



April 6, 2020

The Honorable JB Pritzker  
Office of the Governor  
207 State House  
Springfield, IL 62706

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### Executive Director

**Barbara Arango, MBA**  
Schaumburg, IL

Dear Governor Pritzker:

The Illinois Ambulatory Surgery Center Association (IASCA) promotes excellence in health care delivery through member education, information exchange, community awareness, and government advocacy. As the state's response to the COVID-19 pandemic evolves, I want to alert you to the need for administrative action to provide the regulatory flexibility necessary to allow ambulatory surgical treatment centers (ASTCs) to play a vital role in the pandemic response.

On March 30, the Centers for Medicare & Medicaid (CMS) announced sweeping regulatory changes to address the surge that is expected due to the COVID-19 pandemic. Under the "Hospitals Without Walls" program, hospitals will be able to transfer patients to outside facilities, such as ASTCs, postsurgical recovery care centers, inpatient rehabilitation hospitals, hotels and dormitories, while still receiving hospital payments under Medicare. ASTCs may also contract with local healthcare systems to provide hospital services, or they can enroll and bill as hospitals during the emergency declaration as long as they are not inconsistent with their State's Emergency Preparedness or Pandemic Plan.

Ambulatory surgical treatment centers are eager to do their part in response to the COVID-19 pandemic, and the "Hospitals Without Walls" program provides a commonsense framework to allow ASTCs to use their facilities, staff and expertise in direct service to the pandemic response. For this to happen in Illinois however, we require immediate action on your part.

We ask today that you review all laws and regulations that would prevent ASTCs from serving as alternative sites of service and providing hospital services during the pandemic response and provide the state ASTC community with temporary waivers from these restrictions. ASTCs statewide play a role in ensuring that communities' health needs are met during the pandemic, but without these waivers an essential part of the state's surge capacity will remain unutilized.

We know that the COVID-19 pandemic will place stress on the health system. We stand ready to work with state and local governments to provide needed care during this extraordinary time. Please contact Executive Director Barbara Arango, MBA (269-312-4491), if there is anything that the IASCA or our members can do to assist you as we all face the enormous health and economic challenges of the COVID-19 pandemic.

Sincerely,

Sarah Gardner, CASC  
President  
Illinois Ambulatory Surgery Center Association

cc: Ngozi O. Ezike, MD, Director, Illinois Department of Public Health; Karen Senger, RN, BSN, Division Chief, IDPH Health Care Facilities and Programs

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