



3003 Civic Circle Blvd.
Marion, Illinois 62959
618-993-1112

December 10, 2013

RECEIVED

DEC 12 2013

HEALTH FACILITIES &
SERVICES REVIEW BOARD

Illinois Health Facilities and Services Review Board
525 W. Jefferson St., Second Floor
Springfield, IL 62761

RE: Request for Public Hearing
Project 13-069
Memorial Hospital of Carbondale

Ladies and Gentlemen,

On behalf of Marion HealthCare, LLC, a state-licensed multi-specialty ambulatory surgical treatment center located in Marion, Williamson County, Illinois, a request is hereby made for public hearing on Project 13-069, Memorial Hospital of Carbondale.

Among other things, Marion HealthCare, LLC objects to the proposed project on the basis that the planned modernization of the same-day surgical suite and addition of three operating rooms constitute an unnecessary duplication of services. Marion HealthCare has available capacity to perform additional surgical procedures. However, an agreement between Memorial's parent company, SIH and Blue Cross and Blue Shield of Illinois prevents Blue Cross from contracting for outpatient surgical services with competitors of SIH/Memorial. The agreement artificially inflates Memorial's utilization, thereby falsely suggesting there is a need for additional capacity. The agreement between SIH/Memorial and Blue Cross and Blue Shield of Illinois causes members of the public to pay inflated costs for their health care at SIH/Memorial, driving up costs for routine outpatient surgical procedures.

Further, the preservation of such an agreement, even in the face of pending Antitrust litigation between Marion HealthCare and SIH, renders Memorial's references to Medically Underserved Areas and Populations disingenuous at best. Marion HealthCare intends to offer testimony as to its availability to offer outpatient surgical options to the community and as to the pending Antitrust litigation.

In addition, we request that Illinois Health Facilities and Services Review Board seek copies of the exclusionary contract(s) and agreements SIH/Memorial has had with Blue Cross and Blue Shield of Illinois during the past seven years, so as to independently verify the tactics SIH/Memorial is using to exclude competing healthcare providers, and driving up overall healthcare costs in the region.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Hendren", written over a horizontal line.

Scott Hendren
Director of Operations