

**ILLINOIS HEALTH FACILITIES and SERVICES REVIEW BOARD (HFSRB)
PROJECT HEARING REPORT**

Applicant: NorthPointe Health and Wellness Campus Ambulatory Surgery

Project Number: 13-072

Hearing Date: Monday, February 10, 2014

Location: 10631 Main Street, Roscoe Illinois

Time: 11:00 AM – 1:00 PM

Hearing Officer: Catherine Clarke

Staff Support:

HFSRB Representative: Kathryn J. Olson, Chairwomen

Hearing Requested by: NorthPointe Health and Wellness Campus Ambulatory Surgery

The following summarizes the attendance figures:

Oral/Written Presentations:

Support: 11

Oppose: 5

Registered Attendance Only

Support: 11

Oppose: 1

Neutral: 1

Total individuals registered: 29



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) Tina MacKEVETT

City Beloit State WI Zip 53511

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Beloit Health System

III. POSITION (please circle appropriate position)

Support Oppose Neutral

IV. Testimony (please circle)

Oral Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) MARIO ROJAS

City BROOKFIELD State WI Zip 53520

Signature *Mario Rojas MD*

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Beloit Health System

III. POSITION (please circle appropriate position)

Support Oppose Neutral

IV. Testimony (please circle)

Oral Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) KEN KLEIN MD

City ROSCOE State ILL. Zip 61073

Signature Ken Klein MD

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

BELOIT HEALTH SYSTEM

III. POSITION (please circle appropriate position)

Support

Oppose

Neutral

IV. Testimony (please circle)

Oral

Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION
Name (Please Print) DOUGLAS BROOKS
City ROCKFORD State IL Zip 61107
Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)
Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)
ROCKFORD HEALTH SYSTEM

III. POSITION (please circle appropriate position)
Support Oppose Neutral

IV. Testimony (please circle)
Oral + Written
BY 2/19/2014



STATE OF ILLINOIS
 HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
 Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) Leighton Johnson, M.D.

City Roscoe State IL Zip 61073

Signature Leighton Johnson

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Belait Health System
Orthopaedic Surgeon

III. POSITION (please circle appropriate position)

Support Oppose Neutral

IV. Testimony (please circle)

Oral Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) Peter H Marks

City Roscoe State IL Zip 61107

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Beloit Memorial Hospital

III. POSITION (please circle appropriate position)

Support Oppose Neutral

IV. Testimony (please circle)

Oral Written



STATE OF ILLINOIS
 HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) Curt Lansbery

City Roscoe State IL Zip 61073

Signature Curt Lansbery

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Beloit Health System

North Amer: can Tool Corp.

Self

III. POSITION (please circle appropriate position)

Support

Oppose

Neutral

IV. Testimony (please circle)

Oral

Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) DAVID G. REZIN

City Rockford State IL Zip 61107

Signature David G. Rezin

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Rockford Orthopaedic Associates

324 Roxbury Rd.

Rockford, IL 61107

III. POSITION (please circle appropriate position)

Support

Oppose

Neutral

IV. Testimony (please circle)

Oral

Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) CHARLES M. LASKONIS

City ROCKFORD State ILLINOIS Zip 61103

Signature

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)
- NORTHWESTERN ILLINOIS BUILDING TRADES
- INT. BROTHERHOOD OF ELECTRICAL WORKERS

III. POSITION (please circle appropriate position)

Support Oppose Neutral

IV. Testimony (please circle)

Oral Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) MATT SCHMIDT

City ROCKTON State IL Zip 61072

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

CITIZEN FRIEND

III. POSITION (please circle appropriate position)

Support

Oppose

Neutral

IV. Testimony (please circle)

Oral

Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) Jamwe Evans

City Roscoe State IL Zip 61075

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Roscoe Police Department

III. POSITION (please circle appropriate position)

Support Oppose Neutral

IV. Testimony (please circle)

Oral Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) Jason Dotson

City Beloit State WI Zip 53511

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Beloit Health System

Jared Triplet

Hemal Patel, M.D.

Yvonne Rittenhouse, R.N.

III. POSITION (please circle appropriate position)

Support

Oppose

Neutral

IV. Testimony (please circle)

Oral

Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION
Name (Please Print) Dawnna Menke
City Rockford State IL Zip 61104
Signature Dawnna Menke

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)
Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)
Swedish American Medical Center / Belvidere

III. POSITION (please circle appropriate position)
Support Oppose Neutral

IV. Testimony (please circle)
Oral Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION
Name (Please Print) Nancy Garry
City Rockford State IL Zip 61107
Signature Nancy Garry

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)
Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)
Rockford Endoscopy Center

III. POSITION (please circle appropriate position)
Support Oppose Neutral

IV. Testimony (please circle)
Oral Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) David Krienke

City Roscoe State ILL Zip 61073

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

NORTH Pointe

Village of Roscoe

III. POSITION (please circle appropriate position)

Support

Oppose

Neutral

IV. Testimony (please circle)

Oral

Written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Testimony Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) Thomas Myers

City Rockford State IL Zip 61104

Signature *Thomas Myers*

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Swedish American Health System

III. POSITION (please circle appropriate position)

Support

Oppose

Neutral

IV. Testimony (please circle)

Oral

Written

February 5, 2014

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Dear Ms. Avery:

As President of Beloit Health System, Inc., I am submitting this letter in support of the Ambulatory Surgery Treatment Center that is proposed to be built on NorthPointe's Health and Wellness Campus. Beloit Health System in Beloit Wisconsin proposes to expand and modernize its existing NorthPointe Health and Wellness Campus at 5605 East Rockton Road, Roscoe, Illinois.

Beloit Memorial Hospital has been in the Illinois market since 1991 when it first owned and operated a physician office in Roscoe, Illinois. Prior to opening NorthPointe in 2007, Beloit Memorial Hospital voluntarily approached the Illinois Health Facilities Planning Board (now the Health Facilities and Review Board) to determine if the proposed NorthPointe project fell under the purview of the Board. After consideration by the Illinois Health Facilities Planning Board at its January 23, 2006 meeting, it was determined a CON was not required.

Beloit Health System, Inc., established on January 1, 2010, is a fully integrated healthcare provider with facilities in Southern Wisconsin, and the Northern Illinois. It is comprised of Beloit Memorial Hospital, the Beloit Clinic, NorthPointe Health and Wellness Campus, several satellite clinics in the Stateline region, assisted living facilities and a newly constructed regional cancer care center. NorthPointe Health and Wellness Campus is the first comprehensive health campus of its kind, specifically designed to meet the rapidly growing healthcare needs of individuals and families in the northern Illinois and southern Wisconsin. From diagnostic services, to immediate, primary and specialty care clinics, to a medically integrated health and fitness center, NorthPointe provides a holistic approach for a healthy lifestyle.

Beloit Memorial Hospital needs to modernize its surgical suite. To do so cost-effectively, we have determined it best to relocate outpatient surgery and GI cases to NorthPointe. Our existing surgery and GI facilities are located on the second floor of Beloit Memorial Hospital and date to the Hospital's planning and development in the 1960's. Hence, their general design is based on guidelines established approximately 50 years ago. The surgical suite was developed when the original hospital was constructed. The current operating rooms also do not provide adequate

At-Home Healthcare
1904 E. Huebbe Parkway
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Beloit Clinic
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Beloit, WI • (608) 364-2200

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307 Ogden Avenue
Clinton, WI • (608) 676-2206

Darien Clinic
300 N. Walworth Street
Darien, WI • (262) 882-1151

Janesville Clinic
1321 Creston Park
Janesville, WI • (608) 757-1217

**NorthPointe Health &
Wellness Campus**
5605 E. Rockton Road
Roscoe, IL • (815) 525-4000

NorthPointe Terrace
5601 E. Rockton Road
Roscoe, IL • (815) 525-4800

**Occupational Health Sports
& Family Medicine Center**
1650 Lee Lane
Beloit, WI • (608) 362-0211

Riverside Terrace
3055 S. Riverside Dr.
Beloit, WI • (608) 365-7222

West Side Clinic
1735 Madison Road
Beloit, WI • (608) 363-7510

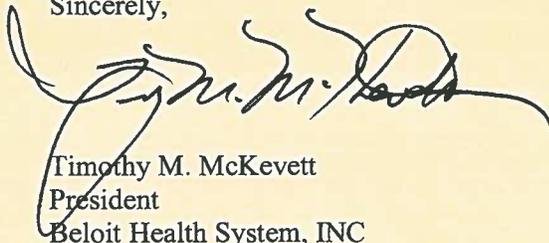
space for complex open heart and other major surgical procedures and need to increase in size. The gastro-intestinal (GI) procedural suite is, in fact, a converted patient care unit contiguous to the surgical suite. Neither area meets contemporary design standards for a modern surgery/procedural area. The current design is based on an inpatient care delivery model and the facilities have been adapted to the shift from an inpatient to primarily outpatient/ambulatory care delivery model. Outpatient focused surgery cases and GI cases are compromised given the fact the existing facilities were designed around an inpatient care delivery model which did not contemplate, by way of example, adequate pre-and post-recovery space, family waiting areas, and patient support areas. Our utilization figures for hospital surgery and GI procedures have shifted from inpatient to primarily outpatient/ambulatory in character which is consistent with national care delivery trends, thus requiring the need for Beloit Health System to be responsive and provide a care delivery model (ASTC) for our community.

Locating the proposed multi-specialty Ambulatory Surgery Treatment Center on NorthPointe's campus will allow us to provide existing outpatient surgery and GI cases that are currently being performed at Beloit Memorial Hospital to a new state of the art outpatient surgery center located on the South side of Northpointe's campus. We are choosing this location to build the facility as it provides the utmost privacy for our patients with convenient patient drop-off and parking area in a setting with aesthetics that will help minimize patient anxiety.

The first floor which approximates 19,500 building square feet will house the ASTC, pharmacy for surgery, equipment cleaning and storage space, as well as requisite support space. The second level, approximating 12,500 building square feet, will be shelled in anticipation of housing physician offices for Beloit Clinic at some future date, pending CON approval. The proposed multi-specialty ASTC will house two operating rooms and two GI procedure rooms with an anticipated project cost of approximately \$16,339,587. The surgical and GI cases which justify the proposed four room ASTC will be relocated from Beloit Memorial Hospital to NorthPointe in order for the Hospital to decompress and ultimately modernize its existing surgical suite, over time. These respective ASTC cases are supported by physician referral letters as required by the State Agency.

Thank you for your time today to conduct the public hearing and allow myself, Board Members, other Administrative Team members, our physicians, and community members to provide their testimony of support for this project. I hope this process will convince you that providing a Certificate of Need is the right thing to do for our community. Lastly, I would like to thank the previous Illinois Health Facilities Planning Board for supporting the NorthPointe Health and Wellness campus as it has helped provide our patients a new healthy lifestyle.

Sincerely,



Timothy M. McKeve
President
Beloit Health System, INC

Cc: Mike Constantino

February 4, 2014

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory
Surgery Treatment Center Roscoe

Dear Ms. Avery:

As an ophthalmologist who currently performs outpatient surgery cases in an inpatient setting at Beloit Memorial Hospital, I am submitting this letter in support of the Ambulatory Surgery Treatment Center that is proposed to be built on NorthPointe's Health and Wellness Campus.

I am in support of this project as it will allow me to shift approximately 92 percent of my outpatient ophthalmology surgery cases currently performed in an inpatient facility at Beloit Memorial Hospital to an outpatient facility. This facility will greatly benefit my patients as the newer facility is designed with both a patient and physician focus that allows for quicker turnaround time for cases, larger operating rooms, no bumped cases (this happens today when emergency c-section cases occur). Furthermore, the ASTC would provide convenient patient drop off and pick up, and increased patient privacy which leads to improved patient care. As a result, this will allow Beloit Health System to modernize their existing ORs for future inpatient cases that will be performed at Beloit Health System.

It is my sincere hope that the Illinois Health Facilities and Services Review Board will provide a Certificate of Need for this project to better serve the patients in our Stateline community.

Sincerely,



Mario Rojas, MD
N4220 Park Road
Brodhead, WI 53520-8611

Cc: Mike Constantino

At-Home Healthcare
1904 E. Huebbe Parkway
Beloit, WI • (608) 363-5885

Beloit Clinic
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Janesville, WI • (608) 757-1217

NorthPointe Health & Wellness Campus
5605 E. Rockton Road
Roscoe, IL • (815) 525-4000

NorthPointe Terrace
5601 E. Rockton Road
Roscoe, IL • (815) 525-4800

Occupational Health Sports & Family Medicine Center
1650 Lee Lane
Beloit, WI • (608) 362-0211

Riverside Terrace
3055 S. Riverside Dr.
Beloit, WI • (608) 365-7222

West Side Clinic
1735 Madison Road
Beloit, WI • (608) 363-7510



Operated by Beloit Memorial Hospital

1969 West Hart Road • Beloit, Wisconsin 53511-2230 • (608) 364-5011
www.BeloitHealthSystem.org

February 5, 2014

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Dear Ms. Avery:

As a resident of Roscoe and a practicing physiatrist (non-surgical orthopedic) physician at NorthPointe and the Beloit Health System, I am writing this letter in support of the proposed Ambulatory Surgical Treatment Center (ASTC) at NorthPointe.

In my practice I often refer patients for orthopedic surgery and they have given me feedback as to their desire to have the procedure in an outpatient setting close to home. I have also experienced some difficulty getting those patients, and others that need more complex surgical procedures, in for their surgeries in a timely manner due to operating room availability at Beloit Memorial Hospital.

Thank- you for your time today. I hope you will approve this project to help improve this project to help improve the care for our patients.

Sincerely,

Kenneth L. Klein, M.D.
Vice President
Beloit Health System, Inc.

Cc: Mike Constantino

At-Home Healthcare
1904 E. Huebbe Parkway
Beloit, WI • (608) 363-5885

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Wellness Campus**
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Respectful Care

**TESTIMONY IN OPPOSITION TO PROJECT 13-072
NORTHPOINT HEALTH AND WELLNESS CAMPUS
AMBULATORY SURGERY TREATMENT CENTER
FEBRUARY 10, 2014**

Good morning. My name is Douglas J. Brooks, AIA, and I am Vice President Campus Development of Rockford Health System.

Thank you for the opportunity to address you this morning. Rockford Health System and Rockford Memorial Hospital have significant concerns over Beloit Health Systems' plans to develop an outpatient surgery center just to the north of Rockford. Our specific concerns will be presented in a written submission, consistent with the Board's rules.

**Rockford Memorial
Hospital**

2400 N. Rockton Ave.
Rockford, IL 61103
(815) 971-5000

**Rockford Health
Physicians**

2300 N. Rockton Ave.
Rockford, IL 61103
(815) 971-2000

**Van Matre HealthSouth
Rehabilitation Hospital**

950 S. Mulford Rd.
Rockford, IL 61108
(815) 381-8500

**Visiting Nurses
Association**

4223 E. State St.
Rockford, IL 61108
(815) 971-3550

**Rockford Memorial
Development Foundation**

2400 N. Rockton Ave.
Rockford, IL 61103
(815) 971-4141

February 7, 2014

1905 E. Huebbe Parkway • Beloit, Wisconsin 53511-1842 • (608) 364-2200
www.BeloitHealthSystem.org

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center Roscoe

Dear Ms. Avery:

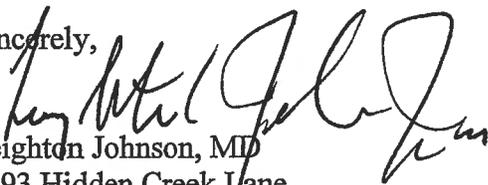
As an orthopedic surgeon who currently performs inpatient and outpatient surgery cases in an inpatient setting at Beloit Memorial Hospital and a physician who used to perform cases in an Ambulatory Surgery Center, I am submitting this letter in support of the Ambulatory Surgery Treatment Center that is proposed to be built on NorthPointe's Health and Wellness Campus.

I am in support of this project as it will allow me to shift approximately 85 percent of my outpatient orthopedic surgery cases currently performed in an inpatient facility at Beloit Memorial Hospital to an outpatient facility. This facility will greatly benefit my patients as the newer facility is designed with both a patient and physician focus that allows for quicker turnaround time for cases, larger operating rooms, no bumped cases (this happens today when emergency c-section cases occur). Furthermore, the ASTC would provide convenient patient drop off and pick up, increased patient privacy which leads to improved patient care. As a result, this will allow Beloit Health System to modernize their existing ORs for future inpatient cases that will be performed at Beloit Health System.

As an orthopedic surgeon, I see patients who are less mobile and this facility would better accommodate my patients due to the proposed design and layout. This will result in less discomfort which is important for my patient population.

I know from performing outpatient surgical cases at another Ambulatory Surgery Center in California the benefits this facility will provide to patients and their family members. It is my sincere hope that the Illinois Health Facilities and Services Review Board will provide a Certificate of Need for this project to better serve the patients in our Stateline community.

Sincerely,


Leighton Johnson, MD
7893 Hidden Creek Lane
Roscoe, IL 61073

cc: Mike Constantino

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1904 E. Huebbe Parkway
Beloit, WI • (608) 363-5885

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1650 Lee Lane
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Beloit, WI • (608) 363-7510

February 7, 2014

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center Roscoe

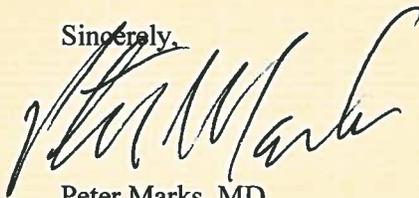
Dear Ms. Avery:

As a cardiothoracic surgeon who currently performs inpatient and outpatient surgery cases in an inpatient setting at Beloit Memorial Hospital, I am submitting this letter in support of the Ambulatory Surgery Treatment Center that is proposed to be built on NorthPointe's Health and Wellness Campus. Since I joined Beloit Health System as an employed physician in 2013, the number of inpatient cases I have performed at Beloit Memorial Hospital have increased, this increase puts additional pressure on our OR as my emergent cases are causing other non-emergent outpatient surgery cases to be delayed or re-scheduled.

I am in support of this project as it will allow Beloit Memorial Hospital to modernize its existing operating rooms to better serve physicians and ultimately the patient. This facility will greatly benefit patients as the newer facility is designed with both a patient and physician focus that allows for quicker turnaround time for cases, and larger operating rooms. Furthermore, the ASTC would provide convenient patient drop off and pick up, and increased patient privacy that leads to improved patient care. As a result, this will allow Beloit Health System to modernize their existing ORs for future inpatient cases that will be performed at Beloit Memorial Hospital.

It is my sincere hope that the Illinois Health Facilities and Services Review Board will provide a Certificate of Need for this project to better serve the patients in our Stateline community.

Sincerely,



Peter Marks, MD
2 Jacoby Place
Rockford, IL 61107

Cc: Mike Constantino

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Janesville Clinic
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NorthPointe Health & Wellness Campus
5605 E. Rockton Road
Roscoe, IL • (815) 525-4000

NorthPointe Terrace
5601 E. Rockton Road
Roscoe, IL • (815) 525-4800

Occupational Health Sports & Family Medicine Center
1650 Lee Lane
Beloit, WI • (608) 362-0211

Riverside Terrace
3055 S. Riverside Dr.
Beloit, WI • (608) 365-7222

West Side Clinic
1735 Madison Road
Beloit, WI • (608) 363-7510



February 1, 2014

G.C. Lansbery
President & CEO

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center Roscoe

Dear Ms. Avery:

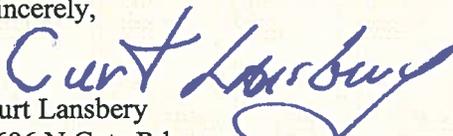
Thank you for the opportunity to publicly share my support of the proposed Ambulatory Surgery Treatment Center (ASTC) at NorthPointe.

I am a resident and businessman living within NorthPointe's service area. As President and CEO of North American Tool (located in South Beloit, IL), I know the importance of a healthy work force. I was impressed with the direction of the Beloit Memorial Hospital, so much so that I joined their Board of Trustees in 1999, and assumed the role of Chairman from 2004 - 2012. I have continued to serve on the Beloit Health System Board after it became an integrated Health System in 2010.

During my time as Chairman, we had many initiatives, one of which was the NorthPointe Health & Wellness Campus. This brought an increased level of access to healthcare locally. Utilizing NorthPointe Wellness on a regular basis has allowed me to see and hear from fellow members and patients how much they have embraced NorthPointe, and the positive affects it has had in their lives. Also during my time as Chairman, the Beloit Memorial Hospital and Beloit Clinic integrated to strengthen their commitment to providing patients with high quality and accessible healthcare services. I support their commitment to providing quality care and I support the proposed ASTC at NorthPointe as it will allow for the decompression of the hospital's current surgical unit and provide for a better patient experience by offering outpatient surgical cases in our local community in a patient centric outpatient facility.

Lastly, I would like to thank the Illinois Health Services and Review Board for allowing us to build the NorthPointe Health and Wellness facility which has provided much needed access to medically integrated services since its opening in 2007.

Sincerely,


Curt Lansbery
7696 N Gate Rd
Roscoe, IL 6107

Cc: Mike Constantino

10/5

Ms. Courtney Avery
Administrator
Illinois Health Facilities & Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Public Comments to Project No. 13-072
NorthPoint Health & Wellness Campus
Ambulatory Surgery Treatment Center (Roscoe, Illinois)

Good morning. My name is Dave Rezin. I am the Chief Clinical Officer for Rockford Orthopedic Surgery Center. The Rockford Orthopedic Surgery Center is a multi-specialty surgery center located in Rockford, Illinois and represents the absolute best example of a physician-hospital joint venture. Organized in July of 2006, the Rockford Orthopedic Surgery Center is a joint venture between OSF-St. Anthony and Rockford Orthopedic Associates, one of the largest medical groups in Winnebago County.

On behalf of the Rockford Orthopedic Surgery Center, I wish to express my strong opposition to the certificate of need application filed by the Beloit Health System to establish and construct what is likely the most expensive four room surgery center in the history of the State of Illinois.

Page
Rezin
20/3

To be honest, the proposed project suffers from so many defects under the Illinois Health Facilities Planning Act that it was hard to focus my testimony, but I will try.

First, the cost of the project is simply outrageous. The rules and regulations set forth a maximum price per square foot for a new surgery center at \$291 per square foot cost. Even if one believes the rather unbelievable space allocation assumptions set forth by the Beloit Health System in its CON Application, the proposed project sets forth a \$379.60 per square foot construction cost. That is \$89 dollars per square foot over budget. In other words, the proposed project costs are more than 30% higher than the state norms.

As justification for these huge cost over runs, the applicant argues that it is going to build the surgery center up to hospital standards. One small problem with that. The applicants are not building a hospital. They are only building a surgery center. The entire premise behind a surgery center is that they are cheaper to build than a hospital.

Dave
Rezin
3/15/15

Of course, I suspect that the Beloit Health System will really attempt to run the surgery center as a provider based unit of its main hospital campus in Wisconsin and effectively pass on these excessive construction costs to its patients and payors. And a provider based designation will also present rather interesting jurisdictional issues to the Illinois Department of Public Health and this Review Board since all of the clinical, financial, and operational controls required under the provider based rules will mean that a hospital licensed in the State of Wisconsin will be controlling the operations of an Illinois provider.

In addition to ignoring the cost constraints imposed by the rules and regulations, the Applicant also ignores the rules and regulations concerning need and the negative impact on the other area providers. As the Applicant well knows, and even admits in its application, the planning area does not need any additional operating rooms. To navigate around this fact, the Applicant basically argues that it will flood the market with Wisconsin residents who will now travel to Illinois to receive treatment.

Dave
Rezin
4085

Indeed, approximately 80% of the projected cases for the proposed surgery center will be coming from Wisconsin. Only 20% of the projected cases will be coming from Illinois. The notion that so many Wisconsin patients, who are currently receiving treatment at a general acute hospital in Wisconsin, will elect to drive to a surgery center in Illinois to receive treatment is illogical and not consistent with the data currently available vis a vis the Illinois surgery centers and Indiana hospitals on the Indiana-Illinois border and the Illinois surgery centers and Wisconsin hospitals on the Wisconsin-Illinois border.

At our surgery center, only 1.2% of our patients came from Wisconsin last year. Given that we have one of the largest orthopedic surgical practices in all of northern Illinois, we think our patient demographics are a more accurate reflection of the driving patterns and location choices that will be exercised by the Wisconsin and Illinois patients. Meaning, the proposed surgery center will not be pulling 80% of its patients from Wisconsin; it is far more likely that the proposed surgery center will be pulling upwards of 90% of its patients from Illinois and the existing facilities in Illinois.

David
Rezin
5/15

Speaking further on this point, the Applicant admits that its current utilization data at its flagship hospital in Beloit (where 100% of the alleged cases will be coming from) would only justify 2 additional operating rooms. But the Applicant did not propose a 2 room surgery center. The Applicant is proposing a 4 room surgery center. Again, by its own admission, the Applicant is proposing to overbuild the surgery center by 100%. Unless the Applicant is going to be pulling additional patients from the existing Illinois facilities, the proposed surgery center would not even be at full utilization.

I could talk longer but will yield to others because we intend to submit additional opposition comments prior to the February 19, 2014 deadline. I thank you for allowing me to speak today.

International
Electrical



Brotherhood
Workers

Local Union 364

6820 Mill Road • Rockford, IL 61108
Telephone (815) 398-6282
Fax (815) 398-1203

February 6th, 2014

Ms. Courtney Avery
Administrator
Illinois Health Facility and Service Review Board
525 West Jefferson Street 2nd Floor
Springfield, Illinois 62761

Ms. Avery:

My name is Charles Laskonis. I am a business representative for the International Brotherhood of Electrical Workers, and also a delegate to the Northwestern Illinois Building Trades. We represent over 16,000 union members in the state line area. Including their family members, that adds up to over 50,000 citizens in the Northern Illinois area.

We are firmly in favor of the proposed expansion of North Pointe. The foremost reason for that is quite simply, jobs. Among the states Illinois leads the nation in an unfavorable category, unemployment. Within the state of Illinois the city of Rockford and the surrounding area leads the state in the same adverse category among Illinois' major cities. Projects such as these are essential to members and their families making their livings and providing for their families. In addition to that this will bring a number of permanent, good paying jobs to our area mainly in the medical field. These jobs will help add to our economy in the future and will in turn lead to more economic opportunity for our members and for the citizens of our community.

Those who express opposition to construction projects often make the argument that the jobs construction project create are merely only temporary jobs. That argument is a bit of a straw man argument for the simple reason that all construction jobs by their nature are temporary.

Careers of all construction workers are made up of temporary construction projects. Quite simply this project is important to our members and their families and will help put our members back to work.

We urge you to approve this project which is certain to benefit our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles H. Laskonis", with a long horizontal flourish extending to the right.

Charles H. Laskonis
Business Representative
IBEW Local 364
6820 Mill Road
Rockford, Illinois 61108
CLaskonis@IBEW364.net

February 7, 2014

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory
Surgery Treatment Center Roscoe

Dear Ms. Avery:

My name is Matt Schmidt, I have lived in Rockton for the last 8 years, and I work in Roscoe. My parents, sister and her family also live in Rockton. We all use doctors at NorthPointe. Dr. Lisek is my Primary care Physician, Dr. Klein has helped with my shoulder pain and Dr. Kapoor is my Dermatologist. I was fortunate that at my annual checkup when I mentioned, the mole on my leg to Dr. Lisek, he insisted I see a dermatologist. Dr. Kapoor biopsied the mole and determined it was melanoma cancer; he removed my mole, I see him every six months now.

My parents see Drs. Kapoor, Wang, Taveras, and Reinicke all at NorthPointe. My sister also sees Dr. Wang and Dr. Kapoor. When it comes time for our check-ups and routine x-ray and labs NorthPointe is convenient, it's the place we go.

I use some aspect of NorthPointe almost daily. I have been a member of NorthPointe Wellness since 2008 and workout at 5:00am at least 3 days a week. NorthPointe has been a life changer & a lifesaver. Now, I participate in running events, Triathlons and the Hustle up the Hancock in Chicago.

NorthPointe means a great deal to me & my family, I support any new programs NorthPointe develops including the proposed ASTC.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Schmidt". The signature is stylized with a large, sweeping "M" and "S".

Matt Schmidt
12820 Annapolis Road
Rockton, IL 61072

Cc: Mike Constantino



VILLAGE OF ROSCOE POLICE DEPARTMENT

10595 Main Street
P.O. Box 312
Roscoe, IL 61073
Phone (815) 623-7338
Fax (815) 623-7254

Jamie Evans
Chief of
Police

February 5, 2014

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center Roscoe

Dear Ms. Avery:

I have been a member of North Pointe Wellness for the last 4 years. In being a member at North Pointe I discovered the immediate care and then later discovered the many medical services North Pointe provides. I have been given fast and friendly service for many years in the Immediate Care and that prompted me to continue going to North Pointe for medical services along with now choosing a family Doctor at North Pointe. In response to the submitted permit and requested public hearing, I am writing this letter of my support of an ASTC at NorthPointe.

I support North Pointe for many reasons. To name a few, North Pointe is the friendliest facility I have ever been to where the staff doesn't just know your name but they learn your name. The immediate care clinic is the fastest clinic I have ever been to. When you are ill and can walk into a clinic, be seen by a doctor, and leave with your prescription in under 30 minutes you don't want to go anywhere else. On a different note I am proud this facility is in Roscoe, it is a beautiful and well taken care of facility and grounds.

Sincerely,

Jamie Evans
602 Talentina Trail
Roscoe, Illinois 61073

Cc: Mike Constantino

February 10, 2014

1905 E. Huebbe Parkway • Beloit, Wisconsin 53511-1842 • (608) 364-2200
www.BeloitHealthSystem.org

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Dear Ms. Avery:

As a Vice President of Beloit Health System, Inc., I am submitting this letter in support of the Ambulatory Surgery Treatment Center (ASTC) that is proposed to be built on NorthPointe's Health and Wellness Campus. I am pleased to provide you with letters of support for this project from the following 23 physicians: Russell Albert, MD, Thanh Andreacos, MD, Tania Balabanova, MD, David Bhaskar, MD, Thomas Boeve, MD, Pierre Charles, MD, Chetan Choksi, DO, Michael Coogan, MD, FACEP, Richard DeAngelo, MD, Michael Donnelly, DO, FACOS, Lisa Garcia Reinicke, DPM, Christina Golner, MD, John Johanson, MD, Neel Karne, MD, Charles Kind, DPM, Mohammed Mohiuddin, MD, Larry Ojeda, MD, Robert Sage, MD, Daniel Sellman, MD, Glenn Tan, MD, Alice Towhshend, MD, Jimson Tse, MD and Tsu Hon Wang, MD. In addition, I included letters of support from two community members, Mrs. Olive M. Samuels from Rockton, Illinois and Mrs. Matilda DeFalco from Roscoe, Illinois.

Ambulatory Surgery Centers provide a rare example of a successful transformation in the health care delivery system that allow physicians to schedule procedures more conveniently, mobilize teams of specially-trained and highly skilled staff, and are designed tailored for physician specialties, and their patients. One article, published by the Ambulatory Surgery Center Association (ASCA), titled *Ambulatory Surgery Centers- A Positive Trend in Health Care*, which was included in our initial CON application, examined the impact of the aging population and forecasted growth of various surgical procedures by the year 2020 that range from 14 to 47 percent, depending on the specialty. Meeting this demand will be a challenge that requires improving the efficiencies of surgeons. NorthPointe's ASTC will allow our physicians to practice efficiently and will assist in mitigating the impact on aging population on the anticipated shortage in the surgery workforce.

At Beloit Health System our patients' quality of care and satisfaction is of the utmost importance. The article by ASCA shows average patient satisfaction levels in ASCs exceeding 90 percent and ASC are growing in popularity. Safe and high quality services, ease of scheduling, and lower costs are among the main reasons for the growing popularity. ASC perform well and are highly regulated by federal and state entities and their safety and quality of care are evaluated by independent observers through state licensure, Medicare certification and voluntary accreditation. One recent study concluded that rates of inpatient hospital admission and death in elderly patients following common outpatient surgical procedures were lower in freestanding ASCs when compared to hospitals.

At-Home Healthcare
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307 Ogden Avenue
Clinton, WI • (608) 676-2206

Darien Clinic
300 N. Walworth Street
Darien, WI • (262) 882-1151

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Janesville, WI • (608) 757-1217

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Wellness Campus**
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& Family Medicine Center**
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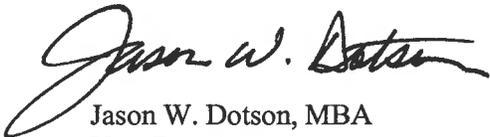
Jason W. Dotson
Illinois Health Facilities and Services Review Board
Page 2

In addition to focusing on high patient satisfaction ASCs provide more affordable care. A Medicare beneficiary could pay as much as \$496 in coinsurance for a cataract extraction procedure performed in a hospital, compared to \$195 co-insurance for the same procedure performed in an ASC. Private insurance companies also save similarly when ASCs are utilized, which means employers healthcare costs also decrease.

As you have already heard today during this hearing, providing a CON for this project will allow us to provide the same high quality care our patients have come to expect from us in a more patient and surgeon focused environment while lowering the cost of care. As outpatient cases performed in our hospital shift to be performed in our new outpatient ASTC, we will decompress our existing operating rooms at our hospital so we can modernize them for our future and the benefit of our most important asset, our patients.

Thank you for your time today to conduct this hearing and allowing me to provide my testimony of support for this project. I ask you to approve a CON for this project as doing so will improve the health status of our community.

Sincerely,

A handwritten signature in black ink that reads "Jason W. Dotson". The signature is fluid and cursive, with a large initial "J" and "D".

Jason W. Dotson, MBA
Vice President
Beloit Health System, Inc.

Cc: Mike Constantino

February 7, 2014

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory
Surgery Treatment Center Roscoe

Dear Ms. Avery:

As a gastroenterologist who currently performs outpatient surgery cases in an inpatient setting at Beloit Memorial Hospital, I am submitting this letter in support of the Ambulatory Surgery Treatment Center that is proposed to be built on NorthPointe's Health and Wellness Campus.

I am in support of this project as it will allow me to shift 600 of my outpatient gastroenterology surgery cases currently performed in an inpatient facility at Beloit Memorial Hospital to an outpatient facility. This facility will greatly benefit my patients as the newer facility is designed with both a patient and physician focus that allows for quicker turnaround time for cases, larger operating rooms, no bumped cases (this happens today when emergency C-sections occur). Furthermore, the ASTC would provide convenient patient drop off and pick up, increased patient privacy which leads to improved patient care. As a result, this will allow Beloit Health System to modernize their existing ORs for future inpatient cases that will be performed at Beloit Health System.

As my current gastrointestinal (GI) procedure rooms at Beloit Memorial Hospital are patient rooms that have been repurposed, it is my sincere hope that the Illinois Health Facilities and Services Review Board will provide a Certificate of Need for this proposed NorthPointe ASTC project to better serve the patients in our Stateline community. The project will allow the much needed modernization of the surgery suite at Beloit Memorial Hospital in the future.

Sincerely,



Hemal Patel, MD

cc: Mike Constantino

At-Home Healthcare
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Beloit Clinic
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3055 S. Riverside Dr.
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West Side Clinic
1735 Madison Road
Beloit, WI • (608) 363-7510

Jarod
Triplet
101-2

January 31, 2014
Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory
Surgery Treatment Center Roscoe

Dear Ms. Avery:

In response to the submitted permit and requested public hearing, I am writing this letter of my support of an ASTC at NorthPointe. It is my hope that your team will find the merits and demand for this project, in our community. My support is based upon the quality of the NorthPointe campus and community.

My family has been a member of the NorthPointe community since it opened its doors. We have been members of the wellness facility and patrons of the urgent care facility. NorthPointe will forever have our support, based upon our urgent care experience in 2010.

On the afternoon of August 20, 2010 my wife discovered our 14 month old son had bloody stool in his diaper. She quickly rushed him to NorthPointe urgent care facilities. The medical team quickly arrived at a diagnosis of a "kinked bowel." The compassionate team explained that the remedy would be a simple enema but urged that we authorize a CT scan to ensure that we achieved a successful resolution. We agreed and the procedures were conducted. Our world was soon turned upside down, when the team discovered a completely unrelated tumor, the size of a large apricot, in our son's abdomen. The quality of care and compassion certainly made this news much more tolerable. The team was respectful, knowledgeable and extended a heart-felt compassion that I had never experienced in the often "sterile" and "cold" medical world.

We quickly transported our son to the American Family Children's Hospital for further review. The medical team, at NorthPointe, made phone calls and arranged for a seamless transition. We soon learned that this unrelated tumor was Stage 2 Neuroblastoma cancer. We firmly believe that the quality of the NorthPointe medical team and advanced technologies saved our son's life. Due to early detection, the tumor was completely removed and we were able to avoid the dangers and challenges of long-term treatments

such as chemo-therapy and radiation. Our son, Matthew, is now a happy, healthy and cancer-free 4.5 year old boy.

Jarod
Triplet
2012

I remain confident that NorthPointe is committed to providing the highest level of respectful, community-based care. The comprehensive resources and technology, such as the CT machine, allow for thorough, high quality care. Review of the proposed ASTC facility, has made it clear that this expansion will carry on the world-class quality of the NorthPointe reputation.

Further, I believe that the proposed investment, in our community, will only aid in attracting more world-class medical providers. Attracting top talent to our community is key to executing the best medical care. I also believe that the highest quality care is achieved when it is conducted with pride and respect, and within the privacy of our own community. It is exciting that NorthPointe has clearly given consideration to all of these concerns with the proposed ASTC facility. I can assure you that a great demand for this facility exists within our state-line community.

We look forward to your support and the commencement of this project.

Sincerely,



Jarod Triplet
4137 Yale Drive
Rockton, IL 61072
[\(815\) 979-5471](tel:(815)979-5471)

Cc: Mike Constantino



Operated by Beloit Memorial Hospital

1969 West Hart Road • Beloit, Wisconsin 53511-2230 • (608) 364-5011
www.BeloitHealthSystem.org

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory Surgery Treatment Center, Roscoe

Dear Ms. Avery:

I am the Director of Surgical Services at Beloit Memorial Hospital and am in full support of the development of an Ambulatory Surgery Treatment Center at NorthPointe. As the number of cases being performed at Beloit Memorial Hospital has shifted over the years from inpatient to outpatient, my staff and I have been challenged and do our best every day to manage case workflow in our operating rooms that were constructed 46 years ago and small GI procedure rooms that are re-purposed patient rooms.

Our operating rooms sizes have not changed since they were built in 1967. The operating room we utilize as our cardiovascular operating room for Dr. Peter Marks is approximately 489 square feet. A standard operating room size for cardiovascular cases is well over 600 square feet. The reason for the additional square feet is due to the amount of equipment and staff needed to perform these types of cases. Hospital cardiovascular operating rooms in California have a minimum clear floor area of 650 square feet as the goal is to provide a universal room size that can accommodate all procedures.

Another reason I am in support of an ASTC at NorthPointe is the increased privacy we can provide our patients and their family members and quicker throughput for smaller, less invasive procedures. The proposed floor plan of the new facility provides private pre-op and recovery rooms for patients that each include a restroom. Today in our OR we are not able to provide this same type of privacy and convenience. Currently, we ask our patients who are going to have outpatient surgery to arrive two hours ahead of their scheduled case time to work through registration and nursing admission requirements in a hospital setting. Ambulatory Surgery Center arrival times required are one hour or less.

State of the art operating rooms have an increase in the use of technology (i.e. robotics surgery) and procedures that combine various forms of imaging with the surgical process (i.e. tumor navigation systems, real-time intraoperative computed tomography, magnetic resonance imaging and contrast media, just to name a few). The challenge for the future is providing space, electrical and air power outlets, heat dissipation, and scavenging (i.e. exhaust) for these devices. The amount of equipment required for state of the art operating rooms may easily double or triple.

The approval of a Certificate of Need for this project will provide improved patient, family, and physician satisfaction and allow Beloit Memorial Hospital to modernize our existing operating rooms. Thank you for your time and consideration of my perspective of how this project will benefit our community.

Sincerely,


Yvonne Rittenhouse, RN
Director of Surgical Services

cc: Mike Constantino

At-Home Healthcare
1904 E. Huebbe Parkway
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307 Ogden Avenue
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February 10, 2014

Courtney R. Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

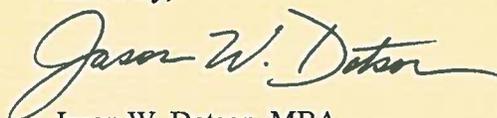
Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Dear Ms. Avery:

Enclosed in this packet are the letters from the individuals who are providing testimony of support for the Ambulatory Surgery Treatment Center. These letters (alphabetical order by last name) of support are included under the left pocket of the enclosed folder. Also enclosed within are letters (alphabetical order by last name) of support from physicians and community members that I will present to you during my testimony today. These letters are included under the right pocket of the enclosed folder.

Thank you again for your time today to administer this hearing.

Sincerely,



Jason W. Dotson, MBA
Vice President
Beloit Health System, Inc.

cc: Mike Constantino

At-Home Healthcare
1904 E. Huebbe Parkway
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SWEDISHAMERICAN
MEDICAL CENTER/BELVIDERE



*Dawn
Menke
10/2*

February 20, 2014

Ms. Courtney Avery, Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street
Springfield, Illinois 62762

RE: Project No. 13-072 NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Dear Ms. Avery:

Please accept this letter of opposition by SwedishAmerican Health System's Medical Center in Belvidere to the application of Beloit Health System (the "applicant") to establish an ambulatory surgery treatment center ("ASTC") in Roscoe, Illinois just northwest of our Belvidere hospital. SwedishAmerican Medical Center/Belvidere (SAMCB), has been serving the Boone County Region since April 6, 2009 and opened two new surgical suites in October of 2011.

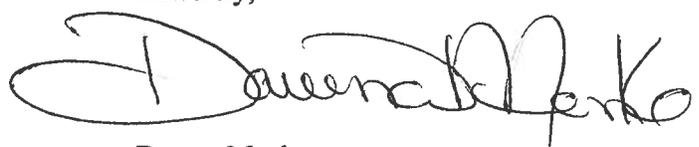
SAMCB's two surgical suites primarily perform ambulatory surgeries with the ability to offer inpatient stays if needed. At SAMCB we average approximately 10 surgeries a week and have not had the need to open our second line.

According to the CON application at 161, the applicant proposes to relocate patients representing 2,282 hours of surgery from Beloit to the proposed Roscoe, ASTC. Of the 2,282 total surgical hours the applicant relies on to support the ASTC, only 456 of those hours represent surgeries on Illinois patients given the physician referral letters showing that only 20% of their patients are from Illinois. The hours of surgery on Illinois residents would not support even one OR at target utilization.

Dawna
Menke
zfp

To summarize, there is no need for additional operating rooms in Roscoe, Illinois. There is excess capacity at the eight existing Illinois facilities. SwedishAmerican Health System's Medical Center in Belvidere respectfully requests that the Illinois Health Facilities and Services Review Board deny Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory Surgery.

Sincerely,



Dawna Menke,
Administrator
SwedishAmerican Medical Center/Belvidere

February 10, 2014

RE: Oral Comments in Opposition to NorthPointe Health and Wellness Campus ASTC, Roscoe CON Application (13-072)

Rockford Gastroenterology Associates, owner of the Rockford Endoscopy Center formally opposes the construction of an ambulatory surgery treatment center on the NorthPointe Health and Wellness Campus in Rockton IL. The reasons for our opposition are as follows:

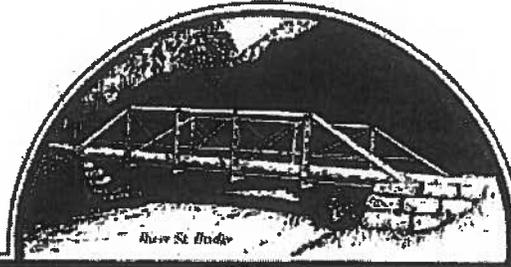
1. The application reports that there is a demonstrated need for better access to healthcare services in Winnebago County, Illinois. That statement is supported by a Community Health Needs Assessment. That document states that access to healthcare is limited for those living in poverty. Median household income statistics suggest that Winnebago County's indigent population lives in Rockford, not Roscoe and Rockton. We believe the addition of a surgery center in Roscoe does not address access concerns of Winnebago County's impoverished residents.
2. Rockford Endoscopy Center is providing services to Winnebago County's low income residents without bias.
3. Rockford Endoscopy Center is also providing services to the residents of Rockton, Roscoe, and South Beloit.
4. Rockford Endoscopy Center is operating at about 75% capacity so we view the addition of GI procedure rooms in Roscoe as a duplication of service that is not justified by lack of capacity in existing facilities.
5. The charge master lists fees as high as \$4,537 for gastrointestinal endoscopic procedures. These charges are more than four times Rockford Endoscopy Center's charges. The addition of this facility introduces a higher cost provider to the market.

In summary, the application states Beloit Memorial Hospital does not believe the proposed NorthPointe ASC will result in unnecessary duplication of services because the project essentially relocates current operating and procedure room utilization from the Beloit to Roscoe. We question why they seek to build a facility that requires additional travel time for 80% of their patients while becoming more convenient for only 20% of their patients. We cannot support the addition of such a facility in an already over served area.

David A. Krienke
President

Don Elliott
Treasurer

Christina K. Marks
Clerk



TRUSTEES

Robert Baxter
Carol A. Gustafson
Dale L. Keller
Stacy Mallicoat
Kevin Muradian
Susan Petty

VILLAGE of ROSCOE

February 7, 2014

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
0000
525 West Jefferson Street
Springfield, IL 62761

Dear Ms. Avery:

As Roscoe's Village President I am expressing my continued support of an ASTC at NorthPointe. My support should be added to the documentation within public hearing on February 10, 2014.

When I speak of the health of the Roscoe community, I am certainly not only referencing the physical health, but also our community's financial health. Beloit Health System's proposed Ambulatory Surgical Treatment Center at NorthPointe is an investment into the community's financial health.

I understand this proposed project would employ much needed construction and trades labors for approximately one year. Many of these trades' people live within our community, returning them back to work, benefits everyone in the Roscoe area. In addition I understand this expansion would require NorthPointe to hire additional staff to meet the needs of the ASTC. Those jobs range from entry level position of housekeeping to skill positions such as registered nurses. When any adds jobs to their community the entire community benefits.

I and my fellow leaders of Roscoe are proud to service the community, and I truly believe my support of Beloit Health System's proposed expansion of NorthPointe, will be recognized as an important commitment to Roscoe's overall health.

Very Truly Yours,

David A. Krienke
Village President
Roscoe, Illinois

Cc: Mike Constantino

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory Surgery Treatment Center Roscoe

SWEDISHAMERICAN
HEALTH SYSTEM



A Top 100 Hospital
Winner Of The Lincoln Award For Excellence

THOMAS M. MYERS, VICE PRESIDENT, MARKETING, PLANNING AND DEVELOPMENT

February 10, 2014

SwedishAmerican Hospital

SwedishAmerican Medical
Center/Belvidere

SwedishAmerican Medical Group/

Belvidere

Brookside Immediate Care

Brookside Specialty Center

Byron

Camelot OB/GYN

Cardiothoracic Surgery

Davis Junction

Five Points

Lundholm Orthopedics

Marengo and Immediate Care

Maternal-Fetal Medicine

Midtown

Neuro & Headache Center

Pulmonary & Sleep Clinic

Rochelle

Rock Valley Women's Health Center

Stateline and Immediate Care

State Street OB/GYN

Valley

Woodside

SwedishAmerican Center For Women

SwedishAmerican Health
Management Organization

SwedishAmerican Home Health
Care & Infusion Services

SwedishAmerican Management
Services Organization

SwedishAmerican Foundation

SwedishAmerican Realty

SwedishAmerican Regional
Cancer Center

SwedishAmerican Wound Care and
Hyperbaric Clinics

Midwest Heart Specialists at
SwedishAmerican

The Heart Hospital at
SwedishAmerican

TriRivers Health Partners

Ms. Courtney Avery, Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street
Springfield, Illinois 62762

RE: Project 13-072 North Pointe Health and Wellness Campus Ambulatory Surgery Treatment Center, Roscoe

Dear Ms. Avery:

Please accept this letter of opposition by SwedishAmerican Health System to the application of the Beloit Health System (the "applicant") to establish an ambulatory surgery treatment center ("ASTC") in Roscoe, Illinois, here in Winnebago County. SwedishAmerican has been serving this area for more than 100 years through our community hospital minutes away in Rockford, and with more than 20 clinics and other ambulatory sites of service.

This area has more than enough surgical capacity, as Beloit's application shows with all eight surgical facilities in the area operating below the State's target utilization level. Adding more, unneeded capacity in the area will harm existing providers, especially hospitals that provide many services to patients of limited means and where reimbursement does not cover the cost of service. Beloit, which operates its own hospital in Wisconsin, understands this principle well. It references a study in its CON application which notes that freestanding surgery centers are "criticized for 'cream skimming' profitable patients and procedures, important sources of revenue for general hospitals." (CON application at page 88)

In this regard, it is noteworthy that U.S. Census data show the percentage of persons below the poverty level in Roscoe is 5.8% while the poverty level in Beloit where the applicant's hospital is located is 24% and in Rockford, where three full service hospitals are located, has a poverty level of 25.1%

The applicant claims existing facilities will not be adversely impacted because the new ASTC will only be treating patients that will be "relocated" from the applicant's hospital in Beloit, Wisconsin. All of the physician referral letters contain the statement that the "greatest majority of my patients reside in Wisconsin."

If the applicant's claims are true and the proposed ASTC in Roscoe, Illinois is intended to primarily serve Wisconsin patients currently being served at the applicant's Wisconsin facility, the better alternative would be to improve or expand the applicant's facilities at its Beloit, Wisconsin campus as three of the alternatives explored by the applicant involve improvement or expansion of the Beloit campus which are less costly than the total cost of their proposed Project 13-072.

To summarize, there is no need for additional operating rooms in Roscoe, Illinois in northern Winnebago County. The area is well served by eight existing Illinois facilities, all of which have excess capacity. The applicant's existing ORs on its Beloit campus are underutilized, and according to the applicant, are in need of upgrading. If the applicant truly desires to improve patient access, it should upgrade and build its Wisconsin facilities for its Wisconsin patients. SwedishAmerican Health System respectfully requests that the Illinois Health Facilities and Services Review Board deny Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory Surgery.

Sincerely,

Thomas Myers, Vice President,
Strategy & Marketing,
SwedishAmerican Health System



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Appearance Only Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) PATRICIA DIDUCH

City ROCKTON State IL Zip 61072

Signature Patricia Diduch

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Village of Rockton

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral

written



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Appearance Only Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) William Groeper

City South Beloit State IL Zip 61080

Signature William E. Groeper

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Beloit Health System

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Appearance Only Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print)

Gregory McCarty

City

Rochester

State

IL

Zip

61114

Signature

Gregory McCarty

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Resident/retiree

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral

2/7/14



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Appearance Only Registration Form

**Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe**

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print)

GUS LARSON

City

ROSCOE

State

IL

Zip

61073

Signature

[Handwritten Signature]

II.

REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Beloit Health System / Northpointe

III.

POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Appearance Only Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) DOUG WAIT

City JANESVILLE State WI Zip 53545

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

BELMONT HEALTH SYSTEM

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Appearance Only Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print)

Ryan Messinger

City

Roscoe

State

IL

Zip

61073

Signature

[Handwritten signature]

II.

REPRESENTATION

(This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

III.

POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Appearance Only Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) Lori Dotson

City Beloit State Wisconsin Zip 53511

Signature [Handwritten Signature]

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Appearance Only Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print)

Shawn Zuck w/ Beloit Daily News

City

Beloit

State

WI

Zip

53511

Signature

II.

REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Four horizontal lines for text entry.

III.

POSITION (Circle appropriate position)

Support

Oppose

Neutral





STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Appearance Only Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) Thomas McCawley

City South Beloit State IL Zip 61080

Signature Thomas McCawley

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Beloit Health System

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Appearance Only Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print)

Greg Soabise

City

Wich Park

State

ILL

Zip

61103

Signature

[Handwritten Signature]

II.

REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

III.

POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Appearance Only Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print) James F. Benkovich

City ROSCOE State IL Zip 61073

Signature James F. Benkovich

II. REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Supervisor Roscoe Township

III. POSITION (Circle appropriate position)

Support

Oppose

Neutral



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

Public Hearing Appearance Only Registration Form

Facility Name: NorthPointe Health and Wellness Campus Ambulatory Surgery
Treatment Center, Roscoe

Project Number: 13-072

I. IDENTIFICATION

Name (Please Print)

GREG BRITTON

City

BEZOST

State

WI

Zip

53571

Signature

[Handwritten Signature]

II.

REPRESENTATION (This section is to be filled if the witness is appearing on behalf of any group, organization or other entity.)

Entity, Organization, etc. represented in this appearance (i.e., ABC Concerned Citizens for Health Care)

Belest Health System

III.

POSITION (Circle appropriate position)

Support

Oppose

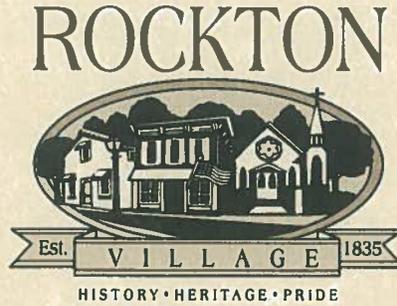
Neutral

VILLAGE PRESIDENT

Dale Adams

VILLAGE CLERK

Sarah Praneis



TRUSTEES

Scott Fridly
Patrick Hoey
Cory Magnus
Trisha Nelson
John Peterson
Dave Winters

February 10, 2014

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Re: Project No. 13-072, NorthPointe Health and Wellness Campus Ambulatory
Surgery Treatment Center Roscoe

Dear Ms. Avery:

In response to the submitted permit and requested public hearing, I am writing this letter of my support of an Ambulatory Surgical Treatment Center at NorthPointe.

The Stateline area of the Rockford region is already served well by several hospitals. Having an ASTC at NorthPointe will allow for greater economic, physical and time efficiencies in the Stateline region. Similarly, the higher volume of focused, specialized surgical procedures will increase surgeon performance of procedure and patient quality of procedure.

Overall, ASTCs are an incredibly vital component of the health care landscape that is lacking in the Stateline Rockford region. NorthPointe's proposal is a crucial step in addressing this deficiency.

Sincerely,

Patricia Diduch, AICP
Planning & Development Administrator, Village of Rockton
110 E. Main Street, Rockton, Illinois 61072

Cc: Mike Constantino



**Rockford Ambulatory
SURGERY CENTER**

Mr. Mike Constantino, Supervisor, Project review Section
Illinois Health Facilities and Services Review Board
525 West Jefferson Street – 2nd Floor
Springfield, IL 62761

RE: Public Hearing Comments
Project No. 13-072
NorthPointe Health and Wellness
10 February 2014

Dear Mr. Constantino and HFSRB:

My name is Dr. Steven Gunderson, D.O. and I am the CEO and Administrative Medical Director of Rockford Ambulatory Surgery Center, a licensed ASC serving Rockford and surrounding communities since 1994. We are an accredited and Medicare-certified multi-specialty ASC that enjoys very high patient and physician satisfaction. We wish to offer the following relevant statements in opposition to the establishment of the NorthPointe ASTC:

- 1) Our existing ASTC is located less than 15 miles from the proposed NorthPointe ASTC site. We currently already provide surgical services in the following specialties: ENT, General Surgery, Gynecology, Ophthalmology, Orthopaedic, Pain Management, Plastic, Podiatric and Urologic Surgery. We provide some Gastroenterology services and have the capacity to add additions procedures in this category. The establishment of a new ASTC will unnecessarily duplicate our investment in facilities, equipment, instrumentation and staffing resources to this community and will not increase access to care as that access already exists. We could accommodate the current hospital outpatient cases and add their surgeons to our Medical Staff which would avoid the unnecessary expenditure of \$9,800,000 in new construction costs.
- 2) Construction costs for the proposed new NorthPointe ASTC are excessive as they propose to meet more restrictive Hospital Standards for construction of their ASTC rather than meeting the required Medicare standards (see their Attachment 14). The project should be denied as it grossly exceeds the state experienced standard for construction costs per gross square foot, estimated at less than \$300 per gross square foot when compared with their proposed \$840 per gross square foot (see their Attachment 9). The proposed project costs do not include the inherent costs of renovations at the existing hospital where the outpatient surgical cases are now performed. This related cost will only increase the total costs of the project. The applicant did not include alternative consideration of using temporary or mobile ORs at its existing hospital campus while the current outpatient surgical space would be renovated or re-constructed without this added cost of building a new ASTC and also building a replacement outpatient surgical area at the main hospital campus, something the Beloit Health System will do anyway.
- 3) NorthPointe's insistence on adhering to hospital construction standards and the inherent resulting excess project costs and their insistence upon construction shelled space now that will not be utilized until 2018 or 2019 is evidence of both a Master Plan that is not divulged in the CON application and their

apparent attempt to construct a new hospital in Illinois piece-by-piece. The addition of laboratory space, pharmacy space, shelled-in 12,480 GSF medical office space and inclusion of MRI and CT scanning/radiographic rooms (the costs of such equipment do not appear to be included in the project costs) all point to this step-by-step development of a hospital instead of just the establishment of an ASTC as outlined in this specific CON application.

4) The NorthPointe proposal includes a price tag of \$16,339,700 includes \$3,000,000 in equipment expenditures and \$544,750 in parking and roadway construction and \$120,000 in artwork and 'activation costs' that are not necessary given the duplication of services and facilities.

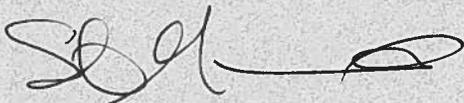
5) The NorthPointe ASTC proposes to perform 3,450 cases per year with almost 33% of their patients coming from Illinois communities that we already serve. NorthPointe acknowledges within its own application (Attachment 27) that there already exists the excess capacity at Rockford Ambulatory Surgery Center to perform all of the cases that NorthPointe anticipates to provide. The proposed project will only increase the underutilization of programs and facilities as it will do nothing to correct current excess capacity of the system.

6) The current hospital-based surgical outpatient cases proposed to be relocated from the Wisconsin-based hospital to the proposed Roscoe, Illinois site will create inefficiencies not normally associated with well-run ASTCs like Rockford Ambulatory Surgery Center. For example, NorthPointe estimates that each of its Ophthalmology cases (usually Cataract with IOL) will take 1.11 hours per case whereas at our facility the average, with prep and cleanup is 20 minutes per case. Similarly, NorthPointe estimates that each of their Pain Management cases will require 1 hour per procedure whereas these cases at our ASTC take less than 20 minutes per case. It appears that the times per case used by NorthPointe in their application exceed usual and customary times in an effort to overestimate or inflate their needed operatory suites and procedure rooms.

We reserve our right to submit additional documentation and/or materials related to this project within the deadline established by the HFSRB.

Sincerely,

ROCKFORD AMBULATORY SURGERY CENTER



Steven A. Gunderson, DO
CEO/Administrative Medical Director