



7435 West Talcott Avenue
Chicago, Illinois 60631
773.792.5555

RECEIVED

FEB 18 2011

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

Sandra Bruce, FACHE
President & Chief Executive Officer

February 3, 2011

Certified Mail Article#: 7005 2570 0001 9217 5663

Mr. Dale Galassie, Chairman
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Re: Project 11-002

Dear Mr. Galassie:

I am in receipt of a letter from Apollo Health Center, Limited, dated December 28, 2010 regarding their intent to file a certificate of need to establish a new multi-specialty ASTC for gastroenterology, obstetric/gynecology and urology procedures. As requested, we wish to inform you of the potential impact a new Ambulatory Surgical Treatment Center (ASTC) in our planning area will have on Resurrection Health Care's surgical services.

The proposed facility is to be located within the primary service area of both Resurrection Medical Center and Holy Family Medical Center. As such, the establishment of a new ASTC at this location will have a significant negative impact on the operation of those two hospitals. Over 33 percent (33%) of patients who receive care at Resurrection Medical Center and over 11 percent (11%) who receive care at Holy Family Medical Center reside within three miles of the proposed facility.

Indeed, documentation is included in Apollo's CON application itself that certain physicians who will be performing surgeries at the proposed center will reduce their referrals to Resurrection Health Care facilities if this new ASTC is established. The negative impact on Resurrection Health Care facilities, therefore, is readily acknowledged by the applicant. Both Resurrection Medical Center and Holy Family Medical Center have sufficient capacity to perform the procedures proposed to be done at the new ASTC. There is no lack of access to care in the planning area. In fact, there is already significant overcapacity of surgical services in the area with a number of both hospital and ambulatory surgery centers operating well below the Planning Board's established volume threshold. I wish to remind the Board that its rules were



7435 West Talcott Avenue
Chicago, Illinois 60631
773.774.8000
www.reshealth.org

Mr. Dale Galassie, Chairman
February 3, 2011
Page 2

developed to prevent unnecessary duplication of services in Illinois. The Board's efforts to uphold this policy is vital to the survival of existing facilities in these times of declining reimbursement and increased costs.

The management of this proposed facility has a history of providing care only to those who can pay their full charges. They provide no Medicaid or charity care to serve the needs of their community, as noted in the CON application for this project. Conversely, Resurrection Health Care provides needed surgical care to all persons in their service areas regardless of their ability to pay.

The upcoming national policies for healthcare reform seek to provide all Americans with affordable healthcare. In order to affectively respond to this national agenda, it is vital that those providers, like Resurrection Health Care, who are seeking to maintain a rational, accountable system of care can remain viable within this new environment.

For these reasons, I ask you to carefully consider your rules regarding unnecessary duplication of services and the impact on established, high quality providers in the planning area as you review the application submitted by Apollo Health Center. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Sandra Bruce".

Ms. Sandra Bruce
President and Chief Executive Officer
Resurrection Health Care

SB:nc