



July 7, 2021

**Via Email Delivery**

Courtney Avery, Administrator  
Health Facilities and Services Review Board  
525 West Jefferson Street, 2<sup>nd</sup> Floor  
Springfield, Illinois 62761  
[courtney.avery@illinois.gov](mailto:courtney.avery@illinois.gov)

**Project #20-040, OrthoIllinois Surgery Center, Elgin  
Opposition Statement of Valley Ambulatory Surgery Center**

Dear Ms. Avery:

Valley Ambulatory Surgery Center ("VASC") in St. Charles has previously submitted written opposition to Project #20-040, OrthoIllinois Surgery Center, Elgin, and wishes to add this additional comment to address the applicants' false statement that VASC is not within the Geographic Service Area ("GSA") of their proposed project.

Under the Review Board's criteria, an applicant is required to provide a list of zip code areas that comprise the GSA within the radii outlined in 77 Ill. Adm. Code 1100.510(d), which is 10 miles for this application. 77 Ill. Adm. Code 1110.235(c)(2)(B)(i). The rule allows the applicant to identify zip code area "in total or in part," and the applicants here chose to include within the project's GSA the entire zip code area where only part of the zip code was within 10 miles. This was done in order for the applicant's to include more residents (and patients) within the GSA. This enabled the applicants to more easily meet the criterion that "at least 50% of admissions were residents of the GSA." 77 Ill. Adm. Code (c)(2)(B)(ii).

For example, although parts of zip code 60175 (St. Charles) are more than 10 miles from the proposed site, the applicants included the entire population of that zip code as within the designated GSA for purposes of meeting the requirement that 50% of admissions were residents of the GSA. VASC is located within zip code 60175 and is therefore within the GSA described by the applicants themselves. In fact, the applicants' own map on page 179 of the application shows St. Charles within the service area, and the applicants' own chart of service area zip codes on page 180 of the application includes St. Charles zip code 60175, which is VASC's zip code.

The applicants cannot have it both ways. They cannot use the entire zip code area for purposes of meeting one criterion (50% admissions within the GSA), and then flip to a partial zip code area for purposes of identifying underutilized services within the GSA. VASC is located within zip code 60175 and within the GSA that the applicants themselves defined, and is only slightly more than 10 miles from the proposed project site. Moreover, VASC is located north of IL-64, which the applicants show is within the southern boundary of their "10-mile radius" map on page 179 of the application.

As the original Staff Report showed, VASC has operating below the State Standard for operating rooms and has excess capacity, which makes this proposed project unneeded and an unnecessary duplication of services. VASC has dedicated, specially-equipped orthopedic surgical suites used primarily by one of the surgeons who is now committing referrals to Orthollinois. That physician does not need a new surgery center to provide orthopedic services – he provides those services now in Valley’s brand new building with its dedicated orthopedic OR suite.

We respectfully request that the Board deny Project #20-040.

Sincerely,

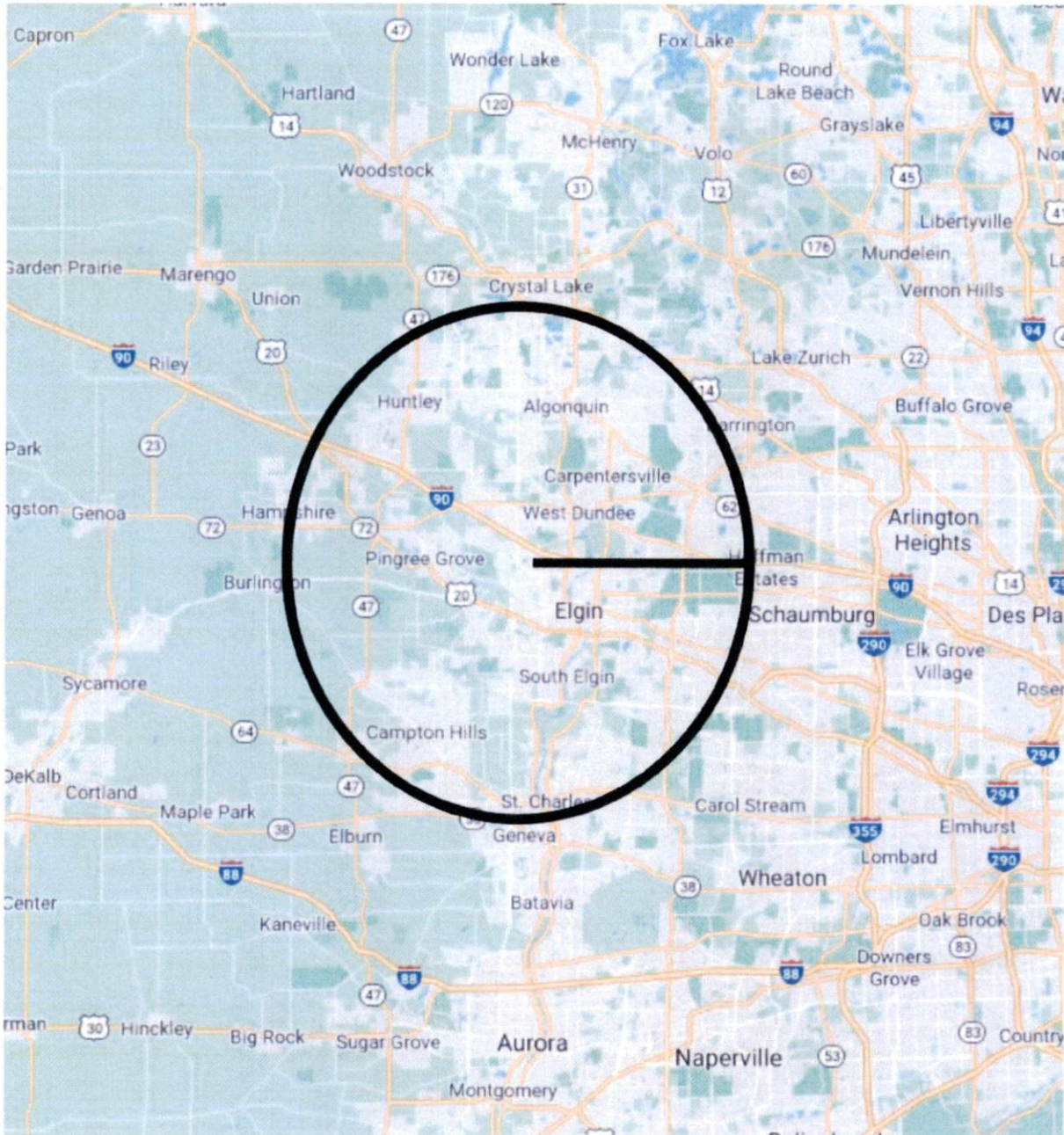


Lauren Blanchard, Administrator  
Valley Ambulatory Surgery Center

Enclosures

cc: Mike Constantino via email: [mike.constantino@illinois.gov](mailto:mike.constantino@illinois.gov)

10 Mile Radius of NE Corner of Alt Lane and Westfield Drive, Elgin Illinois



<b>Zip Code</b>	<b>Population*</b>	<b>Community Name</b>
60102	30,046	Algonquin
60010	41,208	Bartlett
60012	11,120	Crystal Lake
60014	48,550	Crystal Lake
60110	37,691	Carpentersville
60118	7,331	West Dundee
60120 60123 60124	110,849	Elgin
60136	6,879	Gilberts
60142	24,291	Huntley
60156	28,965	Lake in the Hills
60175	32,974	St. Charles
60177	21,985	South Elgin
60184	2,431	Wayne
60192	51,895	Hoffman Estates

\*Per US Census Bureau