SCHEDULE H (Form 990)

Hospitals

OMB No. 1545-0047 2014

Open to Public Inspection

Department of the Treasury Internal Revenue Service

► Complete if the organization answered 'Yes' to Form 990, Part IV, question 20. Attach to Form 990. ► Information about Schedule H (Form 990) and its instructions is at www.irs.gov/form990.

Name of the organization

Employer identification number

06-6068853

The Norwalk Hospital Association Part | Financial Assistance and Certain Other Community Benefits at Cost No Yes 1a Did the organization have a financial assistance policy during the tax year? If 'No,' skip to question 6a.. Χ 1b Х b If 'Yes,' was it a written policy?..... If the organization had multiple hospital facilities, indicate which of the following best describes application of the financial assistance policy to its various hospital facilities during the tax year. |X| Applied uniformly to all hospital facilities Applied uniformly to most hospital facilities Generally tailored to individual hospital facilities 3 Answer the following based on the financial assistance eligibility criteria that applied to the largest number of the organization's patients during the tax year. a Did the organization use Federal Poverty Guidelines (FPG) as a factor in determining eligibility for providing free care? If 'Yes,' indicate which of the following was the FPG family income limit for eligibility for free care: За X X 200% Other b Did the organization use FPG as a factor in determining eligibility for providing discounted care? If 'Yes,' indicate which of the following was the family income limit for eligibility for discounted care: 3b Χ X 400% 200% 250% | |300% 350% Other % c If the organization used factors other than FPG in determining eligibility, describe in Part VI the criteria used for determining eligibility for free or discounted care. Include in the description whether the organization used an asset test or other threshold, regardless of income, as a factor in determining eligibility for free or discounted care. Did the organization's financial assistance policy that applied to the largest number of its patients during the tax year provide for free or discounted care to the 'medically indigent'?..... X 5a Did the organization budget amounts for free or discounted care provided under its financial assistance policy during the tax year?..... 5a X b If 'Yes,' did the organization's financial assistance expenses exceed the budgeted amount?..... Χ c If 'Yes' to line 5b, as a result of budget considerations, was the organization unable to provide free or discounted care to a patient who was eligible for free or discounted care?.... 6a Did the organization prepare a community benefit report during the tax year?..... χ 6a X b If 'Yes,' did the organization make it available to the public?..... 6b Complete the following table using the worksheets provided in the Schedule H instructions. Do not submit these worksheets with the Schedule H. Financial Assistance and Certain Other Community Benefits at Cost (b) Persons served (optional) (d) Direct offsetting revenue (e) Net community benefit expense (a) Number of activities or (c) Total community benefit expense (f) Percent of total Financial Assistance and Means-Tested Government programs (optional) **Programs** a Financial Assistance at cost (from Worksheet 1). 10,525,694 2,875,768 7,649,926 2.16 b Medicaid (from Worksheet 3, column a)...... 20,685,591 5.84 63,146,400 42,460,809 c Costs of other means-tested government programs (from Worksheet 3, column b) d Total Financial Assistance and 8.00 28,335,517 0 73,672,094 45,336,577 Means-Tested Government Programs. 0 Other Benefits e Community health improvement services and community benefit 0.10 35 359,309 359,344 operations (from Worksheet 4). f Health professions education 1.58 4,870,466 5,601,906 10,472,372 (from Worksheet 5)..... g Subsidized health services 2,695,415. 1,519,035 1,176,380 0.33 (from Worksheet 6)..... h Research (from Worksheet 7). i Cash and in-kind contributions for community benefit (from Worksheet 8). 2.01 7,137,595 0 13,527,131. 6,389,536 i Total, Other Benefits..... 35,473,112. 0 0 87,199,225 51,726,113 10.01

k Total. Add lines 7d and 7j.....

Part II

Community Building Activities Complete this table if the organization conducted any community building activities during the tax year, and describe in Part VI how its community building activities promoted the health of the communities it serves.

	promoted the health	of the cor	nmunities it	t serves.		COMMI	nty banding do.			
		(a) Number of activities or programs (optional)	(b) Persons served (optional)	(c) Total community building expense	(d) Direct reve		(e) Net communi building expense	ty e	(f) Pe of to expe	otal
1	Physical improvements and housing									
2	Economic development,									
	Community support									
4	Environmental improvements									
	Leadership development and training for community members									
6	Coalition building		91,488	12,628.			12,6	528.		
7	Community health improvement advocacy.		10,635	1,367,925.			1,367,9	925.	0	.39
	Workforce development									
9	Other		100 100	1 200 552			1 200 [. F.3		.39
	Total		102,123			0.	1,380,	055.	<u> </u>	.39
	t III Bad Debt, Medicare	, & Collect	ion Practic	es						
	•								Yes	No
	Did the organization report bad Association Statement No. 15?					gement		1		Х
2	Enter the amount of the organi methodology used by the organ	zation's bad (nization to es	debt expense. timate this am	Explain in Part VI the nount	Part.VI	2	4,311,968.			
3	Enter the estimated amount of the	e organization	's bad debt exp	ense attributable to patie	nts		1,011,500.			
	eligible under the organization'	s financial as	sistance polic	y, Explain in Part VI the	;	1				
	methodology used by the organ if any, for including this portion	of bad debt	as community	benefit	Part VI	3	1,925,725.			
4	Provide in Part VI the text of the expense or the page number o						Part VI			
Sect	ion B. Medicare									
	Enter total revenue received fro	om Medicare	(including DSI	H and IME)		5 1	02,903,351.			
	Enter Medicare allowable costs						33,715,577.			
7	Subtract line 6 from line 5. This	s is the surple	us (or shortfall	l)		7 -	30,812,226.			
8	Describe in Part VI the extent to valso describe in Part VI the costin Check the box that describes the cost of th	which any shor	rtfall reported in	n line 7 should be treated ed to determine the amou	as commun int reported (ity benefit. on line 6.				
	Cost accounting system	_	ost to charge	ratio V	Other		Part VI			
		ЦΫ	ost to orlarge	ıαιο [<u>Λ</u>]	0 1110.					
	ion C. Collection Practices									
	Did the organization have a wr							9a	X	
Ŀ	If 'Yes,' did the organization's col contain provisions on the colle- financial assistance? Describe	lection policy to ction practice in Part VI	that applied to s to be follow	the largest number of its ed for patients who are	patients duri known to q	ing the tax y ualify for	ear Part.VI	9b	х	
Par	t IV Management Comp	anies and	Joint Ventu	JIPS (owned 10% or more by	officers, direct	ors, trustees, k		cians -	see ins	trs)
	(a) Name of entity		l) Description of primary	(6) (roanization's	(d) Officers, directors		Physicia t % or s	
		:		activity of entity	proti	it % or stock /nership %	trustees, or key employees' profit % or stock ownership %	pron	nership	KOCK
1	Norwalk Surgery Cen	ter	Ambulato	ry Surgery Cent	er	63.2100			32.0	700
2										
3										
4									-	
- <u>5</u>										
7										
8								ļ		
9										
10										
11										
12										
13										

Part V Facility Information Facility reporting group Section A. Hospital Facilities Chit-dren's hospital Critical access hospital ER-other Other (describe) General medical and surgical Teach-ing hospital Re-search facility ER-24 hours Licensed hospital (list in order of size, from largest to smallest – see instructions) How many hospital facilities did the organization operate during the tax year? $\underline{1}$ Name, address, primary website address, and state license number (and if a group return, the name and EIN of the subordinate hospital organization that operates the hospital facility) Х Х Х 1 Norwalk Hospital Χ 24 Stevens Street Norwalk, CT 06850 norwalkhospital.org

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Part V Facility Information (continued)

Section B. Facility Policies and Practices

(Complete a separate Section B for each of the hospital facilities or facility reporting groups listed in Part V, Section A)

Name of hospital facility or letter of facility reporting group

Norwalk Hospital

			Yes	No
Con	munity Health Needs Assessment			8.5
1	Was the hospital facility first licensed, registered, or similarly recognized by a State as a hospital facility in the current tax year or the immediately preceding tax year?	1		Х
2	Was the hospital facility acquired or placed into service as a tax-exempt hospital in the current tax year or the immediately preceding tax year? If 'Yes,' provide details of the acquisition in Section C	2		Х
3	During the tax year or either of the two immediately preceding tax years, did the hospital facility conduct a community health needs assessment (CHNA)? If 'No,' skip to line 12	3	X	
	If 'Yes,' indicate what the CHNA report describes (check all that apply):			
•	f x A definition of the community served by the hospital facility			
ı	Demographics of the community			
•	Existing health care facilities and resources within the community that are available to respond to the health needs of the community			
•	d X How data was obtained			
•	e X The significant health needs of the community			
í	f \overline{X} Primary and chronic disease needs and other health issues of uninsured persons, low-income persons, and minority groups			
•	g X The process for identifying and prioritizing community health needs and services to meet the community health needs	800A80		6500
ı	$oxed{X}$ The process for consulting with persons representing the community's interests			
i	$\overline{\mathrm{X}}$ Information gaps that limit the hospital facility's ability to assess the community's health needs			
j	Other (describe in Section C)			
4	Indicate the tax year the hospital facility last conducted a CHNA: 2013			1
5	In conducting its most recent CHNA, did the hospital facility take into account input from persons who represent the broad interests of the community served by the hospital facility, including those with special knowledge of or expertise in public health? If 'Yes,' describe in Section C how the hospital facility took into account input from persons who represent the community, and identify the persons the hospital facility consulted	5	Х	
6	a Was the hospital facility's CHNA conducted with one or more other hospital facilities? If 'Yes,' list the other hospital facilities in Section C	6a		Х
1	b Was the hospital facility's CHNA conducted with one or more organizations other than hospital facilities? If 'Yes,' list the other organizations in Section C	6b	Х	
7	Did the hospital facility make its CHNA report widely available to the public?	7	Х	
	If 'Yes,' indicate how the CHNA report was made widely available (check all that apply):			
	a X Hospital facility's website (list url): www.norwalkhospital.org			
!	b X Other website (list url): See Part VI			
,	\mathbf{c} $\overline{\mathbf{X}}$ Made a paper copy available for public inspection without charge at the hospital facility			
	d Other (describe in Section C)			1130.10
8	Did the hospital facility adopt an implementation strategy to meet the significant community health needs identified through its most recently conducted CHNA? If 'No,' skip to line 11	8	Х	
9	Indicate the tax year the hospital facility last adopted an implementation strategy: 2013			
10	Is the hospital facility's most recently adopted implementation strategy posted on a website?	10	Х	
	a If 'Yes,' (list url): See Schedule O			
	b If 'No,' is the hospital facility's most recently adopted implementation strategy attached to this return?	10b		Х
11	Describe in Section C how the hospital facility is addressing the significant needs identified in its most recently conducted CHNA and any such needs that are not being addressed together with the reasons why such needs are not being addressed. Part V			
12	a Did the organization incur an excise tax under section 4959 for the hospital facility's failure to conduct a CHNA as required by section 501(r)(3)?	12a		Х
	b If 'Yes' to line 12a, did the organization file Form 4720 to report the section 4959 excise tax?	12b		
	c If 'Yes' to line 12b, what is the total amount of section 4959 excise tax the organization reported on Form 4720 for all of its hospital facilities?			

Part V Facility Information (continued)	Сору	1 (of <u>1</u>
Financial Assistance Policy (FAP)			
Manual basility and the cities and the cities appointing group.			
Name of hospital facility or letter of facility reporting group Norwalk Hospital		Yes	No
Did the hospital facility have in place during the tax year a written financial assistance policy that:	:		
13 Explained eligibility criteria for financial assistance, and whether such assistance included free or		X	
If 'Yes,' indicate the eligibility criteria explained in the FAP:			
a X Federal poverty guidelines (FPG), with FPG family income limit for eligibility for free care of and FPG family income limit for eligibility for discounted care of 400 %	200 %		
b Income level other than FPG (describe in Section C)			100.0
c Asset level			
d Medical indigency			
e X Insurance status			
f X Underinsurance status			
g Residency			
h Other (describe in Section C)			
14 Explained the basis for calculating amounts charged to patients?		X	
15 Explained the method for applying for financial assistance?			
If 'Yes,' indicate how the hospital facility's FAP or FAP application form (including accompanying instruct	ions)		
explained the method for applying for financial assistance (check all that apply):		a 8 a	
a X Described the information the hospital facility may require an individual to provide as part of his or he			
b X Described the supporting documentation the hospital facility may require an individual to submit as p her application			
c X Provided the contact information of hospital facility staff who can provide an individual with information FAP and FAP application process			
d Provided the contact information of nonprofit organizations or government agencies that may be soul assistance with FAP applications	rces of		
e Other (describe in Section C)			
16 Included measures to publicize the policy within the community served by the hospital facility?		Х	
If 'Yes,' indicate how the hospital facility publicized the policy (check all that apply):			
a X The FAP was widely available on a website (list url): norwalkhospital.org			
b X The FAP application form was widely available on a website (list url): norwalkhospital	.orq		
	hospital.org		
d X The FAP was available upon request and without charge (in public locations in the hospital facility ar	nd by mail)		
e X The FAP application form was avaitable upon request and without charge (in public locations in the hand by mail)	nospital facility		
f X A plain language summary of the FAP was available upon request and without charge (in put hospital facility and by mail)	olic locations in the		
g X Notice of availability of the FAP was conspicuously displayed throughout the hospital facility			
h Notified members of the community who are most likely to require financial assistance about availab	ility of the FAP		
i Other (describe in Section C)			
Billing and Collections			
17 Did the hospital facility have in place during the tax year a separate billing and collections policy,	or a written financial		
assistance policy (FAP) that explained all of the actions the hospital facility or other authorized pupon non-payment?	arty may take 17	, X	
Check all of the following actions against an individual that were permitted under the hospital facility's potax year before making reasonable efforts to determine the individual's eligibility under the facility	olicies during the r's FAP:		
a Reporting to credit agency(ies)		1	
b Selling an individual's debt to another party			
c Actions that require a legal or judicial process			
d Other similar actions (describe in Section C)			
e X None of these actions or other similar actions were permitted			

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24

Х

23

who had insurance covering such care?.....

charge for any service provided to that individual?.....

24 During the tax year, did the hospital facility charge any FAP-eligible individual an amount equal to the gross

If 'Yes,' explain in Section C.

If 'Yes,' explain in Section C.

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Part V Facility Information (continued)

Section C. Supplemental Information for Part V, Section B. Provide descriptions required for Part V, Section B, lines 2, 3j, 5, 6a, 6b, 7d, 11, 13b, 13h, 15e, 16i, 18d, 19d, 20e, 21c, 21d, 22d, 23, and 24. If applicable, provide separate descriptions for each hospital facility reporting group, designated by facility reporting group letter and hospital facility line number from Part V, Section A ('A, 1,' 'A, 4,' 'B, 2,' 'B, 3,' etc) and name of hospital facility.

Part V. Line 5 - Account Input from Person Who Represent the Community

Facility: Norwalk Hospital

In conducting its most recent CHNA in 2012 (completed and approved in 2013), Norwalk Hospital and the Norwalk Health Department engaged in a collaborative community planning process to improve the health of the Greater Norwalk Area residents including Norwalk, New Canaan, Westport, Weston, Wilton, Darien, and Fairfield. The initiative included a community health assessment (CHA) to identify the health-related strengths and needs of the area and a community health improvement plan (CHIP) to identify priorities, goals, and implement and coordinate strategies to address these priority issues across the region. Findings from the CHA identified obesity, mental health and substance abuse as priorities for the area. The community health assessment was guided by a participatory, collaborative approach, which examined health in its broadest sense. This process included integrating existing data regarding social, economic, and health indicators in the region with qualitative information from 15 focus groups with community residents and service providers and 17 interviews with community stakeholders. Focus groups and interviews were conducted with individuals from the 7 municipalities that comprise the Greater Norwalk Area, with individuals representing youth; the Hispanic and African American communities; individuals receiving services from a federally-qualified health center; social service, health care, and mental health providers; businesses; housing; law enforcement; and the local government. This qualitative assessment process engaged over 200 individuals.

Part V, Line 6b - CHNA Conducted by Orgnizations Other Than Hospital

Facility: Norwalk Hospital

Norwalk Health Department

Part V, Line 11 - Explanation of Needs Not Addressed and Reasons Why

Facility: Norwalk Hospital

Part V Facility Information (continued)

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of

Section C. Supplemental Information for Part V, Section B. Provide descriptions required for Part V, Section B, lines 2, 3j, 5, 6a, 6b, 7d, 11, 13b, 13h, 15e, 16i, 18d, 19d, 20e, 21c, 21d, 22d, 23, and 24. If applicable, provide separate descriptions for each hospital facility in a facility reporting group, designated by facility reporting group letter and hospital facility line number from Part V, Section A ('A, 1, 'A, 4, 'B, 2, 'B, 3, etc) and name of hospital facility.

Part V, Line 11 - Explanation of Needs Not Addressed and Reasons Why (continued)

To the best of the organization's knowledge, all prevalent issues in the community are being addressed through the 2012 CHIP. Any needs not being addressed are those that Norwalk Hospital does not have the funds or control over, such as housing or environmental Health. In order to address the significant needs identified in the CHNA, a Community Health Improvement Task Force was created of over 100 community residents and professionals representing various organizations. They identified mental health, obesity and substance abuse as the main priorities to address. They created the 2012 Community Health Improvement Plan which details specific goals and metrics for each identified need, and community benefit programs that would help achieve these goals.

The narratives for Part I, Line 7e and Part II Community Building Activities describe actions taken to address the needs identified in the 2012 CHNA.

Part V, Line 22d - Other Billing Determination of Individuals Without Insurance

Facility: Norwalk Hospital

Norwalk Hospital intends to be in compliance withe the regulations regarding the maximum amounts that can be charged to FAP-eligible individuals for emergency and other medical necessary care by the effective date (10/1/16).

Part V Facility Information (continued)

Section D. Other Health Care Facilities That Are Not Licensed, Registered, or Similarly Recognized as a Hospital Facility (list in order of size, from largest to smallest)

How many non-hospital health care facilities did the organization operate during the tax year? 11

Name and address	Type of Facility (describe)
1 Norwalk Hospital Outpatient Rehabilitation Services	Outpatient Rehabilitation
520 West Avenue	Facility
Norwalk, CT 06850	
2 Norwalk Hospital Outpatient Rehabilitation Services	Outpatient Services
40 Cross Street, Suite 110	
Norwalk, CT 06851	
3 Norwalk Hospital Sleep Disorder Center	Sleep Disorder Services
520 West Avenue	<u></u>
Norwalk, CT 06850	
4 Norwalk Hospital Radiology and Mammography Center	Radiology and Mammography
148 East Avenue Suite 1R	Center
Norwalk, CT 06851	
5 Norwalk Hospital New Canaan Radiology	Radiology Services
28-30 East Avenue	
New Canaan, CT 06840	
6 Norwalk Hospital Westport Radiology	Radiology Services
728 Post Road East	
Westport, CT 06880	
7 New Canaan Blood Collection Center	Blood Collection
25-30 East Avenue	
New Canaan, CT 06840	D1 1 0 11 !
8 Westport Blood Collection Center	Blood Collection
728 Post Road East	
Westport, CT 06880	Diesa Callentin
9 Norwalk Blood Collection Center	Blood Collection
40 Cross Street	
Norwalk, CT 06851	Dlood Collegation
10 Norwalk Blood Collection Center	Blood Collection
148 East Avenue	
Norwalk, CT 06851	Schedule H (Form 990)

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Part V Facility Information (continued)

Section D. Other Health Care Facilities That Are Not Licensed	, Registered, or Similarly Recognized as a Hospital Facility
(list in order of size, from largest to smallest)	·

Name and address	Type of Facility (describe)
11 Norwalk Surgery Center, LLC 40 Cross Street Norwalk, CT 06851	7 J. J. L. C. Control
BAA	Schedule H (Form 990

Provide the following information.

- 1 Required descriptions. Provide the descriptions required for Part I, lines 3c, 6a, and 7; Part II and Part III, lines 2, 3, 4, 8, and 9b.
- 2 Needs assessment. Describe how the organization assesses the health care needs of the communities it serves, in addition to any CHNAs reported in Part V, Section B.
- 3 Patient education of eligibility for assistance. Describe how the organization informs and educates patients and persons who may be billed for patient care about their eligibility for assistance under federal, state, or local government programs or under the organization's financial assistance policy.
- 4 Community information. Describe the community the organization serves, taking into account the geographic area and demographic constituents it serves.
- 5 Promotion of community health. Provide any other information important to describing how the organization's hospital facilities or other health care facilities further its exempt purpose by promoting the health of the community (e.g., open medical staff, community board, use of surplus funds, etc.).
- 6 Affiliated health care system. If the organization is part of an affiliated health care system, describe the respective roles of the organization and its affiliates in promoting the health of the communities served.
- 7 State filing of community benefit report. If applicable, identify all states with which the organization, or a related organization, files a community benefit report.

Part I, Line 7g - Costs Associated With Physicans Clinics

SUBSIDIZED HEALTH SERVICES LINE G - Norwalk Hospital Receives a DHMAS Grant From The State Of Connecticut For The Outpatient Psychiatric Clinic. These dollars help offset the shortfall from under or uninsured patients.

Part III, Line 2 - Methodology Used To Estimate Bad Debt Expense

Bad debt expense is a function of actual bad debt write-offs and estimated bad debts for balances still in accounts receivable (AR) as of the measurement date. The Hospital calculates the estimated bad debts in AR by computing historical payment % by payor, service type and by account age and applies those percentages adjusted for price increase to current AR.

Part III, Line 3 - Methodology of Estimated Amount & Rationale for Including in Community Benefit

The percent of charity care applications under Norwalk Hospital's financial assistance policy that resulted in a discount was 44.66%. We applied this % to our bad debt expense of \$4,311,968 to arrive at our estimate of bad debt expense attributable to patients eligible under Norwalk Hospital's financial assistance policy of \$1,925,725.

Part III, Line 4 - Bad Debt Expense

Patient accounts receivable result from the health care services provided by the Hospital. Additions to the allowance for uncollectible accounts result from the provision for uncollectible accounts. Accounts written off as uncollectible are

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- 6 Affiliated health care system. If the organization is part of an affiliated health care system, describe the respective roles of the organization and its affiliates in promoting the health of the communities served.
- 7 State filing of community benefit report. If applicable, identify all states with which the organization, or a related organization, files a community benefit report.

Part III, Line 4 - Bad Debt Expense (continued)

deducted from the allowance for uncollectible accounts.

The Hospital's estimation of the allowance for uncollectible accounts is based primarily upon the type and age of the patient accounts receivable and the effectiveness of the Hospital's collection efforts. The Hospital's policy is to reserve a portion of all self-pay receivables, including amounts due from the uninsured and amounts related to co-payments and deductibles, as these charges are recorded. On a monthly basis, the Hospital reviews its accounts receivable balances and various analytics to support the basis for its estimates. These efforts primarily consist of reviewing the following: Historical write-off and collection experience using a hindsight or look-back approach; Revenue and volume trends by payor, particularly the self-pay components; Changes in the aging and payor mix of accounts receivable, including increased focus on accounts due from the uninsured and accounts that represent co-payments and deductibles due from patients; Cash collections as a percentage of net patient revenue less the provision for uncollectible accounts; and Trending of days revenue in accounts receivable

The Hospital regularly performs hindsight procedures to evaluate historical write-off and collection experience throughout the year to assist in determining the

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- 6 Affiliated health care system. If the organization is part of an affiliated health care system, describe the respective roles of the organization and its affiliates in promoting the health of the communities served.
- 7 State filing of community benefit report. If applicable, identify all states with which the organization, or a related organization, files a community benefit report.

Part III, Line 4 - Bad Debt Expense (continued)

reasonableness of its process for estimating the allowance for uncollectible accounts.

Part III, Line 8 - Explanation Of Shortfall As Community Benefit

All hospitals must record profits in order to generate the capital needed to invest in facilities and services. Services that respond to public health needs provided to Medicare patients at Norwalk Hospital generate negative margins averaging around 25% of cost. It is possible that some of these services would be discontinued if the decision was made on a purely financial basis. For this reason, it would be appropriate to consider the Medicare payment shortfall a community benefit. The Medicare allowable costs of care on part iii, line 6 were computed using the cost to charge ratio from the Medicare cost report multiplied against Medicare charges.

Part III, Line 9b - Provisions On Collection Practices For Qualified Patients

Norwalk Hospital collection practices consist primarily of billing notices and follow up courtesy calls. The patient is notified of the financial assistance program with each written notification and at each point of service. Notification is shared by postings and verbal notification at the time the procedure is scheduled. If at any time during the collection process a patient would like to participate in the financial assistance program collection activity ceases. The patient is then

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- 6 Affiliated health care system. If the organization is part of an affiliated health care system, describe the respective roles of the organization and its affiliates in promoting the health of the communities served.
- 7 State filing of community benefit report. If applicable, identify all states with which the organization, or a related organization, files a community benefit report.

Part III, Line 9b - Provisions On Collection Practices For Qualified Patients (continued)

sent an application and works with the financial counseling team for approval of full or partial discount.

Part VI - Needs Assessment

In 2012 (completed and approved in 2013) Norwalk Hospital and the Norwalk Health Department engaged in a collaborative community planning process to improve the health of the Greater Norwalk Area residents. The initiative included a CHA to identify the health-related strengths and needs of the area and a community health improvement plan (CHIP) to identify the priorities, goals and implement and coordinate strategies CHA was guided by a collaborative approach, which included integrating existing health indicators, social and economic data with qualitative information from community residents and stakeholders. Focus groups and interviews were conducted with participation form youth, ethnic communities, social services, health care provider businesses, law enforcement and local government agencies. For example, Mid-Fairfield Child Guidance Center participated in these focus groups and interviews. Through the process, they were able to identify mental health/substance abuse as a priority need. They also provided data and input on barriers and challenges to access and quality care for children in the area, as well as strategies on how to enhance treatment and care.

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Part VI Supplemental Information

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Part VI - Needs Assessment (continued)

In addition to the CHNAs reported in Part V, Section B, the Western CT Health Network (of which Norwalk Hospital is a part) conducted a Physician Resource Assessment to evaluate the supply of healthcare providers within its combined service area towns. This is done to document community need for healthcare providers, and to develop a plan to meet the healthcare needs of the community served.

Through Western CT Health Network's annual Planning Process, an environmental assessment is conducted to identify healthcare gaps and needs of the service area community brought about by local and national trends in economic, legislative, demographic, healthcare industry and other environmental factors. These forces are incorporated in meeting the healthcare needs of the community by helping to frame the priorities, goals and initiatives of Western CT Health Network's long range and annual strategic plans.

Part VI - Patient Education of Eligibility for Assistance

The patient is notified of the financial assistance program (FAP) with each written notification and at each point of service. Notification is shared by postings and verbal notification at the time the procedure is scheduled. The facility also

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Part VI - Patient Education of Eligibility for Assistance (continued)

available to include State, local and internal. If at any time in the collection process a patient would like to participate in the FAP, collection activity ceases. The patient is then sent an application and works with the financial counseling team for approval of full or partial discount.

Part VI - Community Information

Norwalk Hospital serves an area with a population of about 280,000 people. The Primary Service Area includes Norwalk, New Canaan, Westport, Weston and Wilton, CT, and the Secondary Service Area includes Fairfield, Darien, Redding, Ridgefield (in Fairfield County, CT) and South Salem (in Westchester County, NY). This service area is comprised of a densely populated core of the urban/suburban City of Norwalk surrounded by predominantly affluent residential towns. No other general medical/surgical hospitals are located in this service area. This area is home to a diverse socio-economic population, from the affluent to the medically under served; Central Norwalk is listed as a Medically Under served Area, (or MUA).

Norwalk has a median household income of \$76,051 and a poverty rate of 8.1%. The uninsured population rate is estimated to be 3.8%. Although the population of the primary and secondary service areas is expected to remain virtually level from 2010 to 2020, the cohort aged 65 and over is expected to increase by 2.36%, while the age

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Part VI - Community Information (continued)

20-44 age cohort is forecast to slightly increase at 0.06% over the same time period.

Part VI - Community Building Activities

Part II: Community Building Activities: Obesity/Healthy Lifestyles: Through initiatives led by the Obesity/Healthy Lifestyles Initiative Committee, prevent and reduce obesity in the community by promoting healthy lifestyles. This was done through four programs in 2015: Walk to School Day; NorWALKer walking routes; Healthy Restaurant Initiative; Move More Toolkit

Objective 2.1: Increase the number of children and adults who meet physical activity guidelines, and Objective 2.2: Increase access to and consumption of healthy and affordable foods throughout the region. Initiatives taken: To combat obesity, the Greater Norwalk Healthy Lifestyles work group was formed. The work group is a coalition of organizations, agencies, and community members from the Greater Norwalk area. The mission of the work group is to reduce and prevent obesity and chronic disease in the community by promoting healthy lifestyles.

Two Walk to School Day events were planned this year in collaboration with Norwalk Department of Health, Sacred Heart University Exercise Science students, City

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Part VI - Community Building Activities (continued)

officials, and the Public School Systems of Norwalk, Westport, and New Canaan. Forty area school systems throughout our catchment area were contacted and provided a tool kit containing information on how to conduct a Walk to School Day event. On October 9, 2013, a total of 90 students and family members participated on the first Walk to School Day event. The second event, conducted on May 2, 2014, attracted more than 350 students from area elementary and middle schools, family members, including school staff, and city officials. Events held in October 2014 and May 2015 had more than 1,000 participants from four area schools including Fox Run and Columbus Magnet Elementary Schools in Norwalk, South School in New Canaan and Kings Highway Elementary School in Westport. Both events in fiscal 2015 generated \$1,253 in community benefit expense.

With the objective to increase physical activity among community members and those working within the community, the NorWALKer neighborhood walking project was developed. The project plan identified sixteen neighborhoods in Norwalk and mapped out walking routes in each. The 44 walking routes have been audited, utilizing the Center for Disease Control and Prevention Walkability Audit Tool. As a result of the audit, several routes are being updated and redesigned to accommodate changes in geographical area design, safety and accessibility.

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Part VI - Community Building Activities (continued)

The Greater Norwalk Healthy Restaurant Initiative (HRI) was developed to help meet the goal of increasing access to and consumption of healthy and affordable foods. This healthy restaurant program will help restaurants in the Greater Norwalk area highlight healthy menu options to diners of all ages. The program is voluntary for restaurant owners, and thus far more than 40 area restaurant establishments have shown interest in the program and participated in discussions and/or guided focus groups. Restaurants range from fast food chains, caterers and diners to fine dining establishments. The program is designed to connect restaurant owners to the HRI program coordinator and Registered Dietitian (RD) who will work with the restaurant to assess a current menu option and help develop healthy entrees. Once a meal(s) meets the established nutritional criteria (developed based on nutritional recommendations for both adults and children) it will be highlighted as a healthy menu option on the menu and the restaurant will be designated as a "healthy restaurant" participating in HRI. Area Directors of Health and Sanitarians have collaborated with the workgroup to establish details of the program and provide insight on collaborating for management and oversight of the program. Recruitment for interested restaurants will begin in March 2016. The HRI generated \$3,404 in community benefit expense.

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Part VI - Community Building Activities (continued)

The physical activity workgroup is conducting research of public health guidelines, impact of academics, resources and national recommendations to quide the development of a Move More Toolkit to enhance physical activity among pre-school, elementary, middle and high school students. Members of the Board of Education, school nurses and educators are being consulted to obtain guidance. The comprehensive guide will provide simple, yet specific strategies to incorporate more physical activity into the day.

Coalition Building: Norwalk Hospital provided \$9,601 in EMS & Paramedic coverage at the 2015 Oyster Festival and EMS ambulance tours for the community and elementary schools. They also provided \$19,498 in donations/sponsorships to various organizations, such as American Lung Association and the Women's Business Development Council.

Community Health Improvement Advocacy: Largely state and local elected officials and agency heads were lobbied in support of maintaining patient access to essential services for the uninsured and underinsured. The total advocacy investment for

For fiscal 2015 Norwalk Hospital provided \$1,350,000 in

fiscal 2015 is \$54,231.

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Part VI - Community Building Activities (continued)

support to Norwalk Community Health Center.

Part VI - Explanation Of How Organization Furthers Its Exempt Purpose

Schedule H - Part I, Line 7e - Community Health Improvement Services and Community Benefit Operations - Obesity/Healthy Lifestyles: Through initiatives led by the Obesity/Healthy Lifestyles Initiative Committee, prevent and reduce obesity in the community by promoting healthy lifestyles. One initiative was Project LEAN.

Project LEAN (Learning with Energy from Activity and Nutrition) is an innovative, community-wide program collaborative between Norwalk Hospital, Norwalk Health Department, Jefferson, Kendall, Marvin, Brookside, Tracey and Silvermine Elementary Schools, and Pepperidge Farm, Inc. which is designed to actively engage approximately 1,000 elementary school children with a hands-on interactive curriculum to combat childhood obesity. Project LEAN's goal is to improve attitudes, increase knowledge, and keep Body Mass Index at or below the Center for Disease Control and Prevention average gains through nutrition education and increased activity. The aim is to improve the overall health of the students through healthy nutrition and exercise with the goal to make a sustainable difference in their lives. Approximately 1,100 students in six city elementary schools have demonstrated (through survey measures) increased knowledge about nutrition and positive behavior

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Part VI - Explanation Of How Organization Furthers Its Exempt Purpose (continued) changes.

Mental Health and Substance Abuse: Through initiatives led by the Mental Health/Substance Abuse Initiative Committee, provide education on and access to quality mental health and substance abuse prevention, intervention and treatment services across the life span.

Objective 1.1: Increase providers' and community members' awareness and use of quality mental health and substance abuse services and educational resources for prevention, intervention, treatment and recovery.

Initiative taken: Regional Database for Mental Health/Substance Abuse: In collaboration with Family & Children's Agency, Mid-Fairfield Child Guidance Center and the Norwalk Healthy Family Collaborative (which comprises more than 25 area organizations including the Norwalk Health Department), a regional assessment of existing mental health and substance abuse resources available to children and adults was conducted over the course of a year. After verifying and cross-referencing each resource, a comprehensive database was compiled. The resource quide is updated on a regular basis and community agencies are encouraged to

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Part VI - Explanation Of How Organization Furthers Its Exempt Purpose (continued)

self-report and update any changes related to their agency and/or services.

Objective 1.2: Enhance local and regional partnerships to improve access to timely, comprehensive, and coordinated services for diverse populations across the lifespan.

Initiative taken: In April 2014, Norwalk Hospital launched a community care team (CCT) with the goal of targeting mental health and substance abuse populations. This has allowed us to deliver enhanced care to individuals with complex medical and psychosocial challenges by providing wrap around services to individuals with housing instability suffering from mental health and/or substance abuse issues or serious medical conditions. As of September 30, 2015, the Greater Norwalk CCT developed individualized care plans for 170 individuals. The CCT has enabled Norwalk Hospital to break down existing silos by increasing communication and collaboration among community providers, improve patient engagement to appropriate services, and decrease patient turn-over in community programs with a 27% decrease in inappropriate ED utilization. Approximately, 40 patients have been successfully linked to housing and the majorities have been referred to support services. The success of the Greater Norwalk CCT has enabled expansion of the program across our

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Part VI - Explanation Of How Organization Furthers Its Exempt Purpose (continued)

Initiative taken: Norwalk Hospital's Behavioral Health Specialists established a collaborative relationship with practitioners from the Norwalk Community Health Center (a Federally Qualified Health Clinic, FQHC) to incorporate behavioral health consultations and analysis into primary care visits. All patients aged 14 years and older are routinely assessed for substance abuse/misuse disorders at each office visit using SBIRT (Screening, Brief Intervention and Referral to Treatment) technique. The Behavioral Health Specialists work in conjunction with the primary care provider and will see and assess the patient at the time of the office visit and when appropriate, make recommendations to the patient or physician. This practice allows for enhanced collaborative planning, service delivery, resource sharing ant the ability to address behavioral health issues early. Utilizing the SBIRT technique specifically allow earlier implementation, intervention and active involvement from emergency services when appropriate.

Objective 1.3: Reduce financial barriers to treatment. The strategy for this is to convene payers in ACO/PHO (Accountable Care Organization/Physician Hospital Organization) to address reimbursement issues around mental health and substance

abuse.

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Part VI - Explanation Of How Organization Furthers Its Exempt Purpose (continued)

Initiative taken: The Western Connecticut Health Network, which includes Norwalk Hospital, is participating in multiple programs and initiatives that address the needs of its most vulnerable citizens.

In January of 2015, WCHN was accepted into CMS Medicare Shared Savings Program (MSSP) as an accountable care organization (ACO). The ACO is structured to enhance care services to Medicares seniors and people who are dual eligible. Programs under the ACO include care management and care transitions for those individuals who are identified as having greater healthcare or psychosocial needs, promotion of preventative services for those with gaps in care and clinical protocols to decrease variation in how care is delivered. The expectation is that through these efforts we will be able to meet the tenets of the triple aim, better care for populations, increase patient satisfaction and at lower costs.

Another focus in our organization is on the Community Care Teams. The Norwalk Community Care Team (CCT) is a collective of parties from the Norwalk community working together to improve outcomes for vulnerable populations including those who

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Part VI - Explanation Of How Organization Furthers Its Exempt Purpose (continued)

are chronically physically and/or mentally ill, homeless or abusing substances. The goal is to improve care, increase community safety and reduce costs by developing wrap around services through multi-agency partnership. The Norwalk Community Care Team, Initiated in February 2014 as an outcome of the Norwalk Community Health Assessment, provides dedicated leadership from Norwalk Hospital and brings together a widely diverse group of community agencies. The Norwalk Super-user Team was developed to augment the CCT and focuses specifically on Emergency Department over-utilization. This team began meeting in October 2014 and has representatives from emergency medicine including the department chair, psychiatry, case management and population health.

To date, the Norwalk CCT and Super-user Team have served more than 200 individuals linking them to housing and social, medical and psychiatric services thereby improving quality of care and reducing ED visits by 30 and 23% respectively. The target population for these programs includes those who are homeless and/or high Emergency Department visitors. Though successful, there is still much work to be done. The 83 members of the Super-user team visited the ED more than 1300 times in FY15.

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Part VI - Affiliated Health Care System Roles and Promotion

Western Connecticut Health Network (WCHN) is an integrated health care delivery system comprised of three community hospitals and their affiliated entities. In addition to Danbury, New Milford and Norwalk Hospitals, the continuum of care includes a large medical group, home health care services, a nationally renowned biomedical research institute, the WCHN and Norwalk Hospital Foundations, and other related affiliates. WCHN's mission is to improve the health of every person we serve through the efficient delivery of excellent, innovative and compassionate care. For 2015, WCHN provided \$19,826,631 in total charity care.

Danbury, New Milford and Norwalk Hospitals provide medical services to the community regardless of the individual's ability to pay. Services include routine inpatient ancillary and outpatient care in support of the hospital's mission statement, to improve the health and well-being of those we serve. For 2015, WCHN provided charity care in the following amounts: Norwalk Hospital \$7,649,926, Danbury Hospital including the New Milford Hospital campus \$11,003,250.

Western Connecticut Medical Group/Norwalk Hospital Physicians & Surgeons: The mission of Western Connecticut Medical Group is to provide safe, innovative, convenient and coordinated primary and specialty health care in the communities they

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Part VI Supplemental Information

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Part VI - Affiliated Health Care System Roles and Promotion (continued)

serve and strive to be aware of and respond to their patients' needs. They support a commitment to advance the health and well-being of individuals in their community by delivering quality care, participating in medical research and medical residency programs and the provision of medical services to patients.

Western Connecticut Health Network Foundation Inc's mission is to raise funds, reinvest and administer these funds and make distributions to Danbury Hospital and other not-for-profit health care affiliates. For 2015, WCMG/NHP&S provided \$1,023,000 in charity care.

Western Connecticut Health Network Affiliates principal purpose is to provide outpatient health care services in various locations and also provide ambulance services to Danbury and surrounding towns, while serving those that cannot afford the care. For 2015, WCHN Affiliates provided \$ in charity care. Western Connecticut Home Care, Inc. (WCHC) provides state of the art clinical services ranging from pediatric patients to the elderly utilizing best practice in home care to meet the needs of their patients. For 2015, WCHC provided \$91,000 in charity care.

Eastern New York Medical Services (ENYMS) was formed in April, 2013. The mission at ENYMS is to provide safe, innovative, convenient and coordinated primary and Gastro

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- 4 Community information. Describe the community the organization serves, taking into account the geographic area and demographic constituents it serves.
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- 6 Affiliated health care system, If the organization is part of an affiliated health care system, describe the respective roles of the organization and its affiliates in promoting the health of the communities served.
- 7 State filing of community benefit report. If applicable, identify all states with which the organization, or a related organization, files a community benefit report.

Part VI - Affiliated Health Care System Roles and Promotion (continued)

health care in the communities we serve and strive to be aware of and respond to our patients' needs.

Part VI - States Where Community Benefit Report Filed

CT

Additional Information

Part I Line 7e Promotion of community health. In order to promote the health of the community, Norwalk Hospital is responsible for coordinating the services of the hospital with those of other health, education, and social services in the community. These services are promoted in order to optimize the availability of a full scope of services in a cost-effective manner.

In FY15, Norwalk Hospital served over 1.6 million persons through over 400 community health events and sponsorships. Hospital staff and affiliated physicians participated in health fairs, community education lectures and screenings with community organizations.

Norwalk Hospital offers programs and financial support to the city of Norwalk and surrounding areas. Examples include the Norwalk Community Health Center (a FQHC) and program support to Americares Clinic (also a FQHC). Norwalk Hospital sub-specialty

Provide the following information.

- 1 Required descriptions. Provide the descriptions required for Part I, lines 3c, 6a, and 7; Part II and Part III, lines 2, 3, 4, 8, and 9b.
- 2 Needs assessment. Describe how the organization assesses the health care needs of the communities it serves, in addition to any CHNAs reported in Part V, Section B.
- 3 Patient education of eligibility for assistance. Describe how the organization informs and educates patients and persons who may be billed for patient care about their eligibility for assistance under federal, state, or local government programs or under the organization's financial assistance policy.
- 4 Community information. Describe the community the organization serves, taking into account the geographic area and demographic constituents it serves.
- 5 Promotion of community health. Provide any other information important to describing how the organization's hospital facilities or other health care facilities further its exempt purpose by promoting the health of the community (e.g., open medical staff, community board, use of surplus funds, etc.).
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Additional Information (continued)

clinics are also staffed by volunteer attending physicians for under served patients.

SCHEDULE H - PART I, LINE 7f - Health Professional Education - Norwalk Hospital has an ACGME Accredited medical residency program partnered with Yale University School of Medicine. Approximately 61 residents and fellows rotate in the medicine, radiology, gastroenterology, pulmonary or sleep programs. The associated costs and revenues are derived from the Medicare cost report.

Part II: Community Health Improvement Advocacy: Largely state and local elected officials and agency heads were lobbied in support of maintaining patient access to essential services for the uninsured and under insured.

Part V Line 5 - The most recently completed CHNA was made available on:

- a) Norwalk Hospital's website: www.norwalkhealth.org,
- b) on the CT Hospital Association's website:

http://www.chime.org/advocacy/community-health/

on the City of Norwalk website:www.norwalkct.org/DocumentCenter/View/4397 and

on the Norwalk Health Department's website:

Provide the following information.

- 1 Required descriptions. Provide the descriptions required for Part I, lines 3c, 6a, and 7; Part II and Part III, lines 2, 3, 4, 8, and 9b.
- 2 Needs assessment. Describe how the organization assesses the health care needs of the communities it serves, in addition to any CHNAs reported in Part V, Section B.
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- 7 State filing of community benefit report. If applicable, identify all states with which the organization, or a related organization, files a community benefit report.

Additional Information (continued)

http://www.ct.gov/dph/lib/dph/ohca/community_needs_assessment/chna/2014/norwalk_hosp ital.pdf

c) is available upon request from the hospital facility.

BAA