

DISTRICT OFFICE:
121 BROADWAY, SUITE 1
HIGHLAND, IL 62249
PHONE: 618-651-0405
FAX: 618-651-0413
EMAIL: REPCMEIER@GMAIL.COM

SPRINGFIELD OFFICE:
200-7N STRATTON BUILDING
SPRINGFIELD, IL 62706
PHONE: 217-782-6401
FAX: 217-782-1141



CHARLIE MEIER

STATE REPRESENTATIVE · 108TH DISTRICT

COMMITTEES:

- AGRICULTURE & CONSERVATION (SPOKESPERSON)
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- APPROPRIATIONS - HUMAN SERVICES
- MENTAL HEALTH (SPOKESPERSON)

May 11, 2021

Ms. Debra Savage, Chair
c/o Courtney Avery, Administrator
Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761
courtney.avery@illinois.gov

RECEIVED

JUL 07 2021

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

**Re: Opposition to Project #21-011
Physicians' Surgical Centre, O'Fallon**

Dear Madam Chair:

I respectfully submit this letter in opposition to Project #21-011, Physicians' Surgical Centre, O'Fallon. This Certificate of Need (CON) application should be denied because it unnecessarily duplicates existing services, does not improve access, and would adversely impact a critical access hospital.

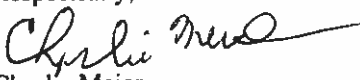
The stated purpose of the Illinois CON process, as set forth in the Health Facilities Planning Act, is to establish a procedure that "avoids unnecessary duplication" of healthcare facilities and promotes the development of facilities "in areas where the health planning process has identified unmet needs." There is no identified unmet need for additional orthopedic surgery services in the Metroeast area. As the Review Board's professional staff found on a similar application filed on behalf the same individual, the area has six hospitals and a surgery center that all provide the same orthopedic surgery services, and all of these providers had excess surgical capacity. The current project is just as much an unnecessary duplication of services as the first one, which received no affirmative votes for approval from the Review Board.

Also, the Review Board's criteria identify five indicators of need for additional services to improve access and only requires an applicant to document that one of the five exists. Neither the first project nor this one satisfies any of the factors, and the applicant itself claims does not claim otherwise.

Finally, Project #21-011 would adversely impact a federally designated Critical Access Hospital, namely, St. Joseph Hospital in Highland. The applicant's first CON project relied on the patient referrals of one surgeon, who promised to redirect 200 surgeries annually from St. Joseph Hospital. That same surgeon is the sole referral source for the current project, and although the referral letter contains a much smaller number of referrals, the CON application states that the applicant "expects orthopedic surgery volumes to grow over time" and the surgeon also states in the referral letter with the application that he expects to increase the volume of referrals. (CON application at pages 90, 91.) In other words, both the applicant and the surgeon are expecting the project to have a much larger impact on existing providers than the referral letter indicates.

For these reasons, I am in opposition to Project #21-011, Physicians' Surgical Centre, O'Fallon.

Respectfully,


Charlie Meier
Illinois State Representative
108th District