



INTERNATIONAL UNION OF OPERATING ENGINEERS • AFL-CIO

LOCAL 399

July 1, 2026

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

Dear Chairwoman Savage:

IUOE Local 399 writes in opposition to Advocate Health Care's Certificate of Need application seeking approval of a \$40 million medical surgical inpatient unit at Advocate Christ Medical Center in Oak Lawn (project # 26-019).

The Christ Medical Center expansion comes while Advocate is engaged in an ongoing labor dispute with skilled maintenance workers represented by the International Union of Operating Engineers Local 399 at multiple Chicagoland facilities – including an Unfair Labor Practice charge this project site. These workers, who are responsible for critical building systems, infection control infrastructure, life-safety equipment, and more, lawfully exercised their right to form a union. Rather than engaging in good-faith bargaining, Advocate is under federal investigation for alleged retaliation, intimidation, and repeated violations of labor law.

Because skilled maintenance workers are essential to safe hospital operations, this instability has direct implications for patient care. These workers ensure that ventilation systems maintain proper pressurization in operating rooms and isolation areas, that humidity and temperature controls protect immunocompromised patients, that plumbing systems function safely, and that backup power systems are ready during emergencies.

We have received reports from maintenance staff across Advocate facilities of moisture issues, air pressurization concerns, heating and cooling failures, plumbing backups, and deferred infrastructure repairs. Workers have raised these issues internally and provided recommendations for corrective action, only to see those recommendations delayed or disregarded. Advocate has not demonstrated that it can stabilize and retain the skilled workforce necessary to operate and maintain its existing facilities – let alone a new inpatient unit.

At the same time, Advocate is experiencing high turnover among skilled maintenance personnel. Workers report unfair and unpredictable scheduling, wages well below industry standards, and working conditions that lead to burnout and attrition. As a result, Advocate is losing experienced engineers left and right. Expanding physical capacity without first resolving workforce instability raises serious concerns about long-term reliability, infection control, and patient safety.

The Board's mandate includes evaluating not only service need and financial feasibility, but also whether a project will support safe, effective delivery of care. Local 399 has spoken with legislators, state agencies, and community members who are deeply concerned about Advocate's ongoing labor dispute, and the effect it may have on patient care.

Before approving additional capacity at Christ Medical Center, the Board should require Advocate to demonstrate that it can do the following:

1. Stabilize and retain a qualified skilled maintenance workforce;
2. Resolve its labor disputes through good-faith bargaining;
3. Address reported infrastructure concerns; and
4. Ensure current facilities consistently meet the highest safety and infection control standards.

Until these steps are taken, proceeding with a \$40 million expansion at Christ Medical Center heightens operational strain and could undermine patient confidence. Local 399 appreciates this opportunity to share our concerns with the Board, and we welcome opportunities to discuss this further.

Sincerely,

A handwritten signature in black ink that reads "Patrick J. Kelly". The signature is written in a cursive, flowing style.

Patrick J. Kelly
President & Business Manager
IUOE Local 399