OSF HEALTHCARE

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HEALTH FACILITIES &
SERVICES REVIEW BOARD

April 27, 2020

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

Re: Response to CON 19-031, The Advanced Surgical Institute, LLC, Evergreen Park

My name is Dr. John Hanlon, President of OSF Healthcare Little Company of Mary Medical Center. I would like to correct several errors that were made in the application and testimony for the Advanced Surgical Institute CON heard at the December 10, 2019 CON Board meeting.

- The applicants stated that another freestanding cardiovascular OR, Premiere Surgical, is at "the edge " of the 10 mile service radius and services a different patient base. In fact, Premiere is 3 miles away and in the same primary service area.

- Dr. Spear stated that there were no viable options for their patients. In fact, Little Company has a state of the art cardiac cath facility that can handle the vast majority of cardiac vascular procedures, and we have received a $500,000 grant from the state of Illinois to build an electrophysiology lab. We have received American Heart Association recognition for our treatment of acute heart attacks.

- Dr. Spear stated that the area cath labs are performing at 150% of capacity, and there is up to a 6 week wait for elective procedures. In reality, Little Company of Mary's cath lab, 1 mile away from the planned ASTC, is underutilized at less than 25% capacity, and same day scheduling of elective procedures is available and welcome. (The attached table shows that, in fact, three of the seven area hospitals are significantly underutilized.)

- The application states that charity care as a per cent of NPR is 5%. There appears to be a math error. The numbers compute to 3%.

In addition to these corrections, please allow me to add:

The June 13, 2019 letter to Ms. Avery states: "Based on our records, we treated 1,645 patients for cardiovascular surgical services in the past 12 months. We anticipate referring 1,336 of these patients to the proposed facility." This is 81% of the patients that they had previously treated in the hospital setting. Removal of such a volume of patients from the cath lab at Little Company of Mary will have a significant negative effect on the ability of the cath lab staff to maintain their skills at the level necessary to treat the many cardiac emergencies that present through our emergency department.

From the December 10, 2019 IHFSRB hearing report:

Criteria 77 ILAC 1110.235 (c) (6) — Service Accessibility

- Reasons for Non-Compliance
  The Applicant was unable to meet one of the four conditions required by this criterion (see pages 12-13 of this report).

Criteria 77 ILAC 1110.235 (c) (7) Unnecessary Duplication/Maldistribution

- Reasons for Non-Compliance
  Of the 11 ASTCs in the planning area, 4 (36%) are operating at the State standard of 1,500 hours per room. Of the 11 hospitals in the planning area, 2 (18%) are operating at the State standard of 1,500 hours per room (see pages 14-17 of this report).

  According to the IHFSRB report: "The proposed project will result in an unnecessary duplication of service. The Applicants have not successfully addressed this criterion".

Criteria 77 Il-AC 1120.140(c) Reasonableness of Project Costs

- Reasons for Non-Compliance
  The Applicant exceeded the State Board standard for Site Preparation, New Construction/Proportionate Contingencies, and Moveable and Other Equipment (see pages 23-24 of this report).

Thank you for the opportunity to clarify statements that were presented to the Review Board in the December meeting.

Respectfully,

John Hanlon, MD, MMM
President, OSF Healthcare Little Company of Mary Medical Center

Attachment

2018 procedures at area hospitals

	Cath Labs Total	Cath Procedures Total	Procedures/room Total
Advocate Christ	6	6,738	1,123
LCMH	2	708	354
Palos	2	2,513	1,257
Riverside	3	2,875	958
Silver Cross	3	4,998	1,666
Holy Cross	1	502	502
Olympia Fields	3	1,532	511
Total	20	19,866	993 (average)

The average cath lab in the area performs 993 procedures/room. The median is 958 procedures/room.

Two area hospitals are at about half of the <u>average</u> lab's volume and at about 31% of the busiest lab.

Little Company of Mary is at 35% of the average lab, and 21% of the busiest.