

January 5, 2021

Ms. Debra Savage  
Chair  
Illinois Health Facilities and Services Review Board  
525 West Jefferson Street, 2<sup>nd</sup> Floor  
Springfield, IL 62761

**Re: Notice of Project Opposition  
OrthoIllinois Surgery Center, Elgin  
CON #20-040**

Dear Ms. Savage:

Northwestern Medicine Huntley Hospital (NMHH) respectfully opposes the proposed OrthoIllinois Surgery Center Elgin project (CON #20-040). The project will duplicate surgical services already provided in the service area and will create excess capacity at NMHH as well as other existing hospitals and ASTCs.

Five (5) of the ten (10) physicians listed as owners for the proposed ASTC are currently on staff at NMHH. The applicants have stated (page 178 of their CON application) that they intend to cease their referral of patients to other area facilities, servicing their caseload only at their proposed facility. Based on this statement, NMHH could experience a reduction of at least 1,300 surgical hours if this project is approved, lowering the utilization rate of the 8 ORs at NMHH to 1,233 hours/OR which is under the state standard of 1,500 hours/OR.

Additionally, six (6) of the physicians involved in this project perform surgeries (four (4) are physician investors) at Algonquin Road Surgery Center, a joint venture ASTC with NMHH and Advocate Sherman Hospital, located approximately seven (7) miles from the proposed project. A new ASTC would have a significant negative impact on that facility as well.

The COVID-19 pandemic has caused financial losses for hospitals nationwide as normal hospital operations have been halted to accommodate the surge of COVID-19 patients. The further redistribution of the proposed ambulatory surgeries from NMHH to a new ASTC could reduce NMHH's ability to cross subsidize important safety-net services.

Please consider this unnecessary duplication of services when evaluating this project. Thank you for your consideration.

Sincerely,



Bridget S. Orth  
Director, Regulatory Planning