



**Madison County Government
Madison County Board**

*Kurt Prenzler, CPA · County Board Chairman
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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 – Metro East Endoscopic Surgery Center

Dear Ms. Avery,

As a government official, I fully appreciate that correct outcomes often require a careful balancing of interests. Such an exercise, I respectfully suggest, should lead to the conclusion that this CON application merits denial.

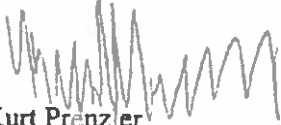
The CON applicant offers, as his sole justification for the project, a supposed cost savings – yet no such savings are documented. Rather, information included in the application proves otherwise. For example, for CPT Code 29807 (Arthroscopic Shoulder Surgical Repair Slap Lesion), the applicant proposes to charge \$39,897 – which is more than double the \$17,535 charged for the same procedure at the affected hospital.

Balanced against this illusory “benefit” are many significant adverse impacts:

- The project relies entirely on redirected outpatient orthopedic surgeries presently performed at two rural hospitals, representing the very essence of an “unnecessary duplication of services.”
- The most dramatically impacted hospital is a federally-designated Critical Access Hospital, meaning by definition that the adverse impacts threaten safety net services.
- This project comes during a pandemic that has financially strained all hospitals, particularly rural hospitals like the two that are adversely impacted here.
- The project callously disregards a positive history of collaboration with the applicant by the impacted Critical Access Hospital – which has purchased and maintained expensive robotic orthopedic surgery equipment for the use of the applicant and at its request.
- The financial pressures caused by this project threaten ongoing charity care at both hospitals, while the surgery center provides absolutely no charity care.
- As reflected in the preceding paragraph, patient cost increases are likely to result.

The preservation of rural hospitals should be of paramount importance at any time, and especially now. The interests of one entrepreneur should not prevail over entire communities. I sincerely hope that the Review Board members will engage a careful balancing of interests and, like me, conclude that Project #20-017 should be denied.

Respectfully,

A handwritten signature in black ink, appearing to read "Kurt Prenzler". The signature is somewhat stylized and cursive.

Kurt Prenzler
Madison County Board Chairman

cc: Mike Constantino