



HSHS
St. Elizabeth's
Hospital

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HEALTH FACILITIES &
SERVICES REVIEW BOARD

July 12, 2016

Ms. Courtney Avery
Administrator
Illinois Health Facilities & Services Review Board
525 S. Jefferson St.
2nd Floor
Springfield, IL 62761
Re: #16-018

Dear Ms. Avery:

On behalf of HSHS St. Elizabeth's Hospital, I write to oppose the above project on the basis that it will create an unnecessary duplication of health care services in the planning area.

The Metro East region, as a whole, is fairly populous. But as you drive east from the Mississippi river, it slowly becomes less so. Belleville is a town of approximately 42,000 residents. Together Shiloh and O'Fallon have approximately 49,000 residents. Smaller communities surrounding these areas are losing population. Although Shiloh and O'Fallon are growing, that growth is mostly among the young and healthy. Belleville's population has remained fairly constant, although it has seen some lost population in recent years.

Despite a joint population of nearly 100,000, these communities, all within 10 miles of one another, have three full service hospitals, a neuroscience building, a dedicated orthopedic building, three medical office buildings (at least) and an ambulatory care center under construction in O'Fallon. After St. Elizabeth's relocates, this will remain the case. In addition, St. Elizabeth's has committed to maintain outpatient services at its current Belleville hospital site, including a walk-in clinic, imaging, medical office space and other ancillary services that will be added to the equation.

There are more than enough bricks and mortar dedicated to healthcare in the region. We do not need more capital spent on another construction project by BJC Memorial for an unnecessary building simply to escalate its ongoing campaign against St. Elizabeth's. BJC Memorial was unsuccessful in stopping St. Elizabeth's from building a replacement hospital. Rather than engaging in a constant game of one-upmanship that does not serve the needs of the community, BJC Memorial should focus its resources on providing care that is easily accessible to those who most need it.

211 South Third Street
Belleville, IL 62220
618-234-2120
www.steliz.org

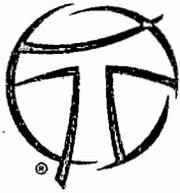
An Affiliate of
Hospital Sisters
Health System

Memorial's November 25, 2014 letter opposing St. Elizabeth's stated: "Project 14-043 (the St. Elizabeth's relocation) would materially diminish the adequacy of services to the community, promote the unnecessary duplication of health care facilities and fail to address the unmet needs in the community." This statement could not be truer regarding this BJC Memorial project. If BJC Memorial wants to spend money, we suggest a better use would be to invest in services that increase access to care for the underserved in the region as opposed to moving its physicians and services from Belleville to Shiloh.

Sincerely,

A handwritten signature in black ink that reads "Peggy Sebastian". The signature is written in a cursive style with a large initial "P".

Peggy Sebastian
President and CEO



Hospital Sisters
HEALTH SYSTEM

Belleville, IL
HSBS St. Elizabeth's Hospital

Breese, IL
HSBS St. Joseph's Hospital

Decatur, IL
HSBS St. Mary's Hospital

Effingham, IL
HSBS St. Anthony's Memorial
Hospital

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HSBS St. Clare Memorial
Hospital

Sheboygan, WI
HSBS St. Nicholas Hospital

HSBS Medical Group

Prairie Cardiovascular

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Ms. Courtney Avery
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Re: Project 16-018

I am the Vice President for Strategy for Hospital Sisters Health System and am writing on behalf of HSBS and St. Elizabeth's Belleville in opposition to BJC Memorial's proposed medical clinics building in Shiloh, Illinois, to be located adjacent to their recently opened hospital.

The Health Facilities and Services Review Board may recall BJC Memorial's opposition to St. Elizabeth's application to relocate its hospital to O'Fallon, Illinois, in which it accused St. Elizabeth's of "abandoning" both its mission and the residents of Belleville. In addition, BJC Memorial stated: "In June 2011 the IHFSRB unanimously approved Memorial Hospital's plans to move a portion of its bed complement in Belleville to Shiloh, establishing a new hospital named Memorial Hospital-East. In developing its plan, Memorial worked closely with the City of Belleville and its stakeholders to insure that this new hospital would not jeopardize or dilute the services being provided at its Belleville hospital."

It appears from this application that BJC Memorial is shifting away from Belleville to Shiloh, as they indicate that they plan to move imaging equipment from BJC Memorial in Belleville to their proposed medical clinics building in Shiloh. It appears this equipment is for Women's Health.

The BJC Memorial East Hospital currently has a lab, PT/OT space, diagnostic imaging, consisting of 2 general x-ray rooms, ultrasound, fluoroscopy, CT, MRI and nuclear medicine. Most of these services will be duplicated at the proposed medical clinics building.

When BJC Memorial opposed St. Elizabeth's relocation to a site just "2 miles" from the BJC Memorial East Hospital (where the new medical clinics building will be located) it said that it "would be devastated by the establishment of a second hospital in such close proximity" and that "Memorial East's admissions would be reduced by nearly 30% and that approximately 200 staff positions would need to be eliminated." This statement was submitted in a January 15, 2015 letter submitted by Memorial. Now, just a year and a half later, BJC Memorial is pursuing a new medical clinics building, again just 2 miles from the already approved St. Elizabeth's hospital and its new ambulatory care building. If Memorial's "devastation" prediction in early 2015 was accurate, the new building will be unused and unnecessary.

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We also notice in BJC Memorial's application, that no alternatives were considered. However, if BJC Memorial feels it needs additional medical office building space, it has ample space within its medical buildings at its Belleville campus. That campus includes a new neurosciences building, a large MOB and a dedicated orthopedic building, and additional space on the campus to build a new medical office building to house the internists, family physicians and other specialists it says will be located in Shiloh. This alternative should have been addressed.

In summary, the medical clinics building is unnecessary as it duplicates the services provided at both BJC Memorial East and at the BJC Memorial Belleville campuses. It will also duplicate services that will be offered at St. Elizabeth's outpatient campus in Belleville, and St. Elizabeth's Ambulatory Care Center in O'Fallon (see attached matrix).

I respectfully ask the Planning Board to turn down this project. Please consider your statutory directive to oversee thoughtful health planning with combined goals of providing access while not duplicating services, and encouraging modern health care facilities while avoiding unnecessary capital expenditures. The project at hand duplicates services in a blatantly obvious way and therefore the capital expenditure is unnecessary. We believe this project is designed solely to compete with St. Elizabeth's, and undermines BJC Memorial's commitment to remain in Belleville with only a "satellite" facility in Shiloh.

Sincerely,

A handwritten signature in cursive script that reads "Peter Mannix".

Peter Mannix

Vice President, Strategy Development and Implementation
Hospital Sisters Health System
4936 Laverna Road
Springfield, IL 62707



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Ms. Courtney Avery
Administrator
Illinois Health Facilities & Services Review Board
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Springfield, IL 62761
Re: #06-018

Dear Ms. Avery:

On behalf of HSHS St. Elizabeth's Hospital, I am writing to oppose the proposed project to build a medical clinics building (MCB) in Shiloh on the BJC Memorial East campus.

The HSHS leadership team and I believe this project would create an unnecessary duplication of services and will not best serve patients from Belleville or underserved patients from across the region.

In April, 2015, the Illinois Healthcare Facilities and Services Review Board (HFSRB) unanimously approved St. Elizabeth's Ambulatory Care Center (ACC) that will be adjacent to the St. Elizabeth's replacement hospital less than two miles from this proposed facility. The St. Elizabeth's hospital and ACC are scheduled to open by the end of 2017.

In a letter dated January 15, 2015, Memorial wrote in opposition to the St. Elizabeth's plans to relocate its aging facility to O'Fallon:

"...the narrative portion of the SBSR should have acknowledged the IHFSRB's unanimous approval of the establishment of Memorial Hospital-East, which will open in 13 months and which is located only 2 miles from the proposed O'Fallon hospital."

We similarly believe that BJC Memorial's application should have, in its narrative, noted the unanimous approval by the IHFSRB of St. Elizabeth's ACC. We also question why BJC Belleville Memorial is not building the MCB on its campus in Belleville.

In a letter dated 11/25/2014, Memorial stated:

"St. Elizabeth's and the HSHS System have had the opportunity and the financial resources to invest in its Belleville hospital over the years, but instead have chosen not to do so. Instead, St. Elizabeth's intention is to relocate its hospital to a community that is more advantageous to its business interest."

Unlike BJC Memorial, St. Elizabeth's has a landlocked campus in Belleville. BJC Memorial has ample space to build an MCB on its Belleville campus, to accommodate the specialists from St. Louis that it states will be seeing patients in Illinois. St. Elizabeth's has committed to maintaining outpatient services on its Belleville campus and St. Elizabeth's new hospital and ACC will be easier to reach for more low-income residents than its current location.

We would also like to express concern that BJC Memorial has indicated it will be providing significant imaging services—a general radiology room, three mammography units, two ultrasounds, a bone densitometry unit, and a stereotactic biopsy unit—without providing historical utilization data for these services, despite the fact it appears some of this equipment may be moved from Memorial Belleville to Shiloh. BJC Memorial provides projected volume for the equipment, but fails to show a current need for the equipment through the historical data that would be available if this is existing equipment. Further, BJC Memorial fails to describe the methodology behind their projected volumes.

If the HFSRB does not deny this project, we respectfully request that it ascertain from BJC Memorial whether in fact it is moving existing equipment from its Belleville campus to Shiloh and also obtain a commitment from BJC Memorial that it will not expand the scope of services offered at this building for a significant period of time.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Joshua Campos', written over the typed name and title.

Joshua Campos, MHS
Manager, Strategic Planning
Hospital Sisters Health System
4936 LaVerna Road
Springfield, IL 62707