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AUG 27 2020

HEALTH FACILITIES &  
SERVICES REVIEW BOARD

August 24, 2020

Courtney Avery  
Administrator  
Illinois Health Facilities & Review Board  
525 W. Jefferson Street, 2<sup>nd</sup> Floor  
Springfield, IL 62761  
[courtney.avery@illinois.gov](mailto:courtney.avery@illinois.gov)

Re: Opposition to CON Application #20-17 – Metro East Endoscopic Surgery Center

Dear Ms. Avery,

I must oppose Project #20-17 – *an unnecessary duplication of existing and underutilized hospital services* – because of its severe adverse impacts on two rural hospitals. As reflected in the CON application, the project relies entirely on redirected outpatient orthopedic surgeries from existing hospital providers, including a CMS-designated Critical Access Hospital. The unavoidable result, particularly after the COVID-19 pandemic, will be hospital service cuts and job losses. That cannot be in the public interest.

As an emergency room physician, I am particularly concerned about the negative impacts this project portends for two rural hospital emergency rooms. By shifting away relative higher-margin outpatient procedures, fewer hospital resources will be left to cross-subsidize those services (like the emergency department) that have low or negative margins. Whatever financial gains the applicant experiences will come at a greater cost for the involved communities.

CON Project #20-17 is poorly timed and contrary to the best interests of the involved rural populations. I respectfully ask that the Review Board deny this CON application.

Respectfully,

DocuSigned by:

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Kelly Geldmacher, M.D.  
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