

August 1, 2024

Debra Savage, Chairwoman  
Illinois Health Facilities and System Review Board  
525 West Jefferson Street – 2<sup>nd</sup> Floor  
Springfield, Illinois 62761

**RE:    *Opposition Letter for CON #24-018***  
***NorthPointe Neighborhood Hospital, Roscoe***

Dear Ms. Savage:

Consistent with submitted opposition for the Mercy Crystal Lake hospital, Northwestern Memorial HealthCare (NMHC) opposes the approval of the proposed NorthPointe Neighborhood Hospital in Roscoe. NMHC urges the HFSRB to abstain from approving any “micro-hospitals” without diligent and thoughtful analysis of this concept and its impact on the State’s health care delivery system. The concept of a “micro-hospital” is in direct conflict with the HFSRB’s rules and criteria for the establishment of a new hospital.

Micro-hospitals have typically been developed in non-CON states most likely because micro-hospitals are considered a growth strategy for health systems and most health systems are using them as entry points into markets where there is not a demonstrated need for a new hospital (Saulsberry, K., “To Grow Your Hospital Think Micro.” *Advisory Board*, 20 May 2016). Additionally, there have been concerns about patient safety at these types of facilities (Sternberg, L. and Dougherty, G., “Risks Are High at Low Volume Hospitals.” *U.S. News & World Report*, 18 May 2015).

NMHC strongly urges the HFSRB to further study this concept; if a decision is made to permit such facilities in Illinois, it should be only after the development of appropriate rules for the establishment and operation of such facilities. Approving this project, while so far from meeting the HFSRB criteria for either an acute care hospital or critical access hospital, would set a dangerous precedent for the State of Illinois and could have a negative effect on the State’s health care delivery system.

Sincerely,



Bridget S. Orth  
Director, Regulatory Planning