

February 5, 2019  
1704 Josephine Place  
Springfield IL 62704

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

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FEB 11 2019

HEALTH FACILITIES &  
SERVICES REVIEW BOARD

Re: CON Application #18-042

Dear Ms. Avery:

I write in opposition to the application of Quincy Medical Group for a certificate of need (#18-042) for a second, free-standing ambulatory surgery center in Quincy, Illinois. I had an academic practice in family medicine for 30 years in Quincy prior to assuming a role in central administration for the SIU School of Medicine. I express my own opinion in this letter. Nothing in this letter should be construed as a statement from an organization. I base my opinion on my education, practice and experience as a past member of the Council on Graduate Medical Education, a council authorized by the U.S. Congress to make physician workforce recommendations to the Secretary of Health and Human Services, and to the two healthcare authorizing committees of Congress -- the Senate Health, Education, Labor and Pensions Committee and the House Energy and Commerce Subcommittee on Health.

Quincy is a regional medical market whose medical needs have been ably served over the years by the Blessing Health System (Blessing), the Quincy Medical Group (QMG), the SIU Center for Family Medicine (CFM), and other independent groups of physicians and healthcare providers. More than 10 years ago, Blessing and QMG entered into a business arrangement regarding the current ambulatory surgery center in Quincy. Though estimates by each organization of the effective use of this center vary considerably, both organizational estimates show that the current ambulatory surgery center is far from fully utilized and has capacity to accommodate more patients and surgical cases in a region whose population is not growing.

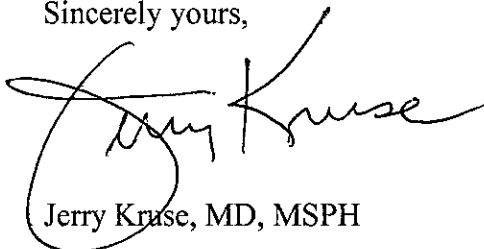
The medical literature has provided much information about the expansion of medical services and competing ambulatory surgery centers. One article, which succinctly states the evidence regarding this issue, is found in the May 25, 2009 issue of the *Annals of Internal Medicine*. This article, entitled "The Cost Conundrum" and authored by surgeon Dr. Atul Gawande, contains data from a study of the healthcare in McAllen, Texas, and an analysis of

why the cost in McAllen is so much higher than in similar surrounding communities. Briefly, the costs in McAllen became so high because of the establishment of for-profit specialty-specific hospitals, free-standing imaging centers, and free-standing ambulatory surgery centers. The specialty hospitals and the duplicate imaging and surgery centers were less likely to provide services for the entire population and more likely to limit the range of services provided. In other words, they were less likely to serve those who are uninsured or receive public aid, and were more likely to emphasize procedures that have a greater margin of profit, such as gastrointestinal endoscopies and cardiac catheterizations. Employers incorrectly believed that increased competition between these centers and hospital-based centers would bring them a cost advantage. It did not. Quite the opposite is true – overall costs for the population rose, and everyone wound up paying more, while at the same time it became more difficult for those who need the care the most to get it. An overview of the proposal in Quincy unfortunately leads to the same conclusion. This proposal will move Quincy and the surrounding area further away from the Institute of Health Improvement Triple Aim of better population-based healthcare outcomes, lower per capita cost, and better healthcare experiences for all people.

Blessing has developed a system that optimizes healthcare access for all, that sponsors excellent training programs for healthcare professionals, and that meets the needs of the communities of west-central Illinois. The effect of a second ambulatory surgical center most certainly would pose a financial problem for Blessing, and would lessen Blessing's ability to reach all citizens, to support healthcare educational systems, and to meet the health needs of the area. My academic practice was with the SIU Quincy CFM. I have observed for three decades the value of the academic-community partnership between SIU and Blessing in Quincy. I also observed the value of the Blessing Rieman College of Nursing. These programs spur better systems of care, better education for the entire region, and a better healthcare workforce for the future. Blessing's financial and philosophical support is essential, and no duplicative program that would harm it should be approved.

Thank you for this opportunity to express my opinion.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jerry Kruse". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail that extends to the right.

Jerry Kruse, MD, MSPH

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HEALTH FACILITIES &  
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January 28, 2019

Ms. Courtney R. Avery  
Administrator  
Illinois Health Facilities and Services Review Board  
525 West Jefferson, 2<sup>nd</sup> Floor  
Springfield, IL 62761

**Re: Opposition to CON 18-042, Quincy Medical Group Surgery Center in Quincy, Illinois**

Dear Ms. Avery:

My name is Mary Reichert, I am an employee for Blessing Health System, employed for over 13 years. I object to the CON18-042 Quincy Medical Group Surgery Center in Quincy, Illinois.

My reasons for my objection are: 1.) It is a duplication of current services for outpatient surgery on the Quincy Medical Group that Blessing Health System currently owns and that Quincy Medical Group Manages. It is my understanding that services rendered at this site are not at 100%, and there is opportunity for more outpatient surgery to be done at this facility. 2.) The community deserves cooperation from both of these organizations to deliver this service to the community. Comments from both groups indicate that they are both interested in promoting the health of the community. Friction between these two groups will not promote healthy outcomes for the community. 3.) Expenses to the population will occur if an individual experiences a medical emergency while the center. These would be for the ambulance and the emergency room. It is my understanding that the EMS in Quincy Illinois is already strained and coverage of this building to transport an individual would mean additional expenses that this community cannot afford. 4.) Job loss to Blessing Health System is estimated to be approximately 400 jobs. 5.) The revenue generated from the outpatient surgery center benefits the not-for-profit mission that provides low cost or no cost services to individual in the community. In addition, Blessing Health System provides financial to the education of many healthcare professionals at Blessing-Reiman College of Nursing and the SIU Family Residency Program. The loss of revenue is estimated to be \$25-41 million. Unity Point, the owner of Quincy Medical Group would receive approximately 40% of the revenue earned at the new outpatient surgery center. Our community has already lost three major chains. I believe that additional loss in revenue will hurt the vitality of the community.

In closing, I respectfully ask that the Health Facilities and Services Review Board deny CON application 18-042. Thank you for your consideration.

Sincerely/Very truly yours/Respectfully,

Mary Reichert

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**HEALTH FACILITIES &  
SERVICES REVIEW BOARD**

February 7, 2019

Ms. Courtney R. Avery, Administrator  
Illinois Health Facilities and Services Review Board  
525 West Jefferson, 2<sup>nd</sup> Floor  
Springfield, Il. 62761

**Re: Opposition to CON 18-42 Quincy medical Group Surgery Center in Quincy Illinois**

Dear Ms. Avery,

My name is Marlin Rempfer. I am a volunteer chaplain at Blessing hospital. I am also a member of the Quincy community.

I am opposed to the certificate of need for the following reasons:

It is suggested that the quality of care would be better. I do not agree. The doctors would be the same. Secondly, I believe we would lose some doctors because Blessing would not be able to continue to fund the staff and programs they currently have.

It is my understanding that the current surgery center has only been used to 50% capacity.

It is my understanding that the QMG doctors wanted to perform either night or weekend surgeries. It is also my understanding that such a request was never made to Blessing. It is also my understanding that if the request had been made it would have been approved. It is also my understanding that a QMG employee is the one who schedules surgeries. This individual did not contact Blessing.

It is my understanding that Blessing hospital has recommended, and agreed to pay for, a system that would translate QMG and Blessing medical records since they use different systems. However, QMG has never responded.

It is my understanding that Blessings hospital was given fifteen minutes of notice on the CON. This was despite the fact that joint meetings were taking place for 4 – 6 months on how Blessing & QMG could cooperate. Yet nothing was mentioned during those meetings.

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It is my understanding that Blessing ambulatory care has reduced rates by 30%.

It is my understanding that QMG built the surgery center but could not fund it so they sold it to Blessing Hospital.

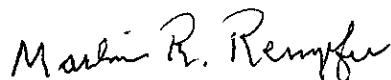
It is also my understanding that QMG could not fund what they had so they reached out to Unity Point which now owns 40% of QMG. My question is, how they can afford another surgery center and does it mean that 40% of the funds will go out of our community?

It is also my understanding that Blessing hospital expects to lose approximately 400 jobs if this goes through.

For the above reasons and many more I believe it is much better for the Quincy community, for QMG and for Blessing hospital if the entities can continue to work together as they have in the past.

It is also for that reason I respectfully ask that the Health Facilities and Services Review Board deny CON application 18-042 Quincy Medical Group Surgery Center.

Respectfully,



Marlin R. Rempfer  
2721 Ken Ray  
Quincy, Illinois 62301