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September 4, 2013

Kathryn J. Olson
Chair
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

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Re: Proj. No. 12-094 – Fresenius Medical Care Prairie Meadows **HEALTH FACILITIES & SERVICES REVIEW BOARD**

Dear Chairwoman Olson:

I am the medical director for Lake County Dialysis. I oppose Fresenius Medical Care's proposal to establish a 12-station dialysis facility in Libertyville, Illinois. There is an excess of 28 stations and underutilized facilities in the planning area. Accordingly, there is no need for this project.

As you may recall, the Board issued an intent-to-deny this project in March. Nothing has changed since the Board made this decision. As reported in the State Agency Report, average utilization of the existing facilities was 70.7%, and it has remained relatively flat at 71.4% (or an increase of 5 patients). Additionally, the "need" for this project is even less now as the number of excess stations in the planning area increased from 16 to 28 as a result of the new inventory calculations that were released last month.

Further, when Lake County Dialysis sought approval from the Board for its relocation and four station expansion in February 2012, the Board issued an intent to deny despite the fact the facility was operating above 80% utilization because there was an excess of 16 stations in the planning area and underutilized facilities. Since that time, nothing has changed. There are still excess stations and underutilized facilities in the planning area.

Finally, the additional information submitted by the FMC misstates the growth in end stage renal disease patients in the service area. From March 2012 to March 2013, 17 additional patients initiated dialysis in this area. This is significantly less than the 29 additional patients set forth in FMC's additional information. Further, even if the suggested growth is accurate, FMC's new Mundelein facility and its Round Lake facility could collectively accommodate these patients.

While I support ensuring sufficient patient access to dialysis, we should strive to build stations in communities that need it most. Accordingly, I oppose this project.

Sincerely,



Donald Steinmuller, M.D.
Nephrologist