



Trials and Tribulations: Implications of Public Health Regulations on Clinical Practice

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IDPH Fast PHACTs
March 19, 2026



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The Illinois Department of Public Health, Medical Services Division is authorized to offer formal Continuing Medical Education (CME) programs to Illinois physicians licensed under (225 ILCS 60/) the Medical Practice Act of 1987. The formal programs must comply with the criteria in subsection (c)(3) of 68 Illinois Administrative Code, Section 1285.110, and all other criteria in this Section.

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Financial Disclosures

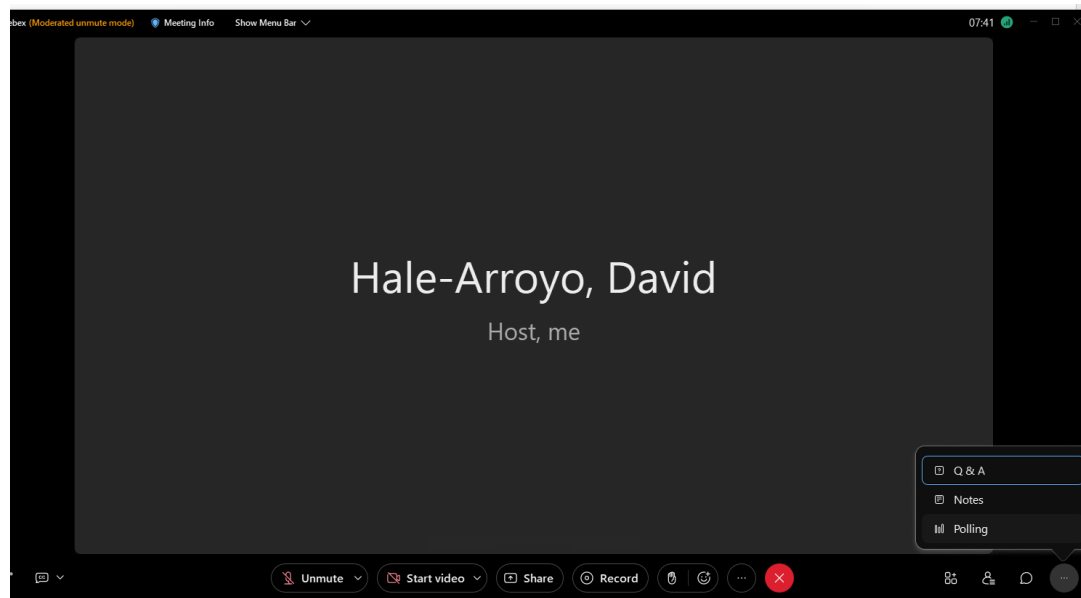
Name and Credentials	Role in Activity	Was there a relevant Financial Disclosure	List of Mitigated Disclosures
Arti Barnes, MD, MPH	Presenter	No	N/A
Somi Nagaraj, DNP, RN, HFSN	Presenter	No	N/A
Jonathan Harwood, MSN, RN	Presenter	No	N/A
David Hale-Arroyo	Staff	No	N/A

Housekeeping:

Webinar sessions are recorded and shared with all participants.

Live Chat has been disabled.

Questions during the Webinar should be entered into the Q&A option where the presentation team will provide responses. To access the Q&A function in Webex, select the three (...) on the right-hand bottom of the Webex screen and then click on the Q&A option (first option) to open the Q&A window:





Objectives

- Increase awareness of IDPH regulatory oversight of healthcare facilities including hospitals, ASTCs and LTCFs
- Explore impact of various types of healthcare facility citations with focus on “immediate jeopardy” situations
- Enhance knowledge of clinician role in regulatory requirements at facilities.

Why are we here today? The Role of Clinicians in HealthCare Regulations

The Importance of Regulatory Compliance in Healthcare



Avoid Legal Risks



Improves Patient Care



Protects Health Information



Enhances Reputation



Prevents Financial Loss



Code or Law? What's the difference

- **Statutory law** (or law): created by legislative bodies (Congress/General Assembly)
- **Administrative code** (rules/regulations): created by executive branch agencies to provide detailed, actionable instructions on implementing those laws.

Chapter I. Department of Public Health

[Subchapter a. General Provisions - Powers and Duties](#)

[Subchapter b. Hospitals and Ambulatory Care Facilities](#)

[Subchapter c. Long-Term Care Facilities](#)

[Subchapter d. Laboratories and Blood Banks](#)

[Subchapter e. Vitals Records](#)

[Subchapter f. Emergency Services and Highway Safety](#)

[Subchapter g. Grants to Dental and Medical Students](#)

[Subchapter h. Local Health Departments](#)

[Subchapter i. Maternal and Child Health](#)

[Subchapter j. Vision and Hearing](#)

[Subchapter k. Communicable Disease Control and Immunization](#)

[Subchapter l. Chronic Diseases](#)

[Subchapter m. Food, Drugs and Cosmetics](#)

[Subchapter n. Recreational Facilities](#)

[Subchapter o. Pest Control](#)

[Subchapter p. Hazardous and Poisonous Substances](#)

[Subchapter q. Mobile Homes](#)

[Subchapter r. Water and Sewage](#)

So...what do we really regulate?

IDPH Regulatory Scope and Scale

Regulate *

- Healthcare facilities/services
 - Also provide specific designations
- Emergency Medical Personnel/ Systems
- CLIA (Lab) compliance and inspection
- School based health centers
- Food safety and certain environmental health hazards (plumbing and pest control)
- Body art and tanning facilities

- * non-exclusive list

Certify *

- Asbestos and lead abatement personnel
- Hearing and vision technicians
- Portable X ray services (Medicare)
- Out-Patient Physical Therapy/ Speech (Medicare)
- Community Health Workers
- Hospice agency (Medicare)
- Home health
- Comprehensive outpatient physical rehabilitation

<https://dph.illinois.gov/resource-center/licensing-certification.html>

<https://dph.illinois.gov/topics-services/environmental-health-protection.html>

What we DON'T regulate!

- Healthcare facilities like
 - Urgent cares
 - Ambulatory clinics
 - Except Rural Health Centers and birthing centers
 - Substance use disorder facilities (IDHS)
- Licensed Healthcare professionals (IDFPR)
- Public/municipal water (IEPA)
- Schools (ISBE) and Daycares (IDEC) but we inform vaccination requirements and school health forms
- Agricultural produce (DoAg)

...But we maintain a registry for unlicensed Health care workers (e.g. home health care aides, CNAs, personal care assistants, private duty nurse aides, day training personnel etc.

The health care worker registry provides information on training and any administrative findings per background checks.

health care worker registry

[Home](#)

To see information on a specific person: **type just the first few letters of the last name and the first few letters of the first name**, then click on the “Search” button. If you do not know the full name, type in the part of the name that you know. Last name is required. If you are unsure of the spelling, type in enough of the name to make it identifiable. A list of health care workers matching your criteria will show on the screen after you click the search button. Click on the desired worker to see more information specific to that person.

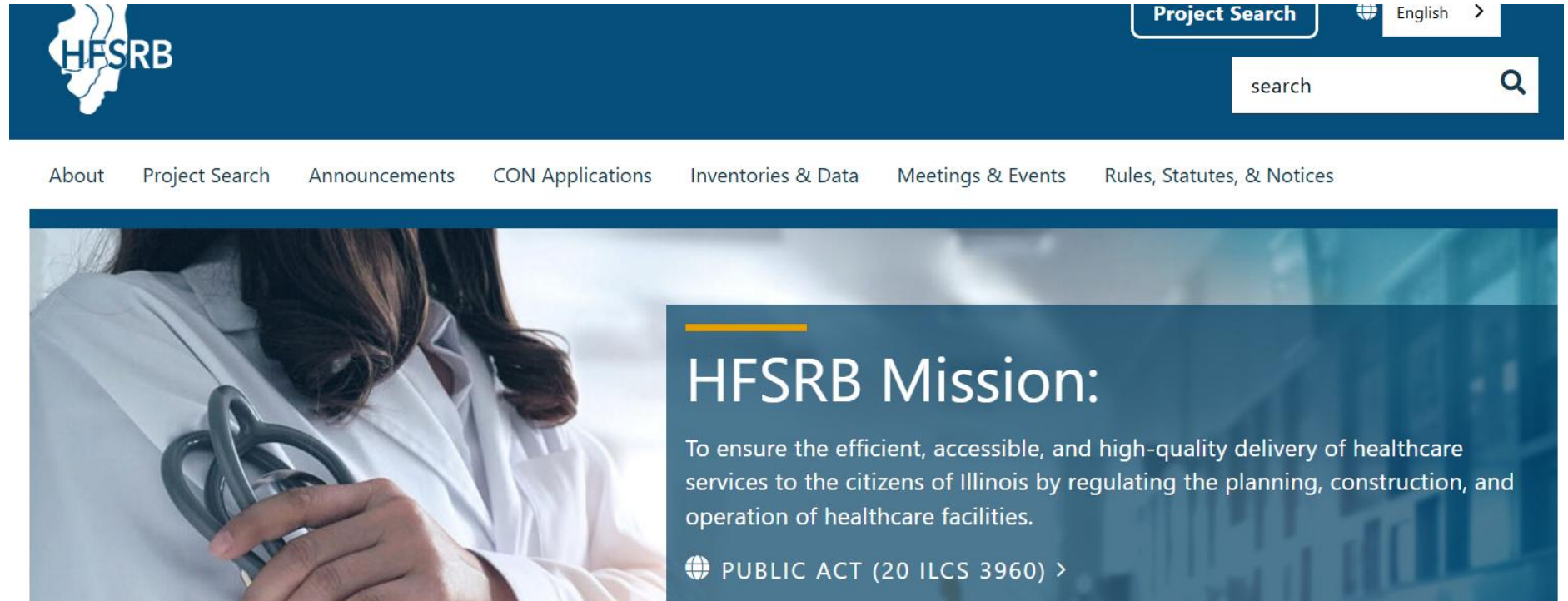
The ability to search by social security number has been removed in an effort to prevent identity theft. However, once the individual is selected you may type in their social security number and verify that it is the correct number.

If you are accessing this site to verify a health care worker for employment purposes, please print the screen with that individual’s specific information, showing that the social security number has been verified. To print the screen click on “File”, “Print” on your web browser’s menu bar. This screen print should be kept in the individual’s employment file.

Last Name: First: Middle:

<https://hcwrpub.dph.illinois.gov/Search.aspx>

Healthcare Facilities and Services Review Board



Certificate of Need (CoN) program aimed at containing health care costs, **approves or disapproves applications for construction or expansion of health care facilities** to avoid unnecessary duplication of such facilities and promotes development of facilities in areas where needed.

Seek and you shall find



Illinois Hospital Report Card and Consumer Guide to Health Care

[Hospital Report Card](#) [Community Map](#) [About](#) [Glossary](#) [Contact](#)



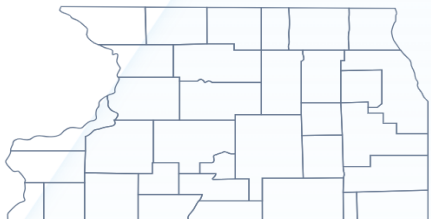
Find Your Health Care Facility

[View Illinois Revenue Data](#)

[Report Card Updates](#) July 2025 >

Consumers have a right to access information about the quality of health care provided in Illinois. This website can help you become a more informed consumer to make better health care choices. You can access information on quality and safety data, nurse staffing, patient satisfaction, and costs of services in hospitals and surgery centers.

Choose a county to view facilities



Medical Center



Voluntary non-profit - Church



Add to Facility Comparison



Export All

Overview

Patient Experience

Services

Staffing / Beds

Quality

Patient Safety

Maternal / Child



63%

Patients that would definitely recommend **Medical Center**
4% lower than the state average | [Based on a national, standardized survey of hospital patients.](#)

Patient Insurance Mix 2024

Inpatient Insurance Mix



Measure	Result
> Charity Care	0.00 %
> Medicaid	25.43 %
> Medicare	48.30 %
> Other Public Financing	0.00 %
> Private Insurance	23.55 %
> Private Pay	2.73 %

Outpatient Insurance Mix



Measure	Result
> Charity Care	0.00 %
> Medicaid	19.44 %
> Medicare	40.67 %
> Other Public Financing	0.00 %
> Private Insurance	37.03 %
> Private Pay	2.86 %

Facility Comparison / Measure Search

Your Selected Facilities

No Facilities Selected



Search for facilities

County

All

Facility Type

All

Order By

Default



Search

Median Charges: Chest Pain

Measure Search

Enter search terms here

Measure Comparison

Q4 2022 - Q3 2023

Median Charges: Chest Pain



47,377.25 dollars



29,151.01 dollars



27,774.63 dollars



26,703.00 dollars



22,750.00 dollars



18,929.86 dollars

Health Facilities Inventories and Data

This section of the Health Facilities and Services Review Board Web site contains completed inventories, surveys and other data sets. If you don't see the year or data set you need, try clicking to the next page or filtering which data sets show up. This site will be periodically updated and if you have any comments or questions, please visit our [Contact Us Page](#).



ILLINOIS
Health Facilities & Services Review Board

HOSPITAL PROFILE
2024

Hospital Name

Medicine

County, HAS designation,
License #

<https://hfsrb.illinois.gov/inventories-data.html>

Not Specified

Hospital Utilization by Category

Clinical Service	CON Auth Beds	Peak Beds Set Up	Peak Census	Admissions	Inpatient Days	Observation Days	Avg LOS	Avg Daily Census	CON Occ Rate	Staffed Bed Occupancy
Medical/Surgical	82	82	83	4,501	16,714	1,354	3.7	50	60.4%	60.4%
0-14 years	—	—	—	0	0	—	—	0	—	—
15-44 years	—	—	—	1,172	3,372	—	2.9	9	—	—
45-64 years	—	—	—	1,233	4,400	—	3.6	12	—	—
65-74 years	—	—	—	724	3,014	—	4.2	8	—	—
75 years +	—	—	—	1,372	5,928	—	4.3	16	—	—
Pediatrics	0	0	0	0	0	0	—	0	—	—
Intensive Care	12	12	12	858	2,170	9	2.5	6	49.7%	49.7%
Direct Admission	—	—	—	858	2,170	—	2.5	6	—	—
Transfers	—	—	—	0	0	—	—	0	—	—

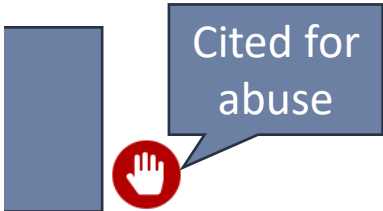
Seek and you shall find

Find & compare
provide

Quarterly Reports of Nursing Home Violators

Not sure what type of
[Learn more about the types](#)

2025



- Welcome
- Doctors & clinicians
- Hospitals
- Nursing homes including rehab services
- Home health service
- Hospice care
- Inpatient rehabilitation facilities
- Long-term care hospitals
- Dialysis facilities
- Community health centers

1st Quarter Report January-March 2025

2nd Quarter Report April-June 2025

3rd Quarter Report July-September 2025

2024

1st Quarter Report January-March 2024

2nd Quarter Report April-June 2024

based on a nursing home's performance on 3 actions, staffing, and quality measures.
[calculates this rating](#)

Quality measures

★★★★☆☆
Average

nation

[View Quality Measures](#)

Adverse Healthcare Events Reporting Law

- In 2005, IL passed a law requiring hospitals and ambulatory surgical treatment centers to report to the Illinois Department of Public Health (IDPH) information on serious adverse events based on a list adopted by the National Quality Forum (NQF)
 - Procedural events
 - Device related
 - Criminal
 - Patient Protection
 - Care Management
 - Environmental
- This law is supportive and NOT punitive, and aims to help reach quality goals
- IDPH is establishing a platform to receive these reports

Joint Commission and NQF Aligning Serious Reportable Events and Sentinel Events Lists

Published Jan 26, 2026

- The 2025 NQF list contains 28 Serious Reportable Events (SREs) of which 5 are new
 - MRI related thermal injury
 - Radiotherapy errors
 - Equipment fires during patient care
 - Neonatal harm
 - Unrecognized clinical deterioration

<https://www.qualityforum.org/en/key-initiatives/updating-the-serious-reportable-events-sre-list>



Office of Health Care Regulation (OHCR) Health Care Facilities and Programs (HCF&P) Surveillance in Illinois

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Public Service Administrator/Unit Manager –Training and Technical Division (HCF&P)

March 19, 2026

Disclaimer

Office of Health Care Regulation (OHCR) Health Care Facilities and Programs (HCF&P) Training and Technical Division

Disclaimer: This Training is provided by the Illinois Department of Public Health (IDPH), Training and Technical Division. This training is intended for the Health Care Facilities and Programs, training purposes only. This training is not an official guidance. For official policies, guidance, rules, and regulations please refer to CMS Quality and Safety Oversight (QSO) Policy Memos, State Operations Manual (SOM), CMS and/or State Laws and Regulations.

The Center for Medicare and Medicaid Services' (CMS) Quality, Certification and Oversight Reports (QCOR) page due to system migrations, CMS has not been able to update the data since May 2022. Data provided in this presentation is from the Acute and Continuing Care Survey and Certification, dashboard from the iQIES (Internet Quality Improvement and Evaluation System) portal.

Data Disclosure

Office of Health Care Regulation (OHCR)
Health Care Facilities and Programs (HCF&P)
Training and Technical Division

The Center for Medicare and Medicaid Services' (CMS) Quality, Certification and Oversight Reports (QCOR) page due to system migrations, CMS has not been able to update the data since May 2022.

Data provided in this presentation is from the Acute and Continuing Care Survey and Certification, dashboard from the iQIES (Internet Quality Improvement and Evaluation System) portal. Data reported in this presentation ranges from 01/2023 – 05/2025.

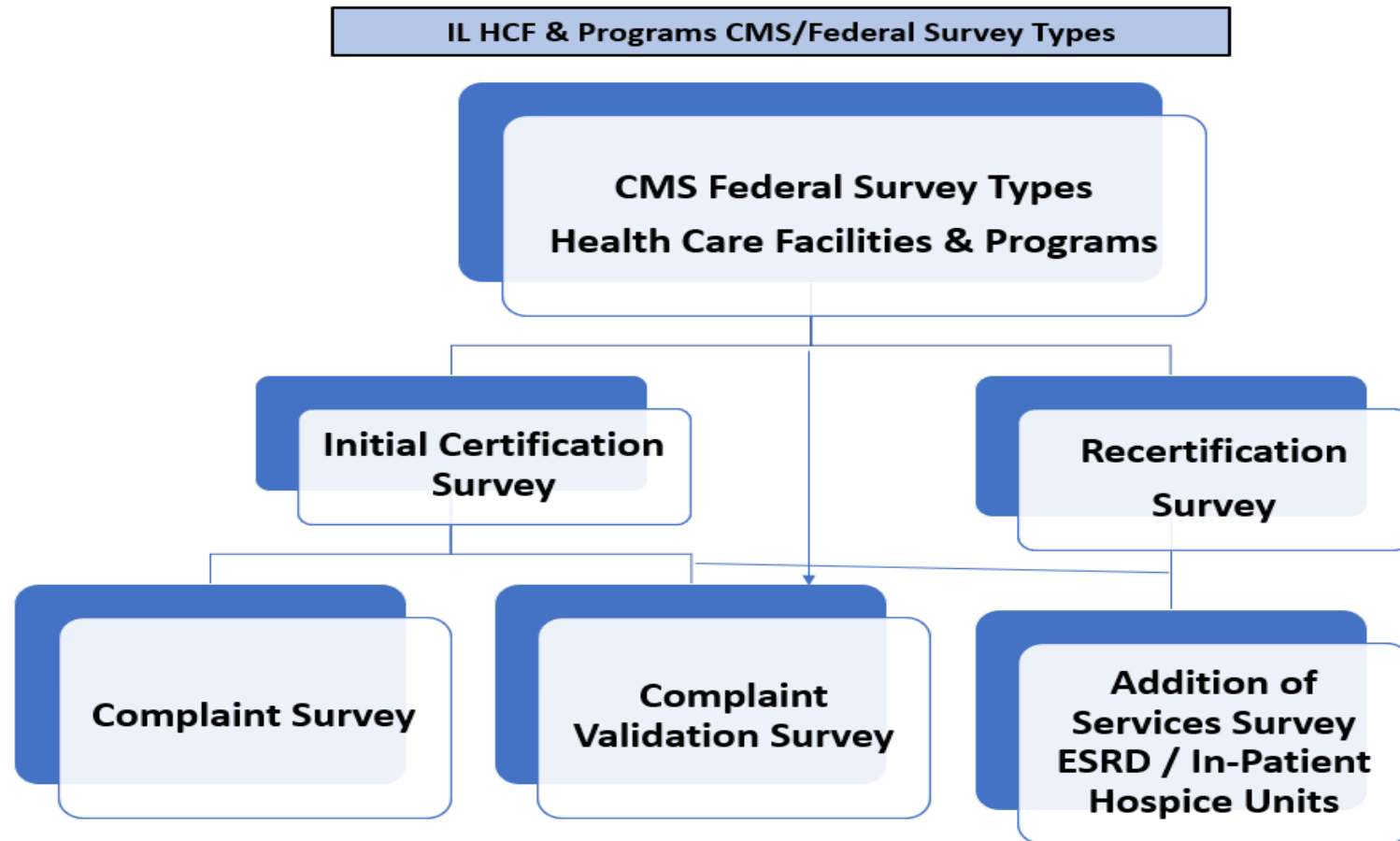
Beginning in May 2021, State Survey Agencies (SAs) and CMS locations began a phased transition to the Internet Quality Improvement and Evaluation System (iQIES), which is an internet-based system that includes survey and certification functions. iQIES consolidated and replaced functionality from the QIES, CASPER, and ASPEN legacy systems. This page will serve as a resource for SAs and CMS staff using iQIES.



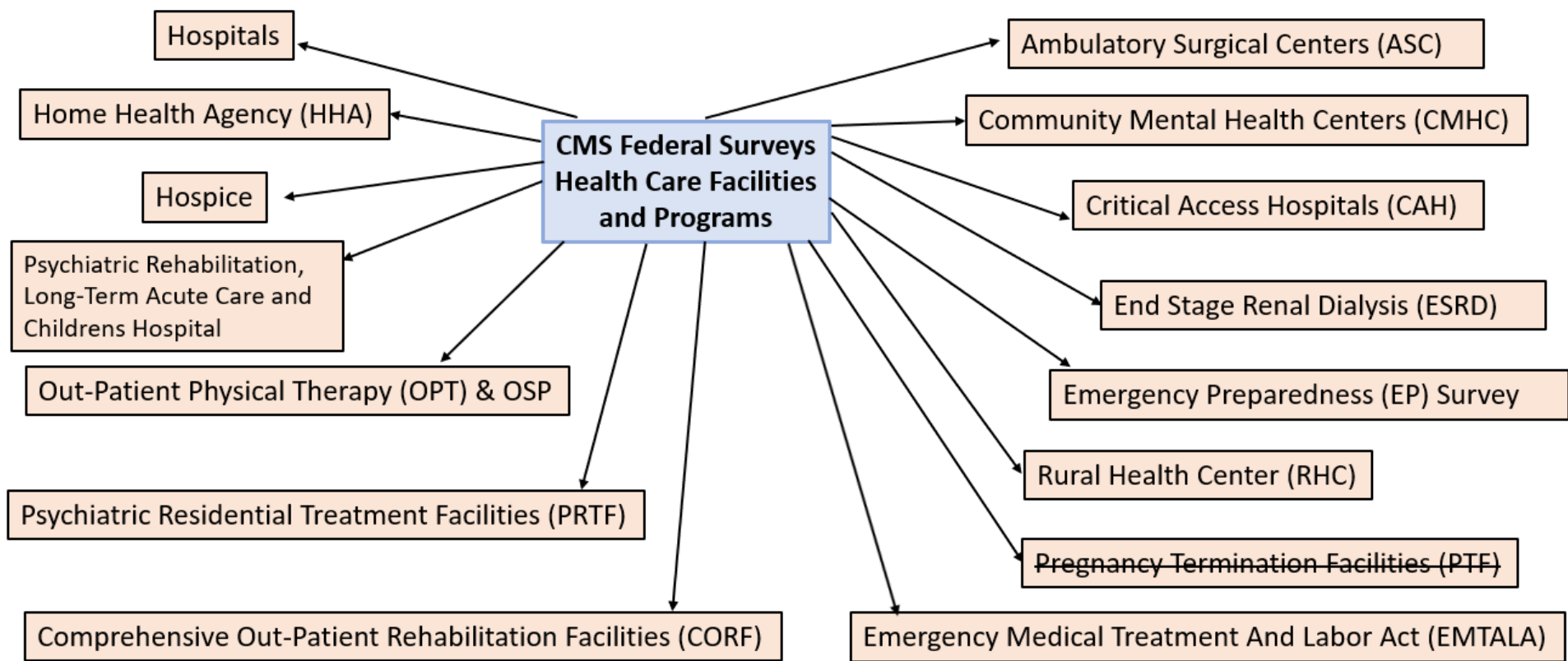
Office of Health Care Regulation

HCF & Programs Surveys

HCF & Programs CMS/Federal Survey Types



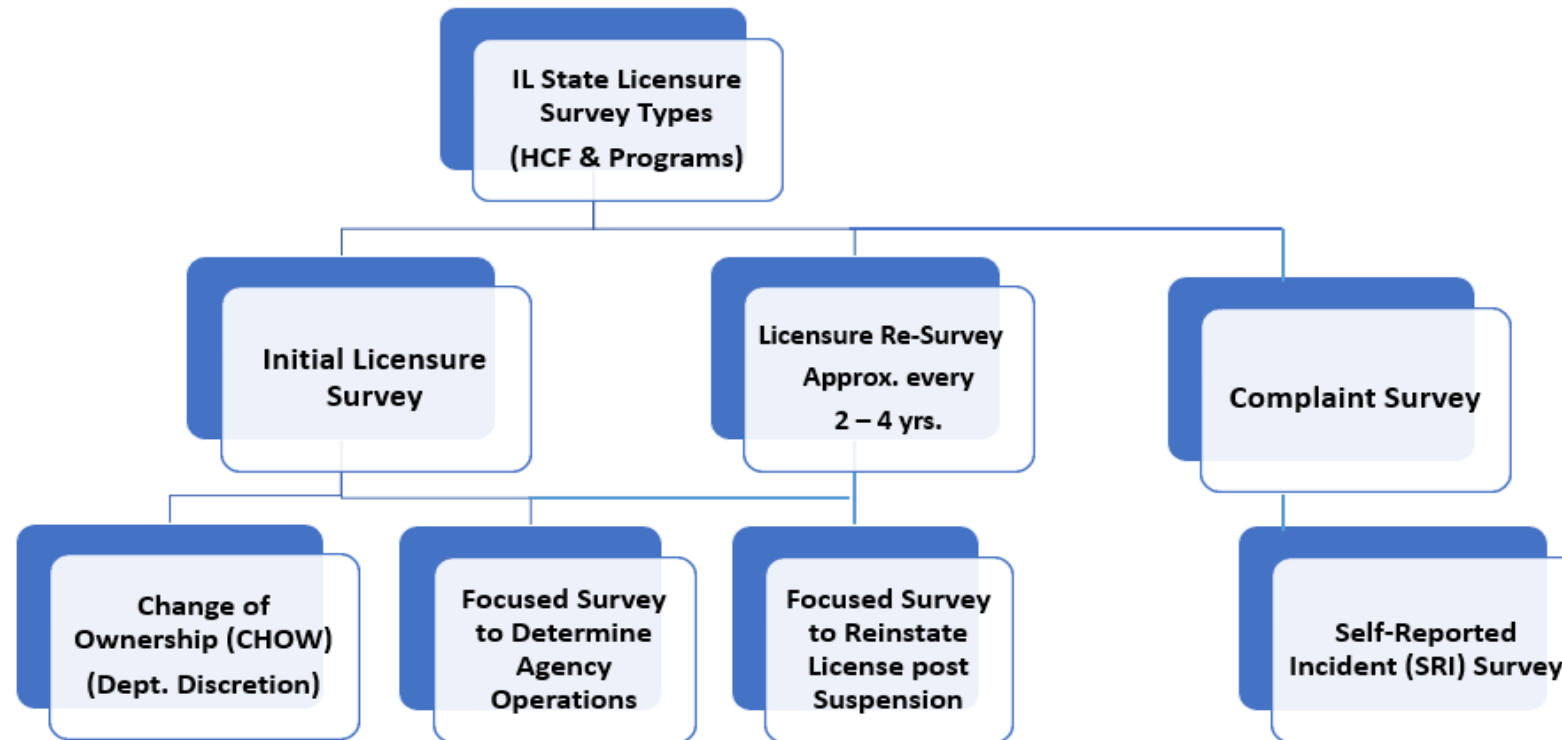
CMS/Federal Survey 14 Programs/Categories



**IL HCF & Programs CMS/Federal Survey
14 Programs/Categories**

Illinois State Survey Types

IL HCF & Programs State Survey Types



State Survey 15 Programs / Categories

State Licensure Programs/Surveys (15 Categories) (See hyperlinks to Administrative Code under references)

State Licensure Programs/Surveys

Ambulatory Surgical Treatment Center Licensure

Birthing Centers Licensure

Children's Community Based Health Care Centers

Community Based Residential Rehabilitation Center

Free Standing Emergency Centers

Home Services Licensure

Home Services Placement Licensure

State Licensure Programs/Surveys

Home Health Licensure

Home Nursing Licensure

Home Nursing Placement Licensure

Hospice Licensure

Hospice Residence Survey

Hospital Licensure

Postsurgical Recovery Care

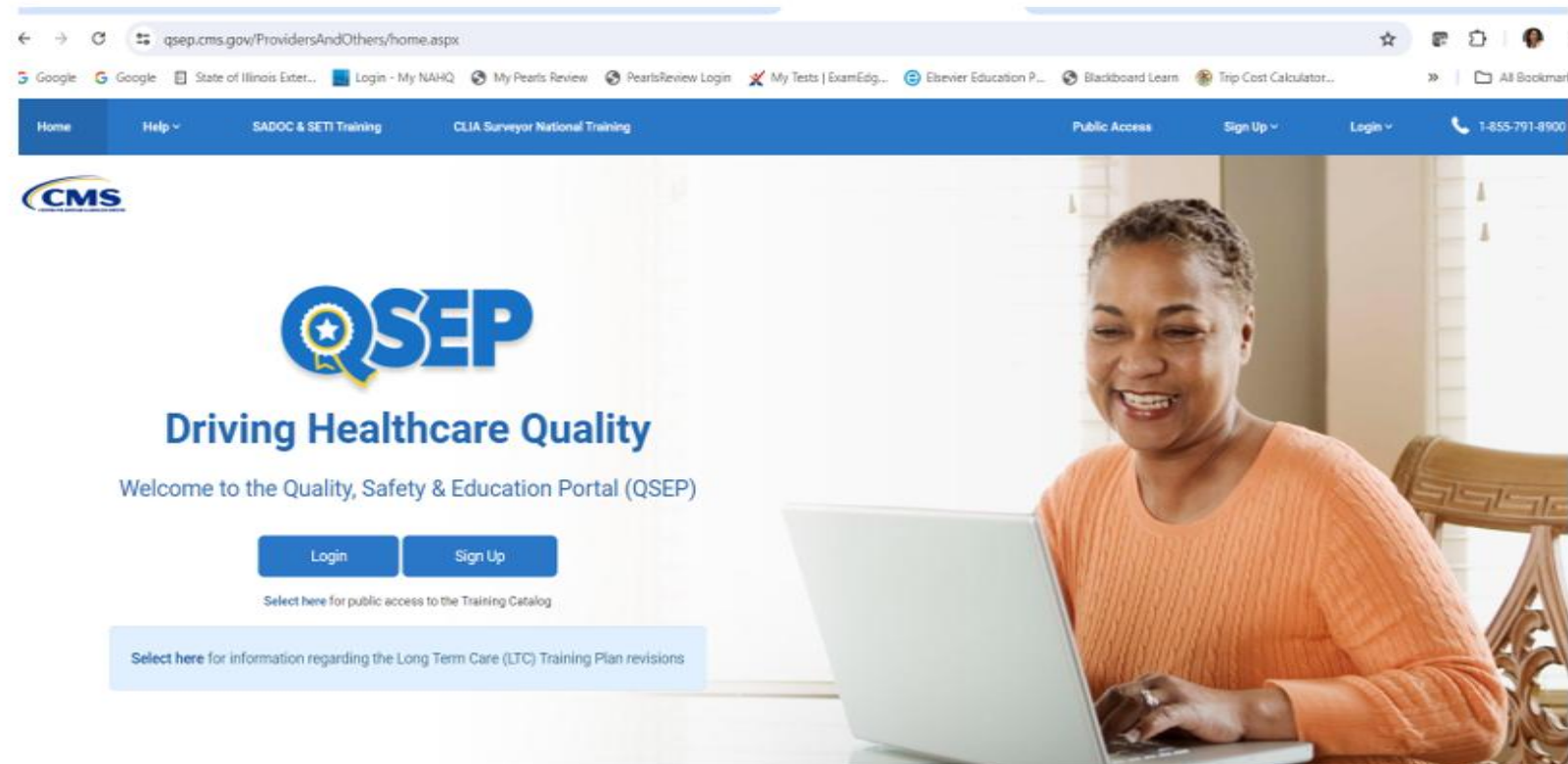
Subacute Care

Quality, Safety, and Education Portal (QSEP): Overview

Quality, Safety, and Education Portal (QSEP): Overview

(See direct link to this site under references)

State Agencies and CMS Surveyors learning site for all kinds of programs that are overseen by CMS – Medicare and Medicaid Services.



CMS.gov Policy and Memos to All States and CMS Surveyors

CMS.gov Policy and Memos to States and CMS Surveyors:

(See direct link to this site under references)

The QSO (Quality and Safety Oversight) memos helps the State Agencies and CMS surveyors to keep abreast of their knowledge regarding all the CMS rules and regulations along with any changes.

The screenshot shows the CMS.gov website. The header includes the CMS.gov logo and navigation links: About CMS, Newsroom, Data & Research, and a search icon. Below the header is a menu with links to Medicare, Medicaid/CHIP, Marketplace & Private Insurance, Priorities, and Training & Education. The breadcrumb trail indicates the current location: Home > Medicare > Health & safety standards > Quality, safety & oversight - General information > Policy & Memos to States and Regions.

The main content area is titled "Policy & Memos to States and CMS Locations" and includes a description: "CMS Quality Safety & Oversight memoranda, guidance, clarifications and instructions to State Survey Agencies and CMS Locations." Below this, there are filters for "Show Entries" (set to 10 per page) and "Filter On" (an empty search box). The page shows "Showing 1 - 10 of 656 entries".

Title ↕	Memo # ↕	Posting Date ↕	Fiscal Year ↕
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Illinois Administrative Code: Title 77: Public Health Part 250: Hospitals

ilga.gov/commission/jcar/admincode/077/07700250sections.html

Google State of Illinois Enter... Login - My NAHQ My Pearls Review PearlsReview Login My Tests | ExamEdg... Elsevier Education P... Blackboard Learn Trip Cost Calculator...

ADMINISTRATIVE CODE

TITLE 77: PUBLIC HEALTH CHAPTER I: DEPARTMENT OF PUBLIC HEALTH SUBCHAPTER b: HOSPITALS AND AMBULATORY CARE FACILITIES PART 250 HOSPITAL LICENSING REQUIREMENTS

The General Assembly's Illinois Administrative Code database includes only those rulemakings that have been permanently adopted. This menu will point out the Sections on which an emergency rule (valid for a maximum of 150 days, usually until replaced by a permanent rulemaking) exists. The emergency rulemaking is linked through the notation that follows the Section heading in the menu.

[View Entire Part](#)

SUBPART A: GENERAL PROVISIONS

- [Section 250.100 Definitions](#)
- [Section 250.105 Incorporated and Referenced Materials](#)
- [Section 250.110 Application for and Issuance of Permit to Establish a Hospital](#)
- [Section 250.120 Application for and Issuance of a License to Operate a Hospital](#)
- [Section 250.130 Administration by the Department](#)
- [Section 250.140 Hearings](#)
- [Section 250.150 Definitions \(Renumbered\)](#)
- [Section 250.160 Incorporated and Referenced Materials \(Renumbered\)](#)

SUBPART B: ADMINISTRATION AND PLANNING

- [Section 250.210 The Governing Board](#)
- [Section 250.220 Accounting](#)
- [Section 250.230 Planning](#)
- [Section 250.240 Admission and Discharge](#)
- [Section 250.245 Failure to Initiate Criminal Background Checks](#)
- [Section 250.250 Visiting Rules](#)
- [Section 250.260 Patients' Rights](#)

Medicare State Operations Manual (SOM)

Medicare State Operations Manual

Appendix



- Each Appendix is a separate file that can be accessed directly from the SOM Appendices Table of Contents, as applicable.
- The appendices are in PDF format, which is the format generally used in the IOM to display files. **Click on the corresponding letter in the “Appendix Letter” column to see any available file in PDF.**
- To return to this page after opening a PDF file on your desktop. Use the browser "back" button. This is because closing the file usually will also close most browsers

a. Access Appendices: A- Z -Opening using the hyperlink posted under references.

<https://www.cms.gov/files/document/som-appendix.pdf>

Medicare State Operations Manual (SOM)

Appendix Letter	Description
<u>A</u>	Hospitals
<u>AA</u>	Psychiatric Hospitals
<u>B</u>	Home Health Agencies
<u>C</u>	Laboratories and Laboratory Services
<u>D</u>	Portable X-Ray Service
<u>E</u>	Outpatient Physical Therapy or Speech Pathology Services-Interpretive Guidelines
<u>F</u>	<i>Community Mental Health Center (CMHC)</i>
<u>G</u>	Rural Health Clinics (RHCs)
<u>H</u>	End-Stage Renal Disease Facilities
<u>I</u>	Life Safety Code
<u>J</u>	Intermediate Care Facilities for Individuals with Intellectual Disabilities
<u>K</u>	Comprehensive Outpatient Rehabilitation Facilities

Medicare State Operations Manual (SOM)

Appendix Letter	Description
<u>L</u>	Ambulatory Surgical Services Interpretive Guidelines and Survey Procedures
<u>M</u>	Hospice
<u>N</u>	Psychiatric Residential Treatment Facilities (PRTF) Interpretive Guidance
<u>P</u>	Survey Protocol for Long-Term Care Facilities
<u>PP</u>	Interpretive Guidelines for Long-Term Care Facilities
<u>Q</u>	Determining Immediate Jeopardy
<u>R</u>	Resident Assessment Instrument for Long-Term Care Facilities
<u>S</u>	Mammography Suppliers - Deleted
<u>T</u>	Swing-Beds – <i>Deleted (See Appendix A and Appendix W)</i>
<u>U</u>	Responsibilities of Medicare Participating Religious Nonmedical Healthcare Institutions
<u>V</u>	Responsibilities of Medicare Participating Hospitals In Emergency Cases
<u>W</u>	Critical Access Hospitals (CAHs)
<u>X</u>	Survey Protocol and Interpretive Guidelines for Organ Transplant Programs
<u>Y</u>	Organ Procurement Organization (OPO)
<u>Z</u>	Emergency Preparedness for All Provider and Certified Supplier Types

Hospital CoP: Appendix A (SOM)



Hospital Conditions of Participation

42 CFR 482

State Operations Manual (SOM)

Appendix: A



CoP: 42 CFR 482 - Hospitals

Hospitals are required to be in compliance with the Federal requirements set forth in the Medicare Conditions of Participation (CoP) in order to receive Medicare/Medicaid payment.



The goal of a hospital survey is to determine if the hospital is in compliance with the CoP set forth at 42 CFR Part 482.

Hospital CoPs



42 CFR 482.11	Compliance with Federal, State, and Local Laws
42 CFR 482.12	Governing Body
42 CFR 482.13	Patient Rights
42 CFR 482.21	Quality Assurance and Performance Improvement
42 CFR 482.22	Medical Staff
42 CFR 482.23	Nursing Services
42 CFR 482.84	Medical Record Services
42 CFR 482.25	Pharmaceutical Services
42 CFR 482.26	Radiologic Services
42 CFR 482.27	Laboratory Services
42 CFR 482.28	Food and Dietetic Services
42 CFR 482.41	Physical Environment

Hospital CoPs (contd.)

42 CFR 482.42	Infection Control
42 CFR 482.43	Discharge Planning
42 CFR 482.45	Organ, Tissue, and Eye Procurement
42 CFR 482.51	Surgical Services
42 CFR 482.52	Anesthesia Services
42 CFR 482.53	Nuclear Medicine
42 CFR 482.54	Outpatient Services
42 CFR 482.55	Emergency Services
42 CFR 482.56	Rehabilitation Services
42 CFR 482.57	Respiratory Services
42 CFR 482.60	Psychiatric Hospital
42 CFR 489.20 -489.24	EMTALA

Survey Protocol Quick View

Tasks in the Survey Protocol



Task 1 – Off-Site Survey Preparation

Task 2 – Entrance Activities

Task 3 – Information Gathering/Investigation

Task 4 – Preliminary Decision Making and Analysis of Findings

Task 5 – Exit Conference

Task 6 – Post-Survey Activities

**Evidence Collection:
Observations, Document Review and Interviews**

Common CoPs in Hospitals

Common CoPs in Hospitals

42 CFR 482.12 Condition of Participation: Governing Body



There must be an effective governing body that is legally responsible for the conduct of the hospital. If a hospital does not have an organized governing body, the persons legally responsible for the conduct of the hospital must carry out the functions specified in this part that pertain to the governing body.

What are some common Conditions of Practice (CoP) reviewed in Hospitals?

42 CFR 482.13 Condition of Participation: Patient Rights

A hospital must protect and promote each patient's rights.

Common CoPs in Hospitals

42 CFR 482.22 Condition of Participation: Medical Staff



The hospital must have an organized medical staff that operates under bylaws approved by the Governing Body, and which is responsible for the quality of medical care provided to patients by the hospital.

Common CoPs in Hospitals

42 CFR 482.23 Condition of Participation: Nursing Services

The hospital must have an organized nursing service that provides 24-hour nursing services. The nursing services must be furnished or supervised by a registered nurse.



Immediate Jeopardy

What is Immediate Jeopardy?

State Operations Manual

Appendix Q – Core Guidelines for Determining Immediate Jeopardy



Immediate Jeopardy (IJ) represents a situation in which noncompliance *by providers, suppliers, or laboratories (hereinafter referred to as “entities”)* has placed the health and safety of recipients in its care at risk for serious injury, serious harm, serious impairment, or death. These situations must be accurately identified by surveyors, thoroughly investigated, and resolved by the entity as quickly as possible. In addition, noncompliance cited at IJ is the most serious deficiency type and carries the most serious sanctions for entities. An *IJ* situation is one that is clearly identifiable due to the severity of its harm or likelihood for serious harm and the immediate need for it to be corrected to avoid further or future serious harm.

Key Components of Immediate Jeopardy

The regulatory definitions noted in section II above form the basis for identifying three key components that are essential for surveyors to use in determining the presence of IJ. These components include:



- **Noncompliance:** An entity has failed to meet one or more federal health, safety, and/or quality regulations;

AND

- **Serious Adverse Outcome or Likely Serious Adverse Outcome:** As a result of the identified noncompliance, serious injury, serious harm, serious impairment or death has occurred, is occurring, or is likely to occur to one or more identified recipients at risk;

AND

- **Need for Immediate Action:** The noncompliance creates a need for immediate corrective action by the provider/supplier to prevent serious injury, serious harm, serious impairment or death from occurring or recurring.

Immediate Jeopardy Template

IJ Component	Yes/No	Preliminary fact analysis which demonstrates when key component exists.
Noncompliance: Has the entity failed to meet one or more federal health, safety, and/or quality regulations? If yes, in the blank space, identify the tag and briefly summarize the issues that lead to the determination that the entity is in noncompliance with the identified requirement. This includes the action(s), error(s), or lack of action, and the extent of the noncompliance (for example, number of cases). Use one IJ template for each tag being considered at IJ level.	Yes/No	
A		
Serious injury, serious harm, serious impairment or death: Is there evidence that a serious adverse outcome occurred, or a serious adverse outcome is likely as a result of the identified noncompliance? If Yes, in the blank space, briefly summarize the serious adverse outcome, or likely serious adverse outcome to the recipient.	Yes/No	
A		
Need for Immediate Action: Does the entity need to take immediate action to correct noncompliance that has caused or is likely to cause serious injury, serious harm, serious impairment, or death? If yes, in the blank space, briefly explain why.	Yes/No	

Disclaimer: The findings on this IJ Template are preliminary and do not represent an official finding against a Medicare provider or supplier. Form CMS-2567 is the only form that contains official survey finding.

CMS 2567 – Statement of Deficiencies

The **CMS-2567** form is the official “State of Deficiencies and Plan of Correction” document used by the State and Federal Surveyors to document non-compliance with health regulations during hospital, ASC, or clinic inspections.

The **CMS 2567** includes a regulatory tag, a narrative summary of findings that does not identify patient or employee names, and the facility’s plan for correction.

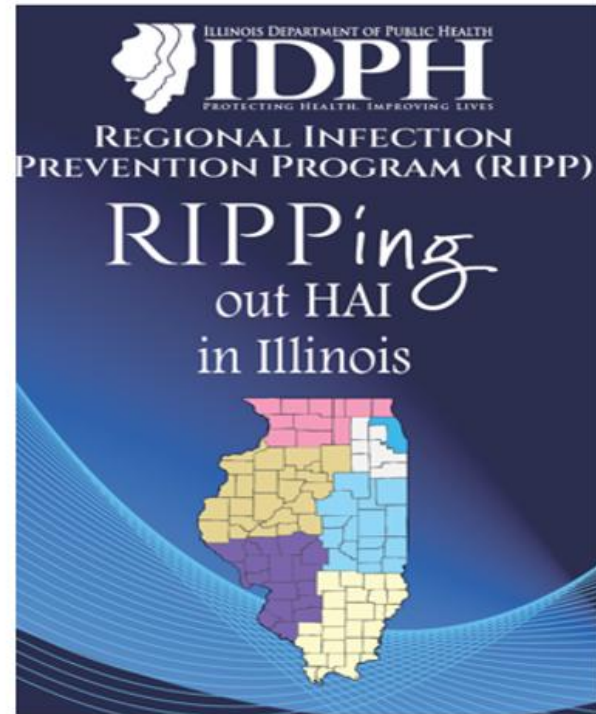
CMS 2567 – Statement of Deficiencies

DEPARTMENT OF HEALTH AND HUMAN SERVICES CENTERS FOR MEDICARE & MEDICAID SERVICES		FORM APPROVED OMB NO. 0938-0391		
STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: _____	(X2) MULTIPLE CONSTRUCTION A. BUILDING _____ B. WING _____	(X3) DATE SURVEY COMPLETED _____
NAME OF FACILITY _____		STREET ADDRESS, CITY, STATE, ZIP CODE _____		
(X4) ID PREFIX TAG	SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY SHOULD BE PRECEDED BY FULL REGULATORY OR LSC IDENTIFYING INFORMATION)	ID PREFIX TAG	PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD BE CROSS-REFERRED TO THE APPROPRIATE DEFICIENCY)	(X5) COMPLETION DATE

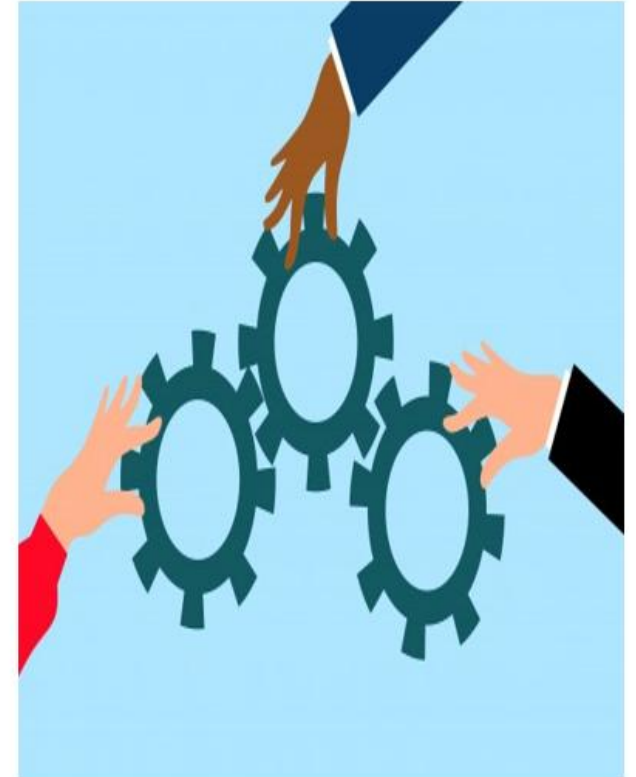
Glimpse of HCF & Programs Surveillance



HCF&P Collaboration with RIPP



**HCF & Programs
Collaboration with
RIPP and Infection
Control Medical
Providers in IDPH**



IHA Presentation

INFECTION PREVENTION AND CONTROL AND ANTIBIOTIC
STEWARDSHIP PROGRAMS FOR CRITICAL ACCESS
HOSPITALS (CODE OF FEDERAL REGULATIONS)



**HCF & Programs
TTU – Regional
Trainer presented
at the Illinois
Hospital
Association (IHA)**

April 18, 2025



IASCA Presentation



Ambulatory Surgical Center Frequent Citations ASTCs Cardiac Cath. Rules and Regulations

Somi Nagaraj, DNP, MSN, RN, CSSGB, CONTL, SMQT
Public Service Administrator/Unit Manager-Training and Technical Division

July 15, 2025

**HCF & Programs
TTU – Unit Manager
presented at the
Illinois Ambulatory
Surgical Center
Association (IASCA)**

August 21, 2025

ASC Top Ten Citations (2023 -2025)

Tag Number	Description
Q0100	Environment (Condition for Coverage)
Q0104	Safety from Fire
Q0162	Form and Content of Record
Q0180	Pharmaceutical Services
Q0181	Administration of Drugs
Q0240	Infection Control (Condition for Coverage)
Q0241	Sanitary Environment
Q0242	Infection Control Program –Selected & Implemented National Infection Control Guidelines
Q0243	Infection Control Program Direction – Qualified Professional who has training in IC.
Q0266	Discharge Order – Physician order - Signed by physician

https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap_l_ambulatory.pdf

(Please copy and paste the above hyperlink to open the SOM)

ASC Survey Citation Level Frequency

Citation Level	Percentage
Immediate Jeopardy (IJs)	1.13%
Condition Level Citations	24.66%
Standard Level Citations	74.22%

Summarized Federal Cited Tags

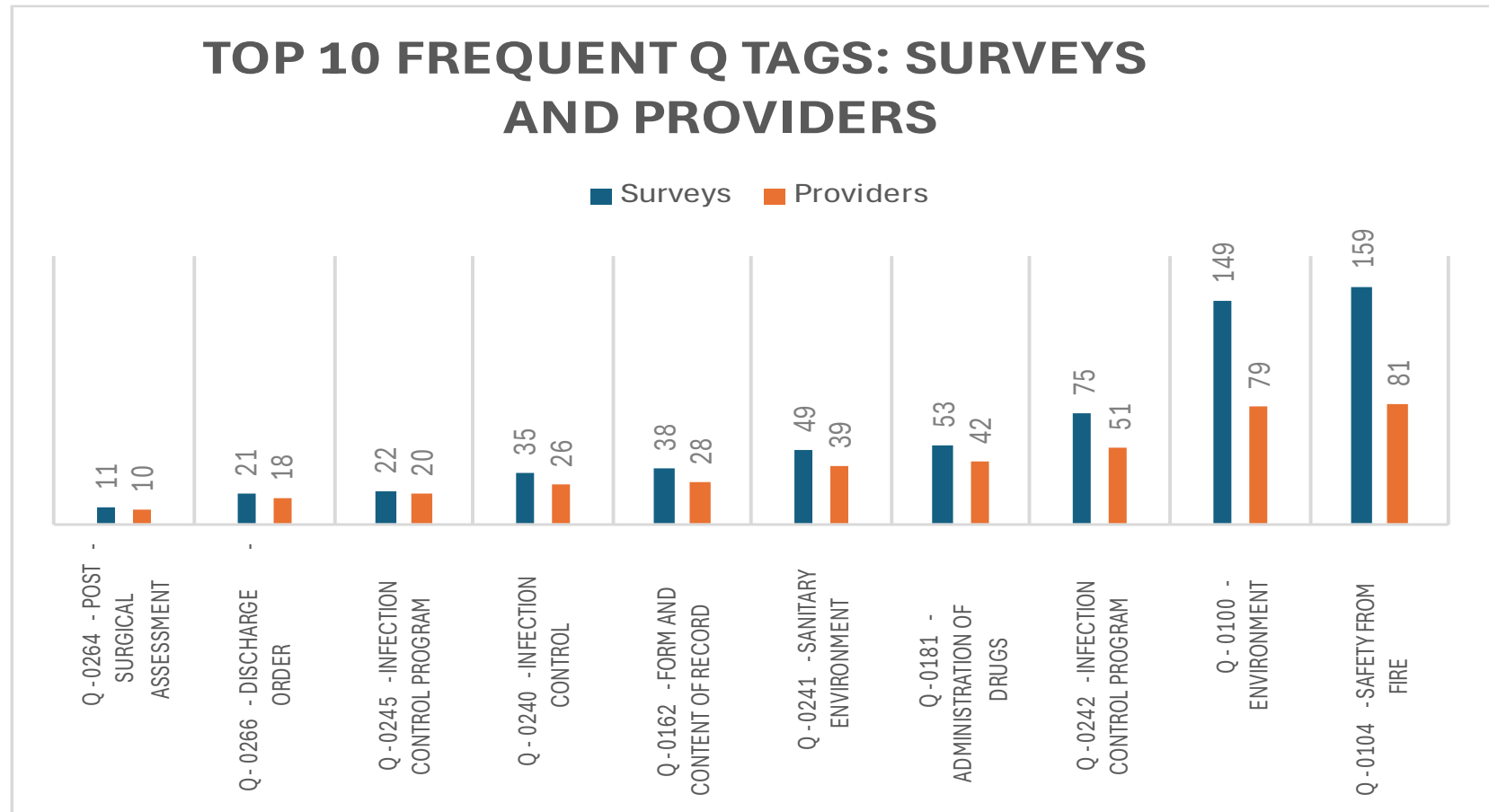
Summarized Ambulatory Surgical Center Federal Cited Specific Tags

This visual shows the distinct count of survey IDs and distinct count of providers cited for each tag.

Click the chart to filter other visuals on the tab.

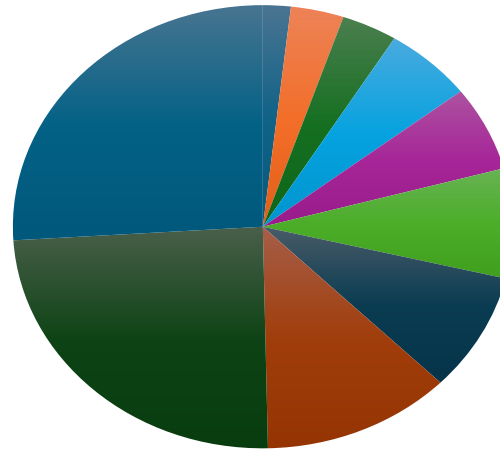
Federal Regulation Set	Distinct Count ^{Ill.} Surveys	Distinct Count Providers
Q-0104-SAFETY FROM FIRE	159	81
Q-0100-ENVIRONMENT	149	79
Q-0242-INFECTION CONTROL PROGRAM	75	51
Q-0181-ADMINISTRATION OF DRUGS	53	42
Q-0241-SANITARY ENVIRONMENT	49	39
Q-0162-FORM AND CONTENT OF ...	38	28
Q-0240-INFECTION CONTROL	35	26
Q-0245-INFECTION CONTROL PROGRAM	22	20
Q-0266-DISCHARGE - ORDER	21	18
Q-0101-PHYSICAL ENVIRONMENT	11	11
Q-0264-POST-SURGICAL ASSESSMENT	11	10
Q-0221-NOTICE OF RIGHTS	9	8
Total	199	91

Top 10 Frequent Q Tags



Top 10 - Q Tags Listings

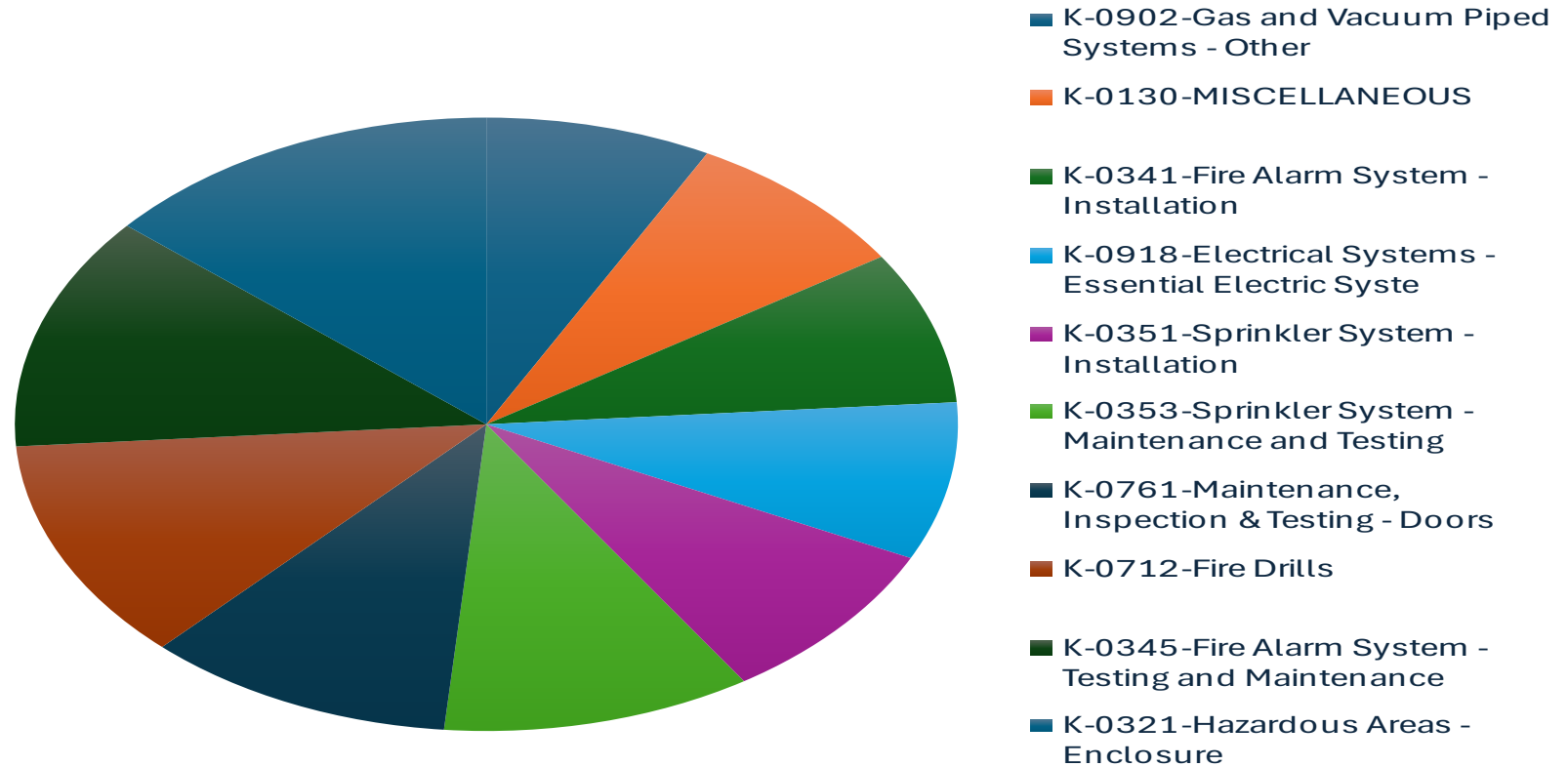
Top 10 Frequent Q Tags: Surveys



- | | |
|-------------------------------------|------------------------------------|
| ■ Q-0264-POST-SURGICAL ASSESSMENT | ■ Q-0266-DISCHARGE- ORDER |
| ■ Q-0245-INFECTION CONTROL PROGRAM | ■ Q-0240-INFECTION CONTROL |
| ■ Q-0162-FORM AND CONTENT OF RECORD | ■ Q-0241-SANITARY ENVIRONMENT |
| ■ Q-0181-ADMINISTRATION OF DRUGS | ■ Q-0242-INFECTION CONTROL PROGRAM |
| ■ Q-0100-ENVIRONMENT | ■ Q-0104-SAFETY FROM FIRE |

Top -10 –K Tag Listings

Top 10 Frequent K Tags: Surveys



Illinois Ambulatory Surgical Treatment Center (ASTC)

Rules and Regulations

**77 Illinois Administrative Code 205
Effective June 27, 2025**

**Section 205.135 Diagnostic, Therapeutic, and
Interventional Cardiac Catheterization**

Section 205.135 Diagnostic, Therapeutic, and Interventional Cardiac Catheterization

Effective June 27, 2025.

Diagnostic, therapeutic and interventional cardiac catheterization procedures included in the Center for Medicare and Medicaid Services' approved procedures list (see Section 205.115(a) (2) (C) may be performed in an ambulatory surgical treatment center in accordance with the following requirements:

- a) The procedure shall be approved by the facility's consulting committee.
- b) The procedure shall meet the general exclusion criteria for invasive cardiac procedures in setting without cardiac surgery.
- c) The facility shall only perform cardiac catheterization procedures approved for reimbursement by the Centers for Medicare and Medicaid Services for ambulatory surgical centers, including -
Percutaneous transluminal coronary angioplasty (PTCA), single coronary artery or branch; each additional branch of a major coronary artery; percutaneous transcatheter placement of intracoronary stents with coronary angioplasty, single and additional branch; percutaneous transcatheter placement of drug-eluting intracoronary stents with coronary angioplasty, single and additional branch.

Section 205.135 Diagnostic, Therapeutic, and Interventional Cardiac Catheterization (contd.)

d) The facility shall have the following **clinical staffing**:

1) A lab director who is board-certified or board-eligible in interventional cardiology, cardiology, internal medicine, pediatrics, vascular surgery, or radiology with subspecialty training in cardiology or cardiovascular radiology.

2) Physicians who are board-certified or board-eligible in interventional cardiology, cardiology, internal medicine, pediatrics, or vascular surgery.

3) If the facilities provide PCIs, physicians who perform PCI cardiac procedures in the catheterization lab must meet the following criteria, at a minimum:

- A) Have completed at least 50 PCI sessions annually during the most recent 24-month period;
- B) Have completed an interventional cardiology fellowship training program;
- C) Be board-certified or board-eligible, and must have unrestricted active current privileges in a cardiac specialty at a hospital in interventional cardiology;
- D) Have performed a total of at least 250 PCI sessions as the primary interventional cardiologist;
- E) Have a minimum of two year's experience at an attending level.

Section 205.135 Diagnostic, Therapeutic, and Interventional Cardiac Catheterization (contd.)

e) Accreditation:

- 1) Facilities shall obtain or maintain accreditation for the establishment of a cardiac catheterization category of service or when applying for a permit to modernize or to acquire new equipment for existing service.
- 2) The cardiac catheterization laboratory shall be accredited by a nationally recognized accrediting organization.

f) Quality Review and Emergency Transfer Preparedness:

1) Peer Review and Registry:

- A) The facility shall develop a protocol for adequate peer review of the service and its participation in a national registry.
- B) Peer review teams will evaluate the quality of studies and related morbidity and mortality of patients and the technical aspects of providing the services.

Section 205.135 Diagnostic, Therapeutic, and Interventional Cardiac Catheterization (contd.)

2) Emergency Transfers

- A) Facilities shall have transfer arrangements and protocols in place with a hospital located within 30 minutes by ground travel that performs cardiac surgery. The protocol shall include coordination or communication among the ambulatory facility, emergency medical services (EMS), and the receiving hospital.
- B) Emergency mock transfer drills shall be conducted a minimum of two (2) times per year and shall include the EMS provider and the receiving hospital.

Communities of Practice (CoP) & Innovation to Quality Care

Organizing Plans for Innovation To Quality Care

Forming Steering Committee



Let's Spark Innovation To Quality Care



Be Part of the Steering Committee



Long-Term Care Survey Process

Jonathan Harwood MSN, RN
Acting Bureau Chief-Long Term Care

March 19, 2026



Introduction

- Purpose of Long-Term Care CMS Survey
- Regulatory Authority
- Ensure quality of care & resident patient/safety
- Enforcement of State and Federal Regulations

Types of Surveys

- Standard (Annual) Survey
- Extended Survey
- Complaint/Incident Survey
- Revisit Survey
- Federal Oversight
- Licensure Surveys



Standard (Annual) Survey



Frequency



Unannounced



Conducted by the
State agency



Utilizes Survey
Protocol



Annual Survey- Focus Areas

Quality of Care

Resident Rights & Quality of Life

Nursing Services

Infection Prevention & Control

Dietary/Nutrition Services

Pharmaceutical Services

Abuse/Neglect/Theft

Care Planning

Annual Survey- Methods



Facility Tour



Resident/Staff Observations



Interviews



Pertinent Record Review



Quality Assurance & Performance Improvement Review

Complaint Process

- Residents, Families, Staff or Advocates
- Central Complaint Registry
- Triage Prioritization





Facility Reported Incidents

Abuse, Neglect, or Theft

Incidents and Accidents

Infection Control

Triage Prioritization Levels



Immediate
Jeopardy



Non-Immediate
Jeopardy High



Non-Immediate
Jeopardy Medium



Offsite



Referral

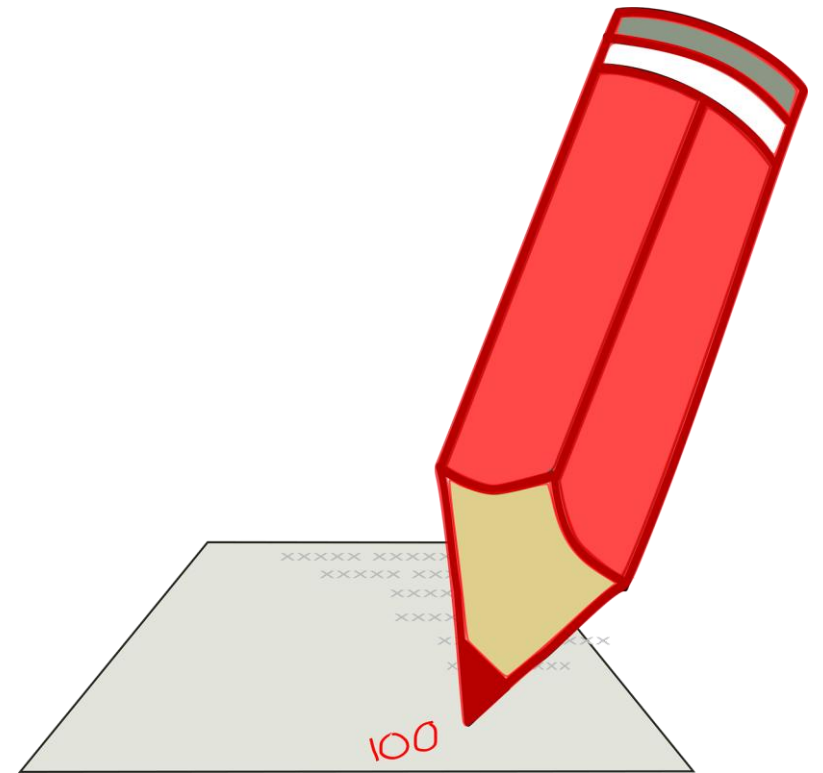
Complaint/Incident Investigations

- Focused Investigations
- Interviews
- Observations
- Relevant Record Review
- Environmental Review



Outcomes

- Compliance/Non-Compliance
- Federal deficiencies
- State deficiencies-State violations
- Plan of Correction



Revisit Survey

Follow up to
noncompliance

Onsite or
Offsite

Focused survey

Licensure Survey

- Timeframe
- Change of ownership
- Bed Change
- Special Licensure Survey



Frequently Cited Deficiencies

Free of Accidents Hazards/Supervision

Infection Prevention & Control

Abuse & Neglect

Quality of Care

Treatment/Services to Prevent/Heel Pressure Ulcer

Food Procurement/Store/Prepare/Distribute

ADL Care for Dependent Residents

Label/Store Drugs & Biologicals

Pharmacy Services

Reporting Alleged Violations

Resources

- [CMS Internet Quality Improvement and Evaluation System](#)
- [State Operations Manual - Appendix L Guidance for Surveyors: Ambulatory Surgical Centers](#)
- [IDPH Ambulatory Surgical Treatment Center Licensure](#)
- [Illinois Nursing Home Care Act](#)
- [State Administrative Code](#)
- [CMS Operations Manual](#)
- [CMS Care Compare](#)
- [Long Term Care & Licensing Certification System](#)
- [Quality, Certification & Oversight Reports \(QCOR\)](#)

Next to come in the FAST PHACTs series

- April 16, 2026: From Evidence to Action: Addressing Alcohol Use in Clinical Practice
- May 21, 2026: Chronic Diseases – Updates and Tools for Clinicians
- June 18, 2026: Infant Health updates
- July 16, 2026: Back to School Updates
- August 20, 2026: STI's and Tick Borne/Summer Preparedness
- September 17, 2026: Physician Education for End-of-Life Options Act

[Register Here](#)

Reach out to us!

**QR Code for
Contacting
IDPH
Medical
Services
Team**



Contact IDPH Medical Services Division

This form should be used for questions from health care providers to IDPH Medical Services Division regarding IDPH resources, and is not intended to provide clinical guidance.

Date Submitted

First name

Last Name

Email Address

Telephone Number

Organization:

Is this Urgent (response requested within one (1) business day)?

Route To

Area of Inquiry:
☐ Reportable Condition
☐ IDPH Resources
☐ Health Advisory
☐ Other

Inquiry Details:

Weblink:

<https://app.smartsheet.com/b/form/2ae48352ac624f95b63197b722830963>

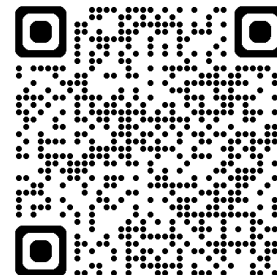




State of Illinois Rapid Electronic Notification System (SIREN)

SIREN is a secure web-based persistent messaging and alerting system that leverages email, phone, text, pagers and other messaging formats to provide 24/7/365 notification, alerting, and flow of critical information. This system provides rapid communication, alerting and confirmation between state and local agencies, public and private partners, target disciplines and authorized individuals in support of state and local emergency preparedness and response.

To sign up for Siren at <https://www.siren.illinois.gov/> or through this QR Code:



Up to one credit hour of CME credit is available. For those wishing to obtain CME credit or a certificate of participation, complete the evaluation survey and quiz at the end of this webinar utilizing the following weblink and/or QR code before March 26, 2026.

<https://forms.office.com/g/at3zNQ2Sad>



CME Available for live attendance ONLY.

For questions contact David Hale-Arroyo at David.hale-arroyo@illinois.gov

Thank you!
Questions?

