We are happy to see Advocate bringing these services to Hazel Crest.

Incorporated in 1995, TLOC is a community-based comprehensive behavioral healthcare organization focused on delivering a range of social services, including mental health and addiction treatment services for children, adolescents, adults and seniors. TLOC's mission is to empower people with quality prevention and intervention services coordinated within a network of resources.

Advocate Aurora Health's commitment to the mental health of the communities it serves aligns with the mission of TLOC. Our enhanced collaborative relationship will be to the greater benefit of the residents of the south suburbs. Together we can heal those suffering and remove the horrible stigma of mental illness.

Please help us in this important work with a favorable vote on this application.

Sincerely,

Dr. Twin Green

Twin D. Green, Ph.D.
Founder, President & CEO



VILLAGE PRESIDENT

Terry Vorderer

TRUSTEES

Tim Desmond - 1st Dist.

Alex G. Olejniczak - 2nd Dist.

Paul A. Mallo - 3rd Dist.

James "Jamie" Pembroke - 4th Dist.

William "Bud" Stalker - 5th Dist.

Ralph Soch - 6th Dist.



Village of Oak Lawn

9446 S. Raymond Avenue, Oak Lawn, IL 60453

VILLAGE MANAGER

Thomas Phelan

VILLAGE CLERK

Claire Henning

Phone: (708) 636-4400

Fax: (708) 636-8606

www.oaklawn-il.gov

August 15, 2022

Debra Savage, Chairwoman
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Dear Chairwoman Savage,

Thank you for the opportunity to opine on the Certificate of Need application to establish a new acute mental illness category of service at Advocate South Suburban Hospital (Advocate South Sub). This application is part of an initiative with the dual purpose of 1) enhancing behavioral health facilities, services, and access in the South and Southwest Suburbs, and 2) relieving patient wait times in the Advocate Christ Medical Center (Advocate Christ) emergency department (ED). I write in full support of both efforts.

A lifelong resident of this community, I currently serve as the Mayor of Oak Lawn, which is home to Advocate Christ. I previously served as a Village Trustee and Park District Commissioner, respectively. I also served as a police officer in the Oak Lawn Police Department, and as a decorated Army veteran of the Vietnam War.

Advocate Christ is a critical part of the health and wellness of our community. As more people have come to the hospital seeking world-class care, the hospital has grown, and we have been happy to partner with Advocate Christ in that growth. And yet, demand for inpatient services out of the ED continues to expand beyond their current footprint. This has led to significant patient wait times in the ED and dozens of patients boarding there daily before being admitted.

Therefore, I was excited to hear of the investment Advocate intends to make at Advocate South Sub to create a brand new, state-of-the-art inpatient behavioral health unit that would not only relieve some of the pressure in the Advocate Christ Medical Center, but it would create a modern healing environment for those in need of acute mental health services across our region. Residents in Oak Lawn and across the South and Southwest Suburbs will be well served by this investment.

Please approve this application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Terry Vorderer", written over a horizontal line.

Mayor Terry Vorderer
Village of Oak Lawn

DISTRICT OFFICE
5144 W. 95TH STREET
OAK LAWN, IL 60453
708.425.0571



CAPITOL OFFICE
632 STATE HOUSE
SPRINGFIELD, IL 62706
217.782.0515

KELLY BURKE
STATE REPRESENTATIVE
36TH DISTRICT

August 11, 2022

Debra Savage
Chairwoman
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Re: Establishment of New Category of Service at Advocate South Suburban Hospital

Dear Chairwoman Savage,

I have served in the Illinois House of Representatives for more than a decade representing a district in the Southwest Suburbs that includes Advocate Christ Medical Center (Christ). I also serve in an additional role as Mayor of Evergreen Park. Over the years, it has been great to watch Christ evolve and grow to serve so many people in the region as one of the top hospitals in the state of Illinois.

Understanding the space constraints at Christ that are impacting patients through the Emergency Department, I support Advocate Aurora Health's regional approach to both improve patient wait times at Christ and enhance inpatient behavioral health access throughout the region through the investment of more than \$10 million at Advocate South Suburban Hospital. This investment will create state-of-the-art facilities to serve patients in need of behavioral health inpatient stays in modern private rooms. Paired with an investment in comprehensive outpatient interventions in the community, this will fill a significant need we are seeing grow across the state.

The transition will improve access to vital health care and mental health services. Please look favorably upon this CON application and approve this much-needed service.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Burke".

Kelly Burke

Illinois State Representative, 36th District



Village President

Vernard L. Alsberry Jr.

Village of Hazel Crest

Trustees

Mary E. Grant
Kevin Moore, Sr.
Benjamin Ramsey
Marlon D. Rias
Java Rogers
Sandra Slayton

Clerk

Isaac R Wiseman

Village Manager

Dante S. Sawyer

Chairwoman Debra Savage
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

August 4, 2022

Re: Advocate South Suburban – Establishment of Acute Mental Illness Category of Service

Dear Chairwoman Savage,

As the Mayor of Hazel Crest, past President of South Suburban Mayors and Managers Association, Executive Board Member for the South Southwest United Way, and Vice Chair of the Advocate South Suburban Hospital (ASSH) Governing Council, I have spent most of my life in public service and am keenly aware of the community needs in the southern suburbs of Cook County. That is why I strongly support the Certificate of Need application to establish Acute Mental Illness Services at Advocate South Suburban Hospital (ASSH).

The proposed establishment of a 27-bed inpatient program will address one of the core findings of the ASSH Community Health Needs Assessment, which showed an increase in alcohol, substance use, and mental health emergency room visits; especially among residents aged 45-64.

This new behavioral health integration program will also include expanded services offered in the outpatient primary care setting to identify triggers for patient referrals including:

- Screening and assessment of potential behavioral health and social needs
- Emotional wellness coaching
- Care navigation and follow up for Behavioral Health
- Referrals to appropriate community resources
- Targeted telehealth psychotherapy
- Case collaboration with psychiatry for medication recommendations
- Therapist collaboration with PCP for patient's mental health needs.

Expanding these resources in the community will help avoid crisis admissions to area emergency rooms and bring much-needed coordination of care for our residents who continue to struggle with the social, emotional, financial and health impacts of the COVID-19 pandemic. I ask that you give serious consideration to this application.

Sincerely,

Vernard L. Alsberry Jr.
Mayor, Village of Hazel Crest

ILLINOIS STATE SENATE

SPRINGFIELD OFFICE:
111 Capitol Building
Springfield, IL 62706
(217) 782-9595

DISTRICT OFFICE:
20855 South LaGrange Road
Suite 102
Frankfort, IL 60423
(815) 464-5431
www.SenatorHastings.com



Michael E. Hastings
STATE SENATOR · 19th DISTRICT
Majority Caucus Whip

**Committee
Assignments:**
Energy and Public
Utilities (Chair)
Education
Executive
Insurance
Judiciary

August 8, 2022

Debra Savage
Chairwoman
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Re: Advocate South Suburban Hospital

Dear Chairwoman Savage,

I am writing in enthusiastic support of Advocate South Suburban Hospital's Certificate of Need application to establish Acute Mental Health Services in the Chicago south suburbs.

During the COVID-19 pandemic, we all witnessed the negative impact the virus played on our lives. As we are continuing to confront the health, social and economic impacts of COVID-19, it has become evident that the need for a broad scope of behavioral health care services is increasingly critical for residents of our community. The relocation of Advocate's south Chicagoland program to its South Suburban campus in a state-of-the-art, modernized inpatient behavioral health unit—as well as their investment in outpatient behavioral health care—could not come at a better time.

Having served the 19th District for nearly 15 years and as a resident of the Chicago south suburbs, I can attest that investing in greater mental health services will be an enhancement to our communities. Therefore, I would appreciate and urge the support of the Illinois Health Facilities and Services Review Board.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael E. Hastings".
Michael E. Hastings

8/8/2022

Debra Savage, Chair
Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Support for Advocate South Suburban Hospital CON Proposal

Dear Ms. Savage:

I am writing to ask that you and your fellow Board members approve the Advocate South Suburban Hospital Certificate of Need request to establish a behavioral health services program for crisis admissions at this hospital. I am a physician currently treating patients who will receive care in the planned unit and I enthusiastically support the modernization of this program.

I am board certified in psychiatry and addiction medicine. Having completed my residency in psychiatry at Advocate Lutheran General Hospital, I have continued my career with Advocate Aurora Health and am currently affiliated with Advocate Christ Medical Center.

I am pleased the new program at Advocate South Suburban Hospital will allow our system to have a significant focus on behavioral health patients for community residents away from the tertiary care setting where there are many competing demands for space and staff. I am particularly excited about the planned capital expenditures to provide for a state-of-the-art inpatient facility with private patient rooms and ample therapy space. I strongly believe that patient experience is an important measure that determines the efficiency and effectiveness of mental health services. As a mental health provider, I work hard to ensure that I deliver an exemplary patient experience. This new program will allow me to do my job in an optimal environment to the benefit of my patients.

I would like to take this opportunity to thank you for your consideration of this project and respectfully encourage your favorable vote.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessica M. Azoff".

Jessica M. Azoff, DO

August 8, 2022

Ms. Debra Savage, Chair
Illinois Health Facilities and Services Review Board
525 West Jefferson St.
Springfield, IL 62761

Re: Relocation of Mental Health Unit to Advocate South Suburban Hospital

Dear Chairwoman Savage:

I am Dr. David Kemp, Psychiatry Section Chair and the Illinois Medical Director of Behavioral Health for Advocate Aurora Health. I write this letter in support of Advocate's application for establishment of a 27-bed acute mental illness category of service at Advocate South Suburban Hospital.

As the Psychiatry Section Chair, I have dedicated my professional career attending to the needs of those living with mental illness in the south Chicagoland area, working in the Emergency Departments at Advocate Christ Medical Center, Advocate Trinity and Advocate South Suburban hospitals. It is challenging but incredibly rewarding work. I, along with my colleagues who work beside me, am extremely proud of our service and dedication to the communities where we serve.

The last two years have been among the most difficult of my career. Since the onset of the COVID-19 pandemic in 2020, I've seen firsthand the devastating impact this crisis has had on residents in the south suburbs. We have seen elevated rates of anxiety, depression, and functional decline and cognitive changes among our patients, as well as increased rates of alcohol and substance abuse.

According to data from the Substance Abuse and Mental Health Services Administration, those struggling with mental health issues are at greater risk of substance abuse and harmful health outcomes. In fact, it is well documented that 37 percent of individuals with severe mental health issues smoke; nearly a third of adults with severe mental health issues are binge drinkers.

We see patients like this in our Emergency Department almost every day, treating patients in full crisis mode due to alcohol and substance abuse, and these anecdotal experiences have been reinforced by Advocate's Community Needs Assessment, showing a significant rise in mental health issues in an area deemed by the federal government as a Mental Health Professional Shortage Area.

The new program at Advocate South Suburban will meet our patients' needs where they are and bring the staffing and expertise they rightfully deserve. I know I speak for many of my


colleagues that Advocate's capital investment of \$21 million in a new, state-of-the-art inpatient facility will bring a much-needed resource to the community, and my staff is eager to make this move to work in such a forward-looking facility. We are particularly emphatic about the opening of 27 private patient rooms, fashioned with the requisite safety and patient protections, that will provide ample 1-on-1 therapy space, along with group therapy, medication management and other critical services in a secure unit.

The investment in inpatient services is complemented by Advocate's expansive and innovative approach to outpatient care, with more emphasis on behavioral health needs in the primary care setting and via telehealth services. This new integrated model allows Advocate to expand access to services, especially among patients who may not seek out counsel themselves or follow through with a physician referral.

To the distinguished members of the Board, I implore you to help us in the fight to deliver mental health care in this underserved region by supporting this Certificate of Need application.

I appreciate your service to the State of Illinois and for your consideration of this very important project.

Sincerely,

A handwritten signature in black ink, appearing to read "David Kemp", written in a cursive style.

David Kemp, MD



Illinois Conference of the United Church of Christ

1840 Westchester Boulevard, Suite 200, Westchester, Illinois 60154
Telephone (708) 344-4470 • Fax (708) 344-4564 • <http://www.ilucc.org>

Rooted in God's Love, We strive to be Relational Agents of God's Transformative Grace.

MINISTRY LEADERSHIP TEAM

Rev. Molly Carlson
Conference Minister
E: MollyCarlson@ilucc.org
P: 708/701-0451

Rev. Kathy Lawes
Associate Conference Minister
E: KathyLawes@ilucc.org
P: 708/701-4962

Rev. Dr. Terrill Murff
Associate Conference Minister
E: TerrillMurff@ilucc.org
P: 708/701-4325

Rev. Dr. Stephanie Perdue
Associate Conference Minister
E: StephaniePerdue@ilucc.org
P: 708/701-4933

SUPPORT STAFF

Naomi Else
Administrative Assistance
E: ConferenceAdmin@ilucc.org

Lynn Chindlund
Operations
E: LynnChindlund@ilucc.org

Rev. Sarah Lohrbach
Communications/Technology
E: SarahLohrbach@ilucc.org

OUTDOOR MINISTRIES

Pilgrim Park Camp
26449-1340 North Avenue
Princeton, Illinois 61356-8790
P: 815/447-2390; F: 815/447-2205
E: PilgrimParkCamp@ilucc.org

Mitch Kloster
Site Manager
Pilgrim Park Camp
E: MitchKloster@ilucc.org

Tower Hill Camp
12173 Tower Hill Road
Sawyer, Michigan 49125
P: 269/426-3881; F: 269/426-8255
E: TowerHillCamp@ilucc.org

Rev. Tracy Heilman
Site Manager
Tower Hill Camp
E: TracyHeilman@ilucc.org

TPIRC PROGRAM

Rev. Melody Seaton
TPIRC Program Director
E: MelodySeaton@ilucc.org
P: 773-550-1681

Marz Rivera
TPIRC Program Coordinator
E: MarzRivera@ilucc.org

Kathy Brown
TPIRC Program Assistant
E: TPIRCadmin@ilucc.org

August 11, 2022

Debra Savage
Chairwoman
Health Facilities and Services Review Board
525 W. Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Re: New Behavioral Health Services at Advocate South Suburban Hospital

Dear Ms. Savage,

I am writing urging you and your fellow HFSRB members to support a new behavioral health program in Hazel Crest at Advocate South Suburban Hospital and write as a representative of the Illinois Conference of the United Church of Christ. Formed in 1964, the Illinois Conference is the third largest conference in the UCC, with five associations representing 68,972 members from 241 churches in Northern Illinois.

Forty-six years of service has given us a strong foundation that sends us forward with a broad sense of ministry. The promotion of congregational health and vitality and pursuing God's peace and justice is our mission. One of our Core Processes is to facilitate communication, participation, reconciliation, justice and action. Mentally healthy communities are instrumental in sustaining our mission and Core Principals.

I confirm for you that the Illinois Conference and Advocate Aurora Health are united in our commitment to work for a just world for all.

We commend Advocate for investing in our community and investing in our congregants' lives and well-being, and I urge you to support this vital service.

Sincerely,

Reverend Terrill N. Murff; DMin
Associate Conference Minister
Chicago Metropolitan Association
Illinois Conference United Church of Christ

CAPITOL OFFICE:
ROOM 329B STATE CAPITOL
SPRINGFIELD, IL 62706
PHONE: 217-782-5145



ILLINOIS STATE SENATE
BILL CUNNINGHAM
PRESIDENT PRO TEMPORE
STATE SENATOR • 18TH DISTRICT
WWW.SENATORBILLCUNNINGHAM.COM

DISTRICT OFFICES:
10400 SOUTH WESTERN AVE.
CHICAGO, IL 60643
PHONE: 773-445-8128
FAX: 773-672-5143

16033 SOUTH 94TH AVE.
ORLAND HILLS, IL 60487
PHONE: 708-233-9703

August 5, 2022

Debra Savage, Chairwoman
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Dear Chairwoman Savage,

I write to you to request the approval of Advocate Aurora Health's Certificate of Need application to establish a new acute mental illness category of service at Advocate South Suburban Hospital (Advocate South Sub), which will serve patients across the South and Southwest suburbs of Chicago. The construction of this state-of-the-art behavioral health inpatient unit will not only create a great space for healing, but also allow Advocate Christ Medical Center (Advocate Christ) to press the release valve in their busy Emergency Department (ED) through the addition of much needed medical/surgical beds.

Advocate Christ—which sits in my State Senate district—is one of the busiest trauma centers in the Midwest, and one of the top two Medicaid providers in the state, by volume. It is the region's only Level 1 Trauma Center and tertiary care provider, including a host of specialty services, including oncology, neurosciences, cardiovascular, organ transplant, and women's and children's health.

The hospital has seen explosive growth in the last several years as it has delivered high-quality care to this community, and others around it. As a result, wait times in the ED can be extraordinary—with more than 30 patients per day waiting in ED for an inpatient bed. This proposed regional approach to delivering care will help reduce ED wait times, improve patient throughput, and make sure that both behavioral health inpatients, and other patients in the community will get timely access to superior care.

I humbly seek the support of the Illinois Health Facilities and Services Review Board on this project.

Thank you for your service to the State of Illinois.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bill Cunningham".

State Senator Bill Cunningham
Illinois State Senate, 18th District
Assistant Majority Leader & President Pro Tempore



August 24, 2022

Debra Savage
Chairwoman
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Re: New Behavioral Health Services Inpatient Unit at Advocate South Suburban Hospital

Dear Chairwoman Savage:

I am writing to express Aunt Martha's ardent support for the Certificate of Need application to establish an inpatient acute mental illness category of service at Advocate South Suburban Hospital. This project will have an overwhelmingly positive impact in the south suburbs.

What began 50 years ago as a small group of people in Park Forest who wanted to give youth a place to be safe, heard and understood has since grown into the third largest community health center in Illinois and the largest provider of behavioral health services among community health centers in the state.

Day after day, we work to build on our organization's proud legacy to create strong, healthy communities, where everyone has access to high-quality health and wellness care to foster better social and emotional health, but we can't do that without our partners in the community who share our organization's vision and values. Collaborating with Advocate and supporting this project is in the best interest of our organization and the communities we serve.

Advocate South Suburban Hospital's new behavioral health program, involving a capital investment of more than \$21 million, more integrated outpatient care and expanded pediatric mental health services, will allow so many more families in the south suburbs to receive the care they need and deserve.

This application deserves your approval. Please vote in support.

Sincerely,

A handwritten signature in black ink, appearing to read 'Raul Garza', is positioned above the typed name.

Raul Garza
President and CEO
Aunt Martha's