



P.O. Box 7005 Quincy, IL
217-223-8400
www.blessinghealthsystem.org

February 13, 2019

VIA HAND DELIVERY

Michael Constantino
Lead Project Reviewer
Illinois Health Facilities & Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

RECEIVED
FEB 13 2019
HEALTH FACILITIES &
SERVICES REVIEW BOARD

**Re: Request for Referral to IDPH Prior to Review Board Action on
Project # 18-042, Quincy Medical Group Surgery Center**

Dear Mr. Constantino:

Blessing Hospital has recently been approached by Quincy Medical Group ("QMG") seeking a transfer agreement for its proposed new cardiac catheterization service and ambulatory surgical treatment center. Blessing Hospital promptly responded with questions regarding patient safety, detailed peer review mechanisms, service delivery and quality control matters. QMG has not yet responded to our inquiries.

QMG is proposing a unique and unprecedented service in Illinois, namely, a remote free-standing cardiac catheterization lab that is not on or adjacent to a hospital with acute cardiac surgery back-up. In fact, the *only* free-standing cardiac catheterization lab in the State was closed last year, and that facility was adjacent to the St. John's Hospital campus in Springfield. (*See, Prairie Diagnostic Center at St. John's Hospital – Discontinuation, Project # E-021-18.*) QMG's proposed catheterization lab will be located three miles from the acute cardiac surgery back-up at Blessing Hospital.

There is precedent for the Review Board's staff to seek guidance from the Illinois Department of Public Health ("IDPH"), prior to Review Board action on a project, as to whether IDPH would license the facility. In Progressive Hospital of Southern Illinois, Project # 06-027, the Supplemental State Agency Report for the project noted as follows:

"During the review of this application, the State Agency requested clarifying information from the applicants regarding the project. Based on this supplemental information, the Illinois Department of Public Health's ("IDPH") Office of Healthcare Regulation determined the facility cannot be licensed under the Illinois Hospital Licensing Act." See Attachment 1; Emphasis added.

The Second Supplemental State Agency Report on the project stated:

“Also, the State Agency contacted IDPH’s Office of Health Care Regulation (“HCR”) on April 6, 2007 regarding the licensing issue of the proposed facility. According to HCR, ‘the applicants cannot be licensed unless the applicants upgrade the current facility to a new hospital building requirements. If the applicants meet all of the new hospital building requirements and all of the other requirements of the Hospital Code, they could be licensed. The State Agency’s architects did a walk through and there would be a tremendous amount of work to do and it would be very expensive.’” See Attachment 2; Emphasis added.

Finally, the Review Board’s Vote Tally Sheet for May 2007 stated with regard to the Progressive Hospital project: “Null & Void (Declaratory Ruling denied application validity).” See Attachment 3.

Given the patient safety and public health issues raised by a remote, free-standing cardiac catheterization lab, the process employed by the Review Board’s staff in the Progressive Hospital project would be particularly appropriate here. We would further note that in the days of mobile cardiac catheterization labs, the requirement for approval of such labs was that there was open heart surgery back-up immediately available “on-site.” QMG’s proposed remote free-standing cardiac catheterization lab does not even meet the standards that were applied for mobile cath labs.

For these reasons, Blessing Health respectfully requests that Review Board staff refers QMG’s project to IDPH for a ruling on whether IDPH would license a remote, free-standing cardiac catheterization laboratory under the circumstances proposed by Project #18-042, Quincy Medical Group Surgery Center.

Thank you very much for your attention to this matter.

Sincerely,



Betty J. Kasparie
Vice President, Corporate Compliance
Blessing Corporate Services

Enclosures

DOCKET NO: A-12	BOARD MEETING: December 20-21, 2006	PROJECT NO: 06-027	PROJECT COST: Original: \$532,000 Current:
FACILITY NAME: Progressive Hospital of Southern Illinois		CITY: Belleville	
TYPE OF PROJECT: Substantive			HSA: XI

PROJECT DESCRIPTION: The applicants propose to establish a long-term acute care hospital ("LTACH") containing 30 long-term medical surgical beds ("M/S") in 10,620 gross square feet ("GSF") of space. The proposed facility will be located in the Calvin Johnson Care Center, a 180-bed long term nursing care facility in Belleville. The estimated cost of the project is \$532,000.

The applicants did not provide additional information therefore this report remains unchanged from the Original State Agency Report.

Long-term acute care hospitals are defined by the Social Security Act - Section 1886(d)(i)(B)(n) as hospitals that have an average Medicare inpatient length of stay greater than 25 days. These hospitals typically provide extended medical and rehabilitative care for patients who are clinically complex and may suffer from multiple acute or chronic conditions. Services typically provided include comprehensive rehabilitation, respiratory therapy, cancer treatment, head trauma treatment and pain management.

The State Agency notes that, under current State Board rules, a category of service for LTACH has not been defined or established. Therefore, the State Agency is reviewing this proposal under current State Board rules reflected at 77 IAC 1110.530 - Medical Surgical-ICU Review Criteria and 77 IAC 1110.320 - Bed Related Review Criteria. Because there is a computed excess of M/S beds in the planning area, the applicants must address the variance as part of the Medical/Surgical - Review Criteria. The applicants addressed the medically underserved variance at 77 IAC 1110.530(b)(2) for the service. The applicants believe they have identified a segment of the population that is not currently being served by the health care delivery system.

The Illinois Hospital Licensing Act [210 ILCS 85/4] states that no person shall establish a hospital without first obtaining a permit (emphasis added) and a license from the Illinois Department of Public Health ("IDPH"). Therefore, this proposal comes under the purview of the Illinois Health Facilities Planning Board [20 ILCS 3960/3]. In most instances, the findings of the State Agency (as they relate to the need for this project) are negative. Because the State Board's rules do not accommodate this specific category of service, the State Agency's findings reflect an analysis of the material presented by the applicants as it relates to the specific criteria in which this review was undertaken.

During the review of this application, the State Agency requested clarifying information from the applicants regarding the project. Based on this supplemental information, the Illinois Department of Public Health's ("IDPH") Office of Healthcare Regulation determined the facility cannot be licensed under the Illinois Hospital Licensing Act.

DOCKET NO:	BOARD MEETING: May 1-2, 2007	PROJECT NO: 06-027	PROJECT COST: Original: \$532,000 Current:
FACILITY NAME: Progressive Hospital of Southern Illinois		CITY: Belleville	
TYPE OF PROJECT: Substantive			HSA: XI

PROJECT DESCRIPTION: The applicants propose to establish a long-term acute care hospital ("LTACH") containing 30 long-term medical surgical beds ("M/S") in 10,620 gross square feet ("GSF") of space. The proposed facility will be located in the Calvin Johnson Care Center, a 180-bed long term care facility in Belleville. The estimated cost of the project is \$532,000.

This project was deferred from the October and December 2006 and February and March 2007 State Board meetings. It is noted that the deferral from the December 2006 meeting was the result of a deferral issued by the State Board (77 IAC 1130.655(e)). The applicants did not provide additional information; therefore, the Second Supplemental State Agency Report remains unchanged from the First Supplemental State Agency Report and the Original State Agency Report.

Also, the State Agency contacted IDPH's Office of Health Care Regulation ("HCR") on April 6, 2007 regarding the licensing issue of the proposed facility. According to HCR, "the applicants cannot be licensed unless the applicants upgrade the current facility to new hospital building requirements. If the applicants meet all of the new hospital building requirements and all of the other requirements of the Hospital Code, they could be licensed. The State Agency's architects did a walk thru and there would be a tremendous amount of work to do and it would be very expensive."

Results of May 1 & 2, 2007 meeting of the Illinois Health Facilities Planning Board

Members Present: Acting Chairman Susana Lopatka, Courtney Avery, and John Penn

Members Absent: Eugene Verdu

PROJECT **VOTE (Yes-No)**

Permit Renewal Requests (none)

Extension Requests (none)

Exemption Requests

Alterations

Galena Stauss Hospital

Approved 3-0

Declaratory Rulings/Other Business

Progressive Hospital of Southern Illinois

Denied 0-3

Health Care Worker Self-Referral Act (none)

Status Reports on Conditional/Contingent Permits (none)

Applications Subsequent to Initial Review

Non-Substantive

OSF St. Anthony(06-082)

Deferred by Board

DSI Renal Services - Scottsdale (07-001)

Approved 3-0

DSI Orland Park (07-003)

Intent to Deny 0-3

Blue Island Dialysis (07-005)

Approved 3-0

Methodist Medical Center of Illinois (07-007)

Approved 3-0

Parkview Care Center (07-009)

Approved 3-0

Substantive

Progressive Hospital of Southern Illinois (06-027)

Null & Void (Declaratory Ruling denied application validity)

Brentwood LTACH(06-065)

Intent to Deny 0-3

Springfield Behavioral Health Center (06-085)

Approved 3-0

Streamwood Behavioral Health Center (06-074)

Approved 3-0

St. Mary's Hospital (06-078)

Deferred

Morris Healthcare and Rehabilitation Center (06-079)

Approved 3-0

Northwestern Memorial Hospital (06-080)

Approved 3-0

Evanston Hospital (06-081)

Approved 3-0

Applications Subsequent to Intent-to-Deny

Riverview Health Center (06-015)

Deferred