

**Written Testimony of the Illinois Health and Hospital Association (IHA)
Chicago City Council, Committee on Environmental Protection and Energy Meeting**

Wednesday, April 3, 2024

Honorable Members of the Committee on Environmental Protection and Energy:

The Illinois Health and Hospital Association (IHA) is the statewide advocacy organization representing over 200 hospitals and nearly 40 health systems across Illinois, including the 40 hospitals located in the City of Chicago. These hospitals collectively provide over 250,000 inpatient visits each year and employ over 60,000 employees, many of whom are City residents. As the representative of these hospitals, we appreciate the opportunity to share our thoughts regarding the proposed Clean and Affordable Buildings Ordinance (CABO). We look forward to working with you and the co-sponsors in order to achieve sustainability goals while maintaining the consistent, high quality patient care that Chicagoans expect from their local hospitals.

Our hospital members share the sponsors' twin goals of decreasing the environmental impact of commercial buildings and improving the health and well-being of our residents. However, the proposed ordinance does not adequately take into account the fact that not all commercial buildings are the same or have the same energy requirements. For example, hospitals - unlike office buildings or many other types of commercial facilities - are open 24 hours a day, seven days a week, 365 days a year and require numerous energy-intensive operations in order to maintain consistent access to care for patients. In addition to energy used for space and water heating, hospital-specific activities range from constant utilization and sterilization of medical equipment and food services for patients, visitors and employees, to around-the-clock laundry operations, computer and server functions and specialized refrigeration units for preserving laboratory specimens, among other things. These critical activities support the delivery of safe patient care and require a consistent and dependable power supply. Any interruption to a hospital's power supply could jeopardize its ability to safely serve patients, which would be catastrophic.

Additionally, as key members of the emergency management infrastructure in Chicago, hospitals must always be ready to assist in the event of a natural disaster, severe weather event or other large-scale crisis. Hospitals are prepared to handle unexpected surges in patient volume in case of such an emergency. In light of hospitals' recent lifesaving role throughout the COVID-19 pandemic, it should be noted that a significant percentage of hospitals' energy usage is dedicated to air exchange operations, in order to ensure pure, safe air for patients, visitors and employees. As such, reliability in energy supply is critical to maintaining this level of constant readiness for emergency response functions. In fact, other municipalities that have passed emissions restrictions have exempted hospitals in recognition of their key role in the local emergency response network.

Moreover, there are already many codes and guidelines that govern the design and construction of hospitals, including both state and federal requirements. There are also standards required by The Joint Commission, which is the accreditation body for hospitals. The Joint Commission standards require access to reliable sources of energy in order to meet requirements of several crucial accreditation domains, including patient safety and environment of care. At a minimum, any new regulations

regarding hospital construction must be harmonized with longstanding federal, state and The Joint Commission requirements that prioritize safe patient care.

Furthermore, many of our member hospitals already have sustainability goals for the purposes of minimizing their operations' impact on the environment, bringing about energy savings and increasing patient comfort. Several hospitals that are currently undertaking new construction projects are striving to meet the U.S. Green Building Council's (USGBC) Leadership in Energy and Efficiency Design (LEED) energy-efficiency standards. LEED certification is the gold standard in green building construction design around the world and has been recognized as such for several decades. In addition to being the most established such recognition system, hospitals have opted to achieve LEED certification because of its holistic approach to building sustainability. The LEED certification system allows for nuance in construction design and the selection of a wide variety of different measurements to meet energy reduction goals depending on the building's use. By providing an expansive menu of options to choose from, the LEED system provides multiple pathways to meet environmental goals and avoids a proscriptive, one-size-fits-all approach to construction sustainability.

Finally, IHA appreciates that the proposed ordinance includes a partial exemption for certain hospital operations. However, as currently drafted, its application is unclear. The exemption applies to combustion used for the "primary purpose of operating a hospital" but also excludes combustion used for space heating or domestic hot water. Maintenance of internal temperatures and a consistent supply of hot water to prevent patient infection are both critical aspects of hospital operations and central to the primary purpose of operating a hospital. Other municipalities that have considered emissions restrictions have included full hospital exemptions due in part to the overall difficulty in separating certain energy-dependent activities from others in a complex hospital setting.

In conclusion, while contemplating the best approach to construction sustainability standards for the City of Chicago, we urge the committee to consider a more flexible, holistic approach that will allow hospitals to meet sustainability goals but also use energy sources necessary to maintain critical patient care needs. The approach also must take into account longstanding federal, state and accreditation requirements as outlined above.

Thank you for your consideration.

A handwritten signature in blue ink that reads "Jennifer Koehler". The signature is written in a cursive, flowing style.

Jennifer Koehler
Vice President, Government Relations
Illinois Health and Hospital Association (IHA)