the BURGETT group

August 20, 2020

Courtney Avery
Administrator
Illinois Health Facilities & Services Review Board
525 W. Jefferson Street, 2nd Floor
Springfield, IL 62761
courtney.avery@illinois.gov

RECEIVED
AUG 27 2020
HEALTH FACILITIES &
SERVICES REVIEW BOARD

Re: Opposition to CON Application #20-017 – Metroeast Surgery Center

Dear Ms. Avery:

As past President of the Highland Chamber of Commerce, the Highland Area Community Foundation, and the First Congregational Church of Highland, and as a Board Member of the local library and several other organizations, and as past Superintendent of the Highland Community Unit School System, I am both personally and professionally embedded in the success of our community and it's service to our citizens. I now have the privilege of serving as HSHS St. Joseph's Hospital – Highland (SJH) Board Chairman. In my personal, professional and voluntary board capacities, I respectfully oppose this CON application and urge its denial.

In this CON application, Metroeast Endoscopic Surgery Center (MESC), located in Fairview Heights, proposes to add orthopedic surgery services to its existing surgery center by redirecting 200 surgeries annually from SJH, and another 20 surgeries each year from St. Joseph's Hospital – Breese. At both hospitals, these redirected surgical cases will adversely impact surgical utilization (which are already below state standards) and reduce marginal revenue at a time when they have been negatively impacted by the COVID-19 pandemic and associated state orders to suspend and limit elective procedures. In so doing, this CON project unnecessarily duplicates existing services and adversely impacts a Critical Access Hospital.

SJH is a 25-bed Critical Access Hospital, a CMS designation for rural hospitals that have 25 or fewer beds and are either located more than 35 miles from another hospital or designated by IDPH as a "Necessary Provider." By adversely impacting a Critical Access Hospital, this CON project will diminish safety net services in the area – contrary to the core goals of the Planning Act. The 200 redirected procedures represent *all orthopedic surgeries* and *more than 15 percent of total outpatient volume* at SJH. That translates into a reduction of $1.7 million in net hospital revenue, and a loss of $616,000 in margin – which will negate our hospital's ability to provide charity care and to cross-subsidize other services, such as the Emergency Department. For context, SJH's charity care from outpatient services totals $640,937, while MESC reports zero charity care on over $2.3 million in net patient revenue (CON application, p.98). For these and other reasons, I respectfully urge the Review Board to deny this CON application.

Sincerely,

Jim Burgett

Jim Burgett
Board Chairman
HSHS St. Joseph's Hospital
ADDRESS

Cc: Mike Constantino