



**VALLEY AMBULATORY
SURGERY CENTER**
Dedicated to Excellence in Patient Care

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DEC 28 2017

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

December 8, 2017

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson, Second Floor
Springfield, IL 62761

Re: Valley Ambulatory Surgery Center, St. Charles (Project 17-057)

Dear Ms. Avery:

I write from the unique perspective as a co-owner of the current building, and thus part of the landlord group, and as the current medical director of Valley Ambulatory Surgery Center (VASC), and thus well aware of the many obvious and significant deficiencies with the current location. While as a member of the landlord group I might benefit from VASC continuing at the same address, my concerns for our patients and the quality of care they receive must be paramount. Accordingly, I wish to express my strong support for this Certificate of Need application of VASC, which will allow it to relocate to a new building with modern, state-of-the-art design and an improved clinical environment for patients and staff. For VASC to remain in its current location would entail excessive repair costs, lost efficiencies with the current floorplan, failure to meet patient expectations of aesthetics for health care facilities, and enormous disruption of service during what would essentially be a rebuilding of the current building.

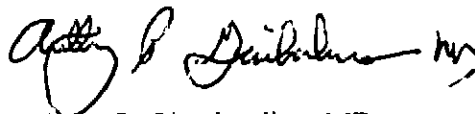
For 30 years, VASC has provided outpatient surgical procedures in St. Charles from the same, now outdated building. I have been a full-time staff anesthesiologist at VASC since 1990 and have served as Medical Director and Chief of Anesthesia since 2007. There is no one in a better position to evaluate the Center's capabilities and limitations. We have an outstanding clinical staff and stand ready to meet the outpatient surgical needs of the Fox Valley for years to come. However, the facility is simply no longer suitable as an ambulatory surgery center. Multiple evolutions in the life safety code and infection control guidelines have made compliance with current codes and best practices extremely difficult, and have resulted in citations to the surgery center. For instance, many doors fail to reach ADA requirements, and the building is not handicap-accessible. Additionally, sterile processing work space is not separated into clean and dirty instrument areas, and the loading area is not designed to protect the integrity of medical products.

Furthermore, the building's infrastructure includes serious electrical and plumbing deficiencies, and has not been cabled for modern IT needs. Leaking fire sprinkler lines and a malfunctioning fire alarm system have resulted in recurring false alarms and periodic closures of the facility. The building's layout includes four separate patient areas, resulting in staffing complications and other inefficiencies, and there is inadequate storage space for operating room equipment, soiled linen, and red bag (biohazard) waste. Staff lockers do not connect directly to the sterile corridor, as required to prevent one-way flow of staff from nonsterile to sterile areas of the facility. The exterior of the building requires roofing and foundation repairs, and the design of the main entrance often requires cars to back-up and re-approach when dropping off and picking up patients.

To avoid interruption in patient care for the massive and expensive required repairs, VASC plans to relocate to a new, steel-frame building with less total square footage and a more efficient and modern design. Located only one-quarter mile from the existing facility, VASC's new building will be convenient for patients and staff. The new building will be compliant with current codes and best practices, and will feature a more cost-efficient layout with new mechanical and electrical systems. We will be able to care for our patients in a 21st century facility.

VASC has served St. Charles-area residents since 1987, and I support its efforts to offer a modern and efficient facility that is consistent with current codes, best practices, and our mission to provide high-quality, cost-effective care. I believe the Fox Valley needs this center as an alternative to the large, overbuilt facilities operated by consolidated health systems to our north, south and east.

Respectfully,



Anthony P. Giamberdino, MD
Medical Director
Valley Ambulatory Surgery Center

