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STATE SENATOR • 48th DISTRICT  
August 31, 2020

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Re: CON Project #20-030  
Effingham Medical Office Building  
Procedural Inquiry and Concern

Dear Ms. Avery:

I represent a central Illinois district that includes hospitals operated by Hospital Sisters Health System ("HSHS"), as well as the HSHS Illinois division headquarters in Springfield. One of the HSHS hospitals in Illinois – HSHS St. Anthony's Memorial Hospital, a CMS-designated Sole Community Hospital established in 1877 – appears to be directly and adversely impacted by this CON application.

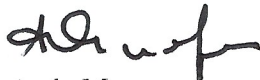
While it has been my practice to comment sparingly on CON matters, I have a profound commitment to protect the continued viability of rural hospitals, especially with the ongoing COVID-19 pandemic that has brought extreme financial and operational challenges to hospitals everywhere. My concern over Project #20-030 arises from the conflicting information contained in the applicant's press statements and permit application with respect to the extent of the impact of the project on St. Anthony's.

In press statements and the application overview, the applicant characterizes Project #20-030 as a simple "modernization of existing services" – specifically, the mere replacement of a dilapidated medical office building. Yet in the details of the application, there appear to be new services that are not currently provided by the applicant. St. Anthony's believes the resulting shift in patient volume will reduce its total hospital revenue by nearly ten percent, or some \$31.5 million. If those estimates are remotely correct, significant hospital service cuts, job losses and reduced community engagement will be unavoidable. I respectfully believe that fuller information by the CON applicant, prior to any public hearing, may be necessary for both St. Anthony's and the greater Effingham community to understand and meaningfully comment upon the CON application as originally submitted.

My procedural inquiry is as follows: *If the CON application does indeed seek to establish new clinical services, will the applicant be required to document the need for these additional services, and demonstrate that there will be no resulting reduction in utilization of services at existing area providers, as I understand is required by regulation (77 Ill. Adm. Code. 1110.270(b))?* The originally submitted application does not provide such documentation or demonstration, apparently reflecting the characterization that this merely involves "modernization of existing service." If such documentation and demonstration is called for pursuant to the actual

details of the CON application, I look forward to reviewing that information, and thereafter the results of an informed public hearing, while reserving the right of a potential future comment. A simple and genuine modernization of existing services should be of no material concern, and I hope that a fully informed discussion and review may ultimately result in a win-win outcome for all. Obviously, much is at stake.

Sincerely,



Andy Manar  
Illinois State Senator  
48<sup>th</sup> District—Illinois

cc: Mike Constantino  
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