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HEALTH FACILITIES &
SERVICES REVIEW BOARD

November 18, 2014

Mike Constantino
Illinois Health Facilities & Services Review Board
2nd Floor
525 West Jefferson Street
Springfield, Illinois 62761

In Re: Application 14-043 HSHS St. Elizabeth's Hospital Facility
Application 14-044 HSHS St. Elizabeth's Ambulatory Care Center
Certificates of Need

Dear Board President & Board Members,

I urge you to DENY both applications as they do not meet the necessary requirements for a Certificate of Need and present the following facts to support such a denial:

Claim: *Saint Elizabeth's Hospital is building a "replacement" hospital*
Fact: The proposed location does NOT serve as a "replacement" hospital as the location is over 7 miles "as the crow flies" from its current location. It may be 7 miles geographically; however, it's anywhere from 20-25 minutes or more during peak traffic periods from its current location. While St. Elizabeth's downplays such a distance, they ignore the significant additional time this will add to communities already 6-10 miles from the current Belleville location. These significantly growing communities include; Millstadt, Freeburg, New Athens, and Smithton, Illinois. Each of these communities experienced growth rates of more than 10% from the 2000 to 2010 and their rapid growth continues. Adding an additional 20-25 minutes of time for Emergency care will likely result in increased deaths from not only these communities but from Belleville residents.

CLAIM: *Saint Elizabeth's Hospital needs a new facility to provide the best care.*
FACT: Saint Elizabeth's Hospital has invested little over the last decades to improve their facilities at their current location. Outside of the Heart Institute, few renovations have been made. However, mere facilities do not necessarily equate to the "best" care. They are merely a "perception" by patients in many cases. Had St. Elizabeth's provided exceptional care, it would not matter where they were located or how new their facilities were.

However, in light of the decades of neglect by St. Elizabeth's, a new facility may be needed. I fully support the construction of a "replacement" hospital on or near their current location. That would be a true "replacement" meeting the needs of its customers.

CLAIM: *Saint Elizabeth's Hospital is building a "regional" hospital*
FACT: Saint Elizabeth's Hospital in Belleville IS a regional hospital. It serves the communities of Belleville, Millstadt, Freeburg, New Athens, Smithton, Swansea, Shiloh, Mascoutah, and O'Fallon. Moving the hospital 20-25 minutes further away from these communities REDUCES its status as a "regional" hospital by increasing travel times and abandoning these communities' access to emergency and full-service hospital care.

CLAIM: *Building Saint Elizabeth's Hospital on Interstate 64 will improve access.*
FACT: It will for some but for most, it will significantly increase travel times and distances for hospital services. With a population of approximately 50,000 residents, Belleville residents will be denied immediate medical care and be forced to travel 20-25 minutes longer for care. Belleville, Smithton, Millstadt, Freeburg, and d New Athens are not located on I-64. Communities such as East St. Louis and Washington Park are located along I-64. These communities are only 5-10 minutes away from care at Touchette Hospital in Centreville, Illinois or to major hospitals in Saint Louis, Missouri. Will they choose 5-10 minutes to the closest hospitals with excellent care reputations such as those in Saint Louis or drive 10-15 minutes on I-64 to O'Fallon? It is likely they will continue to choose closer hospitals with excellent reputations.

Secondly, the argument that St. Elizabeth's needs to be located on I-64 stands in stark contrast to HSHS's flagship hospital, Saint John's, in Springfield, Illinois. That hospital is 4 miles from I-55 to the east and 7 miles to I-55 to the south. It sits in the heart of Springfield, Illinois. Why is Saint Elizabeth's location in Belleville "unacceptable' for this reason but not their flagship hospital's location?

Thirdly, if these requests are approved, there will be no hospital near or south of Illinois Route 15. This will leave a huge void in healthcare services for a large and growing portion of the population of Saint Clair County, Illinois.

CLAIM: *If these applications are not approved, Saint Elizabeth's Hospital will have to close in Belleville*
FACT: That may be the case. However, this contrary and extortive claim is an insult to the people they serve and to this board. If their goal is to provide the best quality health care, threats to close down operations if their proposal is not accepted is certainly not the way to do that. This is clearly an attempt to unjustly influence this Board and sway public opinion. Even so, such a plan would require approval of this same board to cease operations. It is clear that Saint Elizabeth's has chosen to intentionally disregard alternatives that the City of Belleville could offer at or near its current location.

CLAIM: *Saint Elizabeth's is responding to health care needs in a "regional" way and O'Fallon has a need for a new hospital.*
FACT: Absolutely false. The full-service and ambulatory needs of the communities of O'Fallon and Shiloh are in the process of being fully met. Right now, construction is underway on Memorial Hospital East in Shiloh, Illinois. A certificate of need was previously granted to the Memorial Medical Group for construction of a full-service hospital. If these applications are approved, this will place two full-service hospitals within 2 miles of each other. In fact, you'll be able to visually see one hospital from the other one. Approval of these certificates is contrary

to your Board's policy of not duplicating services in an immediate area. With Saint Elizabeth's Hospital and Memorial hospital being both full-service ambulatory care facilities, services would be clearly duplicated.

In addition, this would leave Belleville and nearby surrounding communities with one quarter of the hospital beds it presently has. Upon completion of Memorial Hospital East in Shiloh, it will reduce the number of beds at its Belleville location by almost half. Therefore, if these certificates of need are granted, Belleville and its surrounding communities will lose 75% of the beds available as well as a full-service ambulatory care hospital in its entirety. What is not lost is the 50,000 residents and their need for a full-service hospital (don't forget the nearby communities of Smithton, Millstadt, Freeburg, & New Athens).

CLAIM: *Saint Elizabeth's will provide care through an urgent care and doctor's offices to remain in Belleville*
FACT: These facilities are not an adequate replacement for Saint Elizabeth's Hospital. I strongly question the services and commitment to the Belleville and nearby communities. HSHS does not have an impressive track record here as evidenced by their Waterloo, Illinois facility. It opened and closed within a span of a few short years, leaving no urgent care and few affiliated doctors in Waterloo, Illinois. It is very likely that many physicians in Belleville would move their offices closer to their new facility and no guarantee any health care will be left in Belleville in years to come.

CLAIM: *Saint Elizabeth's is not moving to O'Fallon to seek a better payer mix of patients.*
FACT: I cannot speak to what their mindset is. However, the data is clear that O'Fallon residents have higher income levels and the City of O'Fallon has fewer residents living in poverty than Belleville does. Their argument that they will be better suited to serve low-income communities such as East St. Louis, Washington Park, Brooklyn and the like ignores the fact they are already serving members of those communities in Belleville at this time. The only change would be to lure wealthier, privately insured customers to their new hospital location. Based on these facts, I would conclude this claim is false.

It is my view that Saint Elizabeth's Hospital has acted prejudicially in this application process by moving forward to purchase $19 Million dollars of real estate, preparing design plans, and making preparations for closure of the current hospital and opening of a new hospital before even submitting these applications for a certificate of need. I pray the Board will not allow these actions to unjustly influence their decision in these cases. Saint Elizabeth's acted in bad faith by refusing to explore any options at or very near its current location. Furthermore, it's current expenditures of significant funds for billboards and advertising campaigns is an affront to its argument that it cannot continue services at its Belleville location if these certificates are not approved. These are funds that could be used to improve patient care. Letter from their employees or paid contractor relationships should be appropriately judged as the employees and contractors may be under employment or contract duress by their employer. I don't have an organized campaign or funds to conduct letter writing or public influence campaigns.

After 140 years in Belleville, it is astounding that Saint Elizabeth's Hospital wishes to abandon a community that has supported it fully. I still do. The issue here is whether there is a need to build a hospital and ambulatory care center in O'Fallon, Illinois and to reduce or eliminate all services in Belleville? The answer is clear: There is NO need for an additional full-service

hospital and care facility in O'Fallon, Illinois based on the facts discussed herein. I am certain the residents and city leaders in Belleville stand ready to assist Saint Elizabeth's Hospital and HSHS in replacing their current Belleville hospital and continuing their relationship for the next 140 years.

I urge you to vote NO on both applications.

I thank you for your attention in this matter.

Respectfully yours,

Christopher Rothweiler
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