

## **Constantino, Mike**

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**From:** Nicole Pacini [anpacini@gmail.com]  
**Sent:** Friday, March 15, 2013 3:55 PM  
**To:** Constantino, Mike  
**Subject:** Response to Riverside's Appeal of Their Intent to Deny  
**Attachments:** Attachment A.rtf; Attachment 38G and Source File.TIF

In regards to Riverside's reply statement to the intent to deny, I would like to point out some major inconsistencies with Riverside's response.

A. Riverside claims that a need for additional emergency services exist based on general US statistics and studies. Primarily, they reference a study by the CDC stating that 80% of adults visit ER's due to lack of access to other providers. However, I think it's important to note this is NOT the case given the location of their proposed service area, and their proposal. There is not a lack of access in the proposed location. In fact, convenient access to multiple emergency department services, urgent care services, and primary care services ALREADY exist within Riverside's service area and all of them are well within the 30 minute standard.

Furthermore, for 83 percent of Riverside's anticipated patient volume, the existing ER locations of nearby St James Olympia Fields and Silver Cross New Lenox would be closer, than that of Riverside's proposed location (see Attachment A). Riverside also claims their core service area is south of Frankfort down to Manteno.

However, this clearly is not where they plan to derive their patient cases based on their own application (see Attachment 38g from Riverside's application page 282).

B. Riverside claims their FEC is proposed in part to reduce health care costs. However, emergency room visits are significantly much more costly than that to doctors offices, or urgent care clinics. A study by Blue Cross Blue Shield discovered that many members 34 and under are going to emergency rooms for treatment of minor illnesses. However, quality care can be provided for many of these conditions, such as sore throat or ear infections at a local urgent care clinic for far less out-pocket expenses. In fact, 17 percent of all visits to hospital emergency departments nationally could potentially be treated at retail medical clinics or urgent care centers for an estimated savings of \$4.4 billion, according to a RAND Corp. study published in the September 2010 edition of Health Affairs. Not only does going to urgent care for minor illnesses help reduce insurance member costs, it also reduces costs for employers or health plans. For example, emergency rooms generally charge an average of \$737 to treat strep throat compared to \$99 at urgent care centers.

It is also worth noting that St James Franciscan is opening an urgent care "ExpressCare" location in March of 2013 in Frankfort. This location will have 7am-11pm hours staffed daily 365 days a year by actual physicians.

The addition of another urgent care clinic to the area will likely reduce resident's emergency room visits for more minor health concerns, as well as their own health care costs. The St James project is already approved and further supports the lack of need for Riverside's proposal

C. Riverside claims that the establishment of an FEC in Frankfort will not effect utilization rates at other local facilities. However, this simply is not true for multiple reasons. Riverside even points out that five existing area emergency departments are currently BELOW target utilization rates. They also make a false claim that the existing providers are not within 30 minutes. Yet, their own chart shows that Silver Cross New Lenox, St James Olympia Fields, Advocate South Suburban, Silver Cross Homer Glen FEC, St James Chicago Heights, and Ingalls Memorial are ALL within 30 minutes of their proposed facility, proving a lack of need for the Riverside FEC.

Riverside also fails to note that Provena St. Mary's is actually the closest emergency department provider to Manteno residents, just 10.3 miles, 20 minutes away. By comparison, Riverside's proposed FEC location is 17.9 miles, and 26 minutes away based on Google Maps. In fact, Riverside's proposed FEC is actually further

away for Manteno residents than their own existing hospital location in Kankakee which is 11.2 miles and 23 minutes away.

Furthermore, Riverside's proposed FEC location will NOT improve access or proximity for 83 percent of their anticipated patient volume and would actually be FURTHER for a staggering 76 percent of their anticipated patient base, see Attachment A for reference.

D. Riverside now is making the claim that their core service area is south of Frankfort down to Manteno.

However, their own application proves it is entirely inconsistent with this statement, given its anticipated patient volume projections. On Riverside's new position, the multitude of their expected patient load should come from the geographic area made up of Frankfort, Manhattan, Green Garden, Wilton Center, and Andres.

But instead, their patient load for 2014 is expected as follows: Matteson (2,522), Manteno (1,623), Park Forest (981), Frankfort (864), Richton Park (836), Monee (709), Peotone (694), New Lenox (490), Mokena (392), and Manhattan (302). Please note that there is no mention of any of these other communities south of Frankfort in their anticipated patient volume statement, on Attachment 38g, page 282 of their application. Also, just to mention, the population of these areas south of Frankfort are as follows: Green Garden (4,010), Wilton Center (150), and Andres (less than 50), which further highlights the lack of need of a facility in this location. It also makes it quite apparent that Riverside could not rely on this area south of Frankfort to make up its patient volume and support such a costly facility. In order to do that, they must try to derive its client base from other northern, more populous communities (as shown on their application Attachment 38 g, page 282) at the expense of stealing patient volume from the two leading, closest hospital providers--St. James Olympia Fields and Silver Cross New Lenox. Clearly, Riverside's FEC proposal would be duplicating existing services, would create maldistribution, and fails to exhibit an area need. Therefore, the board should proceed to deny their certificate of need for these very reasons.

(Attachments referenced are attached as separate files)

# Attachment A.

PROJECTED PATIENT VISIT VOLUME BY ZIPCODE (Numbers Derived from Riverside Application, pg 282)						
City (Zip Code)	2014	% of Total	Current Distance From Existing Closest ER	Current Distance from Proposed Riverside Site	East or West of 1-57	County
Patient Volume						
Matteson	2,522	26.79%	St James Olympia Fields 4 Minutes/ 2.31 miles	16 Minutes/10.44 miles	East	Cook
Manteno	1,623	17.24%	St Mary's Provena 18 Minutes/12.81 miles	21 Minutes/17.23 miles	East	Kankakee
Park Forest	981	10.42%	St James Olympia Fields 9 Minutes/4.54 miles	20 Minutes/11.61 miles	East	Cook
Richton Park	836	8.88%	St James Olympia Fields 5 Minutes/3.22 miles	14 Minutes/9.14 miles	East	Cook
Monee	709	7.53%	St James Olympia Fields 13 Minutes/6.68 miles	15 Minutes/10.93 miles	East	Will
Peotone	694	7.37%	St James Olympia Fields 20 Minutes/14.10 miles	19 Minutes/14.92 miles	East	Will
New Lenox	490	5.21%	Silver Cross New Lenox 8 Minutes/3.03 miles	13 Minutes/7.86 miles	West	Will
		83.44%	Source: MapQuest.Com, City to Hospital Address			