

August 27, 2020

**Via Email Delivery**

Courtney R. Avery  
Administrator  
Illinois Health Facilities and Services Review Board  
525 West Jefferson Street, 2<sup>nd</sup> Floor  
Springfield, IL 62761

**RE: Project 20-030 – Effingham Medical Office Building, Effingham  
Response to Written Comments from HSHS Illinois, Dated 8/22/20**

Dear Ms. Avery,

On August 22, 2020, Hospital Sisters Health System (“HSHS”) and HSHS St. Anthony’s Memorial Hospital submitted written comment for the proposed Project #20-030. This letter is intended to address the comments presented by HSHS. Each item will be addressed in the numerical order as submitted by HSHS.

1. As stated in the application on page 5, Sarah Bush Lincoln Health Center (“SBLHC”) **does provide** the proposed clinical services and programs of the Effingham Medical Office Building at existing SBLHC locations. CT and Ultrasound services are currently provided at the main hospital campus in Mattoon, IL (Planning Area D-05). In addition, **Ultrasound services are currently provided in Planning Area F-02 at a clinic located at 1106 N Merchant St., in Effingham, IL.** As stated in the application on pages 93 and 94, Sarah Bush Lincoln acknowledged “ultrasound is not currently provided in the **existing** medical office building,” however **it is being provided at a provider office location in Effingham, IL (Planning Area F-02) and therefore is not a new service.** Sarah Bush Lincoln does not intend to redirect patient volume from HSHS St. Anthony’s Memorial Hospital for Ultrasound.

Per statute, the General Service Area (GSA) for a medical office building is 21 miles. Since the main hospital campus in Mattoon, IL is located 28 miles from the proposed medical office building, SBLHC will re-categorize the CT service as a new service to the Planning Area and therefore will address the Need Determination - Establishment criteria per Section 1110.270(b) of the Administrative Code. The Criterion 1110.270(b) and physician referral letters for the CT scan service will be submitted to the Health Facilities and Services Review Board by the public hearing date.

Since Ultrasound services are currently being provided in Effingham and within the 21 mile service area, this service is not classified as a new clinical service and therefore

physician referral letters are not required. Historical utilization for Ultrasound services currently provided in Effingham can be found in the table below.

UTILIZATION					
	DEPT./ SERVICE	HISTORICAL UTILIZATION	PROJECTED UTILIZATION	STATE STANDARD	MEET STANDARD?
YEAR 1	Ultrasound	444 visits	300 visits	3,100 visits	Yes
YEAR 2	Ultrasound	(FY20)	350 visits	3,100 visits	Yes

2. As stated in the response to item #1, SBLHC will address Need Determination Criterion for CT scan services and will submit an Attachment 30 addendum by September 2, 2020.

In the application, SBLHC projected 1,000 CT scan visits in Year 1. In FY20, SBLHC had 334 CT scan referrals from employed providers who cared for patients who reside near the proposed Effingham medical office building. SBLHC anticipates that future referrals from patients who reside in this Planning Area will be redirected from the Mattoon CT location to the proposed CT scan service at the Effingham medical office building. This redirection of referrals will not negatively impact SBLHC's utilization of CT in Mattoon. More detailed information regarding provider referrals and patient origin will be submitted to the Health Facilities Services Review Board in the Attachment 30 addendum.

In FY20, SBLHC made a capital investment for two Mako robots. The Mako enables providers to have a more predictable surgical experience when performing joint replacement surgery. A CT scan of the patient is needed prior to surgeries where the Mako robot is used. Due to the increased utilization of the Mako robots, SBLHC projects 372 new CT scans will be ordered by the employed orthopedic surgeons who will be practicing in proposed Effingham medical office building.

In calendar year 2019, SBLHC employed providers practicing in the Effingham area ordered 314 CT scans at HSHS St. Anthony's Memorial Hospital (source: Trilliant Health). These future referrals may be redirected to the CT scan in the proposed Effingham medical office building.

According to HSHS St. Anthony's Memorial Hospital's CY 2018 Hospital Profile, they own 2 CT scanners and performed 2,604 inpatient examinations and 10,979 outpatient examinations, for a total of 13,583 examinations in 2018. The state standard is 7,000 examinations for a CT scan. Currently, HSHS St. Anthony's Memorial Hospital is operating at 97% utilization for the CT scanners. If all 314 CT scan referrals are redirected to the proposed Effingham medical office building, the impact to HSHS St. Anthony's Memorial Hospital is minimal. Their CT volume would still achieve 94.8% utilization.

3. Sarah Bush Lincoln opened its first location in Effingham more than 20 years ago. Since that time, Sarah Bush Lincoln has continued to grow and currently owns and operates multiple locations in Effingham and provides patient care services in that community, including primary care, orthopedics, otolaryngology, pediatrics, interventional pain,

general surgery, urology, walk-in clinic services, occupational medicine, physical and occupational therapy, MRI, ultrasound, X-ray, laboratory services, audiology, home health, hospice, and durable medical services.

The information submitted regarding patient origin on page 82 of the application was specific to inpatient discharges at SBLHC. Inpatient discharges are not relevant when considering the proposed **outpatient** medical office building. As indicated in Table 1110.1270 in Attachment 30 of the application, SBLHC has experienced significant growth in outpatient provider office visits at Effingham-based practices over the past few years. In FY2020, SBLHC provided 40,143 provider office visits at Effingham-based physician practices and that volume is projected to increase to more than 49,000 visits in FY2023. This growth has resulted in the need to replace our undersized and outdated medical office building.

Table 1110.1270: Historical & Projected Utilization Provider office visits at Effingham-based practices		
Fiscal Year	Number of Office Visits	Annual Growth
2017	7,684	
2018	15,007	95%
2019	38,352	155%
2020*	40,143	5%
Projected 2021	42,953	7%
Projected 2022	45,960	7%
Projected 2023	49,177	7%

\*FY20 is based on annualized numbers of July 2019 through May 2020. During the Covid-19 pandemic, our practices reduced capacity, resulting in a decrease in office visits.

As stated in item #1, physician referral letters will be submitted for the CT Scan service, which is the only new service being added to the Planning Area with this replacement project.

4. The proposed project is over twice the size of the current medical office building. The increased square footage is needed to address the growth SBLHC has experienced in the Planning Area, as described in item #3. This proposed project will improve access to care for our patients by consolidating several of our current services, provided in Effingham, into one convenient centralized location.

The current medical office building was not originally constructed and designed as a medical office building. It was built in the 70's and was a Skating Rink for many years before being converted to a Provider Office Clinic. The inappropriately sized waiting and exam rooms and the poorly configured layout creates privacy and efficiency challenges for both employees and patients. In addition, the current building does not have adequate space to support our MRI services therefore SBLHC has leased a MRI truck

that sits outside of the building. Patients who require a MRI procedure are escorted outside of the building to access this service, regardless of weather conditions. The size limitations of the current building have negatively impacted the patient experience.

The floor plan schematic drawings are being resubmitted as an attachment to this letter.

5. The interventional pain management practice is located in the current medical office building that is being replaced. This practice is simply a clinic practice therefore no procedure rooms are included in the proposed office suite. All interventional pain management procedures performed by this physician will continue to be conducted at the Effingham Surgical Center.
6. All the providers that are going to be housed in the proposed 64,500 gsf building are currently practicing in the Effingham market. These providers will continue to care for and treat their patients as they have in the past. As stated in item #1, physician referral letters will be submitted for the CT Scan service, which is the only new service being added to the Planning Area with this replacement project.
7. The projected utilization of all the diagnostic imaging services proposed with this replacement building meet the state standards with the exception of x-ray. As described in Attachment 15 of the application, in the proposed medical office building, the first floor will consist of a primary care walk-in clinic while the second floor includes an orthopedic clinic, occupational medicine clinic, pain management clinic and primary care clinics. Current utilization in the orthopedic clinic justifies the need for two x-ray units. Due to the configuration of the proposed building, a third x-ray unit is needed on the first floor to support the primary care walk-in clinic patients. Without this unit on the first floor, patients would be transferred to the second floor for x-ray services which would cause significant disruption in the orthopedic clinic.

The diagnostic imaging services are provided in this medical office building to improve the patient experience of care. Having these services housed in one building provides patients the opportunity to see their provider for a medical visit and receive any needed diagnostic imaging care in one convenient location.

Updated historical utilization based on actual FY20 data for each proposed imaging service is provided below.

UTILIZATION					
	DEPT./ SERVICE	HISTORICAL UTILIZATION	PROJECTED UTILIZATION	STATE STANDARD	MEET STANDARD?
YEAR 1	General Radiology	8,500 procedures (Actual FY 20)	9,292 procedures	8,000 procedures	2 units Yes 3 units justification provided
YEAR 2	General Radiology		9,598 procedures	8,000 procedures	2 units Yes 3 units justification provided

UTILIZATION					
	DEPT./ SERVICE	HISTORICAL UTILIZATION	PROJECTED UTILIZATION	STATE STANDARD	MEET STANDARD?
YEAR 1	MRI	1,356 (Actual FY 20)	1,395 procedures	2,500 procedures	Yes
YEAR 2	MRI		1,507 procedures	2,500 procedures	Yes

UTILIZATION					
	DEPT./ SERVICE	HISTORICAL UTILIZATION	PROJECTED UTILIZATION	STATE STANDARD	MEET STANDARD?
YEAR 1	Ultrasound	444 visits (Actual FY20)	300 visits	3,100 visits	Yes
YEAR 2	Ultrasound		350 visits	3,100 visits	Yes

Historical utilization is not available for CT scan in the Planning Area. As stated in item #1, physician referral letters will be submitted for this service.

UTILIZATION					
	DEPT./ SERVICE	HISTORICAL UTILIZATION	PROJECTED UTILIZATION	STATE STANDARD	MEET STANDARD?
YEAR 1	CT	N/A	1,000 visits	7,000 visits	Yes
YEAR 2	CT		1,030 visits	7,000 visits	Yes

Thank you for providing SBLHC with the opportunity to respond to the written comment submitted by HSHS. We believe this additional information will provide the necessary documentation to support the replacement of the current Bonutti Clinic medical office building.

Sincerely,



Kim Uphoff  
Vice President of Operations  
Sarah Bush Lincoln Health Center

Attachments

cc: Mike Constantino, Lead Project Review, via email

Architectural floor plan of the first floor of a medical facility. The plan shows various rooms including a waiting room, registration area, examination rooms, treatment rooms, and a pharmacy. It also includes a large open area, a vestibule, and a parking lot. The plan is oriented with North at the top. A grid system is overlaid on the plan, with letters A through Z along the top and numbers 1 through 13 along the left side. The plan is labeled 'FIRST FLOOR' in the center.

[illegible]







