

November 14, 2023

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

Re: Request for Additional Information Project #23-040

Dear Mr. Constantino:

Please find our response to your request for additional information related to the referenced project above.

1. Please provide the financial assistance policy for the proposed ASTC.

The planned ASTC is committed to partnering with Edward Hospital to effectively address the cardiovascular needs of the community. As a part of this collaboration, the planned ASTC will be adopting Edward Hospital's financial aid policy to ensure accessible care for all individuals in the community. For reference, please see the enclosed NorthShore-Edward Elmhurst Health Financial Assistance Policy.

2. Pages 74-75 of the Application for Permit. The multi-institutional variance requires a comparison of the charges of the procedure listed to be performed at the proposed ASTC compared to the charges of the procedures performed at Edward Hospital. Please provide this information.

Please see Edward Hospital and planned ASTC charge comparison below:

CPT Code	CPT Description	Calendar Year 2024 HB Gross Charge for EEH effective 1/1/24	Calendar Year 2026 Cardiovascular Institute ASTC Charge	ASTC- Hospital Charge Variance	ASTC- Hospital Charge % Variance
33206	Insert heart pm atrial	\$32,073	\$25,502	-\$6,571	-20.5%
33207	Insert heart pm ventricular	\$32,073	\$25,408	-\$6,665	-20.8%
33208	Insrt heart pm atrial & vent	\$32,073	\$26,057	-\$6,016	-18.8%
33210	Insert electrd/pm cath sngl	\$24,038	\$14,141	-\$9,897	-41.2%
33212	Insert pulse gen sngl lead	\$24,638	\$22,147	-\$2,491	-10.1%
33213	Insert pulse gen dual leads	\$32,073	\$26,030	-\$6,043	-18.8%
33214	Upgrade of pacemaker system	\$32,874	\$25,193	-\$7,681	-23.4%
33215	Reposition pacing-defib lead	\$8,577	\$4,872	-\$3,705	-43.2%
33216	Insert 1 electrode pm-defib	\$24,038	\$20,098	-\$3,940	-16.4%
33217	Insert 2 electrode pm-defib	\$24,038	\$21,821	-\$2,217	-9.2%

33218	Repair lead pace-defib one	\$22,917	\$5,887	-\$17,030	-74.3%
33221	Insert pulse gen mult leads	\$57,394	\$39,079	-\$18,315	-31.9%
33222	Relocation pocket pacemaker	\$7,544	\$3,032	-\$4,512	-59.8%
33223	Relocate pocket for defib	\$7,733	\$3,032	-\$4,701	-60.8%
33224	Insert pacing lead & connect	\$49,313	\$26,067	-\$23,246	-47.1%
33227	Remove&replace pm gen singl	\$24,638	\$21,629	-\$3,009	-12.2%
33228	Remv&replc pm gen dual lead	\$32,874	\$25,468	-\$7,406	-22.5%
33229	Remv&replc pm gen mult leads	\$41,923	\$39,989	-\$1,934	-4.6%
33230	Insrt pulse gen w/dual leads	\$73,195	\$66,538	-\$6,657	-9.1%
33235	Removal pacemaker electrode	\$9,808	\$7,680	-\$2,128	-21.7%
33240	Insrt pulse gen w/singl lead	\$73,195	\$68,259	-\$4,936	-6.7%
33241	Remove pulse generator	\$8,162	\$5,887	-\$2,275	-27.9%
33285	Insj subq car rhythm mntr	\$24,638	\$23,782	-\$856	-3.5%
33286	Rmvl subq car rhythm mntr	\$3,513	\$1,140	-\$2,373	-67.5%
37220	Iliac revasc	\$17,468	\$10,373	-\$7,095	-40.6%
37221	Iliac revasc w/stent	\$27,396	\$22,268	-\$5,128	-18.7%
37224	Fem/popl revas w/tla	\$15,570	\$10,899	-\$4,671	-30.0%
37225	Fem/popl revas w/ather	\$31,948	\$23,811	-\$8,137	-25.5%
37226	Fem/popl revasc w/stent	\$32,176	\$23,515	-\$8,661	-26.9%
37227	Fem/popl revasc stnt & ather	\$58,551	\$39,791	-\$18,760	-32.0%
37228	Tib/per revasc w/tla	\$31,391	\$20,535	-\$10,856	-34.6%
37229	Tib/per revasc w/ather	\$49,848	\$37,521	-\$12,327	-24.7%
37230	Tib/per revasc w/stent	\$49,848	\$38,308	-\$11,540	-23.1%
37231	Tib/per revasc stent & ather	\$49,848	\$38,207	-\$11,641	-23.4%
37236	Open/perq place stent 1st	\$31,391	\$21,548	-\$9,843	-31.4%
37241	Vasc embolize/occlude venous	\$32,176	\$19,873	-\$12,303	-38.2%
37242	Vasc embolize/occlude artery	\$31,391	\$22,677	-\$8,714	-27.8%
37243	Vasc embolize/occlude organ	\$32,176	\$15,452	-\$16,724	-52.0%
37246	Trluml balo angiop 1st art	\$15,190	\$10,248	-\$4,942	-32.5%
92920	Prq cardiac angioplast 1 art	\$22,784	\$11,048	-\$11,736	-51.5%
92928	Prq card stent w/angio 1 vsl	\$30,050	\$21,391	-\$8,659	-28.8%
93451	Right heart cath	\$14,029	\$5,023	-\$9,006	-64.2%
93452	Left hrt cath w/ventrclgrphy	\$13,687	\$5,023	-\$8,664	-63.3%
93453	R&I hrt cath w/ventrclgrphy	\$15,154	\$5,023	-\$10,131	-66.9%
93454	Coronary artery angio s&i	\$13,994	\$5,023	-\$8,971	-64.1%
93455	Coronary art/grft angio s&i	\$18,292	\$5,023	-\$13,269	-72.5%
93456	R hrt coronary artery angio	\$18,548	\$5,023	-\$13,525	-72.9%
93457	R hrt art/grft angio	\$19,476	\$5,023	-\$14,453	-74.2%
93458	L hrt artery/ventricle angio	\$18,110	\$5,023	-\$13,087	-72.3%

93459	L hrt art/grft angio	\$17,700	\$5,023	-\$12,677	-71.6%
93460	R&L hrt art/ventricle angio	\$18,540	\$5,023	-\$13,517	-72.9%
93461	R&L hrt art/ventricle angio	\$18,489	\$5,023	-\$13,466	-72.8%
0238T	Trluml perip athrc iliac art	\$49,848	\$33,007	-\$16,841	-33.8%
C9600	Perc drug-el cor stent sing	\$27,692	\$21,898	-\$5,794	-20.9%

3. Page 116 of the Application for Permit. Please explain how the leasing of cardiac cath lab staff from Edward Hospital is going to work.

The planned ASTC plans to enter into a contractual agreement with Edward Hospital to lease cardiac cath lab staff which will provide that the ASTC will pay the salary and benefit costs of clinical staff during the times they are providing services at the ASTC. Relative to scheduling, this lease agreement will be designed to be flexible and will operate on a month-to-month basis. This staffing arrangement will contribute to the efficient and effective operations of the planned ASTC, ensuring high-quality care for our patients while maintaining flexibility in workforce management. It is important to note that if the ASTC chooses to hire a company for non-clinical back-office support and other staffing, the staffing plan may be subject to change.

4. Page 118 of the Application for Permit. The letter states the list of procedures is non-exhaustive list of the procedures typically performed with the new surgical specialty. It is unclear what is the intent of this language. Is the list provided on pages 116-117 not all inclusive? If not please provide the complete list.

Please see comprehensive list of all charges below:

CPT Code	CPT Description	Charge
33206	Insert heart pm atrial	\$25,502
33207	Insert heart pm ventricular	\$25,408
33208	Insrt heart pm atrial & vent	\$26,057
33210	Insert electrd/pm cath sngl	\$14,141
33212	Insert pulse gen sngl lead	\$22,147
33213	Insert pulse gen dual leads	\$26,030
33214	Upgrade of pacemaker system	\$25,193
33215	Reposition pacing-defib lead	\$4,872
33216	Insert 1 electrode pm-defib	\$20,098
33217	Insert 2 electrode pm-defib	\$21,821
33218	Repair lead pace-defib one	\$5,887
33221	Insert pulse gen mult leads	\$39,079
33222	Relocation pocket pacemaker	\$3,032
33223	Relocate pocket for defib	\$3,032
33224	Insert pacing lead & connect	\$26,067
33227	Remove&replace pm gen singl	\$21,629
33228	Remv&replc pm gen dual lead	\$25,468

33229	Remv&replc pm gen mult leads	\$39,989
33230	Insrt pulse gen w/dual leads	\$66,538
33235	Removal pacemaker electrode	\$7,680
33240	Insrt pulse gen w/singl lead	\$68,259
33241	Remove pulse generator	\$5,887
33285	Insj subq car rhythm mntr	\$23,782
33286	Rmvl subq car rhythm mntr	\$1,140
37220	Iliac revasc	\$10,373
37221	Iliac revasc w/stent	\$22,268
37224	Fem/popl revas w/tla	\$10,899
37225	Fem/popl revas w/ather	\$23,811
37226	Fem/popl revasc w/stent	\$23,515
37227	Fem/popl revasc stnt & ather	\$39,791
37228	Tib/per revasc w/tla	\$20,535
37229	Tib/per revasc w/ather	\$37,521
37230	Tib/per revasc w/stent	\$38,308
37231	Tib/per revasc stent & ather	\$38,207
37236	Open/perq place stent 1st	\$21,548
37241	Vasc embolize/occlude venous	\$19,873
37242	Vasc embolize/occlude artery	\$22,677
37243	Vasc embolize/occlude organ	\$15,452
37246	Trluml balo angiop 1st art	\$10,248
92920	Prq cardiac angioplast 1 art	\$11,048
92928	Prq card stent w/angio 1 vsl	\$21,391
93451	Right heart cath	\$5,023
93452	Left hrt cath w/ventrclgrphy	\$5,023
93453	R&l hrt cath w/ventrclgrphy	\$5,023
93454	Coronary artery angio s&i	\$5,023
93455	Coronary art/grft angio s&i	\$5,023
93456	R hrt coronary artery angio	\$5,023
93457	R hrt art/grft angio	\$5,023
93458	L hrt artery/ventricle angio	\$5,023
93459	L hrt art/grft angio	\$5,023
93460	R&l hrt art/ventricle angio	\$5,023
93461	R&l hrt art/ventricle angio	\$5,023
0238T	Trluml perip athrc iliac art	\$33,007
C9600	Perc drug-el cor stent sing	\$21,898

These charges are limited to those procedures currently reimbursable by CMS in an ASC setting. As CMS incorporates new procedures to their list, the planned ASTC may make additions to the chargemaster to align with CMS updates.

5. Page 59 of the Application for Permit. Is there going to be central sterile supply at the ASTC?

The planned ASTC will not have central sterile supply. The majority of the procedures that will be performed at the ASTC will make use of disposable instruments, thus eliminating the need for an on-site central sterile supply. For those procedures that do require instrument sterilization, a contract will be established with Edward Hospital for services. This will ensure that all necessary sterilization requirements are met in a timely and cost-effective manner.

6. In a patient emergency at the proposed ASTC how are the patients transferred to Edward Hospital? Are the patients responsible for the cost of the transfer of the patient?

Patient selection for the elective services that will be provided at the ASTC will exclude patients who are not medically stable or have high risk of complications including a high BMI. As such, the need to transfer a patient to Edward Hospital for admission will be very limited.

In the event of a patient emergency, the protocol involves:

1. Immediate response: Highly trained anesthesia staff will monitor patients for all perioperative care. This staff will respond swiftly to any patient emergency that may arise in the ASTC.
2. Call 911: Upon recognizing a patient emergency that requires a patient transfer to Edward Hospital, the care team will immediately call 911 to request advanced life support care and timely transportation.

Thank you for your time and consideration of our project. Please feel free to contact me if you have any questions or need additional information.

Sincerely,



Cheryl Eck
System VP, Strategy, Planning & Business Development

Enclosure:

NorthShore-Edward Elmhurst Health Financial Assistance Policy