

April 13th, 2021

Via Electronic Delivery

Ms. Debra Savage  
Chair  
Illinois Health Facilities and Services Review Board  
525 West Jefferson Street  
2nd Floor  
Springfield, IL 62761

Re: Orthollinois Surgery Center Elgin, LLC ("Orthollinois")  
Project No. 20-040 (the "Project")  
Letter of Opposition

Dear Ms. Savage:

We want to thank you and your fellow Review Board members for giving us the opportunity for public comment.

We are writing together as three orthopedic surgeons who have served the greater Elgin, Algonquin and Barrington area for the last 30 years. We are also the team physicians for multiple local high schools and colleges. We value our community and what is best for it. Please allow us to explain why this Project is not in the best interest of our community, and why we oppose the Orthollinois Surgery Center.

As three of the 19 physician owners of Algonquin Road Surgery Center (ARSC), we perform procedures at that center weekly. We are proud of the care we provide at that facility. ARSC is owned 49% by 19 area physicians, 25.5% by Northwestern Huntley Hospital and 25.5% by Advocate Sherman Hospital. We appreciate being a part of this surgery center, as it is a model for collaboration among physicians and hospitals, even competing hospitals. ARSC is a great example of the structure that the Planning Act encourages, and the type of model the Review Board should promote.

Unfortunately, the proposed Orthollinois Project undercuts this model and threatens ARSC's sustainability.

The proposed new Project takes all of its cases from existing providers, taking 1,843 cases from three existing area hospitals, 70 from another area surgery center, and an astonishing 831 procedures from ARSC. This project will create significant harm to existing surgery facilities, especially ARSC. Not only will it create no meaningful

additional access to care, it will make access to care even more difficult when ARSC is forced to close its doors as a result of the Orthollinois project.

The Applicants seek to justify a new facility in part, by claiming inadequacies at ARSC and that it would be better to have a dedicated orthopedic facility. These alleged inadequacies are something the three of us are not aware of, and something that we have never seen personally. We have found ARSC to be a great place to perform our orthopedic procedures. We have never had a problem being able to schedule our orthopedic cases at this facility, and at times have done our public aid/Medicaid surgeries at ARSC. Orthopedics is by far the largest specialty at ARSC and constitutes 74% of the procedures performed. ARSC is more than well suited as a facility of excellence for our patients' orthopedic surgical needs. We are concerned about further access to patient care at this facility in this location and geographic area if ARSC is forced to close as a result of the Orthollinois project.

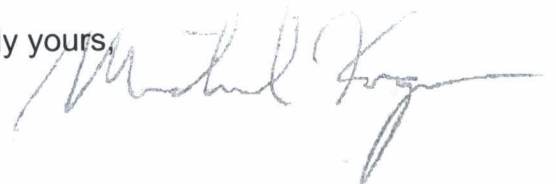
One of the major purposes of the Review Board is to review proposed projects and to determine whether there is a need for a new facility. In this case, it is clear that under the Board's rules there is no need for a new facility. For example, ARSC operates at only 62% of target utilization. Based upon projections in the CON application, the Orthollinois Project will take almost 50% of ARSC's surgical hours and similarly cut its utilization in half. You can understand the devastating effect losing half of ARSC's utilization would have on our facility, including even whether the facility even remains sustainable. We would expect the applicants to argue that two of the owners are large hospital systems. While that is true, the other 19 physician owners are private individuals, and the losses would be personal.

The Review Board plays an important function in setting health care policy in Illinois. The Planning Act's primary purpose and thus one of the Review Board's key responsibilities, is to prevent against avoiding duplicative facilities and the expenditure of health care dollars where there is no need. We ask you to examine the goals you want to promote, and would suggest that this Project seems counter to the policy you would want to promote.

Very truly yours,



seeds



Michael Kogan, M.D.  
James Seeds, M. D.  
Joshua M. Alpert, M.D.

