RECOMMENDATIONS to STRENGTHEN HB 2115

March 6, 2017

The following recommendations from the Community Benefits Team¹ of Mid-Valley Health Care Advocates are based on investigation of financial policies and procedures of various non-profit hospitals in Oregon, other states and assessment of these policies and procedures, and Hallmarks for Assessing A Solid Program for Community Benefits, prepared by professional staff from Community Catalyst² and Catholic Health Association³.

The intent of our recommendations is to achieve better transparency and public participation not only in the reporting but also in the planning of community benefit activity.

Our primary focus has been to identify and recommend significant improvements in Community Benefits Programs in Oregon and particularly in Samaritan Health Services hospitals in Linn, Benton and Lincoln counties. These improvements would include, but not limited to:

- achieve optimum use of community benefit funds to address unmet community needs,
- improve population health,
- actively engage community members in evaluating, planning and determining priorities and evaluating plans.

RECOMMENDATIONS:

1. Non-profit hospitals are required to develop annual community benefit plans. The plan must be developed with broad community participation including county and regional public health departments.

Recommendations regarding the selection and composition of the hospital community benefits board will be provided pending further investigation.

The non-profit hospital Community Benefit Plan must be an operational plan to serve the community's health needs as determined by a community health needs assessment and must consider social determinants of health. The Community Benefit Plan will include one, two and three year goals with measurable objectives, a budget for implementing the plan and mechanisms to evaluate the plan's effectiveness.

- 2. In an effort to expand focus on prevention and social determinants of health and engage communities more actively in evaluating, planning and determining priorities, Oregon non-profit hospitals shall be required to include the following in their annual reports to the Oregon Health Authority:
 - a. Unmet needs identified in most recent needs assessment and the hospital's priorities.
 - b. Community groups including county and regional public health departments which were involved in needs identification and prioritization.

- c. Community Benefit initiatives implemented in previous year and evaluation of outcomes in comparison to objectives.
- d. Unmet needs which were not addressed and reasons therefore.
- e. How Community Benefit initiatives addressed social determinants of health.
- 3. Oregon Health Authority shall compile above information annually and distribute it to Oregon legislators and various pertinent parties statewide. OHA shall also post the report on its website. Hospitals shall make their Community Benefit annual report readily available throughout the community and post it on their websites.
- 4. In order to achieve greater accountability and ensure that the local community can be confident that the hospital's community benefit offering is commensurate with its tax exemption privilege, Oregon non-profit hospitals will report annually the value of its community benefits program in comparison to its tax exemption. The report will be distributed to Oregon legislators and made publicly available for wide distribution.
- 5. The determination of unreimbursed hospital costs shall not include Medicaid, Medicare, State Children's Health Insurance Program or other publicly funded health care program shortfalls.
- 6. The non-profit hospital shall report how the hospital determines community benefits, profits, surplus and its tax liability. The report will include Form 990 and Schedule H reports. To foster public confidence and involvement the report will be written in a high-school reading level format.
 - Members of the MVHCA Community Benefits Team include: Richard Knowles, Michael Huntington MD, Gary Lahman, Linda Modrell, Nadine Sandbo, Betty Johnson, Bruce Thomson MD, Joe Zaerr, residents of Linn, Benton and Lincoln counties.
 - 2. Community Catalyst is a national non-profit advocacy organization working to build the consumer and community leadership that is required to transform the American health system. (goo.gl/WVoqUk)
 - 3. Catholic Health Association has for 20 years researched the community benefit field, helping not-for-profit health care organizations fulfill their community benefit. (goo.gl/DLhoAO)