

**Elmhurst Outpatient Surgery Center**  
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APR 12 2018

**HEALTH FACILITIES &  
SERVICES REVIEW BOARD**

March 28, 2018

Ms. Courtney Avery  
Illinois Health Facilities and Services Review Board  
525 West Jefferson street (2<sup>nd</sup> floor)  
Springfield, IL 62761

RE: Letter of Impact  
Project: 17-073 Illinois Back & Neck Institute, Elmhurst IL

Dear Ms. Avery:

On behalf of the Elmhurst Outpatient Surgery Center and its members, we are submitting this letter as a statement of opposition to the proposed Illinois Back & Neck Institute multi-specialty Ambulatory Surgery Treatment Center (ASTC) to be located at 360 W Butterfield Road, Elmhurst, Illinois.

Illinois Back & Neck Institute has not provided proper notification regarding this proposed project to Health Service Area 7 healthcare facilities and there are several concerns related to the project application which include:

**Unclear Project Scope:**

The project narrative (page 8) indicates that the proposed ASTC would provide Pain, Orthopedic, Podiatry and Gastroenterology procedures. The remaining application does not identify expected Podiatry and Gastroenterology referral volumes or physicians.

**Lack of Comprehensive HSA 7 Region Assessment:**

The application fails to include a comprehensive ASTC market assessment which would document substantial pain, orthopedic and podiatry ASTC capacity currently available in the area.

**Outdated supporting reference documents:**

The application includes ASTC marketplace reference documents from 2009. These outdated reference documents fail to adequately represent the current ASTC marketplace in which market saturation, healthcare provider consolidation, flattening reimbursement and healthcare reform uncertainty has negatively impacted many local ASTCs.

Elmhurst Outpatient Surgery Center (EOSC) is a multi-specialty ASTC located 1.6 miles and three (3) minute drive from the proposed new ASTC. EOSC performs 8,000 surgical cases within 4 operating and 4 procedure rooms. EOSC provides high quality, cost effective multispecialty care including the provision of pain, orthopedic, gastroenterology and podiatry care to the same geographic service area as the proposed Illinois Back & Neck ASTC.

EOSC is operating at approximately 50% of available capacity. This level of underutilization is not uncommon in the area. Of the 27 multispecialty ASTCs within this geographic area, only 4 are operating at or above 50% of available capacity. All but one ASTC within a thirty-minute drive time of the proposed Illinois Back & Neck ASTC do not meet the IHSRB surgical capacity standard of 1500 hours per operating room. With the upcoming opening of six (6) additional ORs at the Rush Oakbrook Surgery Center, the local orthopedic ASTC marketplace will become even more saturated.

Should the Illinois Back & Neck ASTC be approved, this severe underutilization and excess capacity in the market will only be exacerbated leading to added cost and inefficiency in the healthcare delivery system.

EOSC has been serving the Elmhurst community and surrounding suburbs since 1999. There is no doubt that our future volume potential and operations will be negatively impacted by the proposed Illinois Back & Neck ASTC project. A more prudent alternative to building a new ASTC in the area would be to utilize existing capacity within the market.

As the IHSRB is reviewing this project, we ask that you give serious consideration to the lack of need for this project and the negative impact it will have on existing facilities.

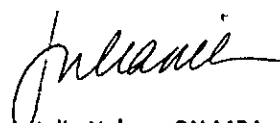
Sincerely,



Harry Siavelis, MD  
Chairman of the Board  
Elmhurst Outpatient Surgery Center



Andrew Belavic, MD  
Medical Director  
Elmhurst Outpatient Surgery Center



Julia Nelson, RN MBA  
Executive Director  
Elmhurst Outpatient Surgery Center