

  
**Grand Oaks Surgical Center, S.C.**

11-098

October 11, 2011

**RECEIVED**

NOV 14 2011

HEALTH FACILITIES &  
SERVICES REVIEW BOARD

John P. Kniery  
Charles H. Foley and Associates, Inc.  
1638 South MacArthur Boulevard  
Springfield, IL 62704

Re: Certificate of Need for Addition of a Surgical Specialty to Ritacca Laser Center

Dear Mr. Kniery:

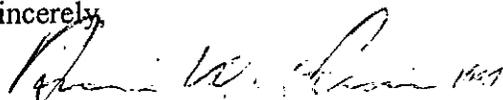
We are in receipt of your letter dated September 29, 2011 wherein you request our response as to how the addition of a pain management specialty at Ritacca Laser Center would impact our facility. Following are the arguments we put forth against the granting of a Certificate of Need for the addition of a pain management specialty to the Ritacca Laser Center:

- Grand Oaks Surgical Center, S.C. is a single specialty, state licensed Ambulatory Surgical Treatment Center dedicated to the practice of pain management.
- Grand Oaks Surgical Center, S.C. is located 1.1 miles from the Ritacca Laser Center.
- Grand Oaks Surgical Center, S.C. is staffed by anesthesiologists who have been fellowship trained in the practice of pain management.
- Grand Oaks Surgical Center, S.C. has not reached 100% utilization and has room to provide pain management services to patients in the same geographic area as the Ritacca Laser Center.

The addition of another pain management facility a mile from Grand Oaks Surgical Center, S.C. would be a duplication of services and have a negative impact on our facility. We, therefore, will request that the Health Facilities Planning and Review Board deny your application for the addition of the specialty of pain management to the Ritacca Laser Center.

If you have any further questions or comments please do not hesitate to contact me.

Sincerely,



Bruce W. Irwin, M.D.

Cc: Mike Constantino  
Health Facilities Planning and Review Board