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May 26, 2016

Mike Constantino  
Illinois Health Facilities & Services Review Board  
525 W. Jefferson, 2nd Fl.  
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**RECEIVED**

**MAY 31 2016**

**HEALTH FACILITIES &  
SERVICES REVIEW BOARD**

Re: Project #16-018

Dear Mike:

As you know I represent HSHS St. Elizabeth's Hospital located in Belleville. It has read the application filed by Memorial Group, Inc. and BJC Health System, and has some concerns it would like to bring to your attention, so that if you are so inclined you might request clarification from the applicants.

I will address the concerns via the order of the attachments. Attachment 7 includes references to a Treatment Room (or rooms). However, there is no mention of treatment rooms anywhere else in the application, including in Attachment 9. How do the treatment rooms differentiate from the exam rooms referenced and the imaging rooms and Rehab space? What are they for?

In Attachment 9, how is the gym accounted for? It appears the MCB will offer a significant gymnasium space, given the equipment references in Attachment 7. Is this gym a public use gym, or is it to be used for the PT/OT/ST (Rehab) services? It is impossible to tell from the application, and thus difficult to know if the GSF for the gym is included in the "public" space reference in Attachment 9 or in the PT/OT/ST space. Also, it would appear the Rehab services are geared to cardiac rehab, but this is not specified. In order to understand whether the services will be duplicative of those offered at the planned St. Elizabeth's O'Fallon hospital and / or Memorial in Belleville, a description of the services should be provided.

Likewise, the "purpose" attachment (attachment 12) refers solely to the project as a medical office, without any reference to the significant imaging services (a women's health service) and Rehab services that will be offered. Further, it does not indicate if the physicians who will office at the MCB will be moving from Belleville or whether they will be independent or employed physicians. It also does not provide any detail regarding the breakdown between primary and specialty physicians who will be providing services at the location – again making it difficult to ascertain impact and necessity.

Attachment 13 offers absolutely no alternatives, such as utilizing existing space in Belleville and/or not relocating the women's services from the Belleville campus (which it becomes clear

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later in the application may be occurring) and/or not providing Rehab services at the location. Another alternative would be for the specialists from "St. Louis" to go to office space at the Belleville campus as opposed to Shiloh. Possibly these alternatives do not make sense, but it is impossible to tell since they are not addressed.

In Attachment 14, there should be a breakdown of DGSF attributable to mammography and ultrasound ("US"). Currently the DGSF for these pieces of equipment are combined with bone densitometry and stereotactic biopsy, which do not have standards. However, this makes it impossible to tell the actual allocation of the total GSF and so it is impossible to truly know if the mammography and US equipment meet HFSRB size standards. Also, this attachment refers to the "Women's Health Center". Will these services still be offered at the Memorial Belleville campus? This is important information for the community and St. Elizabeth's.

In Attachment 15 it is very hard to believe there is no historical utilization for pieces of equipment that are being relocated (which is stated on the next page after Attachment 15) from the Memorial Belleville campus. There is absolutely no information provided to support the utilization projections for imaging and/or PT/OT/ST services. It is very difficult to ascertain whether the imaging will be duplicative of services at Memorial East, even after the applicants' consultant Mr. Axel responded to your question about those services at the Hospital. Also, while the application does not state cardiac rehab will be offered at the MCB, it would appear this may very well be the case. These services would be duplicative of the services St. Elizabeth's provides and will be providing at its new location just 7 miles from the MCB. This is unacceptable.

With respect to financial information, the charity care information should be provided for all Illinois facilities owned by the applicants, which include BJC. Also, as BJC's bond rating is being used to avoid compliance with financial and economic criterion, it would seem that there should be confirmation BJC is paying for the project. Rather, Mr. Turner signs the financial attestation at attachment 39A. Possibly an amended attestation is in order?

Lastly, the response to your request for additional information was insufficient. As an example, the reference to clinics at teaching institutions circumvented the issue of whether there will be ambulatory clinics (walk-in for urgent care, wound clinic, etc.) at the MCB. All of these issues are significant and should be more fully addressed, particularly in light of Memorial's repeated statements regarding its commitment to Belleville and its presence there.

Thank you. Should you have any questions, do not hesitate to contact me.

Very truly yours,

  
Clare Connor Ranalli

cc: Courtney Avery  
Amy Marquardt