

10-03-2024

Illinois Health Facilities and Services Review Board
525 W. Jefferson St. , Second Floor
Springfield, Illinois 62761

RE: Opposition to Proposed NorthPointe Neighborhood Hospital

Dear Chairwoman Savage,

I hope this letter finds you well. I would like to thank you and your fellow board members for the important role you play in ensuring a vibrant healthcare delivery system in our state. I am familiar with your role and, as former Board Chair, I know the importance of the role this Board plays in protecting Illinois. I am writing to share my opposition to Beloit Health System, Inc's proposed NorthPointe Neighborhood Hospital in Winnebago County, Illinois. The proposed facility does not provide sufficient benefit to Illinois, or to Roscoe and surrounding communities, to justify the potential harm it causes through the unnecessary duplication of services, increased cost, and negative impact to existing facilities.

First, Beloit Health System's proposed hospital is unnecessary. Seven hospitals already exist in the proposed service area, including two Level 1 Trauma Centers and one Level 2 Trauma Center. There are also eight emergency departments and thirteen urgent care/immediate care/prompt care centers. Each of these care locations are easily accessible to the residents of Roscoe and do not appear to impose a burden on patients to reach the existing facilities.

Secondly, Beloit Health System indicated their intent to make the proposed NorthPointe hospital location a remote location of their Beloit, Wisconsin, facility, thus subjecting it to the oversight and direction of a Wisconsin hospital. This means the cost for service provided to patients at the existing NorthPointe location would increase to hospital levels of reimbursement, and importantly this would also make an Illinois hospital subject to the whims of Wisconsin-based administrators and medical staff. I am unaware of any situation where this Review Board has considered such a proposal as in the best interests of Illinois.

Thirdly, the proposed project targets an overwhelmingly white, young, and affluent demographic. Beloit Health System has already indicated that they plan to facilitate transfers of higher acuity patients who arrive at Roscoe to Beloit, thus redirecting the commercial payer mix associated with this demographic out of the state. This hurts our existing Illinois facilities that rely on a diverse payor mix to offset the cost of care delivery for poor and underserved patients in their communities.

Finally, there is no criteria for the Board to properly assess this type of facility. The Board's rules are designed to evaluate more traditional hospitals. I would encourage the Board to develop review criteria for micro-hospitals to give them the tools, and health planners around the state the information required, to determine which communities need such a facility. If there were criteria, I believe it would show that the project is not needed in Roscoe, Illinois. For these reasons, I strongly urge the Review Board to oppose this project. Thank you for your kind consideration of my position on this issue

Most sincerely,



Glenn Poshard

Member of Congress, Retired

President Emeritus, Southern Illinois University