

August 24, 2020

Courtney Avery
Administrator
Illinois Health Facilities & Services Review Board
525 W. Jefferson Street, 2nd Floor
Springfield, IL 62761
courtney.avery@illinois.gov

RECEIVED

AUG 27 2020

HEALTH FACILITIES &
SERVICES REVIEW BOARD

Re: Opposition to CON Application #20-017 – Metroeast Endoscopic Surgery Center

Dear Ms. Avery:

As a public health professional charged with safeguarding the well-being of our residents, I must respectfully oppose CON Project #20-017. This CON application represents no real public health benefits – and many negative impacts – for our area residents. Among other things, it duplicates services at existing hospitals, threatens safety net services of a Critical Access Hospital, and increases patient costs as reflected in the CON application itself. Particularly during and after the COVID-19 pandemic, which has presented severe challenges and financial pressures for rural health care, Project #20-017 represents a step backward for public health interests.

The success of rural health care largely depends upon regional collaboration and a careful balancing of interests. This CON project represents neither. It blatantly disregards the significant collaboration by a Critical Access Hospital with the involved surgery center, including significant investment by the hospital in robotic orthopedic surgery equipment for use by the surgery center's principal practice group. While there may be financial rewards for the entrepreneur applicant, the diminished patient volumes and revenues at adversely impacted hospitals will result in job losses and service cuts, including vital safety net services. The involved entrepreneur will continue to perform no charity care; meanwhile, the long history of charity care by the negatively impacted hospitals will be threatened due to the loss of patient revenues and hospital margins. To complete the "balancing of interests" picture, the CON applicant proposes to charge higher costs for the procedures he will redirect away from our area hospitals. I sincerely believe that the Illinois Health Facilities Planning Act, particularly in these times, appropriately calls for denial of CON Project #20-017.

Respectfully,



Sean Eifert, MA
Interim Administrator
Clinton County Health Department
930 Fairfax Street
Carlyle, IL 62231

Cc: Mike Constantino