



Illinois Hospital Association

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To: Name: Dale Galassie

Organization: Illinois Health Facilities and Services Review Board

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From: Name: Howard A. Peters, III, Executive V.P.

Department: Govt. Relations

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Urgent FYI

Memo: Please see the attached comment letter from the Illinois Hospital Association.

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June 7, 2011

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

Re: Project # 11-014

Dear Chairman Galassie:

The Illinois Hospital Association, which represents 200 hospitals statewide, has a longstanding position of support for the Illinois Health Facilities and Services Review Board and the role it plays. Our primary interest in the Certificate of Need program has been in the overall policy decisions that are made both in the General Assembly and by the Board itself as it develops its regulations.

An important concern of our members is for there to be predictability with respect to the Board's decisions. To this end, it is important for the Board to make decisions that rely upon its own rules.

We call your attention to the application for Project #11-014. This project seeks to establish a limited specialty ambulatory surgery center. Under the Board's rules (77 Ill. Adm. Code 1110.1540(c)(2)), "Referrals to health care providers other than ambulatory surgical treatment centers (ASTC) or hospitals will not be included in determining projected patient volume." In other words, the rule does not allow physicians to use their office volumes to justify the need for an ASTC, as they do in this application. The rationale is that if a procedure can be done in a physician's office, the Board should not facilitate collection of a facility fee in addition to the physician fee. Ambulatory surgical treatment centers are eligible to receive this fee, while physician offices are not.

IHA appreciates the hard work that you and all Board members do to make decisions that shape the health care delivery system in Illinois. We know that sometimes these decisions are difficult ones. However, we did want to underscore this rule, highlight the rationale for it, and respectfully request that the Board follow its rule in this instance. At an appropriate time, if you have questions, please feel free to contact Ann Guild, Vice President, Health Policy and Regulation at 630-276-5496 or via e-mail at AGuild@ihastaff.org.

Sincerely,

Howard A. Peters III
Executive Vice President

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