



MEMORANDUM

TO: HOSPITALS, COLORADO HOSPITAL ASSOCIATION
FROM: JAMES JOHNSTON, Health System Value Analyst
DATE: Jan 5, 2024
RE: House Bill 23-1243 Current and New Reporting Requirements

This memorandum from the Department of Health Care Policy and Financing (HCPF) provides guidance to hospitals for the new requirements under House Bill (HB) 23-1243. This includes annual public meeting reporting and investment reporting guidance for hospitals. The expansion of HB 23-1243 includes new requirements for hospitals to complete. **All bolded items are new requirements under HB23-1243 and should be included in hospital reports and submissions.** HCPF would like to emphasize that the submission of these items does not take effect until Summer 2024. HCPF appreciates stakeholders' recent engagement in community benefit meetings. HCPF is currently summarizing this feedback, providing guidance, and identifying potential improvements.

HCPF will share information on the new reporting requirements for community benefit investment categories in April 2024 and hold a webinar in May 2024 to review the template submission process for hospitals.

HCPF will hold more stakeholder meetings for rulemaking from January to April of 2024.

Hospitals - public community meeting requirements

1. During a hospital's annual public community meeting, the presentation of the community benefit activities for the previous year must include:
 - Reporting hospital's discrete community benefit activities
 - The amount funded for each activity
 - A description of how the activities and funding amounts align with the community's identified priorities



2. Each reporting hospital is required to invite, at a minimum, representatives from the following entities to participate in the meeting:
 - Local public health agencies
 - Local chamber of commerce and economic development organizations
 - Local health-care consumer organizations
 - School districts
 - County governments
 - City and town governments
 - Community health centers
 - Certified rural health clinics or primary care clinics located in a county that has been designated by the federal office of management and budget as a rural or frontier county
 - Area agencies on aging
 - Health-care consumer advocacy organizations
 - Safety net clinics
 - **General public**
 - **A member of the tribal council or their designee for a hospital whose community includes one of Colorado’s land-based tribes**
 - **A member from the Urban Indian Organization for a hospital whose community includes a federally designated Urban Indian Health Center or Urban Indian Organizations**
 - **A member from an institution of higher learning for a hospital whose community includes such institutions**
3. Each reporting hospital is required to invite, at a minimum, representatives from the following state agencies to participate in the meetings:
 - The Department of Health Care Policy and Financing, hcpf_hospitalcommunity@state.co.us
 - The Department of Public Health and Environment - Michele Shimomura, michele.shimomura@state.co.us
 - The Department of Human Services - Christopher Frenz, christopher.frenz@state.co.us
 - The Colorado Commission of Higher Education - Megan McDermott, Megan.McDermott@dhe.state.co.us
 - The Office of Saving People Money on Health Care - Isabelle Nathanson, isabelle.nathanson@state.co.us
 - Division of Insurance, Department of Regulatory Agencies - Sara Bencic, sara.bencic@state.co.us
4. Annual meeting invitation requirement:



- Advertisements placed in any major newspaper published in reporting hospital's community
 - **Posting the invitation on the hospital's website**
 - **On hospital's social media page(s)**
 - **In the hospital e-newsletter**
 - **Sent to all email lists**
 - **Invite posted/sent at least 30 days prior to the meeting date**
5. Each public meeting report shall include:
- Date, time, location of meeting
 - Outreach efforts to ensure broad Community participation and accessibility
 - Individuals and organizations, including the populations served by the organizations, are invited to the meeting
 - A list of individual meeting attendees and organizations represented
 - Meeting agenda
 - A summary of the meeting discussion
 - Actions taken because of feedback from meeting participants
6. Presenting proposed community benefit implementation plan, reporting hospitals must:
- Present priority areas identified in the reporting hospital's most recent CHNA and any other community benefit investment option recommended by the reporting hospital
 - Each priority recommendation presented must clearly identify the source of the recommendation
 - Solicit public input for any additional community benefit investment priority
 - Review and incorporate the public feedback received before the reporting hospital finalizes its annual community benefit implementation plan
7. A reporting hospital may only add community benefit priorities to the implementation plan if the community benefit priorities were presented at the annual meeting and the public was provided an opportunity to provide feedback. The reporting hospital must indicate whether the implemented community benefit priorities are a result of the hospital choosing the recommendations or the recommendations coming from community feedback.
8. Each reporting hospital's annual community benefit report submitted must include, at a minimum, the following:
- Making the report available to community members by making the report publicly available on the reporting hospital's website
 - **Meeting minutes**
 - **A list of the meeting attendees**



- **Content of meeting discussion - any community benefit priorities discussed, and the decisions made regarding those discussed CB decision priorities**
- **Community feedback received and how the hospital plans to incorporate the feedback into the reporting hospital's community benefit implementation plan**
- **Any data collected from attendees, such as data concerning race, ethnicity, or income**

Hospitals - community benefit implementation plans

1. Each year, reporting hospitals are required to complete a community benefit implementation plan that:
 - **Addresses the needs described by the reporting hospital's community health needs assessment**
 - **Includes an explanation of the community served by the hospital facility**
 - **Describes how the community was determined pursuant**

Reporting Hospital Templates

1. Each reporting hospital is required to prepare and submit to the state department a report on certain community benefits, costs, and shortfall that must include:
 - **A description of certain spending and investments made by the reporting hospital during the preceding year**
 - **A list of investments made by the reporting hospital that were included in part I, part II, and part III of Schedule H of the reporting hospital's form 990. For each such investment, the reporting hospital shall:**
 - **For any investment that addressed a community-identified health need, identify any of the following categories which may be further defined by rules promulgated by the state board that are applicable:**
 - **Free or discounted health-care services**
 - **Behavioral health**
 - **Community-based health care**
 - **Social determinants of health spending**
 - **Spending to address individuals needs such as housing, food, transportation, interpersonal violence, education, and job opportunities**
 - **Provider recruitment, education, and research and training**



- Provide evidence showing how the investment improves community health outcomes and how the investment directly corresponds to community-identified needs

