



STATE OF ILLINOIS  
HEALTH FACILITIES AND SERVICES REVIEW BOARD

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<b>DOCKET NO:</b> H-03	<b>BOARD MEETING:</b> November 17, 2015	<b>PROJECT NO:</b> 15-040	<b>PROJECT COST:</b> Original: \$68,585,763
<b>FACILITY NAME:</b> Rockford Memorial Hospital-Riverside Boulevard Campus Medical Clinics Building		<b>CITY:</b> Rockford Township	
<b>TYPE OF PROJECT:</b> Non-Substantive			<b>HSA: I</b>

**PROJECT DESCRIPTION:** The applicants are proposing a medical clinics building on the campus of the proposed Rockford Memorial Hospital Riverside Boulevard campus. The proposed cost of the project is \$68,585,763. The anticipated completion date is June 30, 2019.

## **EXECUTIVE SUMMARY**

### **PROJECT DESCRIPTION:**

- The applicants are proposing a medical clinics building on the campus of the proposed Rockford Memorial Hospital Riverside Boulevard campus. The proposed cost of the project is \$68,585,763. The anticipated completion date is June 30, 2019.

### **WHY THE PROJECT IS BEFORE THE STATE BOARD:**

- The project is before the State Board because the project is by or on behalf of a health care facility and the costs of the project is over the capital expenditure minimum of \$12,797,313.

### **PURPOSE OF THE PROJECT:**

- **Per the applicants** *“the purpose of this project is to provide contemporary office space for MercyRockford Health System-affiliated physicians (employed and independent) and other health care professionals, and to provide appropriate facilities for selected hospital-related outpatient, administrative, and support services.*

### **PUBLIC COMMENT:**

- A public hearing was conducted on September 17, 2015. Nineteen (19) individuals registered for the public hearing; fourteen (14) individuals registered in support, five (5) individuals registered in opposition. Letters of support and opposition were received by the State Board Staff.

### **CONFORMANCE:**

- The applicants addressed a total of 15 criteria and have successfully addressed them all.

## STATE BOARD STAFF REPORT

### Project #15-040

#### Rockford Memorial Hospital-Riverside Boulevard Campus Medical Clinics Building

APPLICATION SUMMARY/CHRONOLOGY	
Applicants(s)	Interstate Alliance, Inc. d/b/a MercyRockford Health System, Rockford Memorial Hospital
Facility Name	Rockford Memorial Hospital-Riverside Boulevard Campus Medical Clinics Building
Location	I-90/39 & East Riverside Blvd, Rockford Township , Illinois
Permit Holder	Interstate Alliance, Inc. d/b/a MercyRockford Health System
Operating Entity	Rockford Memorial Hospital
Owner of Site	Rockford Memorial Hospital
Gross Square Feet	81,498 Gross Square Feet
Application Received	August 18, 2015
Application Deemed Complete	August 19, 2015
Financial Commitment Date	November 15, 2017
Completion Date	June 30, 2019
Review Period Ends	October 18, 2015
Review Period Extended by the State Board Staff?	No
Can the applicants request a deferral?	Yes
Public Hearing Date	September 17, 2015

#### **I. The Proposed Project**

The applicants (Interstate Alliance, Inc. d/b/a MercyRockford Health System, Rockford Memorial Hospital) are proposing the establishment of a medical clinics building on the Rockford Memorial Hospital-Riverside campus, which will be physically connected to the proposed hospital facility. Approximately 50% of the space in the medical clinics building will be used as physicians' offices, with the remainder being allocated for a limited scope of outpatient services, administrative functions and support and public areas. The proposed cost of the project is **\$68,585,763 and proposed completion date is June 30, 2019.**

#### **II. Summary of Findings**

- A.** The State Board Staff finds the proposed project appears to be in conformance with the provisions of Part 1110.
- B.** The State Board Staff finds the proposed project appears to be in conformance with the provisions of Part 1120.

#### **III. General Information**

The applicants are Interstate Alliance, Inc. d/b/a MercyRockford Health System and Rockford Memorial Hospital. Interstate Alliance d/b/a MercyRockford Health System is the result of the merger of Mercy Alliance Inc. and Rockford Health System in January,

2015 which was approved by the State Board in December 2014. The MercyRockford Health System includes four hospitals, two in Illinois and two in Wisconsin: Rockford Memorial Hospital, Rockford, Illinois, Mercy Harvard Hospital, Harvard Illinois, Mercy Hospital and Trauma Center, Janesville, Wisconsin, and Mercy Walworth Hospital and Medical Center, Lake Geneva, Wisconsin.

This is a non substantive project subject to a Section 1110 and 1120 review. Obligation will occur after permit issuance.

The Illinois Historic Preservation Agency is required by the Illinois State Agency Historic Resources Preservation Act (20 ILCS 3420, as amended, 17 IAC 4180) to review all state funded, permitted or licensed undertakings for their effect on cultural resources. The Illinois Historic Preservation Agency has determined that no significant historic, architectural or archaeological resources are located within the proposed project area. Dan Parod Senior Vice President Hospital and Administrative Affairs has attested that the proposed project is in compliance with Executive Order #2006-05.

**IV. Project Details**

The Medical Clinics Building will consist of six levels in approximately 81,498 GSF of space.

- Lower Level: mechanical
- 1st Floor: retail pharmacy and support areas
- 2nd Floor: physicians' offices
- 3rd Floor: physicians' offices
- 4th Floor: diagnostic services and administrative space
- 5th Floor: mechanical

**V. Project Costs and Sources of Funds**

The applicants are funding the project with cash and securities of \$15,000,000 and a bond issue of \$53,585,763.

<b>TABLE ONE</b>			
<b>Project Costs and Sources of Funds</b>			
	<b>Reviewable</b>	<b>Non Reviewable</b>	<b>Total</b>
Preplanning	\$30,000	\$245,000	\$275,000
Site Survey and Soil Investigation	\$10,000	\$20,000	\$30,000
Site Preparation	\$80,000	\$705,000	\$785,000
Off Site Work	\$2,846,506	\$22,343,810	\$25,190,316
New Construction Contracts	\$1,764,193	\$13,837,906	\$15,602,099
Contingencies	\$88,210	\$691,895	\$780,105
Architectural and Engineering Fees	\$165,000	\$1,025,600	\$1,190,600
Consulting and Other Fees	\$442,395	\$3,487,005	\$3,929,400
Movable and Other Equipment	\$2,232,711	\$8,930,842	\$11,163,553
Bond Issuance Expense	\$75,753	\$594,192	\$669,945
Net Interest Expense During	\$1,014,246	\$7,955,499	\$8,969,745

<b>TABLE ONE</b>			
<b>Project Costs and Sources of Funds</b>			
	<b>Reviewable</b>	<b>Non Reviewable</b>	<b>Total</b>
Construction			
<b>Total Use of Funds</b>	<b>\$8,749,014</b>	<b>\$59,836,749</b>	<b>\$68,585,763</b>
<b>Sources of Funds</b>			
Cash and Securities	\$1,950,000	\$13,050,000	\$15,000,000
Bond Issues	\$6,799,013	\$46,786,750	\$53,585,763
<b>Total Sources of Funds</b>	<b>\$8,749,013</b>	<b>\$59,836,750</b>	<b>\$68,585,763</b>

## VI. Cost Space Requirements

The applicants are proposing new construction of 81,498 GSF of new construction.

<b>TABLE TWO</b>			
<b>Cost Space Requirements</b>			
	<b>Cost</b>	<b>Proposed</b>	<b>New Construction</b>
Diagnostic Testing	\$6,649,250	5,695	5,695
Infusion Therapy	\$2,099,763	2,282	2,282
<b>Reviewable</b>	<b>\$8,749,013</b>	<b>7,977</b>	<b>7,977</b>
Physicians Offices	\$29,002,873	37,961	37,961
Staff Areas	\$2,369,535	3,115	3,115
Public Areas Circulation	\$17,155,196	18,842	18,842
Conference Center	\$2,961,919	2,064	2,064
Administration	\$2,369,535	2,444	2,444
Medical Staff	\$1,777,151	2,366	2,366
Mechanical	\$3,548,319	6,729	6,729
DGSF>>>BGSF	\$652,221	0	0
Non Reviewable	\$59,836,749	73,521	73,521
<b>Total</b>	<b>\$68,585,762</b>	<b>81,498</b>	<b>81,498</b>

**VII. Section 1110.230 - Purpose of Project, Safety Net Impact Statement, Alternatives to the Project**

**A) Criterion 1110.230 (a) – Purpose of the Project**

The applicants state *“the purpose of this project, addressing the development of a medical clinic building on the RMH-Riverside campus, is to provide contemporary office space for MercyRockford Health System-affiliated physicians (employed and independent) and other health care professionals, and to provide appropriate facilities for selected hospital-related outpatient, administrative, and support services.*

*One of the goals identified during the 2014/2015 formation of MercyRockford Health System was to centralize specialty services. These specialty services are intended to be located at RMH-Riverside, with many of the system-employed specialists’ offices in the proposed medical clinic building because of its location on I-90/39, which links the traditional service areas of Rockford Health System and Mercy Alliance, Inc. As a result, it is anticipated that certain patients that have traditionally been referred from Mercy’s Wisconsin service area to Madison or Milwaukee will be referred to RMH-Riverside due to its convenient location. As noted in the table above, traditionally few patients from Wisconsin have been admitted to RMH. Among the goals of the projects is improved patient satisfaction with the facilities and improved access, resulting in an increase in the number of patients referred from Wisconsin. The achievement of these goals will be measurable during the first year following the projects’ completion.”*

**B) Criterion 1110.230 (b) – Safety Net Impact Statement**

This is a non substantive project and a safety net impact statement is not required. Charity Care information was provided as required.

<b>TABLE THREE</b>			
<b>Rockford Memorial Hospital</b>			
<b>Charity Care <sup>(1)</sup></b>			
	<b>2012</b>	<b>2013</b>	<b>2014</b>
Net Patient Revenue	\$314,128,727	\$314,090,683	\$323,042,795
Charity Care (Charges)	\$28,075,442	\$33,923,122	\$15,219,396
Charity Care (Costs)	\$8,963,540	\$10,770,825	\$4,779,953
% of charity care to Net Patient Revenue	2.85%	3.43%	1.48%
1. 2014 reduction in charity care is off-set by increased Medicaid, and is a result of the Implementation of the Affordable Care Act			

**C) Criterion 1110.230 (c) – Alternatives to the Proposed Project**

**Three alternatives to the proposed project were considered.**

1. The first alternative considered was to substitute re-configured and renovated space on the current Rockford Memorial Hospital campus instead of the proposed Medical Clinic Building on the Rockton-Riverside campus. This alternative was

dismissed due to the importance of locating physicians, and particularly subspecialists, on the RMH-Riverside campus.

2. The second alternative considered was the incorporating of the physicians' offices and the other functions to be located in the proposed medical clinic building into the design of RMH-Riverside. This alternative was evaluated and dismissed, primarily for cost reasons. To implement this alternative, the required space would need to be constructed to hospital standards, adding approximately \$25M to the anticipated capital cost associated with the proposed project. The operating costs, quality of care and access to services resulting from this alternative would be very similar to that of the proposed project. The estimated capital costs for this alternative is approximately **\$93 million**.
3. The third alternative considered was the use of an outside developer to construct, own and operate a medical clinic building on the RMH-Riverside campus. This alternative was dismissed for two primary reasons. First, the applicants' ability to control access to the medical clinic building, including the hospital's outpatient services that will be located in the building, would be diminished. Second, the applicants' control of the tenet mix and future potential building expansion would be compromised if they did not own the building. Had this alternative been selected, the capital costs to be incurred by the applicants would be minimal, but would be offset by the required lease costs for the hospital-based physicians' offices, the outpatient clinical services, and administrative and support functions associated with the hospital's operations that would be located in the building. It is believed that the quality of care to be provided in the building would be similar to that of the proposed project.

## **VIII. Section 1110.530 – Background of Applicants**

### **A) Criterion 1110.530 (b) (1) (3) - Background of Applicants**

The applicants are Interstate Alliance, Inc. d/b/a MercyRockford Health System, Rockford Health System, and Rockford Memorial Hospital. Interstate Alliance, Inc. is an Illinois not for profit corporation, incorporated under the laws of the state on October 24, 2014. Interstate Alliance is in good standing with the Illinois Secretary of State. Interstate Alliance Inc. has been approved to transact business under the assumed corporate name of MercyRockford Health System. Rockford Memorial Hospital, is an Illinois not for profit corporation incorporated under the laws of this state on December 15, 1883, and is in good standing with the Illinois Secretary of State. Rockford Health System consists of affiliated corporations, which include Rockford Memorial Hospital Rockford Health Physicians (RHPH), Visiting Nurses Association of the Rockford Area (VNA), Rockford Memorial Development Foundation (RMDF), Rockford Health System Ventures, LLC (RHSV), and Rockford Health Insurance Ltd.

The applicants have attested that they do not have any adverse actions against any facility owned and operated by the applicant during the three year period prior to the filing of this

application, and authorizes the State Board and the Illinois Department of Public Health to access to information to verify documentation or information submitted in response to the requirements of Review Criterion 77 IAC 1110.530 (b) or to obtain any documentation or information which the State Board or the Illinois Department of Public Health finds pertinent to this application.

**THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IS IN CONFORMANCE WITH CRITERION BACKGROUND OF APPLICANT (77 IAC 1110.530 (b) (1) (3))**

**IX. Section 1110.234 - Size of the Project, Utilization, Assurance**

**A) Criterion 1110.234 (a) - Size of the Project**

The applicants will be providing diagnostic services in 5,695 GSF of new construction. The State Board does not have gross square footage standards for these services. The applicants will be providing the following services in that space:

- **Holter monitors** which is a battery-operated portable device that measures and tape records your heart's activity continuously for 24 to 48 hours or longer depending on the type of monitoring used.
- **EKG testing** or electrocardiogram is a test that checks for problems with the electrical activity of your heart.
- **Echo testing** is a type of ultrasound test that uses high-pitched sound waves that are sent through a device called a transducer. The device picks up echoes of the sound waves as they bounce off the different parts of your heart,
- **TEE procedures** is a transesophageal echo is a type of echo test in which the ultrasound transducer, positioned on an endoscope, is guided down the patient's throat into the esophagus,
- **Stress Echo testing**, Stress echocardiography, also called an echocardiography stress test or stress echo, is a procedure used to determine how well your heart and blood vessels are working
- **EEG a electroencephalogram** is a test that detects electrical activity in your brain using small, flat metal discs (electrodes) attach
- **EMG Electromyography** is a diagnostic procedure to assess the health of muscles and the nerve cells that control them

In addition the applicants will have six chair infusion therapy stations in 2,282 GSF of space.

**THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IS IN CONFORMANCE WITH CRITERION SIZE OF THE PROJECT (77 IAC 1110.234 (a))**

**B) Criterion 1110.234 (b) - Projected Utilization**

**C) Criterion 1110.234 (e) - Assurance**

The applicants are projecting the following utilization for these services. The State Board does not have utilization standard for these services. Because the State Board does not have utilization targets for these services assurance by the applicants that they will be at target occupancy is not required.

<b>TABLE FOUR</b>		
<b>Clinical Services Provided at Medical Clinics Building</b>		
	Historical Utilization*	Projected Utilization
Holter monitoring	148	75
EKG testing	1,011	500
Echo testing	1,091	550
TEE testing	56	30
Stress echo testing	290	145
EEG	855	425
EMG	599	300
Non-oncology infusion therapy	702	700
*Rockford Memorial Hospital 2013-2014 Average Utilization		

**THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IS IN CONFORMANCE WITH CRITERION PROJECTED UTILIZATION ASSURANCE (77 IAC 1110.234 (b) (e))**

**X. Section 1110.3030 – Clinical Services Other than Categories of Services**

**A) Criterion 1110.3030(a) Introduction**

These criteria are applicable only to those projects or components of projects (including major medical equipment), concerning Clinical Service Areas (CSAs) that are not "Categories of Service", but for which utilization standards are listed in Appendix B, including:

- A) Surgery
- B) Emergency Services and/or Trauma
- C) Ambulatory Care Services (organized as a service)
- D) Diagnostic and Interventional Radiology/Imaging (by modality)
- E) Therapeutic Radiology
- F) Laboratory
- G) Pharmacy
- H) Occupational Therapy/Physical Therapy
- I) Major Medical Equipment

The applicants have identified the services in Table Four above to be located in the medical clinics building. The State Board does not have size or utilization standards for these services.

**THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IS IN CONFORMANCE WITH CRITERION CLINICAL SERVICES AREA OTHER THAN CATEGORIES OF SERVICE INTRODUCTION (77 IAC 1110.3030 (a))**

**XI. FINANCIAL**

**A) Criterion 1120.120 - Availability of Funds**

The applicants are funding this project with cash of \$15 million and a bond issue of \$53,585,763. The applicants have provided evidence of an A3 Bond Rating from Moody’s Investors Services. Moody’s states *“The initial A3 issuer rating reflects the scale and market presence of the combined legacy health systems (Mercy and Rockford), good balance sheet resources and proven management team as evidenced by already improving margins. While MercyRockford Health System’s debt profile currently does not include any direct debt obligation, our rating is a forward view of MercyRockford Health System’s plan to become the sole corporate member of every entity that is currently a subsidiary of Mercy or Rockford, consolidate all existing debt under a newly created MercyRockford Health System obligated group and fund clinical integration and operational expansion with debt that will be parity to the planned MercyRockford Health System’s obligated group. The rating is constrained by the historically weak operations of Rockford, risks inherent with integration and operational improvement initiatives, as well as the likelihood of sizable capital building plans which would materially elevate MercyRockford Health System’s leverage in CY 2016.”* A review of Rockford Health System’s and Mercy Alliance audited financial statements balance sheets indicate sufficient cash to fund this project. See page 57-58d of the application for permit for the A3 Bond Rating from Moody’s Investors Services.

<b>TABLE FIVE</b>			
<b>Audited Financial Statements</b>			
<b>December 31</b>			
<b>(Dollars in thousands)</b>			
	<b>Rockford Health System</b>		<b>Rockford Memorial Hospital</b>
	2014	2013	2014
Cash	\$45,085	\$46,244	\$40,078
Current Assets	\$102,975	\$165,573	\$121,155
Total Assets	\$547,843	\$542,730	\$351,371
Current Liabilities	\$83,251	\$77,718	\$50,315
LTD	\$85,691	\$88,071	\$57,724
Net Patient Service Revenue	\$385,543	\$358,093	\$308,202
Total Revenue	\$441,813	\$428,913	\$368,512
Expenses	\$443,644	\$428,250	\$332,736
Excess of Revenues over Expenses	\$4,513	\$19,165	\$35,776

<b>TABLE SIX</b> <b>Mercy Alliance, Inc.</b> <b>Audited Financial Statements</b> <b>December 31</b> <b>(Dollars in thousands)</b>		
	<b>2014</b>	<b>2013</b>
Cash	\$22,326	\$13,284
Current Assets	\$141,088	\$122,359
Total Assets	\$726,088	\$677,694
Current Liabilities	\$89,086	\$83,945
Long Term Debt	\$213,017	\$218,178
Total Liabilities	\$325,595	\$329,196
Operating Revenue	\$527,133	\$502,633
Operating Expenses	\$518,128	\$489,585
Operating Income	\$9,005	\$13,048
Excess of Revenues over expenses	\$22,740	\$23,565

**THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IS IN CONFORMANCE WITH CRITERION AVAILABILITY OF FUNDS (77 IAC 1120.120)**

**B) Criterion 1120.130 – Financial Viability**

The applicants have provided evidence of an A3 bond rating from Moody’s Investors Services; therefore the financial viability ratios do not need to be provided.

**THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IS IN CONFORMANCE WITH CRITERION FINANCIAL VIABILITY (77 IAC 1120.130)**

**XII. ECONOMIC FEASIBILITY**

**A) Criterion 1120.140 (a) - Reasonableness of Financing Arrangements**

**B) Criterion 1120.140 (b) – Terms of Debt Financing**

The applicants stated *“This letter is provided as a response to Section 1120.140.b, and as an affirmation that, in the opinion of the applicants, the conditions of debt proposed to partially finance two projects proposed for Rockford Memorial Hospital's site located to the southeast of the intersection of I-90/39 and East Riverside Boulevard in Rockford Township, Winnebago County, Illinois, are reasonable. As of the filing of the required Certificate of Need applications, it is anticipated that approximately \$446,000,000 will be incurred through the issuance of bonds, with an anticipated interest rate of 4.96% and term of 30 years. It is the applicants' opinion that the combination of debt and equity financing identified in the CON applications represents the lowest net cost reasonably*

available to the applicants at this time, and the most advantageous funding scenario available to the applicants.” See page 59 of the application for permit. The financing appears reasonable and per the applicant the financing will be at the lowest net cost available to the applicants.

**THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IS IN CONFORMANCE WITH CRITERION REASONABLENESS OF FINANCING ARRANGEMENTS TERMS OF DEBT FINANCING (77 IAC 1120.140(a) (b)**

**C) Criterion 1120.140 (c) – Reasonableness of Project Costs**

**Itemization of project costs include both reviewable and non-reviewable costs**

**Preplanning Costs** – These costs are \$30,000 and are less than 1% of the State Standard Board Standard of 1.8% or \$73,532. These costs include

Evaluation of alternatives	\$150,000
Initial programming	\$65,000
Misc/Other	<u>\$60,000</u>
<b>Total</b>	<b>\$275,000</b>

**Site Survey Soil Investigation and Site Preparation Costs** – These costs are \$90,000 and are 4.86% of construction and contingencies of \$1,852,403. The State Board Standard is 5.0%. These costs include the following:

Soil Investigation load testing	\$20,000
Surveys	\$10,000
Excavation	\$590,000
Erosion Barriers	\$60,000
Landscaping	\$115,000
Other/Misc	<u>\$20,000</u>
<b>Total</b>	<b>\$815,000</b>

**Offsite Work Costs** are \$2,846,506. The State Board does not have a standard for these costs. These costs include the following:

Pkg/walk-way/roadway paving	\$5,338,402
Utilities related	\$2,975,957
Parking	\$10,500,000
Trails/park	\$1,900,000
Misc/other	<u>\$4,475,957</u>
<b>Total</b>	<b>\$25,190,316</b>

**Construction and Contingency costs** are \$1,852,403 and are \$232.22 per GSF. This appears reasonable when compared to the State Board Standard of \$242.49 per GSF

**Contingency Costs** are \$88,210 and are 5% of construction costs of \$1,764,193. This appears reasonable when compared to the State Board Standard of 10%.

**Architectural/Engineering Fees** are \$165,000 and are 8.91% of construction and contingency costs of \$1,852,403. This appears reasonable when compared to the State Board Standard range of 7.36-11.06%. These costs include the following:

Design	\$945,000
Document Preparation	\$70,000
Interface w/agencies	\$20,000
Project monitoring	\$30,000
Other	<u>\$125,000</u>
<b>Total</b>	<b>\$1,190,000</b>

**Consulting and Other Fees** are \$442,395. The State Board does not have a standard for these costs. These costs include the following:

Project Management	\$1,600,000
Interior Design	\$340,000
IT Planning and Consulting	\$400,000
Con-Related	\$100,000
Legal	\$80,000
Medical Equipment Planning	\$100,000
Commissioning	\$250,000
Re-location related	\$500,000
Signage/Graphics Design	\$100,000
Other	<u>\$459,400</u>
<b>Total</b>	<b>\$3,929,400</b>

**Movable Equipment costs** are \$2,232,711. The State Board does not have a standard for these costs. A complete list of the equipment can be found at page 38-42 of the application for permit.

**Bond Issuance Expense** is \$75,753. The State Board does not have a standard for these costs.

**Net Interest During Construction** \$1,014,246. The State Board does not have a standard for these costs.

**THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IS IN CONFORMANCE WITH CRITERION REASONABLENESS OF PROJECT COSTS (77 IAC 1120.140(c))**

**D) Criterion 1120.140 (d) - Projected Operating Costs**

**E) Criterion 1120.140 (e) - Total Effect of the Project on Capital Costs**

The State Board does not have a standard for these costs for a medical clinics building.

**THE STATE BOARD STAFF FINDS THE PROPOSED PROJECT IS IN CONFORMANCE WITH CRITERION PROJECTED OPERATING COSTS**

**TOTAL EFFECT OF THE PROJECT ON CAPITAL COSTS (77 IAC 1120.140 (d)  
(e))**

# 15-040 Rockford Memorial Hospital, Riverside Boulevard Campus MOB - Rockford

