



STATE OF ILLINOIS HEALTH FACILITIES AND SERVICES REVIEW BOARD

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DOCKET ITEM NUMBER: E-01	BOARD MEETING: March 18, 2025	PROJECT NUMBER: NA
BUSINESS ITEM: Declaratory Ruling Request		
REQUESTING ENTITY / LOCATION: HSHS St. Elizabeth Hospital – O’Fallon		

STATE BOARD STAFF REPORT **DECLARATORY RULING REQUEST**

I. Request for Declaratory Ruling

Hospital Sisters Health System (“HSHS”) is an Illinois not-for-profit corporation. It is the parent corporation for several subsidiary corporations and exerts control through various reserved powers. HSHS St. Elizabeth Hospital is one of nine hospitals controlled by the Hospital Sisters Health System in Illinois.

HSHS St. Elizabeth Hospital requests changes to several Annual Hospital Questionnaires regarding surgery/procedure cases and hours, the number of emergency department stations, the number of General Radiology/Fluoroscopy, Mammography, and Angiography equipment, and Imaging Equipment Utilization.

II. Background Information

The State Board annually requests utilization information for all Illinois hospitals as part of the Annual Hospital Questionnaire Survey conducted by the Illinois Health Facilities and Services Review Board. This declaratory ruling requests the State Board to approve corrections to the information submitted by HSHS St. Elizabeth Hospital in several Annual Hospital Questionnaire Surveys.

To avoid submitting requests for a Declaratory Ruling to correct Annual Questionnaire Data in the future, HSHS states it is instituting a new policy that requires data reported in the Annual Hospital Questionnaire to be standardized for all HSHS hospitals in Illinois and confirmed by the reporting hospital’s President, Chief Operating Officer, and Chief Nursing Officer.

III. Request Details

1. Operating/Procedure Cases and Hours

On February 14, 2025, the State Board received correspondence from HSHS St. Elizabeth Hospital requesting a declaratory ruling to correct operating/procedure room information reported for CY 2023. The Hospital stated, “*In a review of the 2023 Annual Hospital*

Survey, it was discovered that PACU hours were included in the total operating room hours. The error was not in prior years, and the Hospital could not determine why PACU hours were included in the 2023 Annual Hospital Survey.”

TABLE ONE
 HSHS St. Elizabeth Hospital
 2023 Annual Hospital Survey
 Operating/Procedure Rooms

	Original data	Corrected data	Change
Operating Rooms			
Cases	10,295	6,999	-3,296
Hours	29,193	18,975	-10,198
Procedure Rooms			
Cases	4,726	8,651	+3,925
Hours	4,795	6,455	+1,660

2. Emergency Room Stations

The Hospital stated that the Emergency Department rooms were misreported when the Hospital opened in O’Fallon in 2017. That error carried over into subsequent reporting years until it was corrected in the 2023 Annual Hospital Questionnaire. The hospital was approved for 25 Emergency Department stations, and the number of stations established and operated at the Hospital has been 25 since 2017.

The Hospital believes the reason for this error was that nine observation stations had been located near the Emergency Department, and these observation stations had inadvertently been added to the count of 25 ED stations. The Hospital asks that the number of Emergency Department stations be corrected for 2017 through 2022, and the Hospital Profiles show that the Hospital has 25 stations each year.

3. Imaging Equipment

The Hospital is asking for the number of pieces of imaging equipment (General Radiology/Fluoroscopy, Mammography, and Angiography) to be corrected. According to the Hospital, the numbers reported in the Annual Hospital Questionnaires for these pieces included equipment located in off-campus locations. The Annual Hospital Questionnaires specifically request information for equipment the hospital owns or leases *on-site* and provides on-site services.

TABLE TWO						
Imaging Equipment						
2017						
	Original		Corrected		Difference	
Imaging Equipment	Owned	Contract	Owned	Contract	Owned	Contract
General Radiology	16	0	5	0	-11	0
Mammography	4	0	3	0	-1	0
Angiography	5	0	5	0	0	0
2018						
	Original		Corrected		Difference	
Imaging Equipment	Owned	Contract	Owned	Contract	Owned	Contract
General Radiology	16	0	5	0	-11	0
Mammography	4	0	3	0	-1	0
Angiography	2	0	5	0	3	0
2019						
	Original		Corrected		Difference	
Imaging Equipment	Owned	Contract	Owned	Contract	Owned	Contract
General Radiology	18	0	5	0	-13	0
Mammography	4	0	3	0	-1	0
Angiography	6	0	5	0	-1	0
2020						
	Original		Corrected		Difference	
Imaging Equipment	Owned	Contract	Owned	Contract	Owned	Contract
General Radiology	19	0	5	0	-14	0
Mammography	4	0	3	0	-1	0
Angiography	5	0	5	0	0	0
2021						
	Original		Corrected		Difference	
Imaging Equipment	Owned	Contract	Owned	Contract	Owned	Contract
General Radiology	19	0	5	0	-14	0
Mammography	4	0	3	0	-1	0
Angiography	5	0	5	0	0	0
2022						
	Original		Corrected		Difference	
Imaging Equipment	Owned	Contract	Owned	Contract	Owned	Contract
General Radiology	19	0	5	0	-14	0
Mammography	5	0	3	0	-2	0
Angiography	5	0	5	0	0	0
2023						

TABLE TWO						
Imaging Equipment						
	Original		Corrected		Difference	
Imaging Equipment	Owned	Contract	Owned	Contract	Owned	Contract
General Radiology	19	0	5	0	-14	0
Mammography	5	0	3	0	-2	0
Angiography	5	0	5	0	0	0

4. Imaging Equipment Utilization

Table Three shows the corrections to the imaging equipment utilization data for 2021, 2022, and 2023.

TABLE THREE											
IMAGING EQUIPMENT UTILIZATION											
	Contracted		2021			2022			2023		
	Hospital	Service	IP	OP	Total	IP	OP	Total	IP	OP	Total
General Radiology	5	0	13,913	25,206	39,119	14,252	26,969	41,221	15,218	27,290	42,508
Nuclear Medicine	3	0	451	2,149	2,600	390	2,211	2,601	491	2,139	2,630
Mammography	3	0	0	12,613	12,613	0	13,112	13,112	0	13,262	13,262
Ultrasound	5	0	877	8,626	9,503	906	8,916	9,822	1,028	8,084	9,112
Angiography	6	0	359	683	1,042	371	773	1,144	533	990	1,523
Diagnostic Angiography			36	26	63	38	30	67	54	38	92
Interventional Angiography			323	657	979	333	743	1,077	479	952	1,431
PET/CT	0	1	1	235	236	0	264	264	1	269	270
CT	2	0	8,407	17,103	25,510	9,292	19,491	28,783	10,509	19,394	29,903
MRI	1	1	1,324	4,207	5,531	1,538	6,117	7,655	1,863	5,678	7,541

IV. Applicable Statutes and Rules

Section 1130.810 - Declaratory Rulings

HFSRB shall render determinations on various matters relating to permits and the applicability of statutes and regulations. Requests for determinations shall be made in writing. Under Section 5-150 of the Illinois Administrative Procedure Act, these determinations are declaratory rulings and are not subject to appeal. Matters subject to declaratory rulings by HFSRB include, 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.

HFSRB NOTE: Declaratory ruling requests about an application for a permit or exemption during the review period may be submitted only by the applicant and by HFSRB staff.

V. Other Information

Appended to this report is a copy of the letter requesting the declaratory ruling.