



NORTHSHORE CENTER
FOR GASTROENTEROLOGY

Arkan Alrashid, MD
John Tasiopoulos, DO
Sean Lee, MD

October 22, 2014

RECEIVED

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HEALTH FACILITIES &
SERVICES REVIEW BOARD

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

Re: Winchester Endoscopy Center (Proj. No. 14-025)

Dear Ms. Avery:

As you know, our CON application to establish a licensed endoscopy center is currently pending before the Illinois Health Facilities and Services Review Board ("State Board"). We ask that the State Board consider this application at the November 12, 2014 State Board meeting. This application was deemed complete on June 11, 2014.

We do not believe there are any issues that should delay consideration of the Winchester certificate of need ("CON") application and, in fact, it would be beneficial to move forward with consideration of this matter in the event there may be any IDPH concerns about the affiliated medical practice's provision of endoscopy services. During the site visit that IDPH made to our medical practice, the surveyor indicated that she was satisfied with the scope of our operations so we are disappointed that there has been a delay. As we understand it, when the question of potential non-compliance with the medical practice surgical suite exception to the ASTC Act was recently raised with another gastroenterology practice in Southern Illinois, IDPH articulated that licensure was the best option for remedying any ambiguities in the application of the law to the other provider's operations. In fact, in that other matter, IDPH sought assurances that a CON application was being diligently pursued operations and since that time, that provider has converted to a licensed endoscopy center. We have trouble discerning why its position on this matter would be any different. Therefore, we respectfully request the Winchester CON application be considered at the next State Board meeting.

Until recently, Northshore Center for Gastroenterology, our medical practice, conducted all patient visits, consults, imaging and endoscopy procedures in one suite. Due to the growth of

our practice, congestion in our space and patient flow issues, we decided to obtain additional space in the office park to enable us to meet the demands of our patients at one location so we expanded into adjacent space. We now perform consults and all of our imaging services and endoscopy procedures in this space. We have marketed this service as Winchester Endoscopy Center, however, this is currently a division of our practice and is not operated as a separate entity. Our offices are solely utilized by physicians of our medical practice, and all services, endoscopic or otherwise, are billed in the name of the medical practice. Our affiliated medical practice is not enrolled with Medicare or Medicaid or any other payor as a surgery center nor does it hold itself out as operating a surgery center. Billing is all under our medical practice employer identification number, we bill payors for endoscopy under a global billing arrangement as for office-based endoscopy and all patient treatment records are maintained on our affiliated medical practice's medical record platform, eClinical Works.

Information regarding encounters at Northshore Center for Gastroenterology is as follows:

1. Total Patient Encounters including Endoscopy

January 1, 2013 – December 31, 2013	13,288
January 1, 2014 – June 30, 2014	6,873

2. Total Endoscopic Procedures

January 1, 2013 – December 31, 2013	4,231
January 1, 2014 – June 30, 2014	2,232

Finally, I would like to address the website content of www.colon-check.com and confirm that Northshore Center for Gastroenterology has never operated as an ambulatory surgical treatment center. The website www.colon-check.com is from a 2011 effort to promote awareness of colorectal cancer and the need for colorectal cancer screening colonoscopies. It was never our intent to represent our endoscopy services division to be licensed by the Illinois Department of Public Health as an ambulatory surgical treatment center. We wanted to assure prospective patients they would receive high quality gastroenterology services, and therefore referenced our Joint Commission office-based accreditation and our IDFPR licenses. When notified of a potential issue with the verbiage on this website, we immediately revised the language to make it clear Winchester Endoscopy Center was a part of our medical practice and that all procedures are performed by licensed Illinois physicians, board certified in

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gastroenterology. We have always operated our endoscopy services, which we refer to as Winchester Endoscopy Center, as a part of our medical practice, and it is not and never was our intent to misrepresent licensure status of this service.

I believe the foregoing information is responsive to your request and should address any outstanding issues the State Board may have regarding the Winchester Endoscopy Center CON application to allow consideration of the application at the November 12, 2014 State Board meeting. Thank you for your time and attention to this matter. If you have any questions or need any additional information, please feel free to contact me or our attorney, Kara Friedman at 312/873-3639.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arkan Alrashid', with a large, stylized flourish extending to the right.

Arkan Alrashid, M.D.

cc: Michael Constantino
Anne Cooper