



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: August 6, 2019	PROJECT NUMBER: NA
BUSINESS ITEM:	Declaratory Ruling Request	
REQUESTING ENTITY:	Northwestern Medicine Lake Forest Hospital	

STATE BOARD STAFF REPORT
DECLARATORY RULING REQUEST

I. Request for Declaratory Ruling

Northwestern Medicine is requesting a Declaratory Ruling from the State Board. Specifically, they are petitioning the State Board to adjust the calendar year 2016 and 2017 Annual Hospital Questionnaires regarding the medical surgical patient days, patient days by racial group and patient days by ethnicity for Northwestern Medicine Lake Forest Hospital.

This adjustment is being requested because Northwestern Medicine stated the Hospital submitted inaccurate medical surgical patient days for the two years referenced above that overstated the number of medical surgical patient days. This was caused because the previous methodology relied on a categorization of patient days within the old data system. The new methodology requires a manual mapping¹ of patient days by department.

The old methodology caused some labor and delivery and ICU days to be included in medical surgical days. Additionally, some observation days were also included in medical surgical days.

Annually the State Board collects information as an annual survey of all hospitals in Illinois. That data is summarized and is published in the Annual Hospital Profile that is available on the Board’s website. The Staff of the State Board performs an analytical review (comparison of the current information to prior year information) and makes the individual profiles available to each Hospital before publication to verify if any corrections are needed. Management of each Hospital certifies that the information is correct. The management of each hospital is responsible for the data, not Board Staff or IDPH. The Survey Instrument contains the following certification language and a check box to be checked certifying the survey information.

‘Pursuant to the Health Facilities Planning Act [20 ILCS 3960/13], the State Board requires all health facilities operating in the State of Illinois to provide such reasonable reports at such times and containing such information as is needed’ by the Board to carry

¹ **data mapping** is the process of specifying how one dataset maps or relates to another dataset.

out the purposes and provisions of this Act. The individual named below certifies that he/she has reviewed this document, that he/she is authorized to make this certification on behalf of this facility, and that the information contained in this report is accurate, truthful and complete to the best of his/her knowledge and belief. Please note that the State Board will be relying on the information contained in this document as being truthful and accurate information. Any misrepresentation will be considered material.”

I certify that the information in this report is accurate, truthful and complete to the best of my knowledge

This data is used by Board Staff in compiling the State Board Staff Reports.

II. Applicable Statute and Rules

The following Sections of the Act are applicable to this declaratory ruling request:

Section 12(4) states:

“For the purposes of this Act, the State Board shall exercise the following powers and duties:

“Develop criteria and standards for health care facilities planning, conduct statewide inventories of health care facilities, and develop health care facility plans which shall be utilized in the review of applications for permit under this Act.”

Section 13 states:

“The State Board shall require all health facilities operating in this State to provide such reasonable reports at such times and containing such information as is needed by it to carry out the purposes and provisions of this Act.”

The following administrative rules are applicable to this declaratory ruling request:

77 IAC 1100.60 requires all health care facilities operating in Illinois to provide data needed for planning.

77 IAC 1100.70 states that the State Board, in conjunction with the IDPH, will publish data appendices.

77 IAC 1110.1540(d) specifies the State Board’s utilization standard for operating rooms.

77 IAC 1130.810 (Declaratory Rulings) states:

“The State Board shall render determinations on various matters relating to permits and the applicability of the statute and regulations. Request for

determination shall be made in writing . . . The following matters shall be subject to declaratory rulings by the State Board:

- b) corrections to the facility inventories utilized by the State Board; . . .

Additionally, pursuant to Section 5-150 of the Illinois Administrative Procedure Act, decisions rendered by the State Board in relation to a declaratory ruling request are final and not subject to appeal.

IV. State Board Staff Finding(s)

The State Board Staff notes the following for the State Board's consideration:

- A. The Act grants the State Board jurisdiction to collect data from health care facilities and to compile an Inventory.
- B. The State Board, through its administrative rules, has delineated policies on the collection of data from health care facilities in order to compile an Inventory and to assist in comprehensive health care planning.
- C. The State Board is permitted to make Declaratory Rulings regarding "corrections to the facility inventories utilized by the State Board," per 77 IAC 1130.810(b).

VI. Summary

As referenced, the State Board's rules provide a mechanism to collect information from health care facilities. This data is an integral component of the State Board's review of proposed projects because it allows for a quantifiable assessment of: 1) a proposal compared to the needs of a specific planning area, 2) the potential impact the proposal will have on existing health care providers and 3) the proposal's ability to meet the mandated requirements of the Health Facilities Planning Act (i.e., increased access, improved quality and unnecessary duplication of services).

Based upon this request by Northwestern Medicine, the State Board could determine that the revised patient data for 2016 and 2017 be accepted and the Hospital Profile be adjusted accordingly.

However, it is unknown what impact using the revised data would have had on previously reviewed applications. It is possible the State Board Staff relied upon that information when conducting reviews of other applications (i.e., proposed addition of medical surgical beds or the establishment of a new hospital). As a result, the State Board may not want to accept the revised information.

VII. Other Information

Appended to this report are the following: the request for declaratory ruling.

June 10, 2019

RECEIVED

JUN 11 2019

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson Street – 2nd Floor
Springfield, IL 62761

**RE: Correction of Annual Hospital Questionnaire data
Northwestern Medicine Lake Forest Hospital**

Dear Ms. Avery:

Northwestern Medicine Lake Forest Hospital hereby requests corrections to previously submitted data for IDPH's Annual Hospital Questionnaires. Specifically, the medical/surgical patient days submitted for CY2016 and CY2017 were overstated.

The error was discovered during this year's annual AHQ data review process; a detailed root cause analysis was performed regarding the two previous year submissions. The analysis uncovered that the previously used methodology relied on categorization within an old data system. Our current process requires a manual mapping of patient days by department, utilizing a new decision support system. This manual mapping serves as a safeguard to insure proper data collection and categorization.

The old methodology caused the following errors to occur:

1. Some labor & delivery and ICU days were included in the medical/surgical data
2. Some observation days were included in the medical/surgical data

The corrected numbers are included in the tables below:

PATIENT DAYS	CY16	CY17
Med/Surg – 0-14	396	267
Med/Surg – 15-44	2,393	2,197
Med/Surg – 45-64	5,142	5,255
Med/Surg – 65-74	3,765	4,134
Med/Surg – 75+	5,665	5,763
Total Med/Surg	17,361	17,616
Total Hospital Utilization	42,820	33,246

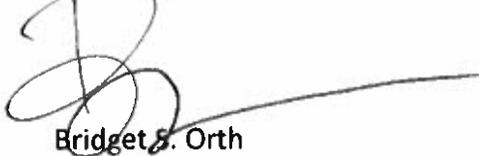
PATIENT DAYS	RACIAL GROUPS	CY16	CY17
	Asian	1,505	944
	American Indian or Native Alaskan	3	24
	Black or African American	2,207	2,562
	Native Hawaiian or Pacific Islander	35	76
	White	35,597	28,777
	Unknown	3,473	863
Total Hospital Utilization		42,820	33,246

PATIENT DAYS	ETHNICITY	CY16	CY17
	Hispanic or Latino	2,702	2,791
	Not Hispanic or Latino	39,721	30,084
	Unknown	397	371
Total Hospital Utilization		42,820	33,246

CY2018 data was collected using the new methodology which is consistent with how data is collected for all Northwestern Medicine hospitals. We are confident that this method of collecting and reviewing data will prevent future errors from occurring.

Please feel free to contact me with any questions at 312-926-8650 or borth@nm.org.

Sincerely,



Bridget S. Orth
 Director, Regulatory Planning