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APR 9 2019

**HEALTH FACILITIES &  
SERVICES REVIEW BOARD**

April 8, 2019

Ms. Courtney Avery  
Administrator  
Illinois Health Facilities and Services Review Board  
525 W. Jefferson St., 2<sup>nd</sup> Floor  
Springfield, Illinois 62762

Re: Ophthalmology Surgery Center of Illinois, Itasca (Project No. 18-047)

Dear Ms. Avery,

Please accept this letter as an expression of my opposition to the proposed Ophthalmology Surgery Center of Illinois, Itasca (Project No. 18-047). As I reviewed the application it stated Dr. Kevin Kovach, of the Kovach Eye Institute, will pull all his surgical volume from the various facilities he currently utilizes. Almost 90% of his surgical case volume is performed at ASTCs across western Chicagoland. 50% of his volume is performed at an ambulatory surgical center that operates under my span of control. That facility, Midwest Center for Day Surgery in Downers Grove is a site that SCA is partnered with and currently operates. Dr. Kovach is also a partner and Board Member at Midwest Center for Day Surgery in Downers Grove and has one of the highest case volumes of our active physicians.

Dr. Kovach's patients already express a high degree of satisfaction with the services they receive at the ASTCs where Dr. Kovach currently operates, and this project would result in an unnecessary duplication of services and maldistribution in the market.

The two current facilities that Surgical Care Affiliates operate have additional capacity to perform cases and could accommodate any increase in volume from Dr. Kovach. We see no need for this project, which would be a duplication of services and have a negative impact on multiple facilities in the market.

I respectfully request the Board Members of the Illinois Health Facilities and Services Review board to deny this project.

Sincerely,

A handwritten signature in black ink that reads "Deborah Gardiner". The signature is written in a cursive, flowing style.

Deborah Gardiner  
Regional Director, Operations

**SCA**  
Surgical Care Affiliates®

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Dear Ms. Avery,

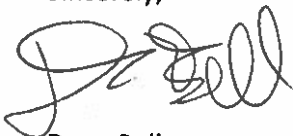
Please accept this letter as an expression of my opposition to the proposed Ophthalmology Surgery Center of Illinois, Itasca (Project No. 18-047). 90% of Dr. Kovach's surgical cases are already performed in ASTCs across western Chicagoland, and his stated intention is to pull 100% of those cases away from the existing sites of service in order to support his new facility. Not only will this materially impair the operations and staff at those existing ASTCs, but it reduces access for his patients and has no reasonable justification.

Dr. Kovach's patients already express a high degree of satisfaction with the services they receive at the ASTCs where Dr. Kovach currently operates, and this project would result in an unnecessary duplication of services and maldistribution in the market.

The ASTCs which we manage, and where he operates, have substantial capacity to accommodate additional growth in the Kovach Eye Institute practice and have continually worked with Dr. Kovach to maximize his operating experience and efficiency at those centers.

I respectfully request the Board Members of the Illinois Health Facilities and Services Review board to deny this project.

Sincerely,



Drew Bell  
Vice President, Operations