



John DeStefano, Jr.
Mayor

CITY OF NEW HAVEN
OFFICE OF THE MAYOR
165 Church Street, New Haven, CT 06510
Phone (203)-946-8200, Fax (203)-946-7683



Testimony of the City of New Haven
Before the Public Health Committee

In Support of

SB 848 AN ACT IMPLEMENTING PROVISIONS OF
THE BUDGET CONCERNING PUBLIC HEALTH.

Submitted by

Dr. Mario Garcia, Director of Public Health

March 15, 2013

Sen. Gerratana, Rep. Johnson, and members of the Committee, the New Haven Public Health Department welcomes the opportunity to comment on S.B. 848. Section 7 of the bill requires non-for-profit hospitals to effectively provide Community Benefit programming in return for the tax-payers' subsidies of their healthcare delivery operation. We strongly support the included concept which requires community input included in the bill.

While in Connecticut the statute has been in place for several years, compliance and monitoring of this regulation has been at best nominal. In calendar year 2000, only half of the hospitals reported on their community benefit activities. In calendar year 2001, 26 out of 42 hospitals provided responses to a survey from regulators and only eight hospitals indicated they had a Community Benefits Program in place. After the requirements changed from annual to biennial reporting, in 2004 the regulators inquiry was reduced from 149 to 49 questions. The 2006 survey revealed little change in Community Benefit activity. Thirty five out of 43 hospitals responded, but only 17 hospitals had instituted a Community Benefits Program. In the 2008 report to the Office of the Health Care Advocate, only 13 hospitals reported having a Community Benefit Program, with only 9 carrying out some form of community needs assessment. The last report is not currently available.

Activities reported as Community Benefits vary widely from providing training for health care professionals and supporting family caregivers to targeting low-income communities with health education programs and support for safety net agencies. Despite the well meaning categories, regulators had cautioned that hospital information is self-reported and provided without independent verification or audit. Moreover, reports are not comparable over years because variability in the number of facilities reporting and changing reporting requirements and circumstances.

Assessing community health status is one of the core essential functions of the Local Public Health Departments. While local agencies do not always have the necessary resources to conduct such assessments, it is anticipated that this activity will increase substantially as it is a requirement by the National Public Health Accreditation Board. Therefore, Health Departments are the natural agencies to oversee, on behalf of the state and local constituents, that Community Needs Assessments and Improvement Plans are inclusive and responsive to the needs of the local community. In addition to the additional requirements established in the bill, the New Haven Health Department recommends that hospitals be required to obtain the endorsement of the local public health authority before filing the Community Benefits Program.

It is also imperative that the implementation of a Community Benefits Plan be consistent with the priorities identified in a Community Needs Assessment. Similarly, allocations and other investments in community support should have some reasonable proportionality to the tax-exempt benefits obtained by a non-for-profit hospital. To ensure the well-known substantial benefits of the health care delivery operation return to the community, local public health authorities should sign off on the documentation indicating the nature of the collaborative effort. We recommend the final regulations require hospitals to provide supportive evidence of why the facility does not intend to meet an identified health need.

Giving community leaders and stakeholders input in this process and delegating review to Local Boards of Health will help to insure that the charitable goals of a hospital are met and that community investment truly mirrors community need. We applaud the governor for the inclusion of this provision and urge your support.