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**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

June 5, 2025

Dear Members of the Review Board,

On behalf of the Vituity physicians currently staffing the Emergency Department at HSHS St. Mary's Hospital, we respectfully submit this letter in strong opposition to the Certificate of Need (CON) application for the proposed for-profit, physician-owned ambulatory surgery center (ASC) in Mt. Zion, Illinois.

While we recognize the value that innovation and competition can bring to healthcare delivery, this proposal raises significant concerns for the long-term viability of the local healthcare infrastructure, patient access to essential services, and health equity within our community.

Financial Impact on Local Hospitals

The proposed ASC would directly siphon off profitable surgical procedures that currently help subsidize the cost of unprofitable but critical services, such as emergency care, inpatient units, and indigent care, at our full-service hospitals. This redistribution of revenue would place enormous strain on both hospitals in the area, including the one we staff, jeopardizing their ability to sustain emergency departments, intensive care units, and other core services that operate on narrow or negative margins.

Vituity clinicians at HSHS St. Mary's Hospital treated tens of thousands of patients in 2024 as part of a system that provides care to over 458,000 patients annually. These services include emergency medicine, hospital medicine, and telecritical care—disciplines that are financially sustained in part by the revenue generated from surgical procedures. Without this balance, access to life-saving care could be compromised.

Erosion of Access and Increased Health Inequity

The ASC model typically favors patients with private insurance, leaving hospitals to absorb the cost of care for Medicaid, Medicare, and uninsured patients. This stratification could further marginalize vulnerable populations in Macon County who already struggle to access consistent, affordable care. The approval of this facility would disproportionately benefit healthier, wealthier individuals, while exacerbating existing disparities in health outcomes for those who are most in need.

In 2024, Vituity and HSHS operated 26 free community healthcare clinics, serving over 7,900 people in underserved areas through the Vituity Cares Foundation, demonstrating a deep commitment to health equity. The introduction of a for-profit ASC undermines these efforts by redirecting resources away from those who need them most.

Staffing Challenges

Our emergency departments, like many others nationwide, are already facing unprecedented staffing shortages among nurses, support staff, and physicians. The introduction of another facility, especially one with more predictable hours and a focus on elective procedures, would make recruitment and retention of qualified staff even more difficult.



Despite these national challenges, Vituity achieved full staffing for its Central Illinois critical care program within six months in 2024, thanks to a robust recruitment strategy. However, introducing an ASC into an already strained labor market could reverse this progress, threatening the continuity and quality of care at HSHS St. Mary's Hospital.

Conclusion

We urge the Board to consider not only the potential benefits claimed by the ASC's proponents but the broader systemic consequences of removing high-margin surgical procedures from the comprehensive care ecosystem of our local hospitals. The approval of this ASC risks creating a fragmented and inequitable system of care that threatens both the financial sustainability of hospitals and the health outcomes of our entire region.

We appreciate your attention to this critical matter and your commitment to ensuring that healthcare development in Illinois serves the public interest in a fair, equitable, and sustainable manner.

Sincerely,

David Birdsall, MD

A handwritten signature in black ink, appearing to read "D. Birdsall", with a stylized, flowing script.

Chief Operations Officer

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