



February 4, 2022

**VIA E-MAIL**

Debra Savage  
Board Chair  
Illinois Health Facilities and Services Review Board  
525 West Jefferson Street, Second Floor  
Springfield, Illinois 62761

**Re: Opposition Letter for Quincy Medical Group Hospital, Quincy, IL - Project #20-044**

Dear Ms. Savage:

The BJC Collaborative remains opposed to Project #20-044, the Quincy Medical Group Hospital. Recent developments regarding the acquisition of the Quincy Medical Group (“QMG”) by the private equity backed DuPage Medical Group highlight the concerns we raised in our previous letter to the Board opposing this project. The project’s approval would set a dangerous precedent and place targets on struggling rural and sole community hospitals throughout Illinois.

There are many Illinois hospitals that are a part of the BJC Collaborative, including:

- Alton Memorial Hospital- Alton, Illinois
- Memorial Hospital Belleville- Belleville, Illinois
- Memorial Hospital Shiloh- Shiloh, Illinois
- Blessing Hospital- Quincy, Illinois
- Illini Community Hospital- Pittsfield, Illinois
- Taylorville Memorial Hospital- Taylorville, Illinois
- Lincoln Memorial Hospital- Lincoln, Illinois
- Springfield Memorial Hospital- Springfield, Illinois
- Jacksonville Memorial Hospital- Jacksonville, Illinois
- Decatur Memorial Hospital- Decatur, Illinois
- Southern Illinois Healthcare Herrin Hospital- Herrin, Illinois
- Southern Illinois Healthcare Memorial Hospital Carbondale- Carbondale, Illinois
- Southern Illinois Healthcare Saint Joseph Memorial Hospital- Murphysboro, Illinois
- Sarah Bush Lincoln Hospital-Mattoon, Illinois

BJC Collaborative hospitals serve nearly a quarter of the state’s patient population and manage over 100,000 admissions each year. Our hospitals work together to make care efficient and



easier to access, two goals consistent with the mission of the Health Facilities and Services Review Board (“HFSRB”). Collaborative members share best practices, leverage savings and precious dollars through group purchases, and streamline entry to each member’s specialty programs across the region.

We respect the role the HFSRB has in ensuring access to care and in lowering healthcare costs in our state. The applicants have stated repeatedly that their project does just that, but their application is based on projections that appear to have no factual basis to back them up. Unlike several of the Collaborative’s hospitals, the QMG Hospital would not qualify as a Critical Access Hospital, a Sole Community Hospital, a safety net hospital, or a High-Medicaid hospital under federal or Illinois law. This type of facility does not increase access to care, it just shifts commercially insured, less acute patients from Blessing Hospital which is less than two miles down the road.

There are other aspects of the project that violate basic principles of the Illinois CON program, such as the ability of a non-public community hospital such as Blessing to deliver essential safety net services to this rural community by cross-subsidizing this care through commercially-insured services. Combined with the loss of their Sole Community Hospital designation by CMS, the financial impact would be devastating for region. This does not lower healthcare costs in Illinois.

If doctors can open their own private hospital, with no regard for the important broader need for safety net services in the region hospitals, as QMG proposes to do, it will serve as a blueprint for further erosion of the safety net services provided in smaller towns across the state. If Quincy Medical Group has its own hospital, as has been made clear in the application, QMG will direct low acuity patients, with private insurance to its facility, and in the process destroy the balance of services in the region and jeopardize federal support designed to stabilize rural healthcare.

Respectfully, we ask that the Board reject CON application #20-044. Not just for Quincy, but for all the smaller markets across Illinois.

Sincerely,

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