

Main Street Church of the Living God
2000 N. Main St. Decatur, IL 62526
Dr. Thomas E. Walker, Pastor



September 4, 2025

Via Email

Chairwoman Debra Savage, DNP, RN, MSN, BSN
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 Chairwoman Savage, Board Members & Staff:

As a lifelong Decatur resident, longtime community leader, and founder and pastor of the Main Street Church of the Living God, I respectfully share my serious concerns over the impact this CON application will have on safety net services in our community. In so doing, I join local elected officials, business leaders, and hospital representatives in asking that you carefully apply the applicable law and rules so as to avoid (a) unnecessary duplication of services and (b) impairment of the ability of existing facilities to cross-subsidize safety net services.

Special care should be taken in evaluating this application because:

- the project relies entirely on the redirection of patient volume from four existing facilities that are all underutilized;
- there are obvious adverse impacts on two critical access hospitals, and significant adverse impacts on St. Mary's Hospital as described in the filed letter by HSHS President and CEO Damond Boatwright; and
- these adverse impacts are in addition to the challenges posed for all Decatur-area hospitals by the One Big Beautiful Bill Act.

For those on the Review Board who may not be familiar with the demographics of our region, in Macon County, poverty disproportionately impacts minority populations, children, and persons living with a disability. Decatur ranks in the top 10% nationally for severe disparities between white and Black household incomes. The following Macon County statistics underscore the regional need for more, not less, safety net services in our region:

- Poverty rate: 15.7%, notably higher than the Illinois average of 11.6%.
- Children in poverty: 35.7% of individuals under 18 years old live in poverty, compared to 16% statewide.
- Medicaid coverage: 24.7% of the population, compared to 18.9% statewide.

I hope that the Review Board will require a meaningful safety net impact statement as part of the application. As you are well aware, the rules that implement the Illinois Health Facilities Planning Act provide:

A safety net impact statement shall describe, if reasonably known by the applicant, all of the following information:

- A) the project's material impact, if any, on essential safety net services in the community;
- B) the project's impact on the ability of another provider or health care system to cross-subsidize safety net services; and
- C) how the discontinuation of a facility or service might impact the remaining safety net providers in a given community.

(77 Ill. Adm. Code 1110.110 (c)(1)). It should not be sufficient for an applicant to simply assert that, because surgery centers do not themselves provide safety net services, no safety net impact statement is required.

Thank you for considering these comments.

Sincerely,



Dr. Thomas E. Walker
Founder and Pastor
Main Street Church of the Living God