



ILLINOIS STATE BLACK CHAMBER OF COMMERCE, INC.
Dedicated to Economic Independence

September 4th, 2025

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 Illinois State Black Chambers of Commerce, I write to express our serious concerns over this proposed project. Before any formal consideration by the Review Board, please insist on a meaningful safety net impact statement from the applicant, as well as the identification of controlling parties as co-applicants. When evaluating this project, please take care to safeguard existing safety net services. The initial staff report indicates that this project has serious deficiencies – it clearly appears to be an unnecessary duplication of services that will negatively impact the ability of existing facilities to cross subsidize safety net care.

According to the most recent census, 36% of children (under 18) live in poverty in the Decatur Metro Area; this vulnerable population depends upon local safety net services for their health care needs. The CON application inappropriately suggests that approval would have no negative impacts on safety net services in the Decatur area since surgery centers do not perform safety-net services, entirely missing the point of why safety net impact statements are required. This is not about the applicant's non-participation in the safety net; rather, it is about the project's impact on those who do constitute the safety net. Our statewide chamber advocates for strong local communities – which, in turn, depend upon a robust health care infrastructure and safety net. We appreciate that the Decatur Regional Chamber of Commerce retracted its earlier support for this project, and now has "no position." The adverse impact of this project on St. Mary's Hospital, as detailed in the posted letter by HSHS CEO Damond Boatwright, is highly concerning: the loss of more than \$5.0 million in positive margin on top of losses in 2024 totaling \$21.9 million, and not even accounting for the additional \$5.0 million loss to be experienced by the hospital under the One Big Beautiful Bill Act.

Please take care to safeguard against adverse impacts to the health care safety net in and around Decatur, and please ensure that the applicants provide a meaningful safety net impact statement and include all controlling parties as co-applicants.

Respectfully,

Larry D. Ivory
President/CEO