

COMMUNITY HEALTH NEEDS ASSESSMENTS:

Make Yours Strategic, Compliant and Impactful

THE SITUATION

The Patient Protection and Affordable Care Act (ACA) requires not-for-profit 501(c)(3) hospitals to conduct a Community Health Needs Assessment (CHNA) once every three years – and develop an implementation plan to meet community health needs. Finalized in 2014, CHNA requirements are very specific and state that the hospital must post the full CHNA report prominently on its website with homepage access to be in compliance.

To make sure CHNA reports address community health issues and meet government requirements, not-for-profit hospitals might consider shining a light on the CHNA process itself to make sure their methodology, documentation and action plan can withstand IRS scrutiny. CHNA plans are subject to be audited. Failure to meet all the requirements could cause a financial penalty of \$50,000 per year and potential loss of tax-exempt status.

CHNA QUALITY MAKES ALL THE DIFFERENCE

Many hospitals' well-intended but noncompliant CHNAs have issues such as a missing action plan; failure to present their findings to their board or another authorized body; missing community input to identify health needs; or a lack of sufficient data or documentation to demonstrate progress from one CHNA reporting period to the next.

Other types of noncompliance include posting it deep within the hospital website or requiring individuals to fill out an online form to access a hospital's two most recent CHNA reports.

Even a bare-bones outline of the IRS requirements for CHNAs gives a sense of the amount of legwork, data crunching and documentation involved.



To be in compliance, a CHNA must:

- Define the community your organization serves, paying special attention to medically underserved, low-income and minority populations.
- Assess community health needs. In doing so, solicit input from people, organizations and agencies who represent the broad interests of that community. CHC conducts one-on-one interviews, collects surveys and convenes focus groups to identify and prioritize health needs.
- Document the CHNA and corresponding implementation plan in a report and submit it for adoption by the hospital's authorized body. Each document has a deadline for adoption and must be noted in board meeting minutes.
- Make the CHNA report widely and readily available to the public, online and as a hard copy available on request. A means of accepting written feedback is also required.



CHNA DOCUMENTATION IS CRITICAL

Regulations also define the content that CHNA reports must present, including:

- A definition of the community served and a description of how the community was determined.
- The process and methods used to conduct the CHNA.
- How community input was solicited and considered.
- The community's significant health needs identified through the CHNA.
- A description of resources available to address those health needs.
- An evaluation of the impact of any actions taken to address the health needs identified in the preceding CHNA.

A comprehensive, compliant CHNA report describes the data and other information used in the assessment, and the methods of collecting and analyzing this information. The report must also identify any parties with whom the hospital collaborated or contracted for assistance in conducting the CHNA.

DOES YOUR HOSPITAL NEED CHNA ASSISTANCE?

CHC has helped more than 100 healthcare organizations conduct CHNAs. Some hospital clients come to us to review existing CHNA documents and ensure requirements are met while others bring CHC in to lead the entire process.

In completing CHNAs and implementation plans for healthcare facilities, CHC checks all the boxes. We also provide guidance to hospitals regarding necessary updates to existing reports to come into compliance with federal regulations, and various levels of support toward completing CHNA reports. 

QUICK TIPS ABOUT CHNAs

- CHNAs are required by the Patient Protection and Affordable Care Act (ACA) for nonprofit hospitals to complete every three years
- CHNAs are also a best practice for all other healthcare facilities
- Done right, the CHNA process involves community members with knowledge of public health
- Hospitals that act meaningfully on CHNA findings help to improve local health issues



HELP WHERE HOSPITALS NEED IT®

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