



**RECEIVED**

**FEB 19 2014**

**HEALTH FACILITIES &  
SERVICES REVIEW BOARD**

February 7, 2014

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

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

Dear Ms. Avery:

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. Page 86 of the application reports that there is a demonstrated need for better access to healthcare services in Winnebago County, Illinois as supported by Attachment 12, Exhibit 2. The Community Health Needs Assessment exhibit does not describe a generalized lack of access to healthcare services in Winnebago County. Rather it states that access to healthcare is limited for those living in poverty. Median household incomes in Rockton and Roscoe were \$67,768 and \$62,134 respectively in 2011. Median household income was \$34,024 for the same period in Rockford. These demographics suggest that 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. Last year, five percent of our patients were Medicaid recipients, and our center wrote off over \$79,000 to charity care.
3. Rockford Endoscopy Center is also providing services to the residents of Rockton and Roscoe. In fact, 8% of our procedures in 2013 were rendered to residents of all income levels from South Beloit, Roscoe, and Rockton.
4. The capacity overview on pages 168-169 implies that Rockford Endoscopy Center's four rooms are five short of nine rooms that are justified, suggesting that our endoscopy center is operating beyond capacity. That is not the case. Because we operate very efficiently, Rockford Endoscopy Center has the capacity to perform in excess of 17,000 procedures per year. Our center is operating at approximately 75% capacity. Therefore, 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 indicates a range of \$771-\$4,537 for gastrointestinal endoscopic procedures. Rockford Endoscopy Center's charges range from \$695-\$935. The addition of this facility introduces a higher cost provider to the market.
6. In the event of a complication at the NorthPointe campus, travel time to Beloit Memorial Hospital is 14 minutes according to Mapquest software. Travel time to OSF St. Anthony Hospital from Rockford Endoscopy Center is 1 minute using the same software. We believe this is a better position for patient safety.

In summary, the application states Beloit Memorial Hospital does not believe the proposed NorthPointe ASC will result in unnecessary duplication because the project essentially relocates current operating and procedure room utilization from the Beloit to Roscoe. While that is the stated intent, BMH may also hope to increase their market share by moving into the most affluent section of Winnebago County. If that is not their desire, 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.

Thank you for your consideration of this matter.

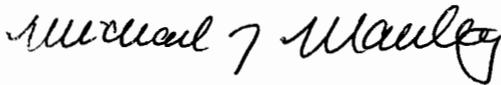
Sincerely,



S. Christopher Moore, MD



Joseph J. Vicari, MD



Michael J. Manley, MD



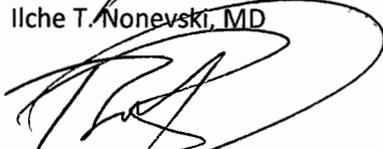
John J. DeGuide, MD



Kevin J. Peifer, MD



Ilche T. Nonevski, MD



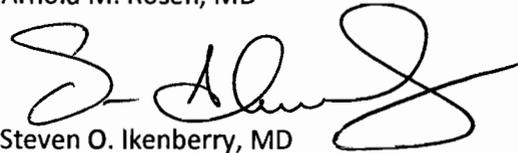
Brad A. Bowyer, MD



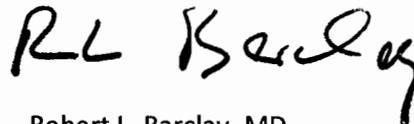
Clinton T. Snedegar, MD



Arnold M. Rosen, MD



Steven O. Ikenberry, MD



Robert L. Barclay, MD



Aaron J. Shiels, MD



Chandrashekar Thukral, MD



Christopher M. Gibbs, MD



Sunil S. Patel, MD