



HSHS St. Joseph's Hospital  
Breese

September 11, 2020

HSHS St. Mary's Hospital  
Decatur

**Via Email and Hand Delivery**

HSHS St. Anthony's Memorial Hospital  
Effingham

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

HSHS Holy Family Hospital  
Greenville

HSHS St. Joseph's Hospital  
Highland

HSHS St. Francis Hospital  
Litchfield

HSHS St. Elizabeth's Hospital  
O'Fallon

**Re: Project #20-017, Metroeast Endoscopic Surgery Center, Fairview Heights**

HSHS Good Shepherd Hospital  
Shelbyville

**HSHS Written Response to Staff Report**

HSHS St. John's Hospital  
Springfield

Dear Ms. Avery:

St. John's College of Nursing  
Springfield

On behalf of the Hospital Sisters Health System ("HSHS"), HSHS St. Joseph's Hospital – Highland and HSHS St. Joseph's Hospital - Breese, I respectfully submit this written response to the Board Staff Report for Project #20-017, Metroeast Endoscopic Surgery Center pursuant to Section 6(c-5) of the Health Facilities Planning Act. 20 ILCS 3960/6(c-5). That provision allows the staff to "revise any findings to address corrections of factual errors cited in the public response." *Id.* The applicant here submitted erroneous material that appears in the Staff Report and we respectfully request that findings in the Staff Report be corrected to address those errors identified below.

The permit application states that the patient volume for the proposed orthopedic surgery service would be obtained by redirecting 220 patient referrals of Dr. Felix Ungacta from St. Joseph's Hospital – Highland and St. Joseph's Hospital – Breese. After HSHS noted that Dr. Ungacta performs little to no surgeries at these two facilities, the applicant admitted in a submission to the Review Board that Dr. Ungacta was not, in fact, the referral source, but that the referrals would come from Dr. Matthew Bradley as member of Midwest Bone and Joint Surgery. We have since learned, and the project file now shows, that Dr. Bradley is no longer a member of Midwest Bone and Joint Surgery and has never committed patient referrals to this project.

In a letter dated September 1, 2020, from Dr. Bradley to Mr. John Ludwig, President and CEO of St. Joseph's Hospital – Highland, Dr. Bradley stated:

“On May 29<sup>th</sup>, 2020, I, Matthew Bradley MD, resigned from my position as an employee of Midwest Bone and Joint Surgery (MBJS). Effective that date all relationships and referrals to any provider of MBJS including Dr. Felix Ungacta ceased immediately.”

See attached letter from Dr. Bradley and email correspondence from Mr. Ludwig, both of which are included in the project file for Project #20-017.

Page 11 of the Staff Report states that “Dr. Ungacta proposes to refer 221 patients to the ASTC for a total of 330 hours” and finds therefore that the project was in conformance with the Service Demand Criterion (77 IAC 1110.235(c)(3)(A) & (B)). This finding is based on the applicant's initial factual error that Dr. Ungacta was the referral source when, in fact, the applicant has since admitted that the patients were not Dr. Ungacta's, but rather Dr. Bradley's, and Dr. Bradley has not, in fact, committed any patient referrals to this project.

We respectfully request therefore that Board's Staff revise the findings of the Staff Report to address corrections of factual errors cited above.

Very truly yours,



Julie Goebel, MHA  
Vice President, Strategy  
HSHS Illinois