

*Only Received 2 pages***Presence**

Saint Joseph Medical Center

6 December 2012

Mr. Paul Pawlak  
 President and CEO  
 Silver Cross Hospital and Medical Centers  
 1900 Silver Cross Boulevard  
 New Lenox, IL 60451

**Letter of Opposition to Project #12-096**

Dear Mr. Pawlak:

I am writing in response to your letter dated November 9, 2012, which was not received in my office until November 26, 2012.

According to MapQuest, Presence Saint Joseph Medical Center is 28 minutes away from the proposed Silver Cross project site. However, if the 1.15 travel time adjustment allowed for metropolitan areas is applied, Presence Saint Joseph Medical Center can be said to be 32.2 minutes from the proposed project and thus just very slightly beyond the required service area boundary. Nonetheless, your proposed freestanding emergency center (FEC) would have a profound negative impact on our emergency department services.

Presence Saint Joseph Medical Center's emergency room includes 53 patient care stations and received 66,577 patient visits in 2011, as reported in its IDPH annual questionnaire. Since the IHFSRB standard for emergency department utilization is 2000 visits per station, Saint Joseph's occupancy was only 62.8% in 2011. Saint Joseph's emergency department volume has declined by 8.6% since its peak utilization of 72,829 in 2007, due to increased area competition from new immediate care centers and retail centers and especially Silver Cross's existing freestanding emergency center in Homer Glen.

Even though Presence Saint Joseph Medical Center is located slightly beyond the western boundary of the formal service area definition of the proposed FEC, (2.2 minutes away), 16,529 or fully 23.5% of Saint Joseph's current ED patients reside in the service area of the proposed FEC and therefore this volume is at risk.

Later this month, Saint Joseph will be opening a Federally Qualified Health Center (FQHC) on its campus to establish a new medical home for patients who currently use the emergency department for primary care needs. It is estimated that the FQHC will reduce hospital ED visits at Saint Joseph by 5,475 visits per year. This will increase Saint Joseph's capacity to treat appropriate ED visits; however, the FQHC's projected volume will reduce the Medical Center's overall ED occupancy to 57.6%.

Given the above analysis, if Silver Cross' FEC were to succeed in reducing Saint Joseph's ED volume by 16,529 and the FQHC reduced the volume by an additional 5,475, Saint Joseph's volume would then be around 44,600 and its occupancy would be reduced to 42.1%. This dramatic decrease in occupancy, as well as the swelling numbers of immediate care and retail care centers in the area, show that there is no need for a freestanding ED in Frankfort.

**RECEIVED**

DEC 07 2012

**HEALTH FACILITIES &  
SERVICES REVIEW BOARD**

**Presence™**

Saint Joseph Medical Center

Letter to Paul Pawlak, Page Three

I will now address the issue of the vacancy rate of full time licensed personnel (RNs in the emergency department), which you are required to inquire of all hospitals within one hour of your project. Recognizing the importance of maintaining a fully staffed ED with high quality personnel, Presence Saint Joseph works very hard on its ED nurse recruitment and retention efforts and has been able to maintain its vacancy rate at 8.06% for the time period of October 1, 2011 through September 30, 2012, which is the time frame for which you requested our data. Although we cannot say that we have a staff shortage, as defined by the State standard of 10%, we must point out that this rate is four times the vacancy rate for the rest of our organization – an obvious indicator of the difficulty in recruiting and retaining ED personnel, both licensed and non-licensed. This freestanding emergency center project in Frankfort, if approved, will have a serious negative impact on the ability to maintain appropriate staffing levels at the Presence Saint Joseph since it will be competing with Silver Cross for qualified candidates. As you requested that I do, I swear and attest that this data is true and correct to the best of my knowledge.

Sincerely,

Beth Hughes  
President and CEO

Cc:

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