



OSF[®] HEALTHCARE

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.

Most of the services at the proposed project will duplicate services already in place at OSF's two hospitals in the area: OSF St. Mary Medical Center (SMMC) in Galesburg and OSF Holy Family Medical Center (HFMC) in Monmouth.

SMMC and HFMC perform the majority of outpatient surgeries for residents of the Galesburg area. As shown in the attached table, the two hospitals provide 54% of general surgeries, 87% of pain management and 46% of OB/gyn. In addition, a significant amount of outpatient surgical cases for residents of the GSA who receive care outside the GSA receive that care at other OSF facilities. For example, 71% of outpatient general surgery, 59% of OB/Gyn and 89% of pain medicine are at OSF. Half of urology and almost half of orthopedics and ENT are at OSF. These data are from COMPdata and are current for the 9-month period January through September 2024. Graham's permit application data are also for 2024.

Meanwhile, Graham Hospital Association is remote from this area and not a provider of a significant volume of services. Both the permit application and the COMPdata table affirm that Graham Hospital Association serves only a small part of the existing outpatient surgical volume in the area. Page 74 of the permit application states that only 8.32% of Graham's admissions are from the GSA. The COMPdata table confirms the small role Graham plays: that between 2% of outpatient surgery orthopedics cases and 10% of urology cases are at Graham. Other Graham services are between 4% and 7% of cases from the GSA.

Graham is a significant distance - 43 miles by car - from the proposed surgery center. The surgery center location is just 1 mile from OSF St. Mary Medical Center and 19.5 miles by car from OSF Holy Family Medical 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 of patient care.



There is significant available unused surgical capacity at OSF St. Mary Medical Center and OSF Holy Family Medical Center. The second attachment is a table that shows the monthly utilization of each of the five ORs and 2 procedure rooms at OSF St. Mary Medical Center and each of the 2 ORs at OSF Holy Family Medical Center. The data is being used to prepare the 2024 Annual Hospital Questionnaires that will be submitted to the State this spring. The table shows that for SMMC, average utilization was 46%, significantly below our goal of 70%. During the 12 months, there were only two months when one of the main ORs was fully utilized, and it was never the case that two or more were fully utilized in the same month. For OSF Holy Family Medical Center, neither of the two ORs were at capacity for any of the months.

Our concern is that the Graham project is likely to draw off a sizeable number of patients now served at SMMC and HFMC. The permit application does not adequately investigate the impact on area providers, specifically the impact related to causing utilization of existing providers to fall further below the annual standard of 1500 hours per surgical/procedure room.

An additional concern is the amplification of current staffing challenges related to surgical techs and anesthesia, as well as duplication of services putting a strain on recruiting and retention of services essential for the sustainability of a rural, sole community hospital.

The project is an aggressive intrusion into the geographic area served by OSF in general and by OSF St. Mary Medical Center and OSF Holy Family Medical Center in particular. The negative impact of the project on these two hospitals has not been addressed in the permit application.

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

Sincerely,

Lisa M. DeKezel
President, OSF Holy Family Medical Center
President, OSF St. Mary Medical Center

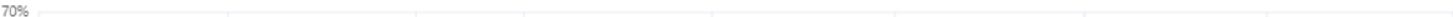
Attachment 1: Table – Outpatient Surgeries in the Galesburg market
Attachment 2: Table – Room Utilization

Outpatient Surgeries in the Galesburg Market - Jan through Sept, 2024				
	Outpatient surgeries from the Galesburg Market			
	(Source: COMPdata - GRID and Contributing Provider Specialty)			
	Total	At SMMC, HFMC	At all OSF	Graham
<i>Specialties planned at ASTC</i>				
General Surgery	3,351	1,822 (54%)	2,382 (71%)	148 (4%)
OB/Gyn	432	197 (46%)	254 (59%)	31 (7%)
Orthopedics	1,673	452 (27%)	764 (46%)	32 (2%)
ENT/Otolaryngology	547	3 (1%)	258 (47%)	32 (6%)
Pain Medicine	838	732 (87%)	742 (89%)	57 (7%)
Podiatry / Podiatrist	99	0 (0%)	3 (3%)	5 (5%)
Urology	537	91 (17%)	271 (50%)	53 (10%)
<i>Specialty not included</i>				
Gastroenterology	1,521	475 (31%)	949 (62%)	81 (5%)
Notes:				
"Galesburg Market" is defined as the GSA in permit application 24-036.				
Pain Medicine reduced by procedures already counted in General Surgery (3), ortho (116), gyne (3)				
Podiatry and Podiatrist reduced by procedures already counted in ortho (90) and gen surg (1)				
Urology stats are for Jan through Sept, 2023				

Room Utilization

Primetime Room Utilization with Setup/Cleanup - Details

	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Oct 24	Nov 24	Dec 24	QTD	MTD	Epic Top 10th	Epic 50th
✓ SMMC MAIN	36%	38%	44%	56%	57%	59%	51%	47%	42%	49%	35%	38%	36%	42%	42%	65%	46%
SMMC ENDO LAB	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	65%	46%
— SMMC MAIN OR 01	42%	49%	57%	54%	74%	68%	49%	49%	46%	54%	43%	55%	49%	45%	45%	65%	46%
— SMMC MAIN OR 02	52%	58%	64%	73%	69%	62%	57%	58%	56%	53%	53%	57%	55%	44%	44%	65%	46%
— SMMC MAIN OR 03	52%	56%	66%	59%	67%	64%	56%	54%	61%	60%	61%	56%	48%	56%	56%	65%	46%
— SMMC MAIN OR 04	48%	53%	59%	50%	62%	43%	43%	38%	52%	54%	46%	47%	44%	48%	48%	65%	46%
— SMMC MAIN OR 05	37%	38%	29%	53%	45%	34%	44%	26%	23%	22%	28%	32%	33%	16%	16%	65%	46%
— SMMC PROCEDURE ROOM 1	20%	12%	16%	11%	7%	0%	0%	0%	14%	0%	16%	16%	23%	0%	0%	65%	46%
— SMMC PROCEDURE ROOM 2	0%	<1%	0%	0%	4%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	65%	46%
✓ HFMC MAIN	19%	20%	28%	22%	24%	22%	23%	20%	29%	26%	22%	25%	22%	25%	25%	65%	46%
— HFMC MAIN OR 01	31%	40%	40%	46%	37%	39%	54%	46%	57%	49%	30%	36%	37%	27%	27%	65%	46%
— HFMC MAIN OR 02	27%	21%	17%	21%	35%	29%	18%	16%	33%	28%	36%	41%	31%	48%	48%	65%	46%



- Key Messages:**
- Goal is 70%
 - Room utilization is below benchmark