

**ILLINOIS HEALTH FACILITIES and SERVICES REVIEW BOARD (HFSRB)
PROJECT HEARING REPORT**

Applicant: Silver Cross Hospital & Medical Center New Lenox, Illinois
Project Number: 12-096
Hearing Date: Thursday, January 10, 2013
Location: Frankfort Park District, 140 Oak Street, Frankfort Illinois
Time: 12:30 PM - 3:00 PM

Hearing Officer: Alexis Kendrick
Staff Support: Courtney Avery, Administrator
HFSRB Representative: Dale Galassie, Board Member

Hearing Requested by: Silver Cross Hospital & Medical Center New Lenox, Illinois

The following summarizes the attendance figures:

Oral/Written Presentations:

Support: 6
Oppose: 5

Registered Attendance Only

Support: 3
Oppose: 10
Neutral: 1

Total individuals registered: 25



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

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Public Hearing Testimony Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) Ruth Colby
 Address Silver Cross, 1900 Silver Cross Blvd.
 City New Lenox State IL Zip 60451
 Signature Ruth A. Colby

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Silver Cross Hospital

III. POSITION (please circle appropriate position)

Support Oppose

IV. Testimony (please circle)

Oral Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

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Public Hearing Testimony Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) THOMAS W SENESENE

Address 1423 Chicago Rd

City Chicago Heights State ILL Zip 60411

Signature _____

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

FRANKFORD ST. JAMES HEALTH

III. POSITION (please circle appropriate position)

Support

Oppose

IV. Testimony (please circle)

Oral

Written

3



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Testimony Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION
Name (Please Print) BILL W. DOUGLAS
Address 350 N. WALL ST.
City KANKAKEE State IL Zip 60901
Signature B. W. Douglas

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)
Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

III. POSITION (please circle appropriate position)

Support

Oppose

IV. Testimony (please circle)

Oral

Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

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Public Hearing Testimony Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) Rich Heim

Address 17800 Kedzie

City Hazel Crest State IL Zip 60429

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Advocate South Suburban
Hospital

III. POSITION (please circle appropriate position)

Support

Oppose

IV. Testimony (please circle)

Oral

Written

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STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Testimony Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) DAVID MIKOLAJCZAK

Address 18021 HUNT CLUB DR

City MTKONA State IL Zip 60448

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care) SILVER CROSS HOSPITAL

III. POSITION (please circle appropriate position)

Support Oppose

IV. Testimony (please circle)

Oral Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

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Public Hearing Testimony Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) DR. SILVIO MORALES

Address SILVER CROSS, 1900 SILVER CROSS BLVD.

City NEW LENOX State IL Zip 60451

Signature 

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

SILVER CROSS HOSPITAL

III. POSITION (please circle appropriate position)

Support

Oppose

IV. Testimony (please circle)

Oral

Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

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Public Hearing Testimony Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) Lonnie Polhemus

Address 26748 Lindengate Circle

City Plainfield State IL Zip 60585

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Silver Cross Hospital

III. POSITION (please circle appropriate position)

Support Oppose

IV. Testimony (please circle)

Oral Written

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STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Testimony Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) Lisa Lager

Address ~~2475~~ 333 N Madison St

City Joliet State IL Zip 60451

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Presence Saint Joseph Medical Center

III. POSITION (please circle appropriate position)

Support

Oppose

IV. Testimony (please circle)

Oral

Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

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~~Public Hearing Testimony Registration Form~~

Facility Name: Silver Cross Health System - Frankfort

Appearance
ONLY

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) JEFF SO

Address 9401 S PULASKI

City EVANSTON PARK State IL Zip 60805

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

ADVOCATE HEALTH CARE

III. POSITION (please circle appropriate position)

Support

Oppose

IV. Testimony (please circle)

Oral CRA

Written



10

STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Testimony Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) LARRY RAUCH

Address 333 W NEBRASKA ST

City FRANKFORT State IL Zip 60423

Signature Larry Rauch

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

FRANKFORT FIRE DIST

III. POSITION (please circle appropriate position)

Support Oppose

IV. Testimony (please circle)

Oral Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

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Public Hearing Testimony Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) Christopher Udovich

Address 222 Colorado Ave

City Frankfort State IL Zip 60423

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Hedges Clinic

III. POSITION (please circle appropriate position)

Support Oppose

IV. Testimony (please circle)

Oral Written

Silver Cross Emergicare Center, Frankfort – 12-096

**Public Hearing
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16/2

Good afternoon. My name is Dr. Silvio Morales and I am Department Chair for Emergency Services at Silver Cross Hospital. I have been on staff at Silver Cross Hospital since 2005 and over the past eight years I have experienced firsthand the tremendous growth in emergency department visits at the hospital.

My group, EM Strategies, provides all the physician emergency medicine services throughout the Silver Cross system. We were very involved in the operational planning for the hospital's FEC in Homer Glen and we have staffed it since its opening in August, 2009. And we also have an "after hours" center at Hedges Clinic in Frankfort. This allows for consistency in care delivery throughout the network and familiarity with the patients who chose Silver Cross. We have well-established, long-standing relationships with other physicians in the community and the EMS system. Because we have an electronic medical record, we can easily access our patients' medical history at all our locations and can communicate with the hospital and other providers in our network. Care delivery is safer and faster and duplicative testing is prevented, ultimately reducing healthcare costs.

We urge the Illinois Health Facilities and Services Review Board to approve Silver Cross Hospital's proposed FEC in Frankfort. We know how to successfully operate an FEC as demonstrated by our experience with the Homer

Silver Cross Emergicare Center, Frankfort – 12-096

*Morales
2/1/13*

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Glen facility and hope that we will be able to bring our unique expertise to the Frankfort community. Thank you for giving me the opportunity today to speak on behalf of this needed project.

Public Hearing
January 10, 2013

Good afternoon. My name is Dr. Dave Mikolajczak, and I am Medical Director for the Silver Cross Emergency Medical Services which serves Will and Grundy counties. I have also been on staff at Silver Cross Hospital for more than 20 years as an emergency medicine physician. Having Silver Cross Hospital establish an FEC in Frankfort will give residents of that area greater access to emergency care and treatment located much close to home.

In my role as Medical Director for the Silver Cross EMS, I can attest that transportation time for an ambulance to the hospital is perhaps one of the most critical measures in an emergency situation. Silver Cross Hospital is located close to the proposed FEC in Frankfort – just 11.6 miles or 18 minutes – so that our emergency responders can transport patients quickly to the hospital. The biggest benefit is that those same emergency responders will remain in our community and be available for other area residents should the need arise.

As an emergency medicine physician, I have seen tremendous growth in emergency room visits over the past several years. While our total emergency volumes have been increasing, roughly 20% of our patients continue to come from areas in and around Frankfort. Given our ED visit growth and the percentage of patients we are seeing from this area – we are projecting that we will soon be over capacity at our two existing sites within the next few years. Since volumes

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**Public Hearing
January 10, 2013**

projected for our proposed FEC in Frankfort would come entirely from our existing patient base, it is important to note that no other hospital will be negatively impacted. However, if our proposed FEC in Frankfort is not approved, it will negatively impact patients in Will County. Patients may be transported out of their county to an unfamiliar location or seen by unfamiliar physicians that are not part of the Silver Cross network.

Our patients deserve to be treated close to home in an emergency. Our residents deserve to have emergency responders who remain in the county and are available to their community. And, Silver Cross Hospital deserves to expand emergency room capacity to meet the growing demand. I urge the Illinois Health Facilities and Services Review Board to approve Silver Cross Hospital's proposed FEC in Frankfort.

Silver Cross Emergicare Center, Frankfort – 12-096

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~~Copy~~
Polhemus
1012

Good afternoon. My name is Lonnie Polhemus and I am the EMS System Manager for Silver Cross EMS. I have been an EMT for 30 years and a nurse for 10 years and in my current role for the past three years. I also still work in the field as a firefighter / paramedic.

In my role, I recognize that there is a need for additional emergency services in order to keep pace with the growing population in our area. I know that current hospital-based emergency departments are rapidly reaching and surpassing available capacity. A Freestanding Emergency Center in Frankfort will be very helpful in offsetting some of the overcrowding that we are experiencing at our local hospital emergency rooms. And, given an option, I would expect most residents in and around Frankfort would choose to go to a facility located much closer to home.

I know from experience that a Freestanding Emergency Center can be an added benefit for the local EMS. Silver Cross Hospital's FEC in Homer Glen – open since August 2009 – has been well-received by our EMS providers and by area residents. With a new FEC in Frankfort, our emergency responders will be able to transport patients quickly to Silver Cross. Those emergency responders will also remain in our community and continue to be available to other area residents should the need arise.

Silver Cross Emergicare Center, Frankfort – 12-096

2/12

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I urge the Illinois Health Facilities and Services Review Board to approve Silver Cross Hospital's proposed FEC in Frankfort. Our community deserves this level of care.

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Good afternoon. My name is Chris Udovich, M.D. – I am a family practice physician based at Hedges Clinic – one of the larger physician practices in Frankfort. Hedges Clinic has served patients in Frankfort and Will County for the past 102 years. We have seen our practice grow tremendously over the past decade. And, one approach we have taken to address this growing patient base is to offer “after hours” urgent care-level services for our patients who need immediate treatment after our regular business hours. We have seen demand for this type of “after hours” urgent care continue to grow among our patients – but urgent care is limited in scope. We do not provide this service 24/7 and we can’t treat the same types of conditions that would normally be addressed in an emergency room. Having a fully-functioning freestanding emergency center located right here in our own community would complement the urgent care services we have been providing to our patients for years. When our “after hours” clinic is closed – we will be referring our patients to seek treatment at Silver Cross Hospital’s proposed FEC in Frankfort.

Our “after hours” urgent care clinic is currently staffed by physicians from EM Strategies – the same physician group that provides emergency services for Silver Cross Hospital and their existing FEC in Homer Glen. A key benefit of the proposed FEC in Frankfort is that EM Strategies physicians would be staffing that

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facility as well – physicians with a medical perspective we understand and have been working with for years and who will ensure continuity of care for our patients.

When minutes matter, our preference is to have patients treated in their own community, with the same physicians and caregivers that have served them for years. Silver Cross Hospital's proposed FEC in Frankfort will give residents in this community that peace of mind. We urge the Illinois Health Facilities and Services Review Board to approve Silver Cross Hospital's proposed FEC in Frankfort. Thank you for giving me the opportunity today to speak on behalf of this needed project.

Silver Cross Emergicare Center, Frankfort – 12-096

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1002

Good afternoon. My name is Larry Rauch and I am Assistant Chief of the Frankfort Fire Protection District. We have worked with Silver Cross Hospital through the Emergency Medical System for many years and, as a result, we know how to work together for the benefit of our community. Having Silver Cross Hospital establish a Free Standing Emergency Center in Frankfort will give residents of this community greater access to emergency care and treatment - located much closer to home.

Our ambulance runs from the Frankfort area to Silver Cross Hospital and the hospital's FEC in Homer Glen have been growing over the last few years. There is a growing need for more hospital-level emergency services in the area. Silver Cross Hospital's extensive experience in running a successful FEC in Homer Glen also makes them a preferred provider for operating a similar service in Frankfort.

Silver Cross Hospital's proposed FEC in Frankfort will save time and money for the Frankfort Fire Protection District's emergency responders, freeing them up for life threatening situations. Patients can easily get to the Center. Silver Cross will have ambulances available on site if patients need transport to the hospital. Basic life support cases can be brought directly to the FEC for care for immediate treatment at all hours of the day. It is also preferred that our

Silver Cross Emergicare Center, Frankfort – 12-096

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ambulances remain available in our community for transport to local hospitals like Silver Cross, rather than having them leave this area for extended periods of time.

I urge the Illinois Health Facilities and Services Review Board to approve Silver Cross Hospital's proposed FEC in Frankfort. Our community deserves this level of care.

Colby
12/5

Public Hearing
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Good afternoon. My name is Ruth Colby and I am the Chief Strategy Officer for Silver Cross Hospital. Our application for a Free Standing Emergency Center in Frankfort, IL is based on the identified need for this service in this market, the fact that we will not negatively impact other providers, that Silver Cross will exceed capacity in 2016, and that we have a proven track record in operating a Free Standing Emergency Center.

Silver Cross relocated to a new campus in New Lenox less than a year ago now. And, since our move, the number of patients we have been treating in our emergency department – both at our New Lenox campus and at our existing Freestanding Emergency Center in Homer Glen – has been growing rapidly. In the first three months of our fiscal year beginning Oct. 1, 2012, our ED visit volume has increased 10.4%, as compared to the same time period last year. In zip code 60423 alone, which is Frankfort, volume has grown by 28.7%.

And according to the most recent census projections, the population in Frankfort and the surrounding communities is expected to grow by nearly 8% over the next five years. The growth of the population combined with the significant increase in visits the Hospital has experienced, form the basis of the need identified for this Center.

Colby
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Silver Cross Hospital also is the market leader in the facility service area which consists of 8 zip codes immediately surrounding the proposed site.

According to Illinois state data, 27.4% of patients from these zip codes chose to come to Silver Cross for emergency services – 11 percentage points higher than the next provider. We have focused on the defined facility service area because of our experience at Homer Glen - 80% of the patients using the Homer Glen FEC are from the closest 11 zip codes – patients tend not to travel long distances if they don't have to.

Our visit volumes support the fact that our *proposed FEC will not negatively impact any other provider's ED volumes*. The patients that our proposed FEC will treat are already coming to Silver Cross Hospital's ED in New Lenox and our FEC in Homer Glen. 16,000 ED visits to Silver Cross were from the 8 closest zip codes – 2,600 from Frankfort alone. The new FEC will provide an access point closer to these people's home that is interconnected with the Hospital and doctors they typically see for care. Furthermore, we have demonstrated that our current facilities will exceed capacity by 2016.

To date, three hospitals have indicated opposition to our proposed project. One of these hospitals – Advocate South Suburban – indicated that their emergency department is operating under State minimum standards and currently

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has excess capacity. While that may be true for that facility – we have stated throughout our application and demonstrated by our historical and projected volumes that *no other area provider will be negatively impacted from our proposed FEC*. The patients we expect to treat at our proposed FEC in Frankfort will come directly from patients Silver Cross is already treating at our hospital ED in New Lenox and at our other Freestanding Emergency Center in Homer Glen. Therefore, our project will have no impact on Advocate South Sub and it will not lower their current ED utilization further.

The other two hospitals that indicated opposition – Presence St. Joe's in Joliet and Riverside Hospital in Kankakee – fall outside the 30-minute normal travel time radius as defined by the State. Furthermore, both serve a very small number of patients in the facility service area. Presence St. Joe's, which by their own admission is 32.2 minutes away, serves approximately 3% of ED patients in the Facility Service Area and Riverside, which is 44.9 minutes away serves less than 1%. These two providers simply do not have significant visit volumes to support their arguments that they will be negatively impacted by our project.

Furthermore, since Silver Cross Hospital moved last February, the City of Joliet has redirected ambulances on the east side of Joliet from Silver Cross to Presence St. Joseph's Medical Center. This appears to be borne out by data

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provided by the Metropolitan Chicago Healthcare Council. According to the data, ED visits for Presence St. Joe's increased by 4.4% for the twelve months ending November 2012 as compared to the previous twelve-month period. And, we do not expect this trend to change at all once our proposed FEC in Frankfort becomes operational.

Interestingly, any negative impact that Presence St. Joe's is expecting would be caused by their own plans. St. Joe's stated in their impact letter that their strategy is to *reduce ED visits* by establishing a Federally Qualified Health Center on their campus in Joliet. They also indicated that their current ED utilization is 62.8%, but their goal is to further reduce volume by 5,475 visits (or 8.2%). With low ED utilization, plans to further reduce ED visits, and an extremely small number of patients from the Frankfort FEC market, it is difficult to follow their logic, but clearly, our proposed project will not be the reason that Presence St. Joe's experiences any decline. As far vacancy rates, St. Joe's has not demonstrated a staffing shortage. Currently Silver Cross has 1 open position for an RN in the emergency department. Our experience has been 20 candidates for each open RN position in the ED.

As I have mentioned previously, Silver Cross Hospital has a Freestanding Emergency Center in Homer Glen which is one of only five in the

Colby
5/15

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January 10, 2013**

State of Illinois. Silver Cross already has expertise in terms of how best to run such a facility and how to work with local EMS providers. Our current ED physician group, EM Strategies, will staff the proposed FEC. This will provide consistency in clinical oversight and management of our patients. And we have found that an FEC is the least costly alternative for providing 24/7 emergency care. Urgent care and after hours help with a portion of the care needed in the community, but our FEC will be there in the middle of the night, seven days a week – because people can't schedule when they get sick. FECs are an important access point across the continuum of care and are extremely efficient and less costly than traditional hospital EDs.

In conclusion, volumes for our proposed FEC will be coming from our existing patients, and we have demonstrated a need to add capacity. We also have the support of key stakeholders – Silver Cross EMS, the Medical Director of the Silver Cross ED, Hedges Clinic in Frankfort – which is the largest medical group in Frankfort, and the Frankfort Fire Protection District. We encourage the Illinois Health Facilities and Services Review Board to approve our project.

Jan. 10, 2013

I am Rich Heim, President of Advocate South Suburban Hospital in Hazel Crest, Ill. I am here today in opposition of the proposed Silver Cross Hospital Freestanding Emergency Center in Frankfort.

The health care situation in our country makes it vital, now and moving forward, that health care providers work together with our government to improve access to primary care and control costs. The construction of a freestanding emergency center in this area, at this time has the potential to work against both of these vital goals.

According to a recent report commissioned by the National Quality Forum, about 50 percent of patients who visit an ED have health issues that are considered non-or semi-urgent. In these lower acuity cases, patients would be more appropriately cared for in a primary care or urgent care setting.

This emphasis on fostering the right care delivery at the right time, in the right place has already proven to reduce costs and improve the quality of healthcare services over the long term. We believe that the State should be encouraging lower cost care and not be encouraging more ED utilization.

At this time, this area is well positioned to meet the primary care needs of patients living in this community. Independent research conducted by Truven Health Analytics, shows that the current supply of primary care physicians in this area is sufficient for today as well as for the projected area population growth.

In addition to a number of primary care physician offices, the broader market area has about 30 urgent care centers able to treat non-or semi-urgent illnesses and injuries. Seven of these centers offer extended evening and weekend hours.

For more than three years, Advocate Health Care has been working with Centers of Medicare & Medicaid Services (or CMS) and Blue Cross Blue Shield of Illinois to reduce ED visit volumes and better manage the health of our population in the southern suburbs. This focus on delivering appropriate non-emergency treatment has already proven to help decrease health care cost and increase the coordinated access to care.

The construction of a freestanding emergency center in Frankfort may well work against these successful efforts, primarily driven by CMS, to provide access to healthcare services in more effective, efficient and cost-effective settings.



January 8, 2013

350 N. Wall Street
Kankakee, IL 60901
815-933-1671

Illinois Health Facilities and
Services Review Board
2nd Floor
525 West Jefferson Street
Springfield, Illinois 62761

To the Illinois Health Planning Board:

We appreciate Silver Cross's recognition that a Freestanding Emergency Department (FSED) is needed in Frankfort. Silver Cross appears to have come to that conclusion after Riverside filed an FSED application in November of last year. Silver Cross filed its "me too" application just a few weeks later.

There is no question as to the need. But of all the places to put an FSED, why would Silver choose one just down the road from where Riverside plans to build?

Did Silver Cross consider locating an FSED in Joliet? Joliet is the fourth largest City in Illinois with a population of 150,000 people, but Joliet now has only one Emergency Department after Silver Cross left for New Lenox last year. It was my understanding that Silver Cross made promises to the City and to the CON Board about maintaining health care services in Joliet. Would a FSED be something that Silver Cross could do for Joliet now?

The application by Silver Cross appears to be a blocking maneuver. Its commitment to Frankfort is questionable. The CON Board gave Silver Cross approval to build a \$15 million medical office project in 2006 on the site that it now proposes to build an FSED.

The medical office project was part of a larger development. When that development deal fell apart, Silver Cross abandoned its CON approved Frankfort Medical Office Building.

I have another concern with Silver Cross' current proposal. If you look at page 39 of the Silver Cross CON application, you will note that the proposed site is located in a floodplain and there is a letter from the Illinois Department of Natural Resources that states Critical Facilities "shall be located outside the floodplain."

I am puzzled why Silver Cross would want to build an Emergency facility in a floodplain? The cost of such a project could be prohibitive. There are extensive and expensive architectural and building requirements that must be complied with to build an emergency facility in a floodplain. There appears to be nothing in Silver Cross' CON application that reflects accommodation for these requirements in the project cost.

For these reasons, Riverside Medical Center respectfully requests that the Illinois Health Facilities and Services Review Board deny Silver Cross' application for an FSED.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill W. Douglas", written over a horizontal line.

Bill W. Douglas
Senior Vice President
Chief Financial Officer
Riverside Medical Center

**PUBLIC HEARING TESTIMONY
IN OPPOSITION TO PROJECT # 12-096
SILVER CROSS EMERGENCY CARE CENTER- FRANKFORT**

FRANCISCAN ALLIANCE
CORPORATE OFFICE
Mishawaka

FRANCISCAN
ST. ANTHONY HEALTH
Crown Point

FRANCISCAN
ST. ANTHONY HEALTH
Michigan City

FRANCISCAN
ST. ELIZABETH HEALTH
Crawfordsville

FRANCISCAN
ST. ELIZABETH HEALTH
Lafayette Central

FRANCISCAN
ST. ELIZABETH HEALTH
Lafayette East

FRANCISCAN
ST. JAMES HEALTH
Chicago Heights

FRANCISCAN
ST. JAMES HEALTH
Olympia Fields

FRANCISCAN
ST. MARGARET HEALTH
Dyer

FRANCISCAN
ST. MARGARET HEALTH
Hammond

FRANCISCAN
ST. FRANCIS HEALTH
Beech Grove

FRANCISCAN
ST. FRANCIS HEALTH
Indianapolis

FRANCISCAN
ST. FRANCIS HEALTH
Mooresville

FRANCISCAN
PHYSICIANS HOSPITAL, LLC
Munster

I am here today to oppose Silver Cross Hospital's proposal to establish a freestanding emergency center in Frankfort. My name is Thomas W. Senesac, and I am the Chief Financial Officer with Franciscan St. James Health. Franciscan St. James operates two hospitals in the far southwestern suburbs: Franciscan St. James- Chicago Heights and Franciscan St. James-Olympia Fields. These two hospitals each operate emergency departments classified by IDPH as "comprehensive", and both emergency departments have excess capacity. Therefore, this project is not needed.

Silver Cross Hospital's relocation from Joliet to New Lenox last year resulted in a significant decline both to our inpatient services and our emergency department services, particularly at our Olympia Fields hospital, located about 5 miles to the east of the proposed FEC site. Our Chicago Heights hospital is located approximately 10 miles from the site. We view this project as another attempt on the part of Silver Cross to gain a stronger foothold into the communities that lie between our hospitals and Silver Cross.

We as operators of community hospitals must all be aware of the uncertainties that lie ahead, and if we are going to continue with our charitable missions, it is incumbent upon us to be aware of changes in our markets, and the proposed FEC will result in a change that will have significant repercussions on St. James Health, and particularly our Olympia Fields hospital.

This project is not needed by the community, and we urge the IHFSRB to disapprove this project.

FranciscanAlliance.org

CHICAGO HEIGHTS
1423 Chicago Road
Chicago Heights, IL 60411
PH: 708 756 1000

OLYMPIA FIELDS
20201 South Crawford Avenue
Olympia Fields, IL 60461
PH: 708 747 4000



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) Ed Green
Address Foley & Lardner 321 North Clark Street
City Chicago State IL Zip 60611
Signature Ed Green

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Silver Cross Hospital

III. POSITION (Circle appropriate position)

Support Oppose Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) Julie Limen

Address 11083 siena dr.

City FRANKFORT State IL Zip 60423

Signature 

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

SILVER CROSS HOSPITAL

FRANKFORT RESIDENT

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) Judith L. Preth

Address 21045 W. Thelma Dr

City Chillicothe State IL Zip 60881

Signature J Preth

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Concerned Citizens

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) Liane McConachy

Address 805 West Joliet Hwy

City New Lenox State IL Zip 60451

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Riverside Medical Center

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) Patricia K. Vitt

Address 1010 Peony Lane

City Burnhams State IL Zip 60914

Signature Patricia K. Vitt

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Riverside Medical Center

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS

HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) MICHAEL DAVID

Address 11083 SILVER DR.

City FRANKFORT State IL Zip 60423

Signature Michael David

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS

HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print)

DAN LAWLER

Address BARNES & THORNBURG, ONE N. WACKER, STE 4400

City Chicago State IL Zip 60606

Signature

Dan Lawler

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

RIVERSIDE MEDICAL CENTER

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) Sloane Bradshaw

Address 480 NEBRASKA CT B

City FRANKFORT State IL Zip 60423

Signature Sloane Bradshaw

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS

HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print)

PHILLIP KAMBIC

Address

3383 TOWLOUSE

City

ROCKFORD

State

IL

Zip

60214

Signature

Phillip Kambic

II.

REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

III.

POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print)

Maria Kurchner

Address

502 Wisconsin Road

City

New Lenox

State

IL

Zip

60457

Signature

[Handwritten Signature]

II.

REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

III.

POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) MARGARET FROBGE

Address 350 N. WALL

City KANKAKEE State IL Zip 60901

Signature Margaret Frobge

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

RIVERSIDE MEDICAL CENTER

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) Jessica Kebert

Address 25877 S Sunrise Ct.

City Monee State IL Zip 60449

Signature Jessica J Kebert

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)
local citizen

III. POSITION (Circle appropriate position)

Support **Oppose** Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) DAVID PUENT

Address 420 LINDEU CT.

City FRANKFORT State ILL Zip 60423

Signature *David Puent*

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

RESIDENT

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW

Public Hearing Appearance Only Registration Form

Facility Name: Silver Cross Health System - Frankfort

Project Number: 12-096

I. IDENTIFICATION

Name (Please Print) CARL MARONICH

Address 1318 Wether Rd.

City Bowling Green State FL Zip 60914

Signature Carl Maronich

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Riverside Medical Center

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral