

## Constantino, Mike

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**From:** Lori Wright [Lori.Wright@fmc-na.com]  
**Sent:** Thursday, July 05, 2012 12:18 PM  
**To:** Constantino, Mike  
**Cc:** clare.ranalli@hklaw.com  
**Subject:** #12-004  
**Attachments:** #12-004 Response to ITD.pdf

Mike,

Attached is our response to the ITD on June 5th.

Thank you,



**FRESENIUS  
MEDICAL CARE**

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Lori Wright  
Senior CON Specialist

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## Fresenius Medical Care

July 5, 2012

Ms. Courtney Avery  
Administrator  
Illinois Health Facilities & Services Review Board  
525 W. Jefferson Street, 2<sup>nd</sup> Floor  
Springfield, IL 62761

**Re: Supplemental Information**  
**Project: #12-004, Fresenius Medical Care North Pekin**

Dear Ms. Avery,

The enclosed pages contain supplemental information in response to the Intent to Deny given to the above mentioned project at the June 5, 2012 meeting.

Thank you for your time and consideration of this information.

Sincerely,

Lori Wright  
Senior CON Specialist

cc: Clare Ranalli

**SUPPLEMENTAL INFORMATION FOR  
#12-004 Fresenius Medical Care North Pekin**

In response to the Intent to Deny issued to project number 12-004, at the June 5, 2012 meeting. Fresenius Medical Care is submitting this **additional** information for the Board's consideration. The applicant requests the Board reconsider its Intent to Deny based on the following points.

There is a need for additional stations in the Pekin area as evidenced by not only the utilization at the Fresenius Pekin clinic but by the support of the healthcare community, consisting of physicians, OSF Hospital, Proctor Hospital, not-for-profits, economic and governmental agencies/representatives, residents, patients and The Renal Network.

At the June 5<sup>th</sup> meeting many Board members referenced that the Peoria facilities were within a reasonable distance for these patients, however they also suggested that competition and patient choice in providers should be considered. Overwhelming support submitted to this Board establishes that the patient and physician choice is Fresenius Medical Care North Pekin to meet the dialysis needs of the community. Through the years Renal Care Associates (RCA) and Fresenius have built a proven track record of meeting the needs of Pekin area residents and have gained their respect and trust through high quality compassionate care and ongoing commitment to the Pekin area. Fresenius is the trusted choice for dialysis in Pekin - based on the patient's own experiences.

Aside from Fresenius being preferred by a majority of Pekin area patients, the 12 RCA nephrologists also treat the majority of the patients in the area and prefer Fresenius. For example, RCA currently is serving over **600** end stage renal disease patients in central Illinois and **310** of these patients are from the Pekin/Peoria area. Specifically 46 are at the Pekin clinic (patient numbers are as of March 31<sup>st</sup> per the CON application). The physician proposing a separate facility for Pekin to "compete" with Fresenius currently has a total (as of July 1<sup>st</sup>) of **4** end stage renal disease patients, none of which he followed as pre-ESRD patients or referred for dialysis initially. All were RCA patients and at least three were hospitalized and then discharged to his care rather than to their RCA physician. It is clear that the physician practice that has the ability to support a clinic in the Pekin area is RCA and since RCA has partnered with Fresenius, the most steadfast option would be to permit the North Pekin facility to serve this patient population. The other nephrologist clearly needs additional time to build his practice in order to support an entire ESRD facility. We note that he has privileges at the existing Fresenius facilities, and would continue to have them along with at the proposed North Pekin facility.

With this said, there are currently two clinics located in Tazewell County: the Fresenius Pekin clinic situated on the campus of Pekin Hospital and the East Peoria clinic. The current Pekin facility is supported by Renal Care Associates and has been since it was first established over 17 years ago. This clinic is now operating in-excess of 90% utilization. (Clinic utilization generally fluctuates and the clinic has been anywhere from

90 to over 100% utilized in the past 6 months.) Thus, pre-ESRD patients in the Pekin area who will require dialysis in the future will have to travel to Peoria for treatment.

They will most likely have to dialyze on the 3<sup>rd</sup> shift. For some patients this is problematic because there are limited public transportation options for patients who dialyze in the early afternoon and into the evening. When there is little to no availability on the first and second shifts (the current situation in Pekin and Peoria for the most part) it hinders patient access for this reason.

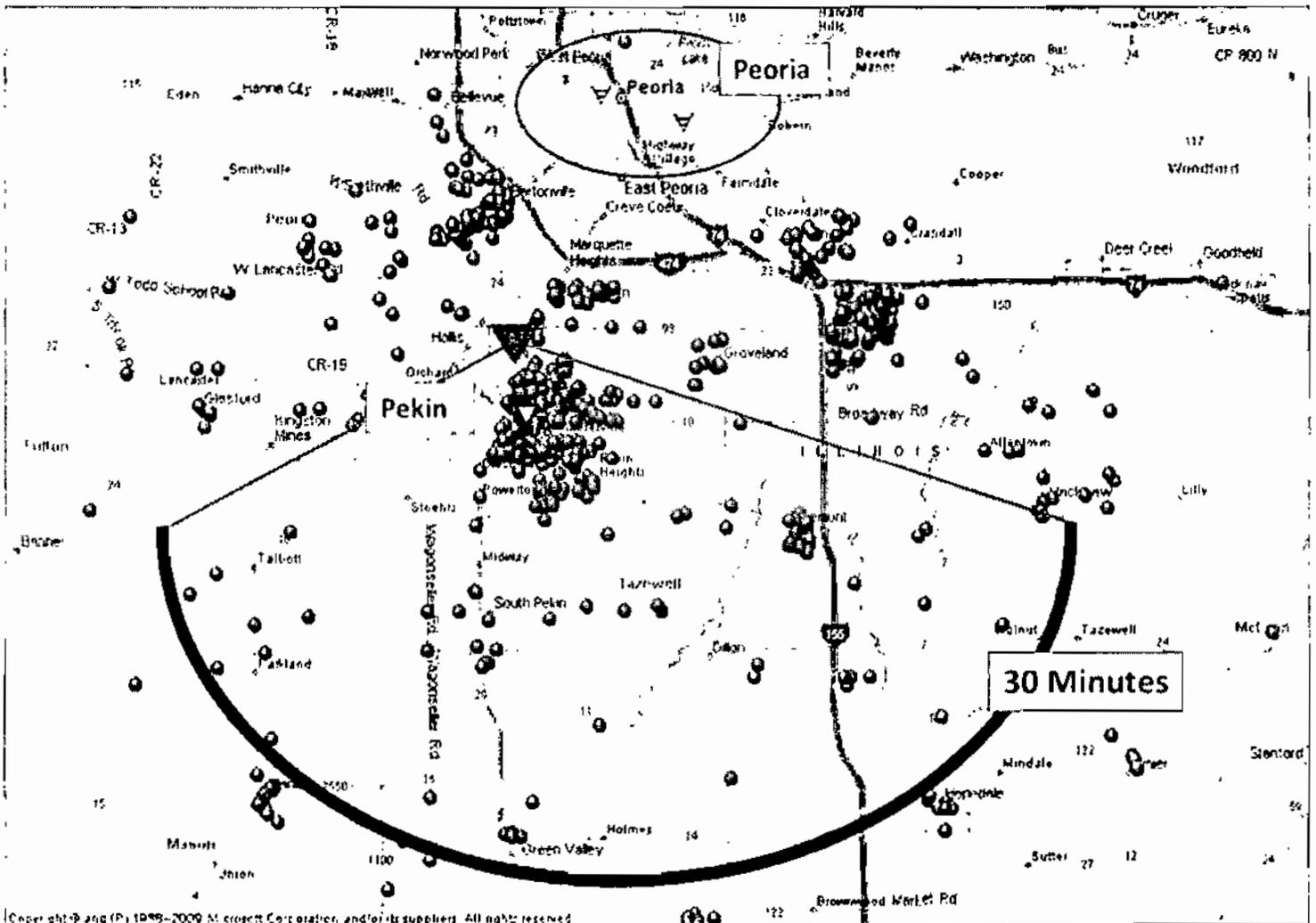
Also, although it may appear that patients need only travel 15-20 minutes from North Pekin to Peoria for treatment the 15-20 minute time frame is based on travel from the North Pekin clinic to the Peoria clinics, based on Board rules. However, while it may be a 15-20 minute drive from facility to facility, the patients are traveling from their homes. Many of them do not live at or even near the facility from which drive times must be calculated. Many of the patients, based on their home addresses, will need to travel near 30 minutes from their home **to the proposed North Pekin site**. If North Pekin is not approved, these patients will be forced to drive an additional 15-20 minutes to reach Peoria. These patients will then be driving 45 – 50 minutes to treatment, greatly limiting their access and ability to have treatment within 30 minutes of their home.

The chart below is representative of some of the travel times patients might experience going to North Pekin vs driving to Peoria if North Pekin is denied.

Town	Travel To North Pekin		Additional 15-20 Min To Peoria
	Miles	Minutes	
Green Valley	15	26	41-46
Manito	19	31	46-51
Hopedale	25	29	44-49
Delavan	23	32	47-52
Mackinaw	23	28	43-48
Tremont	13	18	33-38

The map on the following page shows the location of the pre-ESRD patients who live in the vicinity of the Pekin area and south/east/west of the Pekin area.

# Map of RCA's Pre-ESRD Patients From Areas South of Peoria



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