



## ST. CLAIR COUNTY HEALTH DEPARTMENT

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VIA FEDERAL EXPRESS

March 30, 2015

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

**Re: 14-043 St. Elizabeth's Hospital, O'Fallon**

Dear Ms. Avery:

On October 17, 2014, we submitted a letter expressing our concern that the proposed replacement hospital location will adversely impact the safety net services currently provided by St. Elizabeth's Hospital to residents of St. Clair County. A large concentration of medically underserved and vulnerable population lives in close proximity to the current location. Transportation barriers may reduce access to the proposed location, resulting in a shift of emergency and inpatient services to other hospitals that do not have the capacity to meet this increased demand.

Representatives from St. Elizabeth's met with us on November 13, 2014, and shared their letter of response to our comments that was submitted to the Review Board. At this meeting, we stated that we neither supported nor opposed this project and we would review the information provided. Subsequently, there have been numerous oral and written comments submitted to the Review Board referencing our letter of October 17<sup>th</sup>. These comments have characterized our department as both in support of and in opposition to the proposed project. The fact of the matter is that our focus is preservation of safety-net services.

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**We remain concerned that the proposed location will adversely impact access to safety net services by the medically underserved persons residing in St. Clair County. While the project will likely improve the health care and well-being of a portion of the market area population to be served, private vehicle transportation may be a barrier for many vulnerable persons residing in St. Clair County.**

We also remain concerned that the proposed location will adversely impact the ability of another provider or health care system to sustain remaining safety net services to St. Clair County residents. While the proposed project for an Urgi-Care Clinic on the Belleville campus may somewhat mitigate the adverse impact of closing of the emergency department, it is unclear if Memorial Hospital's emergency department has the staffing and financial capacity to absorb additional service volume from vulnerable populations with barriers to mainstream health care due to lack of insurance, inability to pay, special needs, ethnic or cultural characteristics, or geographic isolation.

Our goal is to review the application to assess its impact on essential services to all residents of St. Clair County. We have reviewed all comments and information made public by the Review Board regarding this project. In addition, we have reviewed the IHFSRB Staff Reports posted for public comment. Based upon this ongoing review, our original stated concerns have not been clearly addressed

We urge the Review Board to assure that the establishment, construction, or modification of this health care facility is consistent with the public interest and is in accord with the standards, criteria, or plans of need adopted and approved by the Review Board.

Sincerely,



Kevin D. Hutchison R.N., M.S., M.P.H.  
Executive Director