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VIA ELECTRONIC AND OVERNIGHT MAIL

November 25, 2014

Mr. Mike Constantino
Supervisor of Project Review
Illinois Health Facilities and Services Review Board
52 W Jefferson St., 2nd Floor
Springfield, IL 62761

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**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

Re: Project 14-043 / Response to Memorial Hospital's impact statement:

Dear Mr. Constantino:

There is no study or report that corroborates Memorial's impact statement that the closing of St. Elizabeth's Hospital will negatively impact Memorial Belleville. However, if one takes the statement that Memorial is at capacity and cannot accept the few patients that might go to it if St. Elizabeth's replaces at a nearby site at face value, then if St. Elizabeth's is eventually forced to discontinue services due to current site and structure issues, that would presumably have an even greater impact.

Memorial's impact response assumes that if St. Elizabeth's re-locates 7 miles away its patients will not go to it at its new site off of I-64. Of course, there is no basis for this statement and it ignores the fact the new site will be closer to 63% of the patients served by zip code origin by St. Elizabeth's. It also ignores that based on patient by zip code origin that a small percentage of St. Elizabeth's patients are from Belleville. Some of those patients despite living in Belleville, will be closer (drive time by Mapquest) to the proposed replacement site than the current hospital site.

Memorial states that it is worried that its Emergency Department cannot accommodate the alleged excess capacity in the event that St. Elizabeth's moves a few miles away. While I have never heard of a hospital not wanting more patients, nonetheless according to CON rules, Memorial has capacity to serve over 20,000 additional patients in its emergency department ("ED"). CON rules state that to be considered at capacity, each ED station must have 2000 visits per year. Memorial has 36 ED stations so in order for it to be considered at capacity it would have to have 72,000 visits. Memorial Hospital - Belleville reported to IDPH this year that they had a little over 52,000 visits. With the additional 8 ED stations at the Shiloh facility, they have capacity for another 16,000 visits, for a grand total of 36,000 available visits at Memorial's two ED's locations (once Shiloh is constructed).

Memorial states that the re-location of St. Elizabeth's Hospital will cause great economic harm to Memorial East. The fact of the matter is St. Elizabeth's is already in the same town as Memorial. How is it different economically to have 3 hospitals, with one each in Belleville, O'Fallon and Shiloh than two in Belleville and one in Shiloh? The argument asserted makes no sense. In fact, Memorial has chosen to duplicate its own services, dilute its own market share and double its own expenses with the Shiloh satellite facility. Any economic impact is a result of Memorial's decision to build a brand new hospital, and not St. Elizabeth's current and on-going operations.

Finally, with regard to Memorial's statements relating to duplication, please note that Belleville's population is around 44,000, and it has 554 beds located within its city borders. The O'Fallon/Shiloh population is around 43,000 with only 94 beds (with the Memorial Shiloh satellite facility). If St. Elizabeth's Hospital is given a CON to relocate 144 beds, then the O'Fallon/Shiloh/Scott Air Force Base area will have 238 beds to serve 48,000 (with Scott AFB) and Belleville will have 210 beds to serve 44,000. This is a more equitable distribution of beds for the communities served.

Among the 50 largest towns in Illinois (including Chicago) Belleville currently has the largest medical/surgical bed to population to patient ratio. Even after the St. Elizabeth's relocation, Belleville will still have the 14th highest bed population ratio. Despite the fact it is 33rd in population amongst the 50 largest cities, Belleville has the 8th highest number of medical surgical beds (in total number of beds, versus bed to population ratio). It would be ranked 19th in total bed count after St. Elizabeth's relocation. In sum, Belleville is significantly over-bedded, and this project reduces bed in the planning area and appropriately re-distributes the remaining beds, a fact Memorial's impact statement ignores.

Thank you for your consideration.

Sincerely,


Clare Connor Ranalli

cc: Susan Beeler, Project Manager
St. Elizabeth's Hospital
211 S Third St.
Belleville, IL 62220

Courtney Avery
HFSRB Administrator