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HEALTH FACILITIES &
SERVICES REVIEW BOARD

October 6, 2010

Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761RE: WRITTEN COMMENT
Project #10-049
University of Chicago Cancer Center at
Silver Cross Hospital, New Lenox

To the Members of the Board:

Please accept the following comments regarding the above-mentioned project from Joliet Oncology and Hematology Associates, Joliet; Hoffman Cancer Center, Joliet; and Provena St. Joseph Medical Center, Joliet.

Each of these mentioned health care providers has submitted individual, written comment in opposition to Project #10-049. We are submitting this joint comment, which summarizes our separate testimonies, to underscore our belief that the proposed project is not needed, will waste nearly \$22 million health care dollars best allocated elsewhere, and will have a negative impact on the residents of the area as well as those providers already caring for these residents with cancer.

Our objections to Project #10-049 can be summarized as follows.

Purpose of the Project

- The applicant states the project is needed to address a growing population of cancer patients. However, the applicant has provided absolutely no evidence that area residents are being denied access to quality care as needed.
- The applicant failed to address existing treatment resources, both hospital and community-based. The applicant provided no documentation regarding the capabilities of existing treatment centers, nor for their ability to handle any growth in demand.
- The applicant has provided extensive material in the application outlining the excellence of the University of Chicago Medical Center (UCMC) in cancer diagnosis and treatment. However, the application fails to note the medical oncology services to be provided in the proposed Cancer Center will be delivered by an existing group of Joliet-located oncology physicians. This practice has been or will be acquired by UCMC, and the UCMC "logo" will be placed on a practice which has been providing care to the Joliet community for many years. There will be no UCMC-based oncologists assigned to the proposed Cancer

Center. In other words, quality and access will be no different. Only the name will change.

- The applicant uses patient migration data to conclude that existing patient care in the area is "very fragmented". This assertion is disingenuous at best, and deliberately misleading at worst. The nature of cancer care is such that patients travel to academic medical centers for high-level services such as bone marrow transplants, or participation in clinical trials, and receive necessary surgery, radiation therapy, or chemotherapy in the community close to home. This is the pattern that exists in the Joliet area, and the pattern will not change whether or not the proposed Cancer Center is approved.
- The applicant has failed to provide, as required, any documentation that the project will improve the health care or well being of the population; or, that there are problems with the existing system; or, any measurable quality or access goals.

Alternatives to the Project

- The applicant has failed to address, as required, the utilization of existing health care resources to meet identified needs. Although it is correct the Illinois Department of Public Health does not collect data from community-based providers, it is also true the applicant made absolutely no attempt to obtain utilization and capacity information from any of the undersigned, not to the best of our knowledge from any other providers.
- We believe there is more than adequate existing capability in the service area to accommodate not only patient requiring services today, but future patients as well. (Please see individual comments for detail.)

Project Services Utilization/Service-Specific Review Criteria

- The applicant's utilization projections are unrealistic (see Provena-St. Joseph Medical Center comment for detail).
- The applicant suggests throughout that the proposed project will bring a new, heretofore unavailable technology to the service area. This is false. IGRT has been available at Hoffman Cancer Center for the past two years. The "new" of the proposed equipment is generational, and can be likened to the difference between keyed and keyless entry to a new car.
- In touting the quality of the radiation equipment to be acquired as part of the project, the applicant extensively discusses the benefits of the selected Varian TrueBeam. However, the application itself includes an article from the New York Times discussing, in fairly gruesome detail, errors in Varian software which

resulted in severe injury, and in some cases mortality, to radiation therapy patients. We by no means intend to suggest Varian equipment is not a viable option for radiation therapy. However, neither do we see any particular evidence to suggest it represents an absolute improvement in patient treatment.

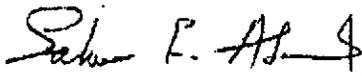
- All of the discussion of utilization and need in the application relates to radiation therapy. However, even though the IHFSRB has not established standards for the utilization of medical oncology (chemotherapy), that portion of the project represents a significant portion of the project cost. The applicant should at least have been able to address the need for, quality of, and impact of medical oncology.

] Charity Care

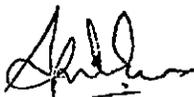
- Existing providers of radiation therapy and medical oncology services provide significant reduced-cost and no-cost treatment to the residents of the area (please see individual comments). As noted in the application, in FY 2009 UCMC provided less than one percent of net patient revenue for the cost of charity care. Given that the total point of the proposed project is the establishment of UCMC in the area, it is reasonable to assume UCMC's charity care procedures will be established as well. This could represent a severe negative impact on the ability of cancer patients to access care. This will be especially true if, as noted in the individual comments of the undersigned, establishment of the proposed project will endanger the continued operation of existing providers.

We very much appreciate the Board's willingness to consider these comments. We respectfully request the application for permit for Project #10-049 be denied.

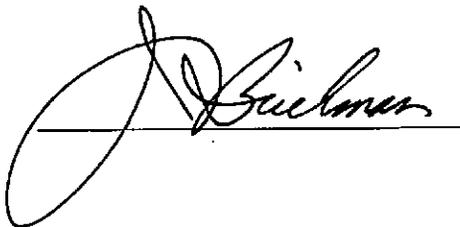
Sincerely,



HOFFMAN CANCER CENTER



JOLIET ONCOLOGY-HEMATOLOGY
ASSOCIATES, LTD (JOHA)



PROVENA ST. JOSEPH MEDICAL
CENTER