



# Winnebago County Health Department

Promoting a Safer and Healthier Community Since 1854

April 20, 2011

J. Maichle Bacon M.P.H., R.S.  
Public Health Administrator

Ms. Courtney Avery, Administrator  
Illinois Health Facilities and Services Review Board  
525 W. Jefferson Street, 2<sup>nd</sup> Floor  
Springfield, IL 62761

Re: Application for Certification of Exemption for OSF Health Care, Rockford Health System and Rockford Memorial Hospital

Dear Ms. Avery,

The Winnebago County Health Department and Board of Health has the responsibility to prevent disease and promote the health of all Winnebago County residents. That responsibility includes optimizing health at all life stages, especially those at greater risk of health disparities. It is from this perspective that we raise the concern that this application for COE, would extend OSF's existing limitations on the provision of family planning related services to a greater proportion of the local primary care system. Since the majority of women seek reproductive health care services through their primary health care provider, it is especially important to minimize barriers to uninterrupted culturally competent contraceptive services.

In Winnebago County there are slightly over 58,000 women of reproductive age (15-44). It is estimated from national data that half of these women (>24,000) are in need of these services. The health objectives for our nation (Healthy People 2020) have as a national goal to expand access to family planning services to improve pregnancy planning and spacing and to prevent unintended pregnancies. Eliminating barriers that women face in accessing such services are critical to the consistent and correct use of contraceptives for effectively accomplishing this. These barriers include lack of insurance, high cost, and some providers and health insurance plans that do not provide services or coverage for contraception.

It is urged that creative ways be identified to assure that the capacity for these vital services not be diminished in the progress of this Application. What must be preserved is the full range of reversible and permanent contraceptive drugs, devices and procedures and the prescriptive access to such supplies along with counseling and patient education that health care providers should routinely offer their patients throughout their reproductive years.



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Thank you in advance for your consideration of this concern in the broader context of the Certificate of Exemption Request.

Respectfully,



J. Maichle Bacon  
Public Health Administrator



Inara McGroarty, President  
Winnebago County Board of Health