



February 11, 2025

Ms. Debra Savage, Chair
Illinois Health Facilities and Services Review Board
525 West Jefferson Street 2nd floor
Springfield, IL 62761

Re: Letter of Opposition – Graham Medical Group Center for Ambulatory Surgery
CON Project 24-036

Dear Chairwoman Savage and Members of the Review Board:

On behalf of OSF Healthcare System, I am writing to express my strong opposition to the project to establish the Graham Medical Group Center for Ambulatory Surgery, proposed at 2028 N. Seminary Street, Galesburg.

The permit application states that there are 1,549 referral cases, and that 1,976 cases are projected after year 2 (page 77). Yet, a total of only 749 cases are supported by physicians' letters of commitment to refer. As a result, most of the projected patient volume is unjustified. It is very probable that the shortfall will be drawn from the services in place at OSF St. Mary Medical Center (SMMC) or OSF Holy Family Medical Center (HFMC). Drawing patients from SMMC and HFMC will reduce surgical utilization at these two hospitals below the State standard of 1,500 surgeries/procedures per room per year. The permit application did not adequately address the review criterion related to impact on area providers.

The permit application claims that the proposed project will focus on residents migrating from the 21-mile GSA. The table on page 75 states that OSF St. Mary Medical Center is the only provider of outpatient surgery in the GSA. That is not the case. OSF Holy Family Medical Center is also located in the GSA. HFMC is located 16 miles by straight line from the proposed site of the ASTC, and 19.5 miles by car. As a result, the table counts its 83 outpatient cases at HFMC as outmigration. That is not the case. This error in the permit application overstates the amount of outmigration and thereby undermines one of the bases claimed to justify the project.

I also challenge the reference to a count of 83 outpatient cases at HFMC for GSA residents. Our COMPdata analysis showed that there were 1,189 residents of the GSA who had outpatient surgery at OSF Holy Family Medical Center in 2024. That included 331 general surgery cases, one of the categories of service proposed at the Graham ASTC. We are not able to explain the difference between this finding and the permit application reference to only 83 outpatient surgical cases at HFMC for GSA residents. This may be further evidence that the CON permit application overstates outmigration, since the hospital is part of the GSA and serves more GSA residents receiving care in the GSA than reported in the permit application.

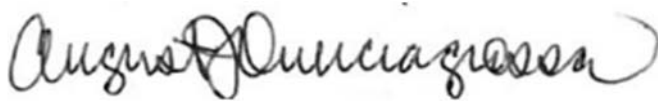
Graham is 43 miles by car from the site of the proposed surgery center. SMMC is just one mile from the proposed surgery center. This project is obviously an attempt to draw patients from an area that has not been significant to Graham, and where Graham is not a significant provider from patients' perspectives.

In summary, the permit application raises several concerns:

- The count of patient case volumes in the applicant's commitment-to-refer letters is significantly lower than the projected volume of the center.
- As a result, there is a likelihood that many of the patients at the proposed ASTC will be taken from OSF, especially from SMMC and HFMC.
- By not counting HFMC in the GSA, the permit application overestimates outmigration.

For these reasons, I strongly urge the members of the Illinois Health Facilities and Services Review Board to reject this proposed project.

Sincerely,

A handwritten signature in black ink, reading "August J. Querciagrossa". The signature is fluid and cursive, with a large, sweeping flourish at the end.

August J. Querciagrossa
Chief Executive Officer, Western Region
OSF Healthcare System
124 S.W. Adams Street
Peoria, IL 61602