



Imagine better health.SM

***Conducting a Community Health Needs
Assessment and Developing an
Implementation Strategy for CHI
Hospitals – Part 1***

September 17, 2015

Diane Jones, Vice President, Healthy Communities

Agenda

- Welcome
- Reflection
- Overview of Objectives
- Part 1:
 - Mission and strategy context
 - Review requirements
 - Discuss CHI process for conducting a Community Health Needs Assessment
 - Questions and next steps

Reflection

"All I ask of you is this: act justly, love tenderly, and walk humbly with your God." **Micah 6:8**

Lord, as we gather virtually here today, we listen to the words of the prophet Micah calling us to action, calling us to justice. We invite you to pierce our hearts with these challenging words and let them ruminate there. For this world is hurting, and it is with our hands that you want to bring comfort. This world is wounded, and it is with our hands that you want to bring healing. This world is divided, and it is with our hands that you want to bring reconciliation. Acting justly is no small task in a world so fractured and polarized. And yet, this is what you ask of us as we come together: to act justly. Amen

Objectives

Webinar series is designed to:

- Review requirements for conducting a community health needs assessment and developing an implementation strategy
- Outline CHI process and timeline
- Determine MBO needs and next steps

Webinars Series for 2015 CHNA

- Update and Overview – August 11, 2015 – recorded
- Part 1: How to Conduct a Community Health Needs Assessment – September 17, 2015
- Part 2: What Needs to be Included in the CHNA Report – September 24, 2015
- Part 3: How to Conduct an Implementation Strategy – October 5, 2015
- Part 4: What Needs to be Included in the CHNA Implementation Strategy Document – October 20, 2015
- Part 5: Ongoing Evaluation and Reporting – November 17, 2015

Resources

Go to the following link:

<http://collab.catholichealth.net/gm/folder-1.11.1329108>

to access the following documents:

- CHA Assessing and Addressing Community Health Needs Brochure
- CHA Summary of final rule on assessments and implementation strategies
- CHNA Summary and Implementation Strategy requirements 2015
- IRS 501r Clarifications
- IRS Additional Requirements for Charitable Hospitals
- IRS Schedule H Instructions

Resources in development:

- *A Guide for Planning and Reporting Community Benefit, 2015, CHA*
- Checklist for assessment and implementation

Mission and Strategy Context

*The Mission of Catholic Health Initiatives is to nurture the healing ministry of the Church, supported by education and research. Fidelity to the Gospel urges us to emphasize human dignity and social justice as we **create healthier communities***

- Creating healthy communities is a core element of CHI's mission and vision
- Community benefit describes, documents and reports how we work to improve the health of the communities we serve

Mission and Strategy Context (Continued)

- CHI's strategic plan moves us toward managing population health
- Understanding community health needs and assets is a critical component in this evolution

Definitions *

- **Community health needs assessment** – a systematic process involving the community, to identify and analyze community health needs and assets in order to prioritize these needs, and to plan and act upon unmet community health needs.
- Differs from community needs assessments used to identify physician needs

*Catholic Health Association

Definitions * *(continued)*

- **Implementation strategy** – Hospital’s plan for addressing community health needs, including health needs identified in the community health needs assessment. *(The implementation strategy is also known as the hospital’s overall community benefit plan.)*

*Catholic Health Association

Federal Requirements -- Recap

- Hospitals must complete community health needs assessment every three years
 - Take into account input from broad base of community representatives (include individuals with expertise in public health and specified other individuals)
 - Make community needs assessment widely available to public
- Adopt implementation strategy to meet identified community health needs
- Report how hospital is addressing identified needs and description of needs not being met and why

Federal Requirements – Recap (continued)

- Assessment may rely on information collected by others and may be conducted jointly with others
- Each **hospital facility** must perform a community needs assessment and develop an implementation strategy
- Failure to meet the community needs assessment requirements of Sec. 501(r) in a particular year can result in a \$50,000 penalty, loss of exempt status or imposition of a facility level income tax
- **For CHI hospitals, assessment must be conducted and completed by June 30, 2016 – No posting of assessment until after July 1, 2016; implementation strategy completed by November 15, 2016**

Process for Conducting a CHNA

- **Step 1:** Plan and prepare for the assessment
- **Step 2:** Define the community
- **Step 3:** Identify data that describe the health and health needs of the community
- **Step 4:** Understand and interpret the data
- **Step 5:** Define and validate priorities
- **Step 6:** Document and communicate results (Webinar 2)

Process for Conducting a CHNA

Step 1: Plan and prepare for the assessment

- A. Determine who in hospital / MBO / Region will participate
 - ✓ Determine who will lead process at the Region / MBO and hospital
 - ✓ Form an internal assessment team - Engage appropriate internal departments - community benefit, strategy, tax, finance, population health management, clinically integrated networks, mission, communications, clinical areas, others as appropriate
 - ✓ Be certain everyone understands their role in the process

Process for Conducting a CHNA

Step 1: Plan and prepare for the assessment

B. Plan for community engagement

- ✓ Preference is to conduct the assessment as part of a community partnership effort
- ✓ Involve community coalition as appropriate
- ✓ Is there a community planning process already in place?
- ✓ Who was involved in the initial assessment three years ago?
- ✓ Are active community groups in place?
- ✓ Be sure to include representatives from populations that are minority and vulnerable

Process for Conducting a CHNA

Step 1: Plan and prepare for the assessment

C. Engage executive leadership and board

- ✓ Involve executive leadership from the beginning
- ✓ Implementation strategies must be adopted by “governing body authorized under state law to adopt the implementation plan”
- ✓ Within CHI, determine what governing body will adopt the implementation plan for your hospital
- ✓ Plan assessment timeline to allow for governing body adoption prior to June 30, 2016
- ✓ Determine how assessment process and progress will be reported to Board and executive leadership

Process for Conducting a CHNA

Step 1: Plan and prepare for the assessment

D. Determine the purpose of the CHNA

- ✓ Identify all of the reasons you are doing the assessment
 - **Improve community health**
 - Scope
 - Community indicators to be assessed
- ✓ Strategic and financial planning
- ✓ Related strategies
 - Nurse “magnet” status
 - Baldrige Quality Award
 - Other initiatives

Process for Conducting a CHNA

Step 1: Plan and prepare for the assessment

E. Determine how assessment will be conducted

- ✓ Ideally conduct in partnership with others in the community
- ✓ Determine if you will conduct your own assessment or collaborate with others in conducting a joint assessment
 - Local and / or state health department; other hospitals / hospital association; Federally Qualified Health Centers
- ✓ Determine if a community health needs assessment has already been conducted (health department/FQHC)
- ✓ Determine if and how you will use a consultant
 - Is this the best use of resources?
 - Screen thoroughly
 - Stay involved in the process

Process for Conducting a CHNA

Step 1: Plan and prepare for the assessment

E. Determine how assessment will be conducted (cont.)

IRS Note:

IRS regulations allow unrelated hospitals and other organizations (such as state or local public health departments) that identically define their communities to prepare a joint CHNA and a joint implementation strategy. Further, the regulations allow hospitals that have overlapping but not identical communities to jointly prepare parts of their CHNAs, and provide guidance that should be followed by such hospitals in such cases.

Review IRS 501(r) for specific instructions and guidance.

Process for Conducting a CHNA

Step 1: Plan and prepare for the assessment

F. Identify and obtain available resources

- ✓ Existing infrastructures – community and hospital planning resources
- ✓ Local colleges; universities; schools of public health
- ✓ Individuals with assessment experience
- ✓ Others already conducting assessments
- ✓ In-kind participation and support

Process for Conducting a CHNA

Step 1: Plan and prepare for the assessment

G. Develop timeline

- ✓ Allow time for:
 - Planning
 - Conducting assessment
 - Analyzing data
 - Determining priorities
 - Developing implementation strategy
 - Governing body adoption of strategy
 - Communication of assessment and implementation strategy

- ✓ Estimate 6-10 months

Process for Conducting a CHNA

Step 2: Define the community

- A. Geographic area
- B. Priority populations
- C. Range of issues
- D. May use previous needs assessment parameters and definitions or change them based on sound rationale
- E. Specialty hospitals may assess subset of population
- F. If conducting joint assessment, it is critical that all participants agree on the definition of community

Process for Conducting a CHNA

Step 2: Define the community (cont.)

- G. Should examine both health issues and risk factors
- H. Should examine social, economic, and environmental conditions that influence health (determinants) such as high unemployment rates, low graduation rates, accessibility of healthful foods, unsafe housing, presence of toxic substances

Process for Conducting a CHNA

Step 2: Define the community (cont.)

IRS Note:

In defining community IRS regulations state that the hospital may take into account all of the relevant facts and circumstances, including the geographic area served by the hospital, target population(s) served and principal function. However, a hospital may not define its community to exclude medically underserved, low-income, or minority populations who live in the geographic areas from which the hospital draws its patients (unless such populations are not part of the hospital's target patient population(s) or affected by its principal functions) or otherwise should be included based on the method the hospital uses to define its community... (cont.)

Process for Conducting a CHNA

Step 2: Define the community (cont.)

IRS Note: Cont.

....In addition, in determining its patient populations for purposes of defining its community, a hospital must take into account all patients without regard to whether (or how much) they or their insurers pay for the care received or whether they are eligible for assistance under the hospital financial assistance policy.

Review IRS 501(r) for specific instructions and guidance.

Process for Conducting a CHNA

- Step 3:** Identify data that describe the health and health needs of the community
- A. Data should be reliable and current
 - B. Use existing public health data (secondary data) and new data collection (primary data) as appropriate
 - C. Review and evaluate prior assessments and reports
 - D. Describe community demographics

Process for Conducting a CHNA

Step 3: Identify data that describe the health and health needs of the community (cont.)

E. Select indicators: varies but should include the following:

- ✓ Demographics and socio-economic status
- ✓ Access to health care
- ✓ Health status of overall population and priority populations
- ✓ Risk factor behaviors and conditions related to top 10 causes of death
- ✓ Child health
- ✓ Infectious diseases
- ✓ Social environment
- ✓ Natural environment
- ✓ Resources/assets

Process for Conducting a CHNA

Step 3: Identify data that describe the health and health needs of the community (cont.)

E. Select indicators: Consider the following:

- ✓ Standards and benchmarks
- ✓ Organizational needs and priorities
- ✓ Quality and usability of data indicators

Process for Conducting a CHNA

Step 3: Identify data that describe the health and health needs of the community (cont.)

F. Identify relevant secondary data

- ✓ National level data
- ✓ State level data
 - State health data
 - State vital records
- ✓ County and local level data
- ✓ Hospital data and information

Process for Conducting a CHNA

Step 3: Identify data that describe the health and health needs of the community (cont.)

G. Collect primary data through community and public health input and feedback

- ✓ Surveys
- ✓ Questionnaires
- ✓ Interviews
- ✓ Community Forums
- ✓ Focus Groups

Process for Conducting a CHNA

Step 3: Identify data that describe the health and health needs of the community (cont.)

G. Collect primary data through community and public health input and feedback (cont.) - IRS REQUIRED INPUT:

- ✓ At least one state, local, tribal or regional governmental public health department (or equivalent agency) representative with knowledge, information or expertise relevant to the health needs of the community
- ✓ Members of medically underserved, low-income and minority populations, or organizations or individuals representing the interests of such populations

Process for Conducting a CHNA

Step 3: Identify data that describe the health and health needs of the community (cont.)

- G.** Collect primary data through community and public health input and feedback: IRS REQUIRED INPUT (cont.):
 - ✓ **Written comments received on the hospital's most recently conducted CHNA and most recently adopted implementation strategy**

Process for Conducting a CHNA

Step 3: Identify data that describe the health and health needs of the community (cont.)

G. Collect primary data through community and public health input and feedback (cont.) - IRS GUIDANCE:

- ✓ “Hospital may solicit and take into account input received from a broad range of persons located in or serving its community, including, but not limited to health care consumers and consumer advocates, nonprofit and community based organizations, academic experts, local government officials, local school districts, health care providers and community health centers, health insurance and managed care organizations, private businesses, and labor and workforce representatives.”

Process for Conducting a CHNA

Step 3: Identify data that describe the health and health needs of the community (cont.)

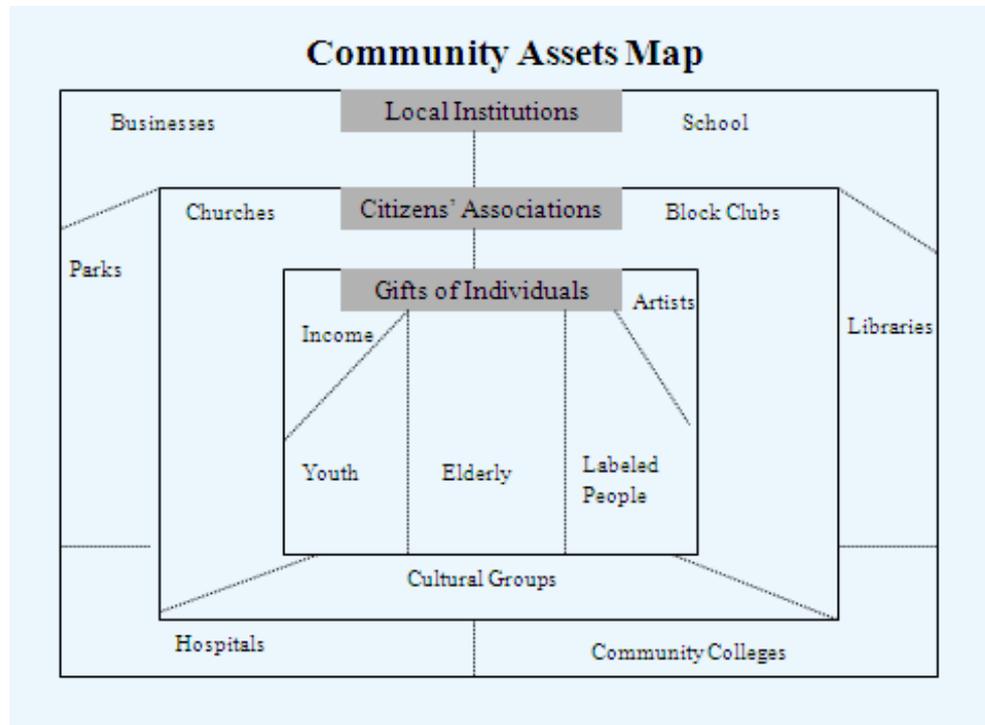
G. Collect primary data through community and public health input and feedback (cont.)

- ✓ **For CHI hospitals include input regarding community violence and input from Area Agencies on Aging or similar organizations / individuals representing senior populations**

Process for Conducting a CHNA

Step 3: Identify data that describe the health and health needs of the community (cont.)

H. Identify community assets and resources



Process for Conducting a CHNA

Step 3: Identify data that describe the health and health needs of the community (cont.)

Final IRS regulations require that the written CHNA report contain an evaluation of the impact of any actions that were taken since the hospital facility finished conducting its immediately preceding CHNA to address the significant health needs identified in the hospital's prior CHNA(s). This evaluation should be conducted as part of the assessment.

Process for Conducting a CHNA

Step 4: Understand and Interpret the Data

A. Analyze and interpret the indicator data

- ✓ Comparisons - How does your community compare to other communities in the state/ U.S.?
- ✓ Trends – Is the indicator increasing, decreasing or remaining the same over time?
- ✓ Benchmarks – Does the community meet benchmarks?
Indicators in which the community fails to meet benchmarks may indicate needs

Process for Conducting a CHNA

Step 4: Understand and Interpret the Data

B. Identify disparities

- ✓ When available, data grouped by demographics such as race, income and age should be evaluated to identify disparities.
- ✓ Consider possible disparities among both geographic areas and subpopulations

Process for Conducting a CHNA

Step 4: Understand and Interpret the Data

C. Identify and understand causal factors

- ✓ Consider societal and physical environmental factors that may be influencing the observed need
- ✓ Will help to identify opportunities for improvement

Process for Conducting a CHNA

Step 4: Understand and Interpret the Data

D. Identify major community health needs

- ✓ Summarize the most severe and important needs facing community
- ✓ Select a manageable number of the most important needs (recommended practice – three to ten [CHA])
- ✓ Document major needs in a data summary
- ✓ May be refined at priority setting stage

Process for Conducting a CHNA

Step 4: Understand and Interpret the Data

D. Identify major community health needs (cont.)

IRS Note:

IRS regulations state that health needs include the requisites for the improvement or maintenance of health status both in the community at large and in particular parts of the community (such as neighborhood or populations experiencing health disparities). The regulations also note that these needs may include the need to address financial and other barriers to accessing care, to prevent illness, to ensure adequate nutrition, or to address social, behavioral and environmental factors that influence health in the community.

Review IRS 501(r) for specific instructions and guidance.

Process for Conducting a CHNA

Step 5: Define and Validate Priorities

- Hospital (and its partners) will not be able to address all identified needs
- Identify and prioritize:
 - Needs hospital will address itself
 - Needs hospital will address with others
 - Needs hospital will refer to others
- Recommended practice – identify three to ten priorities (CHA)

Process for Conducting a CHNA

Step 5: Define and Validate Priorities

A. Determine who will be involved in setting of priorities

- ✓ Hospital assessment team – include all key disciplines
- ✓ Identify key partners to participate in priority setting
 - Public health officials
 - Other service providers
 - Community leaders
- ✓ Share with executive leadership for validation and consensus
- ✓ Should be shared with community for validation and consensus

Process for Conducting a CHNA

Step 5: Define and Validate Priorities

A. Determine who will be involved in setting of priorities

IRS Note:

IRS regulations state that input from persons representing the broad interests of the community should be taken into account in prioritizing significant health needs and identifying resources potentially available to address those health needs.

Review IRS 501(r) for specific instructions and guidance.

Process for Conducting a CHNA

Step 5: Define and Validate Priorities

B. Establish criteria for priority setting (continued)

- ✓ Examples of criteria that can be used include:
 - Magnitude – number of people impacted by the problem
 - Severity – risk of morbidity and mortality associated with the problem
 - Historical trends
 - Alignment of the problem with organization’s strengths and priorities
 - Impact of the problem on vulnerable populations
 - Importance of the problem to the community
 - Existing resources addressing the problem
 - Relationship of the problem to other community issues
 - Feasibility of change, availability of tested approaches
 - Value of immediate intervention vs. any delay, especially for long-term or complex threats

Process for Conducting a CHNA

Step 5: Define and Validate Priorities

B. Establish criteria for priority setting

IRS Note:

IRS regulations state that documentation of the CHNA should include a prioritized description of the significant health needs of the community identified through the CHNA, along with a description of the process and criteria used in identifying and prioritizing those significant health needs.

Review IRS 501(r) for specific instructions and guidance.

Process for Conducting a CHNA

Step 5: Define and Validate Priorities

C. Identify priorities

- ✓ Multiple methods
 - Ranking – numerical score based on criteria
 - Discussion and debate – reach consensus
- ✓ Prioritization process should be transparent

Process for Conducting a CHNA

Step 5: Define and Validate Priorities

D. Validate priorities

- ✓ Confirming that the need identified is the need that should be addressed
- ✓ Describe process used for priority setting and present conclusions to hospital executives, key stakeholders, individuals with expertise in public health to confirm that the correct prioritizations decisions were made

Process for Conducting a CHNA

Step 5: Define and Validate Priorities

D. Validate priorities (continued)

- ✓ Reconciling priorities
 - Conflicting needs – neutral facilitator may help
 - Options – Address community concern first, build trust; conduct educational campaign to raise awareness of priority needs; address both needs if clearly identified
- ✓ Final list of validated priorities will serve as input to the implementation strategy

Process for Conducting a CHNA

Step 6: Document and Communicate Results

Webinar 2 – September 24, 2015

Feedback and Discussion

What do you need?

Questions and concerns?

Suggestions and recommendations?





Imagine better health.SM

Thank You !

