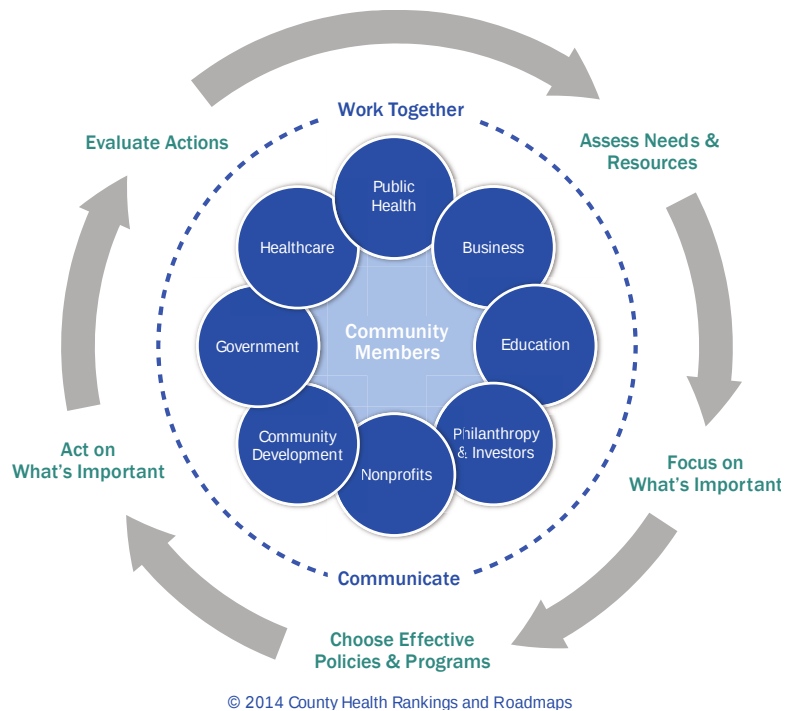


Not-for-Profit Hospital and Wisconsin Public Health Department Requirements for Community Health Improvement Plans and Processes



Both hospitals and health departments in Wisconsin are required to be actively involved in community health improvement processes. While the required activities are very similar, there are some differences. This document outlines the key points in what is required by each type of organization. The table below is organized around a standard model for community health improvement (left) that includes the continuous cycle of: assess needs and resources; focus on what's important; choose effective policies and programs; act on what's important; and evaluate actions. Those steps are accompanied by the ongoing activities of working together and communicating.

Sources for the information provided below are listed at the end of this document. *Note: The information in this document is provided as a general guide and does not guarantee compliance with IRS, Public Health Accreditation Board (PHAB) and Wisconsin state statutes. The document has been reviewed by subject matter experts. However, to assure compliance, please check with the appropriate entities and authorities. Of note, the project is currently seeking PHAB review for compliance with PHAB Standards 1.5.*

Stage/Activity	Hospital Requirements (Per the Affordable Care Act & IRS Rule)	Public Health Requirements: Wisconsin Statute & National Voluntary Accreditation (Public Health Accreditation Board, PHAB)
Assess	Conduct a community health needs assessment at least once every three years. The assessment must: 1. Define the community it serves; 2. Assess the significant health needs of the community; 3. Look at the needs of the community at large and the needs of particular parts of the community (ex: populations experiencing disparities); 4. Identify potential resources and measures available to address the health needs. 5. Include an evaluation of the impact of any actions that were taken to address significant health needs since the previous assessment. Assessment must solicit and take into account input from persons representing the broad interests of the community including: • At least one public health department • Members of the medically underserved, low-income, and minority populations; or individuals or organizations serving or representing those populations • Any written comments received on the most recently conducted CHNA and Implementation Strategy. Note: Significant health needs can include: prevention of illness, ensuring adequate nutrition, addressing social, behavioral and environmental factors, and access to care.	Statute: • Must regularly and systematically collect, assemble, analyze and make available information on the health of the community, including statistics on health status, community health needs and epidemiologic and other studies of health problems. • Involve key policymakers and the general public in determining and developing a community health improvement plan that includes actions to implement the services and functions specified. PHAB: • Every five years, conduct a community health assessment. • Engage with the community (including the public health system and the broader community) to identify and address the health problems; use a collaborative process. • Review data from a variety of primary and secondary sources. Primary data would be gathered by the hosting entity. • Assess health issues of population groups with particular health issues, including the uninsured/low-income and minority populations. • Include assessment data about the prevailing health of the population, demographics, causes of health issues, health inequities, and assets and resources available. • Include the contributing causes of community health issues (including behavioral risk factors, environmental, socio-economic factors, and health status disparities, health equity and high health risk populations. • Develop community health data profiles to support public health improvement planning processes at the local level. • Review data and information from the state health assessment. • Identify issues and themes identified by the stakeholders and the community. • Show that the preliminary findings of the assessment were distributed to the community (including the public health system partners, community groups and key stakeholders and the general public) and that the community's input was sought.

Prioritize	Must identify the significant health needs of the community and prioritize those needs. Musts solicit and take into account input in setting priorities (from the same individuals listed in “Assess” above.) May use any criteria to prioritize the significant health needs. (This may include but is not limited to: the burden, scope, severity, or urgency of the health need; the estimated feasibility and effectiveness of possible interventions; the health disparities associated with the need; or the importance the community places on addressing the need.)	PHAB: • Engage with the community (including the public health system and the broader community) to identify and address the health problems; use a collaborative process. • Describe the process to set community health priorities. • Promote the community’s understanding of and support for policies and strategies that will improve the public’s health. • Identify an established set of priority community health issues with a particular focus on the social determinants of health and health inequities in the community. • Provide a list of prioritized issues and themes identified by stakeholders during the community health improvement planning process. • Data and information from the community health assessment must be provided to participants in the improvement planning process to use in their deliberations. • Seek input from the community at large on the preliminary results of the assessment and chosen priorities. • Assure distribution of the Community Health Assessment to public health system partners, community groups and key stakeholders such as governing entities or groups; and to the public in the jurisdiction at large.
Plan	Must adopt an implementation strategy at least once every three years. This is a written plan to address the significant health needs identified in the assessment. Plan must: • Describe how the hospital plans to address the health need (or identify the health need as one the hospital does not intend to address and explain why). • Describe the actions the hospital intends to take to address the health need • Describe the anticipated impact of these actions • Identify the programs and resources the hospital plans to commit to address the health need. • Describe any planned collaboration between the hospital and other organizations in addressing the health need.	State Statute/Rule: Must Involve key policymakers and the general public in determining and developing a community health improvement plan that includes actions to implement the services and functions specified under s 250.03(1)(L) PHAB: Produce a community health improvement plan as a result of the community health improvement process. Plan must include: • Assessment data about the prevailing health of the population. • Community health priorities, objectives, improvement strategies and performance measures with measurable and time-framed targets. • Policy changes needed to accomplish health objectives. • Individuals and organizations who have accepted responsibility for implementing strategies. • Measurable health outcomes or indicators to monitor progress. • Alignment between the local plan and state and national priorities. • Evidence-based strategies or promising practices. • Specified instructions or timelines for evaluation of the plan.

Implement	• Must execute the implementation strategy. • May be executed by participation in the execution of a community-wide plan. • Must provide an annual update on how the hospital is addressing the needs identified in the Implementation Strategy.	State Statute/Rule: • Involve key policymakers and the general public in determining and developing a community health improvement plan that includes actions to implement the services and functions specified under s. 250.03(1)(L). [251.05 (3)(c)] • Develop and deliver services to reduce the incidence or prevalence of the chronic diseases or injuries that are the leading causes of disability and premature death in the jurisdiction of the local health department, the chronic diseases or injuries for which resources are available to the local health department from the department or the chronic diseases or injuries identified through a community needs assessment under s. 251.04(6)(a), Stats., as priority public health problems, or by the regular and systematic collection of information on the health of the community as required under s. 251.05(3)(a), Stats. [DHS 140.04(1)(c)] • Provide an annual report on the activities of the local health department for the preceding calendar year, including a narrative which describes the progress and performance toward achieving the objectives that the local health department has identified as part of its community health assessment process. [DHS 140.04(3)(c)] PHAB: • Implement elements and strategies of the community health improvement plan, in partnership with others. • Health improvement plans must include: community health priorities, measurable objectives, improvement strategies and performance measures with measurable and time-framed targets, individuals and organizations who have accepted responsibility for implementing strategies, measurable health outcomes or indicators, and alignment between the community's plan and that state and national priorities. Strategies must be evidence-based or promising practices. [5.2.2L 1a or 5.2.2T 1a] Policy changes needed to achieve the objectives must be included. 5.2.2L 1b or 5.2.2T 1b]
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Evaluate	Implementation Strategy must describe the anticipated impact of the hospitals planned actions to address the health need CHNA must include an evaluation of the impact of any actions that were taken to address the significant health needs since the previous assessment.	State Statute/Rule: Must submit an annual report describing the progress and performance toward achieving the objectives that the local health department has identified as part of its community health assessment. PHAB: Monitor progress in collaboration with broad participation from stakeholders and partners. Monitor progress on strategies and health improvement in order to revise the Community Health Improvement Plan as needed, including: • Monitoring performance measures • Reporting on progress related to health improvement indicators. • Revised CHIP based on the evaluation results.
Collaborate	Must solicit and take into account input from: • At least one public health department; • Medically underserved, low-income and minority populations. May collaborate on implementation with related organizations, other hospitals and public health. If do collaborate, must describe the planned collaboration in addressing the health need. May develop a joint implementation strategy, provided: • It is clearly identified as applying to the hospital facility; • It clearly identifies the hospital facility's particular role and responsibilities in taking the actions described in the implementation strategy and the programs and resources the hospital facility plans to commit to such actions; and • It includes a summary or other tool that helps the reader easily locate those portions of the joint implementation strategy that relate to the particular hospital.	State Statute/Rule: Involve key policymakers and the general public in determining and developing a community health improvement plan. PHAB: • Assure participation of partners outside the health department that represent Tribal/community populations as well as the community at large. • Document regular meetings of these partners to review new data, consider changing assets/resources, and conduct additional data analysis.

Communicate	Must create a CHNA report which must be made widely available to the public (i.e. post on hospital website). Report should include: • Definition of the community served by the hospital and how that was determined • Description of the process and methods used to conduct the CHNA • Description of how hospital took into account input from persons who represent the broad interests of the community • A prioritized description of the significant health needs identified • A description of the process and criteria used in identifying certain health needs as significant and prioritizing such needs • A description of the potential measures and resources identified to address the significant health needs.	State Administrative Rule: Annual report on the progress and performance toward achieving the objectives identified as part of the community health assessment process. PHAB: • Assure distribution of the community health assessment to public health system partners, community groups, and key stakeholders such as governing entities or groups. • Assure availability to the public in the jurisdiction at large. • Distribute community health data profiles to support public health improvement planning process at the local level. <i>(Note: The community health data profile is a concise document designed for distribution; the complete data profile may be much longer.)</i>
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Sources:

Affordable Care Act (ACA)

<http://www.gpo.gov/fdsys/pkg/PLAW-111publ148/pdf/PLAW-111publ148.pdf>

IRS Proposed Rule April 2013

<http://www.irs.gov/PUP/newsroom/REG-106499-12.pdf>

IRS Rule December 2014

<http://www.gpo.gov/fdsys/pkg/FR-2014-12-31/pdf/2014-30525.pdf>

Public Health Accreditation Board (PHAB)

<http://www.phaboard.org/>

Wisconsin State Statutes

<http://legis.wisconsin.gov/rsb/Statutes.html>

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