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May 10, 2024

Via Email

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John Kniery
Administrator
Illinois Health Facilities and Services Review
Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Re: Innovia Surgery Center (Proj. No. 23-046)

Dear Mr. Kniery:

This office represents Innovia Surgery Center ("Innovia"). In this capacity, we are submitting additional information responsive to the Health Facilities and Services Review Board ("HFSRB") members' questions at the March 12, 2024, HFSRB meeting.

As discussed at the March 12, 2024, HFSRB meeting, treating underserved patients is a core to who Innovia is, and the application to add spine and orthopedics cases is an extension of that philosophy. Historically, Innovia provides a significant amount of Medicaid and charity care compared to other ambulatory surgery center centers in Illinois.¹ With the addition of spine and orthopedics, Innovia anticipates expanding access to surgical services to more underserved patients. Dr. Erickson and Dr. Park approached Innovia several months ago because, as independent physicians, they could not schedule their Medicaid, workers' compensation, and personal injury cases at nearby hospitals. For many of these patients, Innovia is their only option. Approving Innovia for these surgical services will allow Dr. Erickson and Dr. Park to treat their patients more efficiently and allow their patients to return to work or resume their normal activities more quickly without adversely affecting local hospitals.

¹ Over the past five years, more than 30% of Innovia's patients were Medicaid beneficiaries and 15% of its patients received charity care.

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1. Treatment Room Need Assessment

This review criterion requires an applicant to demonstrate the number of operating/procedure rooms are needed based on an annual minimum utilization of 1,500 surgical hours per operating/procedure room. Innovia has two operating rooms. To justify the need for the second operating room, Innovia must perform over 1,500 hours of surgery annually. As documented in the attached letters, the following physicians anticipate performing cases at Innovia in 2024. Based on the anticipated surgical procedures, Innovia will have sufficient volume to justify its two operating rooms.

Physician	Specialty	Anticipated Cases	Surgical Hours (including Prep and Clean Up)	Total Surgical Hours
Vipul Singhal, DMD	Dentistry	150	2.8	416
Kalpesh Shah, DMD	Dentistry	200	2.1	420
Robert Erickson, M.D.	Neurosurgery	70	3.0	210
Samuel Park, M.D.	Orthopedics	55	4.0	220
Vinay Goyal, D.O.	ENT	265	2.0	520
Michel Malek, M.D.	Pain Management	120	1.7	200
Shoeb Mohiuddin, M.D.	Pain Management	120	1.7	200
Catherine Liu, M.D.	OB/Gynecology	120	1.7	200
Paramjit Chopra, M.D.	Interventional Radiology	100	1.4	140
Total		1,200		2,526

As evident in the enclosed support letters, there is a lot of enthusiasm from the physicians to bring their patients to Innovia. Innovia will continue to bolster its marketing efforts to bring even more physicians on board. Innovia also looks to partner with a nationwide management company that can assist it in reaching out to more physicians.

2. Projected Payor Mix

The projected payor mix for the physicians performing at Innovia is provided in the table below.

Physician	Medicare	Medicaid	Commercial	Self-Pay	Workmen's Comp	Hardship/ Charity Care
Vipul Singhal, DMD	0%	89%	5.5%	5.5%	0%	0%
Kalpesh Shah, DDS	5%	20%	45%	20%	5%	5%
Robert Erickson, M.D.	25%	5%	35%	5%	30%	0%
Samuel Park, M.D.	35%	5%	33%	2%	25%	0%
Catherine Liu, M.D.	0%	45%	40%	0%	0%	14%
Paramjit Chopra, M.D.	50%	5%	40%	0%	0%	0%

All the referring physicians listed in the table above accept Medicaid patients from the range of 5-89%.

With respect to the addition of orthopedics and spine cases, Innovia will not adversely affect nearby hospitals. Dr Erickson and Dr. Park are independent practitioners who want to perform cases that nearby hospitals will not accept such as Medicaid, workman's compensation, and personal injury cases. ***Importantly, no hospital objected to the addition of orthopedics and spine procedures at Innovia.***

Many of the patients Dr. Erickson and Dr. Park intend to bring are Medicaid, Workers' Compensation and Personal Injury patients who often do not have transportation or speak English to receive the care they need. It takes a concerted effort on Innovia's behalf to arrange access to their scheduled surgery. These patients often need several visits to Innovia; they may start out with diagnostic procedures, then pain injections and then eventually progress to surgery.

Familiarity with the facility and the medical team can help alleviate some of the stress and anxiety associated with surgery, particularly for those already dealing with pain and discomfort. Obtaining the HFSRB's approval for these procedures would be a pivotal step for these vulnerable patients that need assistance in scheduling several visits.

3. Scheduling Surgical Procedures

Innovia has two operating rooms and has block time available Mondays through Fridays from 7 a.m. to 4 p.m. and Saturday from 7 a.m. to 2 p.m. (or 104 hours per week/5,408 hours annually). As shown in the table in Section 1, Innovia anticipates a total of 2,526 surgical hours in 2024. Accordingly, Innovia has sufficient capacity to accommodate current and future surgical cases. This would be a tentative schedule.

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
-Pain Management -IR	-ENT	-Spine	-Ortho	-GYN -ENT	-Dental	OFF

4. Interventional Radiology

Innovia's certificate of need permit for interventional radiology was approved in 2020 during the heart of the COVID-19 pandemic. Prior to that time, Dr. Chopra provided a referral letter for interventional radiology, and he was extremely excited to bring patients to Innovia. Then the world changed due to the COVID –19 pandemic. The unexpected challenges brought on by COVID affected Dr. Chopra's practice, which primarily serves elderly patients and those from nursing homes; these patients could not leave their homes or care facilities for elective procedures. During that time, Dr. Chopra ventured into new prospects where he started a new medical organization and opened a new office as well. He has also been out of the country working on various projects including charity work to help the disadvantaged.

Innovia met with Dr. Chopra recently and he is committed to return to Innovia. His group has brought new providers on board, and he intends to bring 6-8 cases per month in the next few months. He has already performed interventional radiology cases at Innovia.

From 2021, interventional radiology cases were performed at Innovia; however, they were not reported on the Annual Ambulatory Surgical Treatment Center Questionnaires because there is no category for "interventional radiology" or "other." Due to lack of category option, Innovia recorded those interventional radiology procedures as pain management. This information was communicated to HFSRB staff on May 8, 2024 to address questions regarding the status of interventional radiology procedures at Innovia.

5. Physician Recruitment Plan

Innovia is continuously recruiting physicians to increase utilization at the surgery center. It employs a focused recruitment plan to attract skilled physicians who align with its mission and

values. Leveraging diverse channels and strategic partnerships, it optimizes its outreach efforts to connect with top talent in the medical community. Innovia's recruitment plan, described below, combines targeted strategies to attract top physician talent, ensuring ongoing success in meeting its staffing needs.

LinkedIn and Professional Platforms:

Utilizing LinkedIn, Crain's Chicago Business, and other professional platforms to highlight Innovia's capabilities will allow it to engage with potential candidates through targeted advertisements and sponsored content.

Online Job Portals:

To maximize visibility on job portals like Indeed and Gusto, Innovia optimizes postings and highlights competitive compensation packages and benefits.

Partnership with Management Companies:

Collaborating with a management company that is a nationally recognized leader in surgery center management will broaden Innovia's reach within the medical community, providing access to a wider pool of qualified candidates.

Direct Mail Campaigns:

Innovia initiates direct communication with physicians through personalized mailings to doctor's offices, creating memorable impressions and fostering relationships.

Email Marketing:

Segmented email lists and personalized messaging allow Innovia to engage with physicians directly, inviting them to events and demonstrating its commitment to their professional growth.

Direct Outreach:

Innovia's outreach plan focuses on identifying target specialties, personalized communication, and offering collaborative benefits. It actively visits local and nearby physician offices establishing relationships and providing education opportunities. By monitoring outcomes and engaging in community events, Innovia aims to build a strong network of committed physicians.

6. Process Improvement Plan for Adding/Removing Surgical Specialties

Due to various factors, e.g., unexpected physician retirements and the COVID-19 pandemic, Innovia was underutilized. To improve capacity and performance at the surgery center, Innovia began various recruiting initiatives. As noted in a recent *Becker's ASC Article*, failure to add more specialized services, like spine and orthopedics in Innovia's case, can be a lost opportunity. Adding surgical specialties allow a surgery center to thrive by increasing "access to care for patients while giving nurses the ability to utilize their skills fully."²

Moreover, there are many areas of Urology and Gynecology which overlap with Interventional Radiology and for these reasons Innovia would like to keep all the specialties that it has been granted by the HFSRB. These specialties are very interrelated and as technology evolves, there will be more opportunities for collaboration between them.

7. Surgical Staff Credentials

A key to a robust and thriving surgery center is prioritization of both cost management in service management and excellence in staffing. Innovia understands compromises in staffing can have significant negative impacts on patient outcomes and reputation.³ Innovia's ensures its staff of Registered Nurses and Scrub Techs are experienced in spine and orthopedics cases from working with these specialties in other surgery centers. Innovia also has various equipment vendors that train its staff in advance on new equipment, and they are also available on-site for procedures.

Dr. Erickson intends to perform **minimally invasive** spine procedures at Innovia. He has an experienced operating room spine team that he works with that will accompany him to Innovia. His team consists of a Physician's Assistant, First Assistant (who has worked with him for many years), an X-Ray tech, a Neuromonitoring Tech and a Scrub Tech specializing in spine procedures. They will be brought on as part-time staff after their credentialing is completed and certifications are verified.

8. Dental Procedures

Innovia and Dr. Singhal are continuing to ramp up dental procedures at Innovia. From November 2023 to date today, Dr. Singhal has performed a total of 18 dental procedures at Innovia. Further, Dr. Singhal anticipates performing a total of 150 dental procedures at Innovia this year.

² Paige Haeffele, *Why New ACSs Could Fall Short*, BECKER'S ASC REVIEW, May 6, 2024, at 1 available at <https://www.beckersasc.com/asc-news/why-new-ascs-could-fall-short.html> (last visited May 7, 2024).

³ *Id.*



John Kniery
May 10, 2024
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Dr. Shah has been recently credentialed at Innovia Surgery Center to perform medical/dental procedures. He intends to regularly schedule more patients as seen in Dr. Shah's referral letter. He is also looking forward to collaborating with ENT physicians since there is some overlap in treatment for his patients.

Thank you for considering the additional information for the Innovia application to add orthopedics and spine procedures. As noted throughout the application and in comments at the HFSRB meeting, Innovia is committed to serving underserved patients. HFSRB approval of spine and orthopedics will allow Innovia to expand access to patients who have no other viable options. We respectfully request the HFSRB to approve Innovia's certificate of need application. If you have any questions or need additional information, please feel free to contact me.

Sincerely

A handwritten signature in dark ink that reads 'Anne M. Cooper'.

Anne M. Cooper

Attachments

cc: Mike Constantino
Vera Schmidt

May 3, 2024

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

To Whom It May Concern,

I am writing to express my gratitude for the partnership between my dental practice and Innovia Surgery Center in facilitating general dentistry cases under general anesthesia. Since receiving approval for the Certificate of Need (CON), Innovia Surgery Center has been invaluable in ensuring that our Medicaid patients and patients with disabilities receive the unique comprehensive care they require.

My office has encountered some hurdles in scheduling these patients for procedures at the surgery center. One significant hurdle has been the requirement for patients to see a primary care physician on short notice, particularly those who are Medicaid recipients. Finding a primary care physician who can accommodate our patients' needs within a tight timeframe and accepts Medicaid has proven to be a challenge, sometimes resulting in delays in scheduling procedures. However, we remain committed to overcoming these obstacles to ensure timely and efficient care for our patients.

Recently, 2 of my experienced front-end staff members resigned from our practice to pursue further schooling which has presented its own set of challenges. Despite these staffing changes, we remain dedicated to maintaining the high standards of care that our patients deserve.

Our scheduling challenges will diminish as we continue to refine our processes. As we have moved further away from the holiday season, which initially posed scheduling difficulties, I am confident that we will be able to bring more patients to Innovia Surgery Center for general dentistry cases under general anesthesia, thereby expanding access to specialized care for our community and especially to our Medicaid patients and those with disabilities.

I have brought the following payor mix of patients to Innovia:

Medicaid 89%
Commercial Ins 5.5%
Self-Pay 5.5%

Sincerely,
Vipul Singhal
Dr. Vipul Singhal



April 23, 2024

Dear Chair Savage and esteemed members of the board,

I hope this letter finds you well. I am Dr. Kalpesh Shah, a dentist dedicated to addressing the complex dental and medical needs of patients, many of whom suffer from metabolic disorders such as diabetes or autoimmune diseases. My practice often involves intricate cases where oral health intersects with broader health concerns, requiring collaboration with specialists across various fields.

I am reaching out to express my sincere interest in joining Innovia Surgery Center, located conveniently within a mile of my dental offices. I am particularly enthusiastic about the center's willingness to accommodate dental patients, as this is not always the case with traditional hospitals or surgical centers. The proximity of Innovia Surgery Center presents an invaluable opportunity to provide comprehensive care to my patients in a supportive environment.

Over the next 12 months, I anticipate referring approximately 200 patients to Innovia Surgery Center. It is my firm belief that this collaboration will not only benefit my patients but also contribute positively to the center's operations and reputation within the community.

In terms of my patient demographics, I would like to provide insight into the payor mix:

- 40 to 50% Commercial Insurance
- Approximately 20% Medicaid
- 20% Self-pay
- 2 to 4 cases per year are handled on a charitable basis

I am excited about the prospect of working closely with Innovia Surgery Center and its esteemed team. I am confident that together, we can further enhance the quality of care available to our patients while fostering a mutually beneficial professional relationship.

Thank you for considering my application. I eagerly await the opportunity to contribute to the success and growth of Innovia Surgery Center.

Warm regards,

Dr. Kalpesh Shah
Dental Surgeon
Karing Dental



M I C R O
N E U R O
S P I N E

DR. ROBERT K. ERICKSON M.D
BOARD CERTIFIED NEUROSURGEON

May 9, 2024

Debra Savage

Chair

Illinois Health Facilities and Services Review Board

525 West Jefferson Street, 2nd Floor

Springfield, Illinois 62761

Dear Chair Savage and Board Members,

Thank you for allowing me to speak at the last Board hearing on Mar 12, 2024. Since that hearing I have been seeing many patients at Innovia Surgery Center for pain. Some of these patients have progressed and are now ready for minimally invasive spine procedures such as vertebroplasty, kyphoplasty and various spinal fusions.

It would be beneficial for these patients to have the procedures performed at Innovia. Many of these patients are workman's comp and personal injury cases which are difficult to schedule at the hospitals because payments often come years later. I also take Medicare and Medicaid patients and the latter are often not accepted by other ASCs and Hospital. The convenience of having these procedures performed at Innovia, along with the support provided by the Innovia staff in arranging transportation and providing interpreters, would likely enhance the overall experience for these patients. Providing a familiar and welcoming environment can also contribute to better patient outcomes.

I eagerly support the integration of spine and orthopedic procedures at Innovia Surgery Center. Streamlining the process for scheduling and coordinating care for workman's comp, personal injury, and Medicaid patients could make a significant difference in their treatment journey.

Thank you.

Sincerely,

Robert Erickson, M.D.
Spine and Neurosurgeon

Access Health Center
1700 75th Street
Downers Grove, IL 60516
www.AccessHealthCenter.net

April 30, 2024

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

Subject: Anticipated Patient Volume and Payor Distribution at Innovia Surgery Center

Honorable Chair, Savage, and Esteemed Members of the Board,

I hope this letter finds you well. I am writing to express my sincere appreciation to be able to provide insight into the anticipated patient volume over the upcoming 12 months.

As a board-certified OB/GYN, I have had the privilege of serving a diverse patient population, with a significant proportion relying on Medicaid for their healthcare needs. Through my experience, I have found it increasingly challenging to provide these patients with the specialized care they require at other hospitals and surgical centers. Therefore, I am particularly enthusiastic about the prospect of bringing my patients to Innovia Surgery Center, where they can receive the high-quality care they deserve.

Based on my projections, I anticipate approximately 250 cases at Innovia Surgery Center within the next year. This number reflects not only my confidence in the facility but also the trust and loyalty of my patient base.

the payor distribution of my patients is:

- Private insurance: 30% to 40%
- Medicaid: Approximately 40%- 45%
- Hardship cases: 7% to 10%

This distribution highlights the diversity of patients I serve and critical need for accessible healthcare services in our community.

In closing, I want to extend my gratitude to the board for their ongoing dedication to excellence in healthcare.

Thank you for your time and consideration.

Warm regards,



Dr. Catherine Liu
630-964-0000

TO: Debra Savage, Chair

Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Dear Chairwoman Savage,

I am writing to express my continued support for Innovia Surgery Center and its vital role in our community. Having been a part of the staff for several years, I have seen firsthand the dedication to excellence that defines this institution.

In 2020, I provided Innovia Surgery Center with a referral letter to bring Pain Management and Interventional Radiology to the center. Shortly after Innovia received their CON, my practice was hit hard by the Covid –19 pandemic as most of my patients are elderly and many come from nursing homes. I have restructured my practice and embarked on new endeavors. I have been busy starting a new medical organization and participating in many speaking engagements that required global traveling. In addition, I have also accepted a board position of a charitable organization.

Within the last year, I have opened a new office and I have brought on new providers to our group. I am excited to announce that going forward, I anticipate bringing approximately 8-10 cases each month to Innovia Surgery Center.

I would like to highlight the diverse payor mix of our patients; approximately 40% of our patients are covered by private commercial insurance, while Medicare accounts for 45-50% of our patient base. We also serve Medicaid patients, comprising approximately 4-5% of our clientele.

I am confident that with our collective efforts, Innovia Surgery Center will continue to thrive and provide exceptional healthcare services to our community.

Thank you.

Sincerely,



Paramjit Chopra, M.D.



(708) 486-2600
9:00 AM – 5:00 PM



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Des Plaines, IL 60018



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