



# Clinton County Rural Health

Affiliated with HSHS Medical Group

August 25, 2020

Courtney Avery  
Administrator  
Illinois Health Facilities & Services Review Board  
525 W. Jefferson Street, 2<sup>nd</sup> Floor  
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AUG 27 2020

HEALTH FACILITIES &  
SERVICES REVIEW BOARD

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

Dear Ms. Avery:

As the manager of a rural physician practice group covering many areas of medicine, from pediatrics to geriatrics, I well understand the critical importance of preserving rural hospitals. The vital health care roles they play, and the delicate challenges they continually face, became especially clear during the COVID-19 pandemic. Because CON Project #20-017 will simply redirect patient volumes and revenue away from two critically needed rural hospitals – including a federally designated Critical Access Hospital – I feel compelled to share my opposition to this CON application.

This is an especially bad time to duplicate rural hospital services. The two hospitals negatively impacted by this CON application have already suffered pandemic-related financial losses. Shifting away substantial outpatient surgery volume only adds to the ongoing financial challenges for these hospitals. If allowed to go forward, Project #20-017 will unavoidably result in hospital job losses and service cuts.

Rural hospitals serve as the health care foundation in our less-densely populated areas. They alone provide 24/7/365 emergency department services, other necessary low- or negative-margin services, and charity care. Rural hospitals rely upon outpatient procedures to cross-subsidize the vital healthcare services upon which their communities depend. I sincerely hope the Review Board will fully consider these negative impacts and deny this CON application.

Respectfully submitted,

Brenda Kuhl  
Clinton County Rural Health  
HSHS St. John's Hospital – Breese  
9401 Holy Cross Lane  
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Cc: Mike Constantino  
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