



STATE OF ILLINOIS
HEALTH FACILITIES AND SERVICES REVIEW BOARD

525 WEST JEFFERSON ST. • SPRINGFIELD, ILLINOIS 62761 • (217) 782-3516 FAX: (217) 785-4111

DOCKET ITEM NUMBER: E-01	BOARD MEETING: June 4, 2019	PROJECT NUMBER: NA
BUSINESS ITEM: Declaratory Ruling Request		
REQUESTING ENTITY(IES): St. John's Hospital of the Hospital Sisters of the Third Order of St. Francis		

STATE BOARD STAFF REPORT
DECLARATORY RULING REQUEST

I. Request for Declaratory Ruling

The State Board Staff is seeking a State Board declaratory ruling on the extension of a temporary discontinuation of an acute mental illness category of service at St. John's Hospital of the Hospital Sisters of the Third Order of St. Francis, Springfield, Illinois.

II. Applicable Statute and Rules

The following sections of the Illinois Health Facilities Planning Act Administrative Rules are applicable to this declaratory ruling request.

Section 1130.810 - Declaratory Rulings

HFSRB shall render determinations on various matters relating to permits and the applicability of the statute and regulations. Requests for determination shall be made in writing. Pursuant to Section 5-150 of the Illinois Administrative Procedure Act, these determinations are declaratory rulings and are not subject to appeal. The following matters shall be subject to declaratory rulings by HFSRB, including, but are not limited to:

- a) *whether a proposed project requires a permit or exemption;*
- b) *corrections to the facility inventories utilized by HFSRB;*
- c) *recognition that a particular service was in existence prior to permit requirements;*
- d) *amount of fees required;*
- e) *project classification as substantive or non-substantive; and*
- f) *applicability of rules.*

Section 1130.240 - Reporting and Notification Requirements

HFSRB shall require health care facilities to provide periodic reports, data, and information as needed to carry out the purposes and provisions of the Act [20 ILCS 3960/13]. Information required to be submitted to HFSRB includes, but is not limited to, reports on capital expenditures, facility and service utilization data, facility bed-capacity information, notices of hospital reductions in services, and any temporary suspensions of service.

- d) *Temporary Suspension of Facility or Category of Service*

A facility that ceased operation or that ceased to provide a category of service due to unanticipated or unforeseen circumstances (such as the loss of appropriate staff or a natural or unnatural disaster) shall file notice to HFSRB of a temporary suspension of service that is anticipated to exceed 30 days. The notice shall be filed no later than 30 days after the suspension of the service and shall include a detailed explanation of the reasons for the suspension, as well as the efforts being made to correct the circumstance and a timetable to reopen the service. Reports documenting the progress of corrections must be filed every 30 days thereafter until services resume. Temporary suspensions shall not exceed one year unless otherwise approved by HFSRB.

III. Background

St. John’s Hospital located at 801 East Carpenter, Springfield, Illinois is in the Acute Mental Illness Planning Area 3. The AMI 3 Planning Area includes the Illinois Counties of Adams, Brown, Calhoun, Cass, Christian, Greene, Hancock, Jersey, Logan, Macoupin, Mason, Menard, Montgomery, Morgan, Pike, Sangamon, Schuyler, and Scott. The State Board’s target occupancy for the AMI service is 85%. Table One shows the 5-year historical utilization of the AMI service at St. John’s Hospital.

TABLE ONE
St. John’s Hospital 5-year Historical Utilization AMI Service

Year	2013	2014	2015	2016	2017
Beds	40	40	40	40	40
Admissions	893	566	324	276	225
Patient Days	8,021	6,200	4,420	4,522	4,584
ALOS	9	11	13.6	16.4	20.4
ADC	22	17	12.1	12.4	12.6
Occupancy	54.90%	42.50%	30.30%	30.90%	31.40%

There are 242 AMI beds in this Planning Area with a calculated excess of 74 AMI Beds as of May 2019 in this AMI Planning Area. See Table Two below.

TABLE TWO
Hospitals with AMI Service in the AMI Planning Area 3

Hospitals	City	Beds	Utilization %
Blessing Hospital	Quincy	41	80.9%
Illini Community Hospital	Pittsfield	10	41.1%
Lincoln Prairie Behavioral Health Center ⁽¹⁾	Springfield	97	76.4%
Memorial Medical Center	Springfield	44	74.0%
Passavant Area Hospital	Jacksonville	10	75.1%
St. John's Hospital ⁽²⁾	Springfield	40	31.4%
Total AMI Beds		242	

1. Child Psychiatric Service Only
2. Staffed 15 AMI beds in 2017 for Adults Only

On June 6, 2018, the State Board received a notice from St. John's Hospital located in Springfield, Illinois requesting the temporary suspension of the 40-bed Acute Mental Illness Category of Service as the hospital evaluated the continuation of the AMI service. On June 25, 2018 the service was suspended as the last AMI patient was discharged from the unit. As required the Hospital has provided 30-day updates since the suspension of this service.

On April 2, 2019 the State Board received a request from the Hospital to extend the temporary discontinuation of the 40-bed Acute Mental Illness Category of Service beyond the 1-year timeframe. The Hospital states: *"Due to the volume and complexity of facility and planning projects currently in progress, we are requesting an extension of the temporary suspension of services until March 25, 2020, so that we may continue to evaluate the optimal use for the AMI Unit, consistent with Section 1130.240(d). If approved, we will continue to provide the HFSRB and IDPH with monthly reports documenting our progress."*

The Hospital needs additional time to evaluate the AMI service due to the number of capital and renovation projects at the Hospital. These projects include:

- (1) ongoing renovation of the 5th floor of the Hospital's main tower, with a tentative completion date of October 1, 2019 (Permit #17-067);
- (2) design work and planning relative to the renovation of the Hospital's Neonatal Intensive Care Unit (#E-012-19);
- (3) project renewal and audit related to the Women and Children's Center Medical Office Building (Permit #16-053);
- (4) internal review and update of the Hospital's master facility plan;
- (5) discernment regarding renovation of the Hospital's Intensive Care Unit.

IV. Staff Discussion

The temporary suspension of service was meant for an unanticipated loss of staff or a natural or unnatural disaster at a health care facility. This language allows a health care facility an opportunity to suspend services up to 12-months to allow a period to recruit new staff or physician or evaluate the extent of a disaster. By suspending services, the health care facility could reestablish the service without submitting a new application for permit and having to justify the need for the service or facility¹.

¹ The Illinois Department of Public Health requires notification of the suspension of the service and continuous updates. If IDPH is informed the service will be resumed IDPH does a survey before the Hospital can readmit patients.

To extend the temporary suspension of a category of service beyond the 1-year timeframe allowed by 77 ILAC 1130.240 requires approval of the State Board. The State Board may:

- Grant the Hospital's a ONE-time request to extend the temporary suspension until March 25, 2020 for a total of 21-months from the beginning of the temporary suspension of June 25, 2018.
- Require the Hospital to resume AMI service on June 25, 2019.
- Require the Hospital to submit an exemption to discontinue the AMI Category of Service.

V. **Information Attached**

Appended to this report are the following:

- St. John's Hospital Request to extend the Temporary Suspension of AMI Service.



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**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

April 2, 2019

VIA ELECTRONIC MAIL
and HAND DELIVERY

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RE: HSHS St. John's Hospital: Temporary Reduction of Acute Mental Illness Services

Dear Ms. Avery, Ms. Singer and Mr. Constantino:

Effective June 25, 2018, St. John's Hospital of the Hospital Sisters of the Third Order of St. Francis ("St. John's Hospital") temporarily suspended services in its Acute Mental Illness ("AMI") Unit, pursuant to 77 ILAC 1130.240(d) for purposes of conducting an on-going review of AMI services along with an assessment of modernizing the facilities of the AMI Unit.

Concurrent with the review of its AMI services, St. John's Hospital has undertaken numerous capital and renovation projects in order to improve its facilities and services, including: (1) ongoing renovation of the 5th floor of the Hospital's main tower, with a tentative completion date of October 1, 2019; (2) design work and planning relative to the renovation of the Hospital's Neonatal Intensive Care Unit; (3) project renewal and audit related to the Women and Children's Center Medical Office Building; (4) internal review and update of the Hospital's master facility plan; and (5) discernment regarding renovation of the Hospital's Intensive Care Unit.

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*An Affiliate of
Hospital Sisters
Health System*

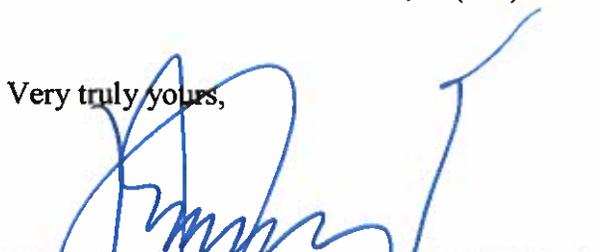


St. John's
HOSPITAL

Per her letter dated July 27, 2018, Ms. Avery acknowledged that the temporary suspension of AMI services began on June 25, 2018, and that the temporary suspension of services would not be allowed to exceed one (1) year unless otherwise approved by HFSRB (77 ILAC 1130.240(d)). Due to the volume and complexity of facility and planning projects currently in progress, we are requesting an extension of the temporary suspension of services until March 25, 2020, so that we may continue to evaluate the optimal use for the AMI Unit, consistent with Section 1130.240(d). If approved, we will continue to provide the HFSRB and IDPH with monthly reports documenting our progress.

We thank you for your consideration of this request and look forward to your response. If you have any questions or concerns, please contact Michelle Clatfelter, Vice President, Legal Affairs, HSHS Central Illinois Division, at (217) 814-8467 or Michelle.Clatfelter@hshs.org.

Very truly yours,



E.J. Kuiper, MHA, DPT, FACHE
Interim President and CEO
HSHS St. John's Hospital
President and CEO
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