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June 15, 2016

VIA FED EX

Ms. Courtney Avery  
Illinois Health Facilities and Services Review Board  
525 West Jefferson, 2nd Floor  
Springfield, Illinois 62761

**RECEIVED**

JUN 16 2016

HEALTH FACILITIES &  
SERVICES REVIEW BOARD

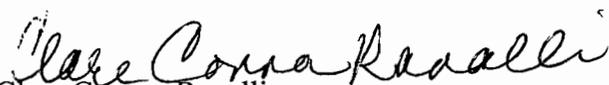
Re: E 07 13  
Rush Oak Park Hospital

Dear Ms. Avery:

This will confirm that the membership substitution transaction described in the above referenced transaction occurred on or before 12/31/13, within the then allotted two year time frame from the exemption issuance on June 26, 2013. IDPH was notified (see attached email chain) and determined, given the internal nature of the change, no new license was required.

Thank you.

Sincerely,

  
Clare Connor Ranalli

cc: Katie Struck, RUMC  
Jeannie Mitchell, HFSRB

Enc.

DM\_US 73846407-1.T13706.0010

## Ranalli, Clare

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**From:** Ranalli, Clare  
**Sent:** Wednesday, December 04, 2013 2:26 PM  
**To:** Robert S. Spadoni (Robert\_Spadoni@rush.edu); Katharine E Struck (Katharine\_E\_Struck@rush.edu)  
**Cc:** Carl Bergetz (Carl\_Bergetz@rush.edu); Anne M. Murphy Esq. (anne\_murphy@rush.edu)  
**Subject:** FW: Scan from a Xerox WorkCentre

Good news - it appears we do not need to file the request for a new license. Carry on!

If you have any questions don't hesitate to contact me. I'll let Megan and Sandy know. Thanks.

Clare Connor Ranalli | Partner  
McDermott, Will & Emery LLP  
227 W. Monroe Street | Suite 4700 | Chicago, IL. 60606  
312-984-3365 | cranalli@mwe.com

-----Original Message-----

From: Senger, Karen [mailto:Karen.Senger@Illinois.gov]  
Sent: Wednesday, December 04, 2013 1:49 PM  
To: Ranalli, Clare  
Cc: Fergusson, Kevin  
Subject: RE: Scan from a Xerox WorkCentre

It will not be considered a license change of ownership

-----Original Message-----

From: Ranalli, Clare [mailto:Cranalli@mwe.com]  
Sent: Tuesday, December 03, 2013 8:35 AM  
To: Senger, Karen  
Subject: Re: Scan from a Xerox WorkCentre

Hi Karen

There were 10 members previously, and now there are 5, all of whom were members of the board prior to the change in membership in the licensed hospital i.e., ROPH, Inc.

Thanks.

Sent from my iPad

> On Dec 3, 2013, at 6:50 AM, "Senger, Karen" <Karen.Senger@Illinois.gov> wrote:  
>  
> Will there be a change in Board of directors ?  
>  
> ----- Original Message -----  
> From: Ranalli, Clare [mailto:Cranalli@mwe.com]  
> Sent: Monday, December 02, 2013 11:18 AM Central Standard Time

> To: Senger, Karen  
> Subject: FW: Scan from a Xerox WorkCentre  
>  
> Hi Karen:  
>  
> OK - I pulled the org charts showing pre change of membership interest and post, as well as a narrative description of the transaction and the license (all as submitted with the COE). The licensed entity - ROPH is not changing - it will still be Rush Oak Park Hospital, Inc., and it will have the same EIN and Medicare provider number.

>  
> The bottom line is way back in the nineties Rush University Medical Center (then Rush Pres St. Luke's) became a member of Oak Park Hospital which had been solely owned by OSF. It ran and operated the hospital and the name was changed to Rush Oak Park Hospital, although OSF remained a member through a convoluted corporate structure. Eventually (in the last year) Rush determined that it wanted to buy the financial interest OSF retained in the hospital and OSF wanted to sell, so it bought out the membership interest. The issue that triggered the need for the change of ownership for CON purposes was the removal of Synergon (which was the entity that RUMC had an interest in and that owned Rush Oak Park). Nonetheless all of this is corporate re-structuring and does not change the licensed entity or the corporate member (Rush) that operated/managed the licensed entity (as Rush is now the sole member of Rush Oak Park).

>  
> We can prepare a license app for a CHOW - we certainly have no objection to doing so. However, in the past as I mentioned if the licensed entity remained the same and the entity that essentially operated the licensed entity remained the same we have not had to do so - and therefore I wasn't sure if we needed to. I also thought it might not be necessary (although not really sure if it matters to IDPH one way or the other) since we do not have to file a new Form 855 with Medicare for a new number. We just have to send an information notice to Medicare.

>  
> Hope this helps, and let me know your thoughts on this.

>  
> Clare Connor Ranalli | Partner  
> McDermott, Will & Emery LLP  
> 227 W. Monroe Street | Suite 4700 | Chicago, IL. 60606  
> 312-984-3365 | cranalli@mwe.com

>  
> -----Original Message-----  
> From: xerox60b@mwe.com [mailto:xerox60b@mwe.com]  
> Sent: Monday, December 02, 2013 11:05 AM  
> To: Ranalli, Clare  
> Subject: Scan from a Xerox WorkCentre

>  
> Please open the attached document. It was scanned and sent to you using a Xerox WorkCentre.

>  
> Attachment File Type: PDF  
>  
> WorkCentre Location: machine location not set Device Name: XEROX60B

>  
>  
> For more information on Xerox products and solutions, please visit  
> <http://www.xerox.com>

>  
>  
> \*\*\*\*\*  
> \*\*\*\*\*

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