



**North American
Partners in
Anesthesia®**

Honorable Debra Savage, Chairperson
Illinois Health Facilities & Services Review Board
525 W. Jefferson St., Second Floor
Springfield, IL 62762

Re: **Opposition to CON #25-012**
Proposed New ASTC in Mt. Zion

RECEIVED

MAY 20 2025

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

Dear Members of the Review Board,

On behalf of NAPA Anesthesia, which has served hospitals throughout Central Illinois, including Decatur for over two years, and serves hospitals and other healthcare facilities nationwide, we are writing to respectfully express our strong opposition to the proposed Certificate of Need (CON) for a physician-owned ambulatory surgery center (ASC) in Mt. Zion, Illinois.

While we support initiatives that aim to improve access to care and patient outcomes, we believe this particular proposal poses significant risks to the existing healthcare infrastructure in Macon County, particularly as it relates to anesthesia services. Our group is currently experiencing unprecedented staffing challenges for both Certified Registered Nurse Anesthetists (CRNAs) and anesthesiologists. These shortages are part of a broader statewide and national trend, but the impact is especially acute in smaller communities like Decatur.

The addition of a new ASC in this already resource-constrained environment will further fragment the regional healthcare workforce. Specifically, it will:

1. **Exacerbate Existing Anesthesia Staffing Shortages:** Our group currently operates at near-capacity in Central Illinois, often times relying on locum tenens coverage or cross-facility reassignments to ensure coverage. Adding another surgical site without a clear and sustainable staffing plan for anesthesia services could lead to unsafe delays or cancellations of procedures, particularly in emergency or high-acuity settings.
2. **Destabilize Existing Providers:** The creation of a new, physician-owned ASC risks drawing away the limited pool of anesthesiology providers by offering preferential scheduling or financial incentives not aligned with community-wide access goals. This destabilizes our ability to maintain adequate staffing for the region's full-service hospitals, which continue to serve the most complex and vulnerable patients.
3. **Undermine Coordinated Care:** ASCs, particularly those with physician ownership, can create a siloed care environment that competes rather than collaborates with

existing healthcare institutions. In a market the size of Decatur's, this type of fragmentation could reduce overall healthcare efficiency and quality.

We urge the Review Board to carefully consider the long-term implications of this proposal. Without assurances of sustainable, community-wide access to critical support services such as anesthesia, approving another surgical site risks compromising—not enhancing—care for Macon County residents.

Thank you for your attention to this important matter and for your continued work in safeguarding responsible, equitable development of Illinois' healthcare system.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Walsh', is positioned above the typed name.

Matthew R. Walsh, MD
Regional Vice President—Midwest
NAPA