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HEALTH FACILITIES
PLANNING REVIEW BOARD

Black Chamber of Commerce of Illinois
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September 3, 2025

Via Email and Personal Delivery
Illinois Health Facilities and Services Review Board
525 W. Jefferson St.
Springfield, IL 62761

Re: Letter of Concern – Proposed Mt. Zion Center for Surgery (CON #25-012)

Dear Members & Staff:

On behalf of the Black Chamber of Commerce of Illinois, I write to express our serious concerns regarding this certificate of need (CON) application.

According to the most recent census data, 36% of children under 18 in the Decatur Metro Area live in poverty. Many of these vulnerable residents rely heavily on local safety-net services for their health care. It is deeply troubling that the applicant suggested in the filed application that this project would have no negative impacts on safety-net services in Decatur simply because surgery centers themselves do not provide such services. While this admission highlights the applicant's lack of contribution to our safety-net infrastructure, it fails to acknowledge the real harm: the redirection of patient volume away from four nonprofit hospitals that do provide safety-net care. This shift will unavoidably reduce these facilities' already limited ability to cross-subsidize critical, negative-margin safety-net care. For this reason, a meaningful and comprehensive safety-net impact statement must be required.

We are further concerned that controlling parties identified in supplemental filings have not been included as co-applicants, as required by Review Board regulations. This omission must be corrected before the application proceeds.

Our Chamber evaluates projects not only on the promise of new investment, but also on potential harm to existing employment, economic activity, and local tax bases. Health care delivery is one of the most essential components of our community's economic infrastructure. Any proposal that weakens our hospitals' financial sustainability threatens both the workforce and the broader economy. The Illinois Health Facilities Planning Act and its implementing rules require that these adverse impacts be fully identified and weighed before approval.

We are encouraged that similar concerns have been raised by our local legislators—Senator Doris Turner and Representative Sue Scherer—as well as by the Illinois Critical Access Hospital Network. We also note that the Decatur Regional Chamber of Commerce, which initially supported the proposal, has now shifted to a neutral position. These developments underscore the importance of a cautious, thorough evaluation.



For these reasons, we respectfully urge the Board to require a full safety-net impact statement and the inclusion of all controlling parties as co-applicants before rendering a decision. Only in this way can we avoid unnecessary duplication of services and preserve the financial stability of hospitals that provide vital safety-net care to our community.

Thank you for your careful consideration.

Respectfully submitted,

Anthony Corey Walker, President

"We make a living by what we get, but we make a life by what we give." — Winston Churchill

Black Chamber of Commerce of Illinois

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