



July 3, 2019

Mr. Michael Constantino
Illinois Health Facilities and Services Review Board
525 W Jefferson Street 2nd floor
Springfield, IL 62761

Re: Inquiry -- Substitution of PET/CT for CT scanner
Project 18-042
Quincy Medical Group Surgery Center

RECEIVED

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**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

Dear Mr. Constantino:

Project 18-042, the Quincy Medical Group Surgery Center, includes a CT scanner located outside of the ASTC space but part of the approved project. As planning continued, QMG physicians have expressed a preference for a PET/CT instead of the standard CT scanner. This letter requests your opinion on whether this change can be made without requiring a permit alteration. The request is based on the presumption that CT is a general category, and PET/CT is a type of CT.

Pursuant to Section 1130.750 of the Illinois Health Facilities and Services Review Board's ("State Board") rules, any change after the issuance of a permit may constitute an alteration. Permitted alterations include: (1) a change in the approved number of beds or stations, (2) abandonment of a category of service, (3) increase in gross square footage up to 5% of the approved gross square footage, (4) decrease in square footage greater than 5% of the approved gross square footage, (5) an increase in project costs up to 7% of the total approved project costs, or (6) increase in the amount of funds borrowed. The change from a CT scanner to a PET/CT scanner does not appear to constitute alteration requiring State Board approval.

Importantly, the change from a CT scanner to a PET/CT scanner will not result in the abandonment or change of a clinical service area. Similar to a CT scanner, the PET/CT scanner is a diagnostic imaging system. It will perform all of the same functions that the CT scanner performs. CT procedures that were projected in the permit application for year 2023 will remain at slightly over 8,300 cases. Additional volume associated with PET will be generated by the medical oncology program. There is no relationship between the request to substitute a PET/CT for a CT and the radiation oncology program in the building. All of the volume -- PET/CT and standard CT -- is generated internally within QMG and the services are currently being provided by QMG at other QMG locations. No other healthcare providers' volumes or revenues are impacted.

There is no change in the space required if PET/CT is installed instead of the standard CT. The permit application references 1,550 sq ft of clinical space for this function.



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The cost of the PET/CT scanner is \$766,999, compared to the \$666,375 referenced in the permit application for the CT scanner. The additional cost will not affect the total project cost of \$19,519,058. Cost reductions in moveable equipment and other capital costs will offset the higher cost of PET/CT.

Given this information, we request your advice on whether this substitution can be implemented without requiring a permit alteration. Thank you for considering this request. If you have further questions, please contact Patty Williamson at 217-222-6550 x 3304, or Ralph Weber 847-791-0830.

Sincerely,



Carol Brockmiller
Chief Executive Officer



Patricia Williamson
Chief Financial Officer

cc: Ralph Weber, CON Consultant