

February 12, 2019

**RECEIVED**

**FEB 13 2019**

**HEALTH FACILITIES &  
SERVICES REVIEW BOARD**

Ms. Courtney R. Avery, Administrator  
Illinois Health Facilities and Services Review Board  
525 West Jefferson, 2<sup>nd</sup> Floor  
Springfield, IL 62361

Re: Opposition to CON-18-042 Quincy Medical Group (QMG) Surgery Center in Quincy, IL

Dear Ms. Avery,

I am writing today in opposition to CON 18-042 with the Illinois Health Facilities and Services Review board regarding the Quincy Medical Group ASTC project.

I offer this opinion as a business owner in the community, as well as a satisfied customer of both organizations for almost 35 years. I have utilized multiple services within both organizations, including the current surgery center, and have never experienced an issue with scheduling or cost. I would prefer to keep it this way and be able to utilize both QMG and Blessing in the years to come, which leads me to why I chose to write this letter in opposition to this proposed project.

I have serious concerns about how this project will affect our two leading healthcare organizations in the region. If this project were to be built and succeed, then Blessing would see a drastic impact on the services that they currently provide the community, myself included. If this project should fail, I foresee a negative impact on the services that I receive at QMG with the potential loss of providers and services. Under the current proposal by QMG, there is no viable way for both organizations to succeed. This region is better served when both healthcare organizations are flourishing and working together, not against each other. Ultimately, the community (consumers/patients) will lose. In the following paragraphs, I will detail why I am opposed to this project.

After taking the time to review the CON for the proposed project, it became evident of the misinformation put forth in the application surrounding many areas such as projected population growth, service area radius they are encompassing, cost of construction, lease agreements at fair market value and the justification of building a cancer center which numbers appear to be manipulated to fall beneath the threshold of the "need for a CON or determination of reviewability". It is very apparent this is an unnecessary duplication of services for the health service area through the following:

- Utilization:
  - Current utilization is 82%, per HFSRB protocol which includes prep time for the OR and cleanup post procedure (none of which are revenue generating). Actual utilization hovers around 50%. Additional rooms will saturate the market, causing inflation of the cost. Because of cost shifting the consumer will have to pay more, not less as they are proposing. The proposal removes 100% of the cases from the

associated to both, as well as assessing the fair market value affixed to the lease. They only allowed for \$917,778 for the cancer center lease. When compared to the \$11,878,000 FMV they affixed to the lease on the ASTC, they clearly have undervalued the FMV of the cancer center. The ASTC is 26,850 square feet, coming up to \$372.00 per square foot. QMG's lease shows them leasing the entire 69,000 square foot building with some space being left for future development. QMG purposely fails to detail how many square feet the Oncology Center will be nor did they provide an appraisal showing the true FMV of the space that they are leasing. This inaccuracy in addition to only allowing \$2475 or architectural fees (in my experience, architectural fees are generally 5-8% of the project budget) and \$700,000 in construction costs when a cancer center currently being constructed in Peoria, IL is currently being estimated at 17 million, shows clearly they are trying to skirt tail the system to avoid the scrutiny of a CON.

- I noticed many errors or omissions in the Determination of Reviewability Checklist provided by QMG for the Radiation Oncology project. The most notable was that this proposed project isn't considered a new facility, new service, or change in ownership. One of those must apply to this situation, as there isn't currently an operating cancer center at the future ASTC building. The only operating Radiation Oncology service is at 11<sup>th</sup> and Broadway and is a partnership with Blessing hospital. This new facility isn't a continuation of that partnership or service, it's a new service as the previous one will still be active and operational. There is no question that this proposed project would substantially change the scope and operation of the existing cancer center in Quincy. This information should require a CON to be applied for on the future cancer center.

In summary, I clearly oppose the CON 18-042 with the Illinois Health Facilities and Services Review board regarding the Quincy Medical Group ASTC project due to the issues mentioned above and the negative impact this will have on the community as well as myself as a consumer. I respectfully ask that the Health Facilities and Services Review board thoroughly review all elements of information in the application for validity in order to correctly determine the need for the proposed ASTC.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam M. Booth', with a long, sweeping horizontal line extending to the right.

Adam M. Booth  
Quincy, IL