

Hills, Bonnie

From: Bhuvan Chawla [B.Chawla@esunhealth.com]
Sent: Tuesday, September 04, 2012 6:16 AM
To: Constantino, Mike
Cc: Hills, Bonnie
Subject: Fresenius Plainfield North - Project #12-047
Attachments: Fresenius Plainfield North SAR.doc

Mr. Constantino / Ms. Hills,

Please find attached my comments on the State Agency Report for this project. I have previously sent an email requesting a correction on page 6.
Please confirm receipt.

Thank you,

Bhuvan Chawla, M.D.
Sun Health, Inc.
2121 Oneida Street
Joliet, IL 60435
815.741.9300

Mr. Dale Galassie
Chairman
Illinois Health Facilities and Services Review Board
525 West Jefferson, Second Floor
Springfield, IL 62761

September 3, 2012

**Re: State Agency Report
Project No. 12-047: Fresenius Medical Care Plainfield North**

Dear Chairman Galassie:

I would urge the Board to review my letter of opposition and to consider the following additional information.

Absence of Need:

The State Agency Report corroborates my letter of opposition, that this project is unneeded. There is a calculated excess of 47 stations in the planning area, and 60% of facilities within 30 minutes are operating below 80% target occupancy; service access is not an issue.

This project will not improve access, but ***will actually exacerbate maldistribution***, as it seeks to divert many patients away from their closest facility, as demonstrated by the zip codes of origin of the proposed patients listed in the application. Facilities in those very zip codes are operating at below the target 80% occupancy, including Fresenius Oswego, Plainfield and Joliet, US Renal Bolingbrook, Sun Health, and Yorkville Dialysis.

Letters:

The Applicant has chosen to inundate the Board with emotional and political letters of support in an attempt to divert the Board from its primary mandate – that of need determination.

The letter of support from Lakewood Nursing Center deserves special mention, since Lakewood itself has actually contributed to maldistribution. Recently, one of my chronic dialysis patients at Sun Health required nursing home placement, and was admitted to Lakewood. Having cared for this patient for a number of years, we were surprised to receive a sudden request for patient transfer to Fresenius Plainfield. On further investigation, we learned that Lakewood Nursing Home and Fresenius Plainfield had apparently entered into some kind of busing arrangement whereby Lakewood would channel its dialysis patients to Fresenius Plainfield. Lakewood then approached the patient's family and arranged for her transfer, without ever contacting me - the attending nephrologist, or Sun Health - the treating dialysis facility.

Alternatives:

Sun Health remains a viable alternative, and would welcome the opportunity to collaborate with Fresenius to serve our community while addressing maldistribution and duplication. This is a no-cost alternative, worthy of serious consideration. Perhaps the Board should encourage Fresenius to explore this option in good faith.

Size of Project:

The project size exceeds the State Board's standard, and the Applicant's rationale for the variance is unacceptable.

Adverse Impact:

This project will have an adverse impact on area providers, contrary to the Applicant's assertion. As the largest provider of dialysis in the US, and in the world, Fresenius is certainly aware that dialysis facilities can lose up to 15-20% of their patients each year to renal recovery, renal transplant, patient relocation or death. This number could be even higher with the push towards home dialysis, and nursing home based dialysis.

Existing facilities thus do require access to new patients, and Fresenius cannot in good faith sequester new pre-ESRD patients for its own proposed project and then claim that there would be no adverse impact on other providers.

Conclusion:

I would humbly urge the Board accept the findings of the State Agency Report, and to reject this application on the above grounds.

Respectively submitted,

Bhuvan Chawla, M.D.
Sun Health, Inc.
2121 Oneida Street
Joliet, IL 60435
815.744.9300