#19-025 Physician 's Surgery Center

September 16, 2019

Ms. Courtney R. Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield IL 62761

Dear Ms. Avery:

Please accept this written comment by HSHS St. Elizabeth's Hospital in opposition to Project #19-025, Physician's Surgical Center, O'Fallon. Our legal counsel, Daniel Lawler of Barnes & Thornburg LLP, was advised by the Review Board's staff that submission of written comment on the project could be submitted via email today because the Review Board's website is still showing that the Deadline for Written Comment is October 2, 2019 and the project is tentatively scheduled for the October 22, 2019 Review Board meeting. We had planned to submit written opposition to the project by the posted deadline. We understand that the project was expedited for the September 17th Board meeting without that being reflected on the Review Board's website. We appreciate the opportunity to submit this written opposition and to have it provided to Review Board members as part of the project file.

As stated in the preceding paragraph, HSHS St. Elizabeth's Hospital would like to formally oppose the proposed plans submitted by Dr. Ahmed to discontinue the single-specialty Ambulatory Surgery Center in Belleville and establish a new, single-specialty ASTC in O'Fallon Illinois.

Currently, this area has two existing facilities offering ambulatory surgery services, they are BJC Memorial Hospital East in Shiloh, Illinois and HSHS St. Elizabeth's Hospital in O'Fallon, Illinois. The ambulatory surgical bed designation for these facilities combined is 14 beds. In 2017, the combined number of operating room hours reported for both facilities was 13,730 hours. Using the State standard of 1,500 hours per operating room, this data reveals that utilization was only at 65% capacity in 2017, leaving 35% capacity across these facilities. Utilization data for St. Elizabeth's in 2018 shows a slight increase in utilization to 79% which still leaves capacity at 20% for the area. (Data from 2018 for BJC Memorial Hospital East is not yet publicly available).* Between the existing facilities, there is ample capacity for increased

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specialized outpatient surgery, including gastroenterology. The establishment of this center would negatively impact both hospital facilities.

In 2014, HSHS St. Elizabeth's came before the Board to gain approval to move the hospital to O'Fallon. A significant component of this move included a commitment to retaining outpatient services in the Belleville area so that the community would have access to services that were most needed for the area. St. Elizabeth's has been faithful to this commitment and has maintained lab, imaging, physical therapy, and primary care and specialty provider practices at that location. These services continue to experience volumes that are above budgeted expectations which supports our belief that access to these services is much needed in this area.

At that same time, we chose not to oppose Dr. Ahmed's proposal to purchase the existing ambulatory surgery center in Belleville due to the fact that it would retain access to outpatient surgical services in the area, a significant factor in retaining access for area residents. The proposal before you would completely remove these services from Belleville and adversely impact access for residents. By closing this ASC, patients and family members will need to leave the area to attain outpatient surgery services. For many of these residents, this will pose a significant hardship.

On behalf of HSHS St. Elizabeth's Hospital, I urge the Review Board to deny Dr. Ahmed's proposal due to the potential of creating an over-saturation of ambulatory surgery beds in the existing O'Fallon/Shiloh market. In addition, removal of this health care option in the Belleville area will create a lack of access to these services for those residents.

Thank you for your time and kind consideration.

Sincerely,

Patti Fischer
President and CEO

* Data source: 2017 AHQ Data File from ILHFRSB Website and 2018 AHQ Submission for SEO