



August 26, 2020

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

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

Dear Ms. Avery:

The Illinois Critical Access Hospital Network (ICAHN) is a member based, non-profit Corporation comprised of 51 federally-designated critical access hospitals (CAH) and six small rural facilities in Illinois. The overarching goal of ICAHN is to preserve access to rural health care while improving the vibrancy and viability of the rural communities served; our mission is to strengthen critical access and small, rural hospitals through collaboration. With that goal and mission in mind, ICAHN must respectfully oppose this CON application.

We respectfully believe that Project #20-017 will cause harm to rural health care in Illinois and diminish quality of life in the greater Highland community. The application would also back away from the exact type of collaboration that should be protected and preserved.

Project #20-017 seeks to redirect 200 outpatient orthopedic surgeries every year from a currently underutilized, 25-bed Critical Access Hospital; namely, HSHS St. Joseph's Hospital – Highland (SJH). The resulting loss of patient volume and associated revenue will inevitably cause service cuts, with negative consequences for safety net services. The project also disregards the substantial hospital investment in robotic surgical equipment, which SJH purchased and has annually maintained for use by this CON applicant and at its request. The success of rural health care in large measure depends upon promoting rather than destroying such collaboration.

To explain further...In 2003, the Illinois Department of Public Health (IDPH) designated St. Joseph's Hospital as a necessary provider of health services for its rural community and the first step in the CAH certification process which identifies the role St. Joseph' Hospital has in providing access to as well as necessary healthcare services for that community. In 2004, St. Joseph's Hospital achieved CMS approval as a federally-designated CAH. St. Joseph's Hospital has served this community for more than a 100 years.

In 2013, St. Joseph's Hospital received approval by the Illinois Health Facilities and Services Planning Board to build a new hospital. At the same time, CMS also approved the hospital to maintain its CAH certification at the new hospital site because of its longstanding capacity to meet the healthcare needs as a necessary provider of health services. St. Joseph's Hospital was able to build new surgery suites and even expand its surgical services for the community. Project #20-017 would be a duplication of such services and such money spent simply to add a new

outpatient surgery facility. The local population has not significantly changed over the years. For example, there has been only an increase in population for the City of Highland from 2016 (9,839) to 2019 (10,131). Highland is located in an agricultural area with a primarily small local businesses. The new hospital was built on the outskirts of Highland to better accommodate easy access for travel particularly from major highways and remain positioned in a federally designated rural area.

The implications of Project #20-017 for rural health care are especially severe given the ongoing challenges posed by the COVID-19 pandemic. We respectfully urge denial of this CON application and sincerely appreciate the consideration of the Review Board. If you have any questions or concerns, please do not hesitate to contact me by email at pschou@icahn.org or I am happy to address the Planning Board.

Sincerely,

A handwritten signature in blue ink that reads "Patricia Schou". The signature is fluid and cursive, with the first name being more prominent.

Patricia Schou, FACHE
Executive Director
Illinois Critical Access Hospital Network

Cc: Mike Constantino