

# FOLEY & ASSOCIATES, INC.

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## HAND DELIVERED

December 15, 2015

Mr. George Roate, Project Review  
**Illinois Department of Public Health**  
**Illinois Health Facilities and Services Review Board**  
525 West Jefferson Street, Second Floor  
Springfield, Illinois 62761

RECEIVED

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HEALTH FACILITIES &  
SERVICES REVIEW BOARD

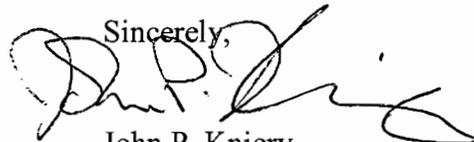
**Re:** Project No. **15-051**, Alden Estates-Courts of  
New Lenox

Dear Mr. Roate:

In response to your November 12, 2015 request for additional information, please accept the enclosed physician referral letters for the above referenced project. Specifically, these letters address that due to HIPAA compliance the physicians' cannot provide specific historical patient origin; although the letters now qualify that the number of referrals that had originated from within 30-minutes travel time of the proposed project site. In qualifying the referral's origins, there appears to be 675 general nursing referrals and 72.6 specialized nursing referrals for a total of 747.6 annual referrals to the facility which originate from within the 30-minute market area. To be able to use all of these referrals would equate to an average length of stay (ALOS) of 61.5 days. It should be known that Will County Planning Area's ALOS for nursing services is 176.9 days as documented on page 209 of the Certificate of Need applications on file. Moreover, ALOS has been decreasing significantly for general geriatric nursing services. The Applicant has been relying on more recent industry standards of 100 day ALOS even though the specialized beds seem to extend that industry standard. As such, only utilizing the qualified referrals, there still appears to be more than enough demand to fill and maintain target utilization.

Thank you for the opportunity to revise these letters to more appropriately address the Board's criteria. As you know this is but one of the "indicators" of need, second to the State's published bed need showing a demand for 141 additional nursing beds. If you have any questions, please do not hesitate to contact me.

Sincerely,



John P. Kniery  
Health Care Consultant

## ENCLOSURES

c: Randi Schullo  
Joe Ourth, Attorney at Law



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Zlatko Haveric  
333 North Madison St.  
Joliet, IL 60435

December 2, 2015

Ms. Courtney Avery, Administrator  
Health Facilities and Services Review Board  
Illinois Department of Public Health  
525 W. Jefferson Street, Second Floor  
Springfield, Illinois 62761

RE: Application for Certificate of Need for Alden Estates – Courts of New Lenox, Inc., 100 Bed Skilled Nursing and 40 Bed Skilled Memory Care Center in New Lenox, Illinois.

Dear Ms. Avery,

I am a practicing physician in the New Lenox area. It is my understanding that the Alden Group, Ltd., through its affiliates, proposes to build a 100 bed skilled rehabilitation and health care center and a 40 bed memory care facility in this area, adjacent to Silver Cross Hospital. With Silver Cross Hospital being adjacent to this location, this development will be a terrific continuum of care for the Village.

As the population continues to age and grow in and around the New Lenox area, these services are very much needed. Specifically, there is a shortage of appropriate care for residents with dementia who receive Medicare and Medicaid benefits. I have patients who have not had proper placement for care and it was detrimental to their well-being.

Over the years, I have referred approximately 20 patients per month for skilled care and 2 patients for memory care to facilities farther than the proposed Alden project location in New Lenox. Due to HIPAA compliance, identification of these residents cannot be provided. I could refer to the proposed project approximately 20 patients per month for skilled care and 2 patients for memory care within a 12 month period after the project is completed, and anticipate the referral volume to remain similar or grow for the next two years. My patient volume originates nearly 90% from within 30-minute travel time of the new Silver Cross Hospital campus and I would expect my referral to be respective of those origins.

Please note that these patient referrals have not been used to support any other pending or approved certificate of need application for this area.

Thank you for giving Alden's certificate of need application every consideration. If I can be of further assistance, please feel free to contact me.

Sincerely,



**Dr. Gandhi**  
16151 Weber Road Suite 101 Crest Hill, IL 60403  
Phone# (815) 773-7827  
Fax# (630) 914-2469

December 2, 2015

Ms. Courtney Avery, Administrator  
Health Facilities and Services Review Board  
Illinois Department of Public Health  
525 W. Jefferson Street, Second Floor  
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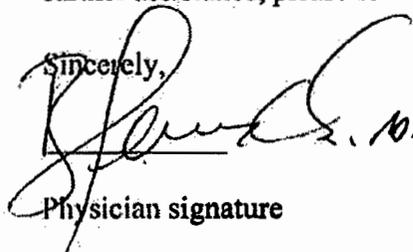
As the population continues to age and grow in and around the New Lenox area, these services are very much needed. Specifically, there is a shortage of appropriate care for residents with dementia who receive Medicare and Medicaid benefits. I have patients who have not had proper placement for care and it was detrimental to their well-being.

Over the years, I have referred approximately 20 patients per month for skilled care and 2 patients for memory care to facilities farther than the proposed Alden project location in New Lenox. Due to HIPAA compliance, identification of these residents cannot be provided. I could refer to the proposed project approximately 20 patients per month for skilled care and 2 patients for memory care within a 12 month period after the project is completed, and anticipate the referral volume to remain similar or grow for the next two years. My patient volume originates 30% from New Lenox and nearly 90% from within 30-minute travel time of the Silver Cross Hospital and I would expect my referral to be respective of those origins.

Please note that these patient referrals have not been used to support any other pending or approved certificate of need application for this area.

Thank you for giving Alden's certificate of need application every consideration. If I may be of further assistance, please feel free to contact me.

Sincerely,

  
Physician signature





**Dr. Singh**  
**1900 Silver Cross Blvd, New Lenox, IL 60451**  
**Phone# (815) 300-5376**  
**Fax# (815) 300-4848**

December 2, 2015

Ms. Courtney Avery, Administrator  
Health Facilities and Services Review Board  
Illinois Department of Public Health  
525 W. Jefferson Street, Second Floor  
Springfield, Illinois 62761

RE: Application for Certificate of Need for Alden Estates – Courts of New Lenox, Inc., 100 Bed Skilled Nursing and 40 Bed Skilled Memory Care Center in New Lenox, Illinois.

Dear Ms. Avery,

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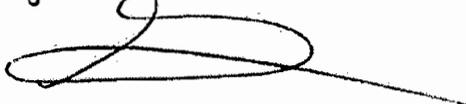
As the population continues to age and grow in and around the New Lenox area, these services are very much needed. Specifically, there is a shortage of appropriate care for residents with dementia who receive Medicare and Medicaid benefits. I have patients who have not had proper placement for care and it was detrimental to their well-being.

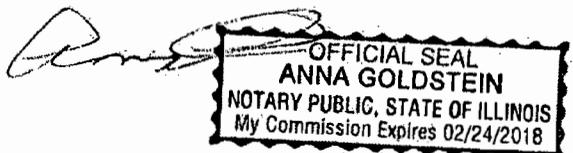
Over the years, I have referred approximately 20 patients per month for skilled care and 2 patients for memory care to facilities farther than the proposed Alden project location in New Lenox. Due to HIPAA compliance, identification of these residents cannot be provided. I could refer to the proposed project approximately 20 patients per month for skilled care and 2 patients for memory care within a 12 month period after the project is completed, and anticipate the referral volume to remain similar or grow for the next two years. My patient volume originates 50% from New Lenox and nearly 80% from within 30-minute travel time of my office and I would expect my referral to be respective of those origins.

Please note that these patient referrals have not been used to support any other pending or approved certificate of need application for this area.

Thank you for giving Alden's certificate of need application every consideration. If I may be of further assistance, please feel free to contact me.

Sincerely,

Manohar Singh MD  
Physician signature 



December 2, 2015

Ms. Courtney Avery, Administrator  
Health Facilities and Services Review Board  
Illinois Department of Public Health  
525 W. Jefferson Street, Second Floor  
Springfield, Illinois 62761

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RE: Application for Certificate of Need for Alden Estates – Courts of New Lenox, Inc., 100 Bed Skilled Nursing and 40 Bed Skilled Memory Care Center in New Lenox, Illinois.

Dear Ms. Avery,

I am a practicing physician in the New Lenox area, near the proposed Alden Estates – Courts of New Lenox project in New Lenox, Illinois. I often encounter the need for long term and short term care after discharge from the nearby Silver Cross Hospital or from my office. I would like this letter to express that after reviewing my records, I feel that a considerable number of my patients would be excellent candidates for such a new facility in the area. Importantly, a facility in this area would offer convenience for both the resident and his or her family.

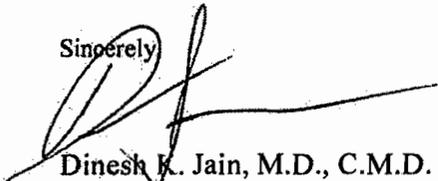
As the population continues to age and grow in and around the New Lenox area, these services are very much needed. Specifically, there is a shortage of appropriate care for residents with dementia who receive Medicare and Medicaid benefits. I have patients who have not had proper placement for care and it was detrimental to their well-being. Over the years, I have referred approximately 5 patients per month for skilled care and 1 patient for memory care to facilities farther than the proposed Alden project location. Due to HIPAA compliance, identification of these residents cannot be provided. I could refer to the proposed project approximately 5 patients per month for skilled care and 1 patient for memory care within a 12 month period after the project is completed, and anticipate the referral volume to remain similar or grow for the next two years. My patient volume originates 50% from New Lenox and nearly 85% from within 30-minute travel time of my office and I would expect my referral to be respective of those origins.

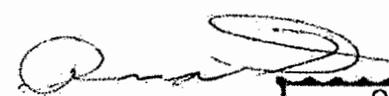
Please note that these patient referrals have not been used to support any other pending or approved certificate of need application for this area.

I believe there is a tremendous need for this level of care and this development will provide unique and much needed service to our growing community. With Silver Cross Hospital being adjacent to this location, this development will be a terrific continuum of care for the Village.

Thank you for giving Alden's certificate of need application every consideration. If I may be of further assistance, please feel free to contact me.

Sincerely,

  
Dinesh K. Jain, M.D., C.M.D.

  
OFFICIAL SEAL  
ANNA GOLDSTEIN  
NOTARY PUBLIC, STATE OF ILLINOIS  
My Commission Expires 02/24/2018