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HEALTH FACILITIES & SERVICES REVIEW BOARD

Ms. Kathryn Olson
Illinois Health Facilities and Services Review Board
525 West Jefferson Street – 2nd Floor
Springfield, Illinois 62761

RE: Opposition Letter for CON #17-002
Mercy Crystal Lake Hospital

Dear Ms. Olson:

Northwestern Memorial HealthCare opposes the approval of a "micro-hospital" without the diligent and thoughtful analysis by the HFSRB of such a concept and its impact on the State's health care delivery system. Currently, the concept of a "micro-hospital" is in direct conflict with the HFSRB's rules and criteria for the establishment of a new hospital.

The concept of a micro-hospital is only about a decade old. Interestingly, these types of facilities have been developed only in non-CON states most likely because micro-hospitals are considered a growth strategy for health systems and most health systems are using them as entry points into markets where there is not a demonstrated need for a new hospital (Saulsberry, K., "To Grow Your Hospital Think Micro." *Advisory Board*, 20 May 2016). Additionally, there have been concerns about patient safety at these types of facilities (Sternberg, L. and Dougherty, G., "Risks Are High at Low Volume Hospitals." *U.S. News & World Report*, 18 May 2015).

Northwestern Memorial HealthCare strongly urges the HFSRB to further study this concept; if a decision is made to permit such facilities in Illinois it should be only after the development of appropriate rules for the establishment and operation of such facilities. Approving this concept without clear standards and criteria would set a dangerous precedent for the State of Illinois and could have a negative effect on the State's health care delivery system.

Sincerely,

Bridget S. Orth
Director, Regulatory Planning