

Community Benefit Report

Fiscal Year 2017

Health Services Cost Review Commission 4160 Patterson Avenue Baltimore MD 21215

BACKGROUND

The Health Services Cost Review Commission's (HSCRC or Commission) Community Benefit Report, required under §19-303 of the Health General Article, Maryland Annotated Code, is the Commission's method of implementing a law that addresses the growing interest in understanding the types and scope of community benefit activities conducted by Maryland's nonprofit hospitals.

The Commission's response to its mandate to oversee the legislation was to establish a reporting system for hospitals to report their community benefits activities. The guidelines and inventory spreadsheet were guided, in part, by the VHA, CHA, and others' community benefit reporting experience, and was then tailored to fit Maryland's unique regulatory environment. The narrative requirement is intended to strengthen and supplement the qualitative and quantitative information that hospitals have reported in the past. The narrative is focused on (1) the general demographics of the hospital community, (2) how hospitals determined the needs of the communities they serve, (3) hospital community benefit administration, and (4) community benefit external collaboration to develop and implement community benefit initiatives.

On January 10, 2014, the Center for Medicare and Medicaid Innovation (CMMI) announced its approval of Maryland's historic and groundbreaking proposal to modernize Maryland's all-payer hospital payment system. The model shifts from traditional fee-for-service (FFS) payment towards global budgets and ties growth in per capita hospital spending to growth in the state's overall economy. In addition to meeting aggressive quality targets, the model requires the State to save at least \$330 million in Medicare spending over the next five years. The HSCRC will monitor progress overtime by measuring quality, patient experience, and cost. In addition, measures of overall population health from the State Health Improvement Process (SHIP) measures will also be monitored (see Attachment A).

To succeed in this new environment, hospital organizations will need to work in collaboration with other hospital and community based organizations to increase the impact of their efforts in the communities they serve. It is essential that hospital organizations work with community partners to identify and agree upon the top priority areas, and establish common outcome measures to evaluate the impact of these collaborative initiatives. Alignment of the community benefit operations, activities, and investments with these larger delivery reform efforts such as the Maryland all-payer model will support the overall efforts to improve population health and lower cost throughout the system.

As provided by federal regulation (26 CFR §1.501(r)—3(b)(6)) and for purposes of this report, a **COMMUNITY HEALTH NEEDS ASSESSMENT (CHNA)** report is a written document that has been adopted for the hospital facility by the organization's governing body (or an authorized body of the governing body), and includes:

- (A) A definition of the community served by the hospital facility and a description of how the community was determined;
- (B) A description of the process and methods used to conduct the CHNA;
- (C) A description of how the hospital facility solicited and took into account input received from persons who represent the broad interests of the community it serves;
- (D) A prioritized description of the significant health needs of the community identified through the CHNA, along with a description of the process and criteria used in

identifying certain health needs as significant; and prioritizing those significant health needs;

- (E) A description of the resources potentially available to address the significant health needs identified through the CHNA; and
- (F) An evaluation of the impact of any actions that were taken, since the hospital facility finished conducting its immediately preceding CHNA, to address the significant health needs identified in the hospital facility's prior CHNA(s).

Examples of sources of data available to develop a CHNA include, but are not limited to:

- Maryland Department of Health and Mental Hygiene's State Health Improvement Process (SHIP)(<u>http://dhmh.maryland.gov/ship/</u>);
- the Maryland Chartbook of Minority Health and Minority Health Disparities (http://dhmh.maryland.gov/mhhd/Documents/2ndResource_2009.pdf);
- (3) Consultation with leaders, community members, nonprofit organizations, local health officers, or local health care providers;
- (4) Local Health Departments;
- (5) County Health Rankings & Roadmaps (<u>http://www.countyhealthrankings.org</u>);
- (6) Healthy Communities Network (<u>http://www.healthycommunitiesinstitute.com/index.html</u>);
- (7) Health Plan ratings from MHCC (<u>http://mhcc.maryland.gov/hmo</u>);
- (8) Healthy People 2020 (<u>http://www.cdc.gov/nchs/healthy_people/hp2010.htm</u>);
- (9) CDC Behavioral Risk Factor Surveillance System (<u>http://www.cdc.gov/BRFSS</u>);
- (10) CDC Community Health Status Indicators (<u>http://wwwn.cdc.gov/communityhealth</u>);
- Youth Risk Behavior Survey (<u>http://phpa.dhmh.maryland.gov/cdp/SitePages/youth-risk-survey.aspx</u>);
- (12) Focused consultations with community groups or leaders such as superintendent of schools, county commissioners, non-profit organizations, local health providers, and members of the business community;
- (13) For baseline information, a CHNA developed by the state or local health department, or a collaborative CHNA involving the hospital; Analysis of utilization patterns in the hospital to identify unmet needs;
- (14) Survey of community residents;
- (15) Use of data or statistics compiled by county, state, or federal governments such as Community Health Improvement Navigator (<u>http://www.cdc.gov/chinav/</u>); and
- (16) CRISP Reporting Services.

In order to meet the requirement of the CHNA for any taxable year, the hospital facility must make the CHNA widely available to the public and adopt an implementation strategy to address health needs identified by the CHNA.

Required by federal regulations, the **IMPLEMENTATION STRATEGY** is a written plan that is adopted by the hospital organization's governing body or by an authorized body thereof, and:

With respect to each significant health need identified through the CHNA, either-

- (i) Describes how the hospital facility plans to address the health need; or
- (ii) Identifies the health need as one the hospital facility does not intend to address and explains why the hospital facility does not intend to address it.

HSCRC COMMUNITY BENEFIT REPORTING REQUIREMENTS

I. GENERAL HOSPITAL DEMOGRAPHICS AND CHARACTERISTICS:

- Please <u>list</u> the following information in Table I below. (For the purposes of this section, "primary services area" means the Maryland postal ZIP code areas from which the first 60 percent of a hospital's patient discharges originate during the most recent 12-month period available, where the discharges from each ZIP code are ordered from largest to smallest number of discharges. This information will be provided to all acute care hospitals by the HSCRC. Specialty hospitals should work with the Commission to establish their primary service area for the purpose of this report).
 - a. Bed Designation The total number of licensed beds
 - b. Inpatient Admissions: The number of inpatient admissions for the FY being reported;
 - c. Primary Service Area (PSA) zip codes;
 - d. Listing of all other Maryland hospitals sharing your PSA;
 - e. The percentage of the hospital's uninsured patients by county. (Please provide the source for this data, e.g., "review of hospital discharge data");
 - f. The percentage of the hospital's patients who are Medicaid recipients. (Please provide the source for this data (e.g., "review of hospital discharge data.")
 - g. The percentage of the hospital's patients who are Medicare beneficiaries. (Please provide the source for this data (e.g., "review of hospital discharge data.")

a. Bed Designation: (FY 2018)	b. Inpatient Admissio ns: (FY2017)	c. Primary Service Area Zip Codes:	d. All other Maryland Hospitals Sharing Primary Service Area:	e. Percentage of Hospital's Uninsured Patients,:	f. Percentage of the Hospital's Patients who are Medicaid Recipients:	g. Percentage of the Hospital's Patients who are Medicare beneficiaries
UM Rehab & Ortho Inst. 137 Beds	2,623	21229, 21228, 21207, 21223, 21217, 21061, 21216, 21045, 21215, 21042, 21227, 21043, 21044, 21060,	Howard County General Hospital UM BWMC Northwest Hospital Carroll Hospital Center UM Midtown	1%	2 <u>1.6</u> 2.9%	44.5%

Table I

	<u>, , , , , , , , , , , , , , , , , , , </u>
21122, 21784,	Levindale Hebrew Geriatric Hospital
21201, 21244,	
21157, 21225,	Sinai Hospital of Baltimore
21222, 21230,	The Johns Hopkins
21771, 21144,	Hospital
21117, 21133,	MedStar Union Memorial Hospital
21206, 21046,	Bon Secours
21218, 21136,	MedStar Harbor
21158, 21205,	Hospital
20723, 21208,	Saint Agnes Hospital
21213, 21075,	Anne Arundel
21093, 21113,	Medical Center
21234	Franklin Square
	Greater Baltimore Medical Center
	MedStar Good Samaritan Hospital
	Johns Hopkins Bayview Medical Center
	Mercy Medical Center
	UM Medical Center
	MedStar Union Memorial Hospital

Data Sources: UMMS Administration data (Bed Designation and Inpatient Admissions), HSCRC Semi-Confidential Database (Primary Service Area Zip Codes, Maryland Hospitals Sharing Primary Service Area, Percentage of Hospital's Uninsured, Medicaid Recipients and Medicare beneficiaries)

- 2. For purposes of reporting on your community benefit activities, please provide the following information:
 - a. Use Table II to provide a detailed description of the Community Benefit Service Area (CBSA), reflecting the community or communities the organization serves. The description should include (but should not be limited to):
 - (i) A list of the zip codes included in the organization's CBSA, and
 - (ii) An indication of which zip codes within the CBSA include geographic areas where the most vulnerable populations (including but not necessarily limited to medically underserved, low-income, and minority populations) reside.
 - (iii) A description of how the organization identified its CBSA, (such as highest proportion of uninsured, Medicaid recipients, and super utilizers, e.g., individuals with > 3 hospitalizations in the past year). This information may be copied directly from the community definition section of the organization's federally-required CHNA Report (<u>26 CFR § 1.501(r)-3</u>).

Statistics may be accessed from:

The Maryland State Health Improvement Process (http://dhmh.maryland.gov/ship/);

The Maryland Vital Statistics Administration (http://dhmh.maryland.gov/vsa/Pages/home.aspx);

The Maryland Plan to Eliminate Minority Health Disparities (2010-2014) (http://dhmh.maryland.gov/mhhd/Documents/Maryland_Health_Disparities_Plan_of_Action_6.10.10.pdf);

The Maryland Chart Book of Minority Health and Minority Health Disparities, 2nd Edition (<u>http://dhmh.maryland.gov/mhhd/Documents/Maryland%20Health%20Disparities%20Data%20Chartbook%202012%20corrected%202013%2002%2022%2011%20AM.pdf</u>);

The Maryland State Department of Education (The Maryland Report Card) (<u>http://www.mdreportcard.org</u>) Direct link to data– (<u>http://www.mdreportcard.org/downloadindex.aspx?K=99AAAA</u>)

Community Health Status Indicators (http://wwwn.cdc.gov/communityhealth)

Table II

Zip Codes included in the organization's CBSA, indicating which include geographic areas where the most vulnerable populations reside.	21201, 21215, 21216, 21217, 21218, 21223, 21229, 21230, 21226, 21227, 21202,21213,21205,21231,21224,21225,21226, 21228,21227 (Vulnerable population defined as ZIP Codes containing census tract with 20% population below poverty level and 25% population less than high school education)	American Community Survey, 2011-2015, 5- Year Estimates data from http://assessment.comm unitycommons.org/Foot print/
Median Household Income within the CBSA	CBSA \$ 77,359	American Community Survey, 2011-2015, 5- Year Estimates, U.S. Census Bureau
Percentage of households with incomes below the federal poverty guidelines within the CBSA	Baltimore City: 19.0% Baltimore County: 6.3% Anne Arundel County: 3.8% Howard County: 3.8%	American Community Survey, 2011-2015, 5- Year Estimates, U.S. Census Bureau
For the counties within the CBSA, what is the percentage of uninsured for each county? This information may be available using the following links: <u>http://www.census.gov/hhes/www/hlthins</u> / <u>data/acs/aff.html;</u> <u>http://planning.maryland.gov/msdc/Ameri</u> <u>can_Community_Survey/2009ACS.shtml</u>	Baltimore City: 7.6% Baltimore County: 5.5% Anne Arundel County: 5.0% Howard County: 4.2%	American Community Survey, 2015, 1-Year Estimates, U.S. Census Bureau
Percentage of Medicaid recipients by County within the CBSA.	Baltimore City: 25.4 % Baltimore County: 12.8% Anne Arundel County: 9.5% Howard County: 6.9%	American Community Survey, 2015, 1-Year Estimates, U.S. Census Bureau
Life Expectancy by County within the CBSA (including by race and ethnicity where data are available). See SHIP website: http://dhmh.maryland.gov/ship/SitePages/ Home.aspx and county profiles: http://dhmh.maryland.gov/ship/SitePages/ LHICcontacts.aspx	Baltimore City All races/ethnicity: 73.9 years White: 76.9 years Black: 72.0 years Baltimore County All races/ethnicity: 79.1 years White: 79.1 years Black: 78.0 years Anne Arundel County All races/ethnicity: 79.8 years White: 79.2 years Black: 77.2 years Howard County	Maryland Vital Statistics Annual Report, 2015

	All races/ethnicity: 82.9 years	
	White: 82.7 years	
	Black: 81.4 years	
Mortality Datas by County within the	Poltimono Citu	Mamiland Vital Statistics
Mortality Rates by County within the	Baltimore City 987.7 per 100,000 population (age-adjusted rate)	Maryland Vital Statistics
CBSA (including by race and ethnicity where data are available).	987.7 per 100,000 population (age-aujusted fate)	Annual Report, 2015
where data are available).	Crude Death Rates by Race and Ethnicity:	
	White: 1,034.1 per 100,000 population	
	Black: 1,145.2 per 100,000 population	
	Asian: 271.5 per 100,000 population	
	Hispanic: 146.9 per 100,000 population	
	rinspanie. 140.9 per 100,000 population	
	Baltimore County	
	735.0 per 100,000 population	
	Crude Death Rates by Race and Ethnicity:	
	White: 1,281.5 per 100,000 population	
	Black: 663.7 per 100,000 population	
	Asian: 222.8 per 100,000 population	
	Hispanic: 164.1 per 100,000 population	
	rispanie. 104.1 per 100,000 population	
	Anne Arundel County	
	708.7 per 100,000 population	
	Crude Death Rates by Race and Ethnicity:	
	White: 849.9 per 100,000 population	
	Black: 607.4 per 100,000 population	
	Asian: 224.5 per 100,000 population	
	Hispanic: 118.8 per 100,000 population	
	Howard County	
	566.4 per 100,000 population	
	Crude Death Rates by Race and Ethnicity:	
	White: 685.3 per 100,000 population	
	Black: 500.0 per 100,000 population	
	Asian: 223.0 per 100,000 population	
	Hispanic: 112.6 per 100,000 population	
Access to healthy food, transportation and	Baltimore City	Comprehensive
education, housing quality and exposure	% Households with Severe Problems ¹ : 24%	Housing Affordability
to environmental factors that negatively	% Food Insecure: 24%	Strategy (CHAS), 2013
affect health status by County within the	% Adult Smokers: 24%	data from
CBSA. (to the extent information is	Violent crime per 100,000 population: 1,389	http://www.countyhealt
available from local or county	% Unemployed: 13.1%	hrankings.org/
jurisdictions such as the local health	% Less than High School Education (age 25 and	
officer, local county officials, or other	over) : 17.5%	USDA Food
resources)	% Without vehicle (Age 16 and over): 16.2%	Environment Atlas,

See SHIP website for social and physical		Map the Meal Gap
environmental data and county profiles	Baltimore County	from Feeding America
for primary service area information:	% Households with Severe Problems: 16%	data from
http://dhmh.maryland.gov/ship/SitePages/	% Food Insecure: 13%	http://www.countyhealt
measures.aspx	% Adult Smokers: 13%	hrankings.org/
	Violent crime per 100,000 population: 504	
	% Unemployed: 6.9%	Behavioral Risk Factor
	% Less than High School Education (age 25 and	Surveillance System,
	over) : 9.5%	2015 data from
	% Without vehicle (Age 16 and over): 3.0%	http://www.countyhealt
		hrankings.org/
	Anne Arundel County	
	% Households with Severe Problems: 15%	American Community
	% Food Insecure: 8%	Survey, 2011-2015, 5-
	% Adult Smokers: 14%	Year Estimates, U.S.
	Violent crime per 100,000 population: 460	Census Bureau
	% Unemployed: 5.9%	
	% Less than High School Education (age 25 and	
	over) : 8.4% Without vahiala (A ga 16 and over): 1.8%	
	% Without vehicle (Age 16 and over): 1.8%	
	Howard County	
	% Households with Severe Problems: 13%	
	% Food Insecure: 8%	
	% Adult Smokers: 10%	
	Violent crime per 100,000 population: 200	
	% Unemployed: 4.9%	
	% Less than High School Education (age 25 and	
	over) : 4.8%	
	% Without vehicle (Age 16 and over): 1.5%	
Available detail on race, ethnicity, and	CBSA Total nonvelation, 2 204 808	American Community
language within CBSA. See SHIP County profiles for	Total population: 2,304,808	Survey, 2011-2015, 5- Year Estimates, U.S.
demographic information of Maryland	Population with ambulatory difficulty:	Census Bureau
jurisdictions.	Baltimore City: 9.4%	Census Dureau
http://dhmh.maryland.gov/ship/SitePages/LH	Baltimore County: 6.6%	
ICcontacts.aspx	Anne Arundel County: 5.2%	
	Howard County: 3.6%	
	Race and Ethnicity:	
	White: 53.5%	
	Black or African American: 32.4%	
	Asian: 5.7%	
	Hispanic, Any Race: 5.4%	
	Others: 3%	
	Total housing units: 964,444	
	Language Spoken:	

	English: 87.2% Spanish or Spanish Creole: 4.3% Indo-European languages: 3.9% Asian and Pacific Island languages: 3.3% Other languages: 1.3%	
Other Infant Mortality Rate	Baltimore CityAll races/ethnicity: 8.4 per 1,000 live birthsWhite: 4.4 per 1,000 live birthsBlack: 9.7 per 1,000 live birthsHispanic: 8.7 per 1,000 live birthsBaltimore CountyAll races/Ethnicity: 6.1 per 1,000 live birthsWhite: 4.1 per 1,000 live birthsBlack: 9.9 per 1,000 live birthsHispanic: 7.2 per 1,000 live birthsHispanic: 7.2 per 1,000 live birthsMine Arundel CountyAll races/Ethnicity: 5.1 per 1,000 live birthsBlack: 9.5 per 1,000 live births	Maryland Vital Statistics Annual Report, 2015
Adult Diabetes Prevalence	Howard County All races/ethnicity: 7.6 per 1,000 live births White: 4.8 per 1,000 live births Black: 13.9 per 1,000 live births Baltimore City: 13.2 % Baltimore County: 10.6 % Anne Arundel County: 8.9 % Howard County: 6.2 %	Maryland Behavioral Risk Factor Surveillance System http://www.marylandbr fss.org

¹ Percentage of households with at least 1 of 4 housing problems: overcrowding, high housing costs, or lack of kitchen or plumbing facilities

	County Ra	nking (Ou	t of 24 Co	ounties in	Maryland, in	cluding Ba	altimore City)*
	Health Outcomes	Length of Life	Quality of Life	Health Factors	Health Behaviors	Clinical Care	Social & Economic Factors	Physical Environment
Baltimore City	24	24	24	24	24	21	24	10
Baltimore County	14	12	17	11	9	10	12	21
Anne Arundel County	9	9	6	7	8	9	8	9
Howard County	2	2	2	1	2	1	1	7

Additional Disparity Information for Baltimore City

*Source – Robert Wood Johnson Foundation, County Health Rankings, 2016 http://www.countyhealthrankings.org/app/maryland/2016/rankings/baltimorecity/county/outcomes/overall/snapshot

As evident in the Table above using the County Health Rankings, Baltimore City is the lowest ranked area in Maryland in 6 out of 8 categories. Within the City of Baltimore, there are further health disparities. In the following Life Expectancy Map, there is a 20 year difference in the life expectancy between many of the zips. In some areas of targeted CBSA, the life expectancy is equivalent to the life expectancy in Nepal and India. In the other counties, there is a higher life expectancy with better health factors, health behaviors and improved social and economic conditions. However, this Table and the rankings speak predominately about the non-disabled community. Disabled adults face unique challenges regardless of their county of residence. The below graph shows the special challenges which face the disabled population nationally as reported by the US Dept of Health and Human Services and the Centers for Disease Control.





Baltimore City Life Expectancy Map

Food Environment Map of Baltimore



#BmoreFoodMap

II. COMMUNITY HEALTH NEEDS ASSESSMENT

1. Within the past three fiscal years, has your hospital conducted a Community Health Needs Assessment that conforms to the IRS requirements detailed on pages 1-2 of these Instructions?

__X_Yes Provide date approved by the hospital's governing body or an authorized body thereof here: **6/30/15** (mm/dd/yy)

___No

If you answered yes to this question, provide a link to the document here. (Please note: this may be the same document used in the prior year report).

http://umrehabortho.org/-/media/systemhospitals/um-rehab/pdfs/about/2015-um-rehab-and-ortho-chna-report--rev--063016.pdf?la=en&hash=744C66D6341A25C3EF08B29C82709DB51257C225

- 2. Has your hospital adopted an implementation strategy that conforms to the IRS requirements detailed on pages 3-4?
 - _X_Yes Enter date approved by governing body/authorized body thereof here: 6/30/15 (mm/dd/yy) __No

If you answered yes to this question, provide the link to the document here:

http://umrehabortho.org/-/media/systemhospitals/um-rehab/pdfs/about/2015-um-rehab-and-orthochna-report--rev--063016.pdf?la=en&hash=744C66D6341A25C3EF08B29C82709DB51257C225

III. COMMUNITY BENEFIT ADMINISTRATION

1. Please answer the following questions below regarding the decision making process of determining which needs in the community would be addressed through community benefits activities of your hospital?

a. Are Community Benefits planning and investments part of your hospital's internal strategic plan?

_X_Yes - Strategic Planning process underway currently. Community benefits and community health needs assessment findings being added to the new Strategic Plan. ____No

If yes, please provide a specific description of how CB planning fits into the hospital's strategic plan. If this is a publicly available document, please provide a link here and indicate which sections apply to CB planning.

Elements of the CHNA and community benefits are being integrated into the Strategic Plan currently within this current fiscal year. Prior Strategic Plan did not include community benefits, but with the process underway currently, this is now being included into the Plan.

- b. What stakeholders within the hospital are involved in your hospital community benefit process/structure to implement and deliver community benefit activities? (Please place a check next to any individual/group involved in the structure of the CB process and describe the role each plays in the planning process (additional positions may be added as necessary)
 - i. Senior Leadership
 - 1. _X_CEO

2. ___CFO __X_Other (please specify) CNO, CMO, Director of Nursing, Director of Therapy, Describe the role of Senior Leadership.

- Provides strategic oversight and leadership for community health ٠ improvement
- Translates connections to population health initiatives •
- Provides contacts to external partners and academic organizations •
- Advises Director and team on strategic direction and planning
- Executive sponsor/link to the Board of Directors ٠
- ii. Clinical Leadership

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- 1._X_Physician CMO
- 2._X__Nurse
- 3.___Social Worker

4. X_Other (please specify) As a rehabilitation hospital, numerous rehab staff, ie physical therapists, occupational therapists, etc participate

Describe the role of Clinical Leadership

- Provides clinical knowledge/context for needs assessment and programming ٠
- Develops/approves protocols for health screenings •
- Provides oversight to health screenings & outreach programs •
- Population Health Leadership and Staff iii.
 - _X__ Population health VP or equivalent (please list) Leathey Smith, 1. Manager of Care Management
 - ___Other population health staff (please list staff) 2.

Describe the role of population health leaders and staff in the community benefit process

- Leads organization with value-based care and population health initiatives
 - Works with medical staff to reduce PAUs and readmissions, works with new Coordinated Care Center for high utilizer patients to prevent readmissions
- · Partners with the University of Maryland School of Medicine
- Partners with the University of Maryland Baltimore Campus

Community Benefit Operations

X Individual (please specify FTEs - 1.5 FTEs)

- 1. __Committee (please list members)
- 2. ____Department (please list staff)
- 3. ____Task Force (please list members)
- 4. X_Other (please describe)

Briefly describe the role of each CB Operations members and their function within the hospital's CB activities planning and reporting process.

Pam Bechtel – Coordinates the reporting for the community benefit report and volunteer activities

Michelle Larcey – Coordinates the reporting for the community benefit report, works with various departments for reporting

Lori Patria – Leads the adaptive sports program, rehab programs, and assists with community benefits tracking

Anne Williams – Provides oversight and guidance to community health improvement initiatives and regulatory requirements

Cindy Kelleher – Leads overall effort in both the development and reporting of community benefits

c. Is there an internal audit (i.e., an internal review conducted at the hospital) of the Community Benefit report?)

Spreadsheet	Xyes	no
Narrative	Xyes	no

If yes, describe the details of the audit/review process (who does the review? Who signs off on the review?)

After completion, the Narrative is reviewed by the UMMS Director, Community Health Improvement, and UM Rehab CEO. After their approval, it is then reviewed by the UMMS SVP for Government & Regulatory Affairs. After completion, the Spreadsheet is reviewed by the UMMS Director, Community Health Improvement, UM Rehab CEO and UMMS SVP for Government & Regulatory Affairs, and the UMMS Vice President of Reimbursement & Revenue. A high level overview of both reports are reviewed and approved at the UM Rehab of the Board meeting in late November.

d. Does the hospital's Board review and approve the FY Community Benefit report that is submitted to the HSCRC?

Spreadsheet	_X_yes	no
Narrative	_X_yes	no

If no, please explain why.

e. Are Community Benefit investments incorporated into the major strategies of your Hospital Strategic Transformation Plan?

___X__Yes ____No

If yes, please list these strategies and indicate how the Community Benefit investments will be utilized in support of the strategy.

Yes, as part of our Innovation Strategy, that included our navigator program, our adaptive sports program and offering free programs such as our walking clinic.

IV. COMMUNITY BENEFIT EXTERNAL COLLABORATION

External collaborations are highly structured and effective partnerships with relevant community stakeholders aimed at collectively solving the complex health and social problems that result in health inequities. Maryland hospital organizations should demonstrate that they are engaging partners to move toward specific and rigorous processes aimed at generating improved population health. Collaborations of this nature have specific conditions that together lead to meaningful results, including: a common agenda that addresses shared priorities, a shared defined target population, shared processes and outcomes, measurement, mutually reinforcing evidence based activities, continuous communication and quality improvement, and a backbone organization designated to engage and coordinate partners.

a. Does the hospital organization engage in external collaboration with the following partners?

__X_Other hospital organizations

__X__Local Health Department

__X_Local health improvement coalitions (LHICs)

X Schools

- __X_Behavioral health organizations
- __X_Faith based community organizations
- __X__Social service organizations

____Post-acute care facilities

b. Use the table below to list the meaningful, core partners with whom the hospital organization collaborated to conduct a CHNA. Provide a brief description of collaborative activities indicating the roles and responsibilities of each partner and indicating the approximate time period during which collaborative activities occurred (please add as many rows to the table as necessary to be complete).

Organization	Name of Key	Title	Collaboration
	Collaborator		Description
University of Maryland	Anne Williams	Director,	Consultant to
Medical Center		Community Health	process
		Improvement	
University of Maryland	Donna Jacobs	Senior Vice	Hosted
Medical System		President	community
			partner focus
			group
BARS	Pam Lenhart	Director	Key informant on
			identifying needs
			of disabled
			community
Dept of Rehabilitation	Darice Bunch	Supervisor	Key informant on
Services	Polly Huston	Director	identifying needs
			of disabled
			community
Mayor's Office on	Dr. Nollie Wood	Executive Director	Understand key
Disabilities			elements of ADA,
			assisting City with
			accessibility
			issues
Mount de Sales	Annie McDonald	Athletic Director	Key informants
Academy			on needs of
			private schools
			sports programs
Howard County Public	Kerrie Wagaman	Coordinator of	Key informants
Schools		Health Services	on needs of public
	John Davis		

Commented [KC1]: I think this has changed; also I would add Brain Injury Association of Maryland;

	Coordinator of	schools sports
	Athletics	programs

c. Is there a member of the hospital organization that is co-chairing the Local Health Improvement Coalition (LHIC) in one or more of the jurisdictions where the hospital organization is targeting community benefit dollars?

___yes __X__no

If the response to the question above is yes, please list the counties for which a member of the hospital organization co-chairs the LHIC.

d. Is there a member of the hospital organization that attends or is a member of the LHIC in one or more of the jurisdictions where the hospital organization is targeting community benefit dollars?

___X_yes ____no

If the response to the question above is yes, please list the counties in which a member of the hospital organization attends meetings or is a member of the LHIC.

Baltimore City – the Baltimore City Health Department leads the LHIC, but our representative is Donna Jacobs, Senior Vice President, UMMS who attends the meetings; Anne Williams to begin attending as well in FY2018.

V. HOSPITAL COMMUNITY BENEFIT PROGRAM AND INITIATIVES

Please use Table III to provide a clear and concise description of the primary need identified for inclusion in this report, the principal objective of each evidence based initiative and how the results will be measured (what are the short-term, mid-term and long-term measures? Are they aligned with measures such as SHIP and all-payer model monitoring measures?), time allocated to each initiative, key partners in the planning and implementation of each initiative, measured outcomes of each initiative, whether each initiative will be continued based on the measured outcomes, and the current FY costs associated with each initiative. Use at least one page for each initiative (at 10-point type). Please be sure these initiatives occurred in the FY in which you are reporting.

For example: for each principal initiative, provide the following:

a. 1. Identified need: This may have been identified through a CHNA, a documented request from a public health agency or community group, or other generally accepted practice for developing community benefit programs. Include any measurable disparities and poor health status of racial and ethnic minority groups. Include a description of the collaborative process used to identify common priority areas and alignment with other public and private organizations.

2. Please indicate how the community's need for the initiative was identified.

- b. Name of Hospital Initiative: insert name of hospital initiative. These initiatives should be evidence informed or evidence based. (Evidence based community health improvement initiatives may be found on the CDC's website using the following links: http://www.thecommunityguide.org/ or http://www.thecommunityguide.org/ or http://www.thecommunityguide.org/ or http://www.chc.gov/chinav/), or from the County Health Rankings and Roadmaps website, here: http://tinyurl.com/mmea7nw. (Evidence based clinical practice guidelines may be found through the AHRQ website using the following link: www.guideline.gov/index.aspx))
- c. Total number of people within the target population (how many people in the target area are affected by the particular disease or other negative health factor being addressed by the initiative)?
- d. Total number of people reached by the initiative (how many people in the target population were served by the initiative)?
- e. Primary Objective of the Initiative: This is a detailed description of the initiative, how it is intended to address the identified need,
- f. Single or Multi-Year Plan: Will the initiative span more than one year? What is the time period for the initiative? (please be sure to include the actual dates, or at least a specific year in which the initiative was in place)
- g. Key Collaborators in Delivery: Name the partners (community members and/or hospitals) involved in the delivery of the initiative. For collaborating organizations, please provide the name and title of at least one individual representing the organization for purposes of the collaboration.
- Impact of Hospital Initiative: Initiatives should have measurable health outcomes and link to overall population health priorities such as SHIP measures and the all-payer model monitoring measures.

Describe here the measure(s)/health indicator(s) that the hospital will use to evaluate the initiative's impact. The hospital shall evaluate the initiative's impact by reporting (in item "i. Evaluation of Outcome"):

- (i) Statistical evidence of measurable improvement in health status of the target population. If the hospital is unable to provide statistical evidence of measurable improvement in health status of the target population, then it may substitute:
- (ii) Statistical evidence of measureable improvement in the health status of individuals served by the initiative. If the hospital is unable to provide statistical evidence of measureable improvement in the health status of individuals served by the initiative, then it may substitute:
- (iii) The number of people served by the initiative.

Please include short-term, mid-term, and long-term population health targets for each measure/health indicator. These should be monitored and tracked by the hospital organization, preferably in collaboration with appropriate community partners.

i. Evaluation of Outcome: To what degree did the initiative address the identified community health need, such as a reduction or improvement in the health indicator? To what extent do the measurable results indicate that the objectives of the initiative were met? (Please refer to

the short-term, mid-term, and long-term population health targets listed by the hospital in response to item h, above, and provide baseline data when available.)

j. Continuation of Initiative:

What gaps/barriers have been identified and how did the hospital work to address these challenges within the community? Will the initiative be continued based on the outcome? If not, why? What is the mechanism to scale up successful initiatives for a greater impact in the community?

k. Expense:

A. what were the hospital's costs associated with this initiative? The amount reported should include the dollars, in-kind-donations, and grants associated with the fiscal year being reported.

B. Of the total costs associated with the initiative, what amount, if any, was provided through a restricted grant or donation?

2. Were there any primary community health needs identified through the CHNA that were not addressed by the hospital? If so, why not? (Examples: the fact that another nearby hospital is focusing on that identified community need, or that the hospital does not have adequate resources to address it.) This information may be copied directly from the section of the CHNA that refers to community health needs identified but unmet.

Priorities as identified in the FY15 CHNA include:

- Quality of Life (for the disabled community)
- Community Education/Awareness (of the disabled in the community)
- Transition to Community
- Dental Care (for the disabled population)

• Health Literacy (UMMS Priority)

Additional 21201 community needs which are not directly addressed by the above priorities include:

- No health insurance
- No transportation
- Local MDs not part of the insurance plans
- Behavioral/mental health

3. How do the hospital's CB operations/activities work toward the State's initiatives for improvement in population health? (see links below for more information on the State's various initiatives)

The Population Health Strategy and Implementation Plan was finalized. This plan covers both the University of Maryland Medical Center and Midtown Campuses with some integration with UM Rehab & Ortho Institute. The Community Health Needs Assessments and Community Benefits Reports are integrated into the Plan to provide a context of the community for planning purposes. There are six workgroups which will be tasked with specific elements of the overall strategy. Initiatives will be further developed which will address the SDoH which are barriers in the targeted West Baltimore population. UM Rehab & Ortho Institute will be part of the West Baltimore Transformation Grant along with the University of Maryland Medical Center and Midtown Campuses. Additionally, UM Rehab has 4 Patient Navigators who are dedicated for population health initiatives. To support the population health initiatives with chronic high

utilizers, UM Rehab & Ortho Institute has begun to offer the Living Well/Chronic Disease Management Program to patients and the community.

MARYLAND STATE HEALTH IMPROVEMENT PROCESS (SHIP) http://dhmh.maryland.gov/ship/SitePages/Home.aspx

COMMUNITY HEALTH RESOURCES COMMISSION http://dhmh.maryland.gov/mchrc/sitepages/home.aspx

PHYSICIANS

- 1. As required under HG§19-303, provide a written description of gaps in the availability of specialist providers, including outpatient specialty care, to serve the uninsured cared for by the hospital.
- 2. If you list Physician Subsidies in your data in category C of the CB Inventory Sheet, please use Table IV to indicate the category of subsidy, and explain why the services would not otherwise be available to meet patient demand. The categories include: Hospital-based physicians with whom the hospital has an exclusive contract; Non-Resident house staff and hospitalists; Coverage of Emergency Department Call; Physician provision of financial assistance to encourage alignment with the hospital financial assistance policies; and Physician recruitment to meet community need.

Category of Subsidy	Explanation of Need for Service
Hospital-Based physicians	
Non-Resident House Staff and	
Hospitalists	
Coverage of Emergency	
Department Call	
Physician Provision of Financial	
Assistance	
Physician Recruitment to Meet	
Community Need	
Other – (provide detail of any	
subsidy not listed above - add	
more rows if needed)	

VI. APPENDICES

To Be Attached as Appendices:

- 1. Describe your Financial Assistance Policy (FAP):
 - a. Describe how the hospital informs patients and persons who would otherwise be billed for services about their eligibility for assistance under federal, state, or local government programs or under the hospital's FAP. (label appendix I)

For *example*, state whether the hospital:

- Prepares its FAP, or a summary thereof (i.e., according to National CLAS Standards):
 - in a culturally sensitive manner,
 - at a reading comprehension level appropriate to the CBSA's population, and
 - in non-English languages that are prevalent in the CBSA.
- Posts its FAP, or a summary thereof, and financial assistance contact information in admissions areas, emergency rooms, and other areas of facilities in which eligible patients are likely to present;
- Provides a copy of the FAP, or a summary thereof, and financial assistance contact information to patients or their families as part of the intake process;
- Provides a copy of the FAP, or summary thereof, and financial assistance contact information to patients with discharge materials;
- Includes the FAP, or a summary thereof, along with financial assistance contact information, in patient bills;
- Besides English, in what language(s) is the Patient Information sheet available;
- Discusses with patients or their families the availability of various government benefits, such as Medicaid or state programs, and assists patients with qualification for such programs, where applicable.
- b. Provide a brief description of how your hospital's FAP has changed since the ACA's Health Care Coverage Expansion Option became effective on January 1, 2014 (label appendix II).
- c. Include a copy of your hospital's FAP (label appendix III).
- d. Include a copy of the Patient Information Sheet provided to patients in accordance with Health-General §19-214.1(e) Please be sure it conforms to the instructions provided in accordance with Health-General §19-214.1(e). Link to instructions: http://www.hscrc.state.md.us/documents/Hospitals/DataReporting/FormsReportingM odules/MD_HospPatientInfo/PatientInfoSheetGuidelines.doc (label appendix IV).
- 2. Attach the hospital's mission, vision, and value statement(s) (label appendix V).

Attachment A

MARYLAND STATE HEALTH IMPROVEMENT PROCESS (SHIP) SELECT POPULATION HEALTH MEASURES FOR TRACKING AND MONITORING POPULATION HEALTH

- Increase life expectancy
- Reduce infant mortality
- Prevention Quality Indicator (PQI) Composite Measure of Preventable

Hospitalization

- Reduce the % of adults who are current smokers
- Reduce the % of youth using any kind of tobacco product
- Reduce the % of children who are considered obese
- Increase the % of adults who are at a healthy weight
- Increase the % vaccinated annually for seasonal influenza
- Increase the % of children with recommended vaccinations
- Reduce new HIV infections among adults and adolescents
- Reduce diabetes-related emergency department visits
- Reduce hypertension related emergency department visits
- Reduce hospital ED visits from asthma
- Reduce hospital ED visits related to mental health conditions
- Reduce hospital ED visits related to addictions
- Reduce Fall-related death rate

Table III – FY 2017 Community Benefits Narrative Report – Adapted Sports Program

A. 1. Identified Need:	A1 Programs to provide exposure and opportunities for
	participation in adapted sports to improve health, fitness,
A. 2. How was the need identified:	social and overall quality of life for individuals with
	physical disabilities.
	A2 Through patient and staff focus groups as well as key
	informant interviews, the Adapted Sports Program was
	identified as part of the Community Health Needs
	Assessment FY'15 as a valued service which is currently
	provided. A need to expand the program was also
	identified to further meet health, fitness, social and
	overall quality of life needs.
B: Name of hospital initiative	Adapted Sports Program
	- Adapted Sports Festival
	- Wheelchair Rugby Team
	- Wheelchair Basketball Clinic
	 Adapted Golf Program
	 Amputee Walking/Running Clinic
C: Total number of people within target	300,000 adults with ambulatory disability in Maryland.
population	This estimate is based on approximately 5% of the adult
	population 18-64 yrs have some type of ambulatory
	disability. Based on 6 million Maryland residents.
	https://disabilitycompendium.org/sites/default/files/user-
	uploads/2016 AnnualReport.pdf
D: Total number of people reached by	582 participants in various programs
the initiative	
E: Primary objective of initiative:	Adapted Sports Program
,,	
	 Increase physical activity (Maryland SHIP) Increase physical activity af a data data data data data data data
	 Increase awareness & benefits of adapted sports for disabled individuals
	3) Increase self-reported quality of life of disabled
	adults
F. Cingle en multi ve en mlem.	All programs are multi-year, ongoing initiatives.
F: Single or multi-year plan:	

	1			
	United States Paralympic Committee			
	Dankmeyer, Inc.			
	Baltimore Municipal Golf Corporation - Forest Park Golf Course			
	Baltimore City Recreation and Parks			
	Baltimore County Recreation and Parks			
H: Impact of hospital initiative:	Description: The Adapted Sports Program maximizes participation for individuals with disabilities in adapted recreational and competitive sports, in order to promote independence, self-confidence, health and overall well- being through structured, individual and team sports Metrics: • # of participants • % of participants who report learning about adapted sports that they can participate in • % of participants who report positive impact on life			
	Participants of the adapted sports program com survey regarding the impact of the program on a of programs available in the community, impact health, fitness, socialization and overall quality o			
I: Evaluation of outcome	 582 participants in all programs 90% of participants reported learning about adapted sports programs in the community 100% of participants reported positive impact on fitness/health, socialization, and overall quality of life as result of the program 			
J: Continuation of initiative:	UM Rehab will continue to monitor performance and outcome measures annually. This priority and the accompanying initiatives will continue until the FY18 CHNA is completed and as long as there continues to be interest and perceived benefit to our participants.			
K: Expense:	a. \$89,185	b. \$0		

Table III – FY 2017 Community Benefits Narrative Report – Dental Clinic

A. 1. Identified Need: A. 2. How was the need identified:	 A1. The UM Rehabilitation & Orthopaedic Institute Dental Clinic serves children and adults who have limited access to oral health care in the community. This population includes special health care needs (SHCN) patients (individuals who are mentally and/or physically disabled), as well as many children in the Maryland Medicaid Program. The Dental Clinic at UM Rehab is one of the few providers in the state who serves both pediatric and adult SHCN populations. These individuals may not receive care otherwise as many dentists in the community are not comfortable performing dental services for special health care needs patients. A2. Through patient and staff focus groups as well as key informant interviews, the Dental Clinic was identified as part of the Community Health Needs Assessment FY'15 as a valued service currently provided.
B: Name of hospital initiative	Dental Clinic
C: Total number of people within target population	912,000 adults and children (0-17 yrs) with a disability in Maryland. This estimate is based on approximately 6.2% of children 0-17 yrs and 9% of the adult population 18-64 yrs have some type of ambulatory disability. Based on 6 million Maryland residents. <u>https://disabilitycompendium.org/sites/default/files/user-uploads/2016_AnnualReport.pdf</u>
D: Total number of people reached by the initiative	3,124 patients with 8,275 visits
E: Primary objective of initiative:	 Dental Clinic 1) Increase children receiving dental care (Maryland SHIP) 2) Decrease emergency department visit rate for dental care (Maryland SHIP) 3) Increase number of dental treatments available to disabled population 4) Improve the oral health for those patients with special needs and who have limited access to good dental care.
F: Single or multi-year plan:	Ongoing initiative; has existed for many years and will continue indefinitely.
G: Key collaborators in delivery:	University of Maryland School of Dentistry

	 Hygienist program 4th year dental students (externship program) Baltimore City Community College Hygienist program Community College of Baltimore County, Dundalk Hygienist program 	
H: Impact of hospital initiative:	Description: Patients with limited access to good dental care experience reduced health care costs and improved patient care by receiving treatment for dental disease in the Dental Clinic instead of in the ER. Outcomes are evaluated by tracking the number of visits that take place in the Dental Clinic each year, and measuring the percent of visits that are preventive. Metrics: • # of visits • % of visits which were preventive • % of visits which were emergent	
I: Evaluation of outcome	 8,275 total visits 69% (or 5746) were preventive 4% (or 406) were emergent 	
J: Continuation of initiative:	Has existed for many years and will continue indefinitely	
K: Expense:	a. \$42,631 b. N/A	

Table III – FY 2017 Community Benefits Narrative Report – Support Groups

A. 1. Identified Need: A. 2. How was the need identified:	A1 Through patient and staff focus groups as well as key informant interviews, support groups were identified as part of the Community Health Needs Assessment FY'15 as a valued service to meet the need to increase knowledge, decrease stress, improve coping strategies, and have support of a peer group		
	A2. This is a long standing program that was developed in response to patient and community members request and the need is re-validated each year though survey and informal comments This meets a need for a forum for individuals with newly diagnosed as well as individuals living with injury/illness for many years to share knowledge, resources, coping strategies and peer support.		
B: Name of hospital initiative	Support Groups • Spinal Cord Injury Support Group • Amputee Support Group • Stroke Support Group • Brain Injury Support Group • Caregiver Support Group		
C: Total number of people within target population	300,000 adults with ambulatory disability in Maryland. This estimate is based on approximately 5% of the adult population 18-64 yrs have some type of ambulatory disability. Based on 6 million Maryland residents. <u>https://disabilitycompendium.org/sites/default/files/user- uploads/2016_AnnualReport.pdf</u>		
D: Total number of people reached by the initiative	1,187 people in support groups throughout the year		
E: Primary objective of initiative:	 Decrease social isolation, depression, and/or anxiety in adults with disabilities in the community Increase coping skills and sense of adjustment in adults with disabilities in the community 		
F: Single or multi-year plan:	All programs are multi-year, ongoing initiatives.		
G: Key collaborators in delivery:	Amputee Coalition of America		

	Christopher and Dana Reeves Foundation	
H: Impact of hospital initiative:	Description: Support group participants share knowledge, resources, coping strategies and provide peer support. Participants of the various programs were surveyed. Topics are solicited by participants on a regular basis and program evaluation information is obtained regarding satisfaction and effectiveness of the program.	
	 Metrics: # of support group participants % of participants reporting positive impact % of participants reporting decrease in isolation, depression and anxiety % of participants reporting increase coping skills and adjustment 	
I: Evaluation of outcome	 1,187 individuals served in variety of support groups 100% of participants reported positive impact on sense of empowerment, ability to talk openly and honestly about feelings, helping to develop a clearer understanding of what to expect with their condition, and receiving practical advice. 92% of participants reported feeling less lonely, isolated or judged and less depression, anxiety and fatigue. 78% reported improved coping skills and sense of adjustment 	
J: Continuation of initiative:	All Support Groups will be continued as long as there continues to be interest and perceived benefit to our participants	
K: Expense:	c. \$35,105	

Table III – FY 2017 Community Benefits Narrative Report – Think First Program

A. 1. Identified Need: A. 2. How was the need identified:	 A1. Through patient and staff focus groups as well as key informant interviews, the Think First for Teens program was identified as part of the Community Health Needs Assessment FY'15 as a valued service to meet the need of reducing the accident/injury rate in the teen population. Injury is the leading cause of death and disability among children, teens and young adults. The most frequent causes of these injuries are motor vehicle crashes, violence, falls, sports and recreation. Research has shown that youth are amenable to changing their behaviors when information is provided by a perceived by a peer. A2. National and local data regarding prevalence of brain and spinal injuries. Identification of the Think First Program as an evidence based program
B: Name of hospital initiative	Think First Injury Prevention Program
C: Total number of people within target population	21,381 Baltimore City students – Gr 9-12 30,571 Baltimore County students – Gr 9-12
D: Total number of people reached by the initiative	152 high school students in Baltimore City and Baltimore County
E: Primary objective of initiative:	 Increase in students' self-reported knowledge or behavior changes as a result of program
F: Single or multi-year plan:	This is a multi-year initiative and is ongoing
G: Key collaborators in delivery:	Think First National Injury Prevention Foundation Baltimore City Public Schools Baltimore County Public Schools
H: Impact of hospital initiative:	Description: The Think First Program is a program provided by a health care professional and an individual who has had either a spinal cord injury or brain injury with the goal of encouraging youth to "Think First", minimize risk-taking behaviors and make decisions that will ensure their safety.

	Metrics: • # of students reached • % of students correctly reporting risk-taking behaviors after the program	
I: Evaluation of outcome	 152 students 100% of students correctly identified risk-taking behaviors that increase their likelihood for brain or spinal cord injury; also correctly identified behavioral changes that they can make to decrease their risk. 	
J: Continuation of initiative:	Ongoing - Think First for Teens program will be continued as long as there continues to be interest and perceived benefit to our participants	
K: Expense:	d. \$2,330	

Appendix 1

Financial Assistance Policy Description

University of Maryland Rehabilitation & Orthopedic Institute is committed to providing financial assistance to persons who have health care needs and are uninsured, underinsured, ineligible for a government program, or otherwise unable to pay, for medically necessary care based on their individual financial situation.

It is the policy of the UMMS Entities to provide Financial Assistance based on indigence or high medical expenses for patients who meet specified financial criteria and request such assistance. The Financial Clearance Program Policy is a clear, comprehensive policy established to assess the needs of particular patients that have indicated a possible financial hardship in obtaining aid when it is beyond their financial ability to pay for services rendered.

UM Rehabilitation and Orthopedic Institute makes every effort to make financial assistance information available to our patients including, but not limited to:

- Signage in main admitting areas and emergency rooms of the hospital
- Patient Handbook distributed to all patients
- Brochures explaining financial assistance are made available in all patient care areas
- Patient Plain Language Sheets Newly revised in June 2016, This handout was revised and is at the 5th grade reading level (available in English, Spanish, French, & Chinese based on top languages spoken by UMMC patients) – See English version attached in Appendix 4
- Patient Information Sheets (available in English, Spanish, French; Russian; Chinese; Korean; Vietnamese; Tagalog) – See attached English version in Appendix 4
- Appearing in print media through local newspapers

Appendix 2

ACA Health Care Coverage Expansion Description

Since implementation of the Affordable Care Act's (ACA) Health Care Coverage Expansion Option became effective on January 1, 2014, there has been a decrease in the number of patients presenting to the hospital in either uninsured and/or self-pay status. Additionally, the ACA's Expansion Option included a discontinuation of the primary adult care (PAC) which has also reduced uncompensated care. While there has been a decrease in the uncompensated care for straight self-pay patients since January 1, 2014, the ACA's Expansion Option has not completely eradicated charity care as eligible patients may still qualify for such case after insurance.

The following additional changes were also made to the hospital's financial assistance policy pursuant to the most recent 501(r) regulatory requirements:

1. LANGUAGE TRANSLATIONS

a. <u>Requirement</u>: The new 501(r) regulations lowered the language translation threshold for limited English proficient (LEP) populations to the lower of 5% of LEP individuals in the community served/1000-LEP individuals. University of Maryland Medical Center translated its financial assistance policy into the following languages: English, Spanish, French, and Chinese.

2. PLAIN LANGUAGE SUMMARY

a. <u>Requirement</u>: The new 501(r) regulations require a plain language summary of the FAP that is clear, concise, and easy for a patient to understand. University of Maryland Medical Center created a new plain language summary of its financial assistance policy in addition to its already-existing patient information sheet.

3. PROVIDER LISTS

a. <u>Requirement</u>: The new 501(r) regulations require each hospital to create and maintain a list of all health care providers (either attached to the FAP or maintained as a separate appendix) and identify which providers on that list are covered under the hospital's FAP and which providers are not. University of Maryland Medical Center maintains that list which is available for review.

Ar	ppe	nd	ix	3
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University of Maryland Medical Center University of Maryland Medical Center Midtown Campus University of Maryland Rehabilitation & Orthopaedic Institute University of Maryland St Joseph Medical Center University of Maryland Baltimore Washington Medical Center	University of Maryland Medical Center	The University of Maryland Medical System Central Business Office Policy & Procedure	Policy #:	TBD
			Effective Date:	07/01/2016
	Subject:	Page #:	1 of 9	
	FINANCIAL ASSISTANCE	Supersedes:	07-01-2015	

<u>POLICY</u>

This policy applies to The University of Maryland Medical System (UMMS) following entities:

- University of Maryland Medical Center (UMMC)
- University of Maryland Medical Center Midtown Campus (MTC)
- University of Maryland Rehabilitation & Orthopaedic Institute (UMROI)
- University of Maryland St. Joseph Medical Center (UMSJMC)
- University of Maryland Baltimore Washington Medical Center (UMBWMC)

UMMS is committed to providing financial assistance to persons who have health care needs and are uninsured, underinsured, ineligible for a government program, or otherwise unable to pay, for emergent and medically necessary care based on their individual financial situation.

It is the policy of the UMMS Entities to provide Financial Assistance based on indigence or high medical expenses for patients who meet specified financial criteria and request such assistance. The purpose of the following policy statement is to describe how applications for Financial Assistance should be made, the criteria for eligibility, and the steps for processing applications.

UMMS Entities will publish the availability of Financial Assistance on a yearly basis in their local newspapers and will post notices of availability at appropriate intake locations as well as the Billing Office. Notice of availability will also be sent to patients to patient with patient bills. Signage in key patient access areas will be made available. A Patient Billing and Financial Assistance Information Sheet will be provided before discharge and will be available to all patients upon request.

Financial Assistance may be extended when a review of a patient's individual financial circumstances has been conducted and documented. This should include a review of the patient's existing medical expenses and obligations (including any accounts having gone to bad debt except those accounts that have gone to lawsuit and a judgment has been obtained) and any projected medical expenses. Financial Assistance Applications may be offered to patients whose accounts are with a collection agency and may apply only to those accounts on which a judgment has not been granted.

UMMS retains the right in its sole discretion to determine a patient's ability to pay. All patients presenting for emergency services will be treated regardless of their ability to pay. For emergent/urgent services, applications to the Financial Clearance Program will be completed, received, and evaluated retrospectively and will not delay patients from receiving care.

University of Maryland St. Joseph Medical Center (UMSJMC) adopted this policy effective June 1, 2013.

University of Maryland Medical Center Midtown Campus (MTC) adopted this policy effective September 22, 2014.
	University of Maryland Medical Center University of Maryland Medical Center Midtown Campus	The University of Maryland Medical System Central Business Office Policy & Procedure	Policy #: Effective Date:	TBD 07/01/2016	
	University of Maryland Rehabilitation & Orthopaedic Institute				
	University of Maryland St. Joseph Medical Center University of Maryland Baltimore Washington	Subject:	Page #:	2 of 9	
	Medical Center			07-01-2015	

University of Maryland Baltimore Washington Medical Center (UMBWMC) adopted this policy effective July 1, 2016.

PROGRAM ELIGIBILITY

Consistent with their mission to deliver compassionate and high quality healthcare services and to advocate for those who do not have the means to pay for medically necessary care, UMMC, MTC, UMROI, and UMSJMC hospitals strive to ensure that the financial capacity of people who need health care services does not prevent them from seeking or receiving care.

Specific exclusions to coverage under the Financial Assistance program include the following:

- Services provided by healthcare providers not affiliated with UMMS hospitals (e.g., durable medical equipment, home health services)
- Patients whose insurance program or policy denies coverage for services by their insurance company (e.g., HMO, PPO, or Workers Compensation), are not eligible for the Financial Assistance Program.
 - a. Generally, the Financial Assistance Program is not available to cover services that are denied by a patient's insurance company; however, exceptions may be made on a case by case basis considering medical and programmatic implications.
- 3. Unpaid balances resulting from cosmetic or other non-medically necessary services
- 4. Patient convenience items
- 5. Patient meals and lodging
- Physician charges related to the date of service are excluded from UMMS financial assistance policy. Patients who wish to pursue financial assistance for physician-related bills must contact the physician directly.

Patients may be ineligible for Financial Assistance for the following reasons:

- 1. Refusal to provide requested documentation or provide incomplete information.
- Have insurance coverage through an HMO, PPO, Workers Compensation, Medicaid, or other insurance programs that deny access to the Medical Center due to insurance plan restrictions/limits.
- Failure to pay co-payments as required by the Financial Assistance Program.
- Failure to keep current on existing payment arrangements with UMMS.
- Failure to make appropriate arrangements on past payment obligations owed to UMMS (including those patients who were referred to an outside collection agency for a previous debt).
- Refusal to be screened for other assistance programs prior to submitting an application to the Financial Clearance Program.
- 7. Refusal to divulge information pertaining to a pending legal liability claim

Patients who become ineligible for the program will be required to pay any open balances and may be submitted to a bad debt service if the balance remains unpaid in the agreed upon time periods.

	University of Maryland Medical Center University of Maryland Medical Center Midtown Campus	The University of Maryland Medical System Central Business Office Policy & Procedure	Policy #: Effective Date:	TBD 07/01/2016
	University of Maryland Rehabilitation & Orthopaedic Institute			
	University of Maryland St. Joseph Medical Center University of Maryland Baltimore Washington	Subject:	Page #:	3 of 9
	Medical Center	FINANCIAL ASSISTANCE	Supersedes:	07-01-2015

Patients who indicate they are unemployed and have no insurance coverage shall be required to submit a Financial Assistance Application unless they meet Presumptive Financial Assistance Eligibility criteria. If the patient qualifies for COBRA coverage, patient's financial ability to pay COBRA insurance premiums shall be reviewed by the Financial Counselor/Coordinator and recommendations shall be made to Senior Leadership. Individuals with the financial capacity to purchase health insurance shall be encouraged to do so, as a means of assuring access to health care services and for their overall personal health.

Coverage amounts will be calculated based upon 200-300% of income as defined by Maryland State Department of Health and Mental Hygiene Medical Assistance Planning Administration Income Eligibility Limits for a Reduced Cost of Care.

Presumptive Financial Assistance

Patients may also be considered for Presumptive Financial Assistance Eligibility. There are instances when a patient may appear eligible for financial assistance, but there is no financial assistance form on file. There is adequate information provided by the patient or through other sources, which provide sufficient evidence to provide the patient with financial assistance. In the event there is no evidence to support a patient's eligibility for financial assistance, UMMS reserves the right to use outside agencies or information in determining estimated income amounts for the basis of determining financial assistance eligibility and potential reduced care rates. Once determined, due to the inherent nature of presumptive circumstances, the only financial assistance Eligibility shall only cover the patient's specific date of service. Presumptive eligibility may be determined on the basis of individual life circumstances that may include:

- a. Active Medical Assistance pharmacy coverage
- b. SLMB coverage
- c. PAC coverage
- d. Homelessness
- e. Medical Assistance and Medicaid Managed Care patients for services provided in the ER beyond the coverage of these programs
- f. Medical Assistance spend down amounts
- g. Eligibility for other state or local assistance programs
- h. Patient is deceased with no known estate
- Patients that are determined to meet eligibility criteria established under former State Only Medical Assistance Program
- j. Non-US Citizens deemed non-compliant
- k. Non-Eligible Medical Assistance services for Medical Assistance eligible patients
- I. Unidentified patients (Doe accounts that we have exhausted all efforts to locate and/or ID)
- m. Bankruptcy, by law, as mandated by the federal courts

	University of Maryland Medical Center	The University of Maryland Medical System	Policy #:	TBD
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	University of Maryland St. Joseph Medical Center	Subject:	Page #:	4 of 9
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- n. St. Clare Outreach Program eligible patients
- o. UMSJMC Maternity Program eligible patients
- p. UMSJMC Hernia Program eligible patients

Specific services or criteria that are ineligible for Presumptive Financial Assistance include:

- a. Purely elective procedures (example Cosmetic) are not covered under the program.
- b. Uninsured patients seen in the Emergency Department under Emergency Petition will not be considered under the presumptive financial assistance program until the Maryland Medicaid Psych program has been billed.

PROCEDURES

- There are designated persons who will be responsible for taking Financial Assistance applications. These staff can be Financial Counselors, Patient Financial Receivable Coordinators, Customer Service Representatives, etc.
- Every possible effort will be made to provide financial clearance prior to date of service. Where possible, designated staff will consult via phone or meet with patients who request Financial Assistance to determine if they meet preliminary criteria for assistance.
 - Staff will complete an eligibility check with the Medicaid program for Self Pay patients to verify whether the patient has current coverage.
 - b. Preliminary data will be entered into a third party data exchange system to determine probably eligibility. To facilitate this process each applicant must provide information about family size and income. To help applicants complete the process, we will provide an application that will let them know what paperwork is required for a final determination of eligibility.
 - c. Applications initiated by the patient will be tracked, worked and eligibility determined within the third party data and workflow tool. A letter of final determination will be submitted to each patient that has formally requested financial assistance.
 - d. Upon receipt of the patient's application, they will have thirty (30) days to submit the required documentation to be considered for eligibility. If no data is received within the 30 days, a denial letter will be sent notifying that the case is now closed for lack of the required documentation. The patient may reapply to the program and initiate a new case if the original timeline is not adhered to. The Financial

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Assistance application process will be open up to at least 240 days after the first post-discharge patient bill is sent.

- There will be one application process for UMMC, MTC, UMROI, UMSJMC and UMBWMC. The patient is required to provide a completed Financial Assistance Application orally or in writing. In addition, the following may be required:
 - a. A copy of their most recent Federal Income Tax Return (if married and filing separately, then also a copy spouse's tax return); proof of disability income (if applicable), proof of social security income (if applicable). If unemployed, reasonable proof of unemployment such as statement from the Office of Unemployment Insurance, a statement from current source of financial support, etc ...
 - b. A copy of their most recent pay stubs (if employed) or other evidence of income.
 - c. A Medical Assistance Notice of Determination (if applicable).
 - Copy of their Mortgage or Rent bill (if applicable), or written documentation of their current living/housing situation.

A written request for missing information will be sent to the patient. Oral submission of needed information will be accepted, where appropriate.

- 4. A patient can qualify for Financial Assistance either through lack of sufficient insurance or excessive medical expenses. Once a patient has submitted all the required information, the Financial Counselor will review and analyze the application and forward it to the Patient Financial Services Department for final determination of eligibility based on UMMS guidelines.
 - a. If the patient's application for Financial Assistance is determined to be complete and appropriate, the Financial Coordinator will recommend the patient's level of eligibility and forward for a second and final approval.
 - If the patient does qualify for Financial Assistance, the Financial Coordinator will notify clinical staff who may then schedule the patient for the appropriate hospital-based service.
 - ii) If the patient does not qualify for Financial Assistance, the Financial Coordinator will notify the clinical staff of the determination and the non-emergent/urgent hospital-based services will not be scheduled.
 (1) A decision that the patient may not be scheduled for hospital-based, non-emergent/urgent services may be reconsidered by the Financial Clearance Executive Committee, upon the request of a Clinical Chair.
- Each clinical department has the option to designate certain elective procedures for which no Financial Assistance options will be given.
- 6. Once a patient is approved for Financial Assistance, Financial Assistance coverage may be effective for the month of determination, up to 3 years prior, and up to six (6) calendar months in to the future. However, there are no limitations on the Financial Assistance eligibility period. Each eligibility period will be determined on a case-by-case basis. If additional healthcare services are provided beyond the approval period, patients must reapply to the program for clearance. In addition, changes to the patient's income, assets, expenses or family status are expected to be communicated to the Financial Assistance Program Department. All Extraordinary Collections Action activities, as defined below, will be terminated once the patient is approved for financial assistance and all the patient responsible balances are paid.

Extraordinary Collection Actions (ECAs) may be taken on accounts that have not been disputed or are not on a payment arrangement. Except in exceptional circumstances, these actions will occur no earlier than 120 days from submission of first bill to the patient and will be preceded by notice 30 days prior to

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commencement of the action. Availability of financial assistance will be communicated to the patient and a presumptive eligibility review will occur prior to any action being taken.

- i) Garnishments may be applied to these patients if awarded judgment.
- A lien will be placed by the Court on primary residences within Baltimore City. The facility will not pursue foreclosure of a primary residence but may maintain our position as a secured creditor if a property is otherwise foreclosed upon.
- iii) Closed account balances that appear on a credit report or referred for judgment/garnishment may be reopened should the patient contact the facility regarding the balance report. Payment will be expected from the patient to resolve any credit issues, until the facility deems the balance should remain written off.
- If a patient is determined to be ineligible, all efforts to collect co-pays, deductibles or a percentage of the expected balance for the service will be made prior to the date of service or may be scheduled for collection on the date of service.
- 8. A letter of final determination will be submitted to each patient who has formally submitted an application.
- 9. Refund decisions are based on when the patient was determined unable to pay compared to when the patient payments were made. Refunds may be issued back to the patient for credit balances, due to patient payments, resulted from approved financial assistance on considered balance(s). Payments received for care rendered during the financial assistance eligibility window will be refunded, if the amount exceeds the patient's determined responsibility by \$5.00 or more.
- 10. Patients who have access to other medical care (e.g., primary and secondary insurance coverage or a required service provider, also known as a carve-out), must utilize and exhaust their network benefits before applying for the Financial Assistance Program.
- 11. The Financial Assistance Program will accept the Faculty Physicians, Inc.'s (FPI) completed financial assistance applications in determining eligibility for the UMMS Financial Assistance program. This includes accepting FPI's application requirements.
- 12. The Financial Assistance Program will accept all other University of Maryland Medical System hospital's completed financial assistance applications in determining eligibility for the program. This includes accepting each facility's application format.
- The Financial Assistance Program does not cover Supervised Living Accommodations and meals while a patient is in the Day Program.
- 14. Where there is a compelling educational and/or humanitarian benefit, Clinical staff may request that the Financial Clearance Executive Committee consider exceptions to the Financial Assistance Program guidelines, on a case-by-case basis, for Financial Assistance approval.
 - Faculty requesting Financial Clearance/Assistance on an exception basis must submit appropriate justification to the Financial Clearance Executive Committee in advance of the patient receiving services.
 - b. The Chief Medical Officer will notify the attending physician and the Financial Assistance staff of the Financial Clearance Executive Committee determination.

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Financial Hardship

The amount of uninsured medical costs incurred at either, UMMC, MTC, UMROI, UMSJMC and UMBWMC will be considered in determining a patient's eligibility for the Financial Assistance Program. The following guidelines are outlined as a separate, supplemental determination of Financial Assistance, known as Financial Hardship. Financial Hardship will be offered to all patients who apply for Financial Assistance.

Medical Financial Hardship Assistance is available for patients who otherwise do not qualify for Financial Assistance under the primary guidelines of this policy, but for whom:

- Their medical debt incurred at our either UMMC, MTC, UMROI, UMSJMC and UMBWMC exceeds 25% of the Family Annual Household Income, which is creating Medical Financial Hardship; and
- 2) meet the income standards for this level of Assistance.

For the patients who are eligible for both, the Reduced Cost Care under the primary Financial Assistance criteria and also under the Financial Hardship Assistance criteria, UMMC, MTC, UMROI, UMSJMC and UMBWMC will grant the reduction in charges that are most favorable to the patient.

Financial Hardship is defined as facility charges incurred here at either UMMC, MTC, UMROI, UMSJMC and UMBWMC for medically necessary treatment by a family household over a twelve (12) month period that exceeds 25% of that family's annual income.

Medical Debt is defined as out of pocket expenses for the facility charges incurred here at UMMC, MTC, UMROI, UMSJMC and UMBWMC for medically necessary treatment.

Once a patient is approved for Financial Hardship Assistance, coverage will be effective starting the month of the first qualifying date of service and up to the following twelve (12) calendar months from the application evaluation completion date. Each patient will be evaluated on a case-by-case basis for the eligibility time frame according to their spell of illness/episode of care. It will cover the patient and the immediate family members living in the household for the approved reduced cost and eligibility period for medically necessary treatment. Coverage shall not apply to elective or cosmetic procedures. However, the patient or guarantor must notify the hospital of their eligibility approval period, each patient must reapply to be reconsidered. In addition, patients who have been approved for the program must inform the hospitals of any changes in income, assets, expenses, or family (household) status within 30 days of such change(s).

All other eligibility, ineligibility, and procedures for the primary Financial Assistance program criteria apply for the Financial Hardship Assistance criteria, unless otherwise stated above.

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Appeals

- · Patients whose financial assistance applications are denied have the option to appeal the decision.
- Appeals can be initiated verbally or written.
- Patients are encouraged to submit additional supporting documentation justifying why the denial should be overturned.
- Appeals are documented within the third party data and workflow tool. They are then reviewed by the next level of management above the representative who denied the original application.
- If the first level of appeal does not result in the denial being overturned, patients have the option of
 escalating to the next level of management for additional reconsideration.
- The escalation can progress up to the Chief Financial Officer who will render a final decision.
- A letter of final determination will be submitted to each patient who has formally submitted an appeal.

<u>Judgments</u>

If a patient is later found to be eligible for Financial Assistance after a judgment has been obtained or the debt submitted to a credit reporting agency, UMMC, MTC, UMROI, UMSJMC and UMBWMC shall seek to vacate the judgment and/or strike the adverse credit information.

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ATTACHMENT A

Sliding Scale – Reduced Cost of Care

MD DH	MH 2016	Income Level	S	Income								
Income	Elig Limit	Up to 200%	L	Level								
Guideli	nes	Pt Resp 0%	Ι	Pt Resp 10%	Pt Resp 20%	Pt Resp 30%	Pt Resp 40%	Pt Resp 50%	Pt Resp 60%	Pt Resp 70%	Pt Resp 80%	Pt Resp 90%
нн	100% MD DHMH	100% Charity	D	90% Charity	80% Charity	70% Charity	60% Charity	50% Charity	40% Charity	30% Charity	20% Charity	10% Charity
Size	Max	Max	I	Max								
1	\$16,395	\$32,790	Ν	\$34,430	\$36,069	\$37,709	\$39,348	\$40,988	\$42,627	\$44,267	\$45,906	\$49,184
2	\$22,108	\$44,216	G	\$46,427	\$48,638	\$50,848	\$53,059	\$55,270	\$57,481	\$59,692	\$61,902	\$66,323
3	\$27,821	\$55,642		\$58,424	\$61,206	\$63,988	\$66,770	\$69,553	\$72,335	\$75,117	\$77,899	\$83,462
4	\$33,534	\$67,068	S	\$70,421	\$73,775	\$77,128	\$80,482	\$83,835	\$87,188	\$90,542	\$93,895	\$100,601
5	\$39,248	\$78,496	С	\$82,421	\$86,346	\$90,270	\$94,195	\$98,120	\$102,045	\$105,970	\$109,894	\$117,743
6	\$44,961	\$89,922	Α	\$94,418	\$98,914	\$103,410	\$107,906	\$112,403	\$116,899	\$121,395	\$125,891	\$134,882
7	\$50,702	\$101,404	L	\$106,474	\$111,544	\$116,615	\$121,685	\$126,755	\$131,825	\$136,895	\$141,966	\$152,105
8	\$56,443	\$112,886	Е	\$118,530	\$124,175	\$129,819	\$135,463	\$141,108	\$146,752	\$152,396	\$158,040	\$169,328

Effective 7/1/16

Appendix 4

Financial Help for Patients to Pay Hospital Care Costs

If you cannot pay for all or part of the care you receive from our hospital, you may be able to get **free** or **lower cost** services.

PLEASE NOTE:

1. We treat all patients needing emergency care, no matter what they are able to pay.

2. Services provided by physicians or other providers may not be covered by the hospital Financial Assistance Policy. You can call (410) 821-4140 if you have questions.

HOW THE PROCESS WORKS:

When you become a patient, we ask if you have any health insurance. We will not charge you more for hospital services than we charge people with health insurance. The hospital will:

1. Give you information about our financial assistance policy, or

2. Offer you help with a counselor who will help you with the application.

HOW WE REVIEW YOUR APPLICATION:

The hospital will look at your ability to pay for care. We look at your income and family size. You may receive free or lower costs of care if:

1. Your income or your family's total income is low for the area where you live, or

2. Your income falls below the federal poverty level if you had to pay for the full cost of your hospital care, minus any health insurance payments.

PLEASE NOTE: If you are able to get financial help, we will tell you how much you can get. If you are not able to get financial help, we will tell you why not.

HOW TO APPLY FOR FINANCIAL HELP:

1. Fill out a Financial Assistance Application Form.

2. Give us all of your information to help us understand your financial situation.

3. Turn the Application Form into us.

PLEASE NOTE: The hospital must screen patients for Medicaid before giving financial help. OTHER HELPFUL INFORMATION:

1. You can get a **free copy** of our Financial Assistance Policy and Application Form: **D Online** at http://umm.edu/patients/financial-assistance

☑ In person at the Financial Assistance Department – University of Maryland Medical System, 11311 McCormick Road, Ste 230, Hunt Valley, MD 21031

By mail: call (410) 821-4140 to request a copy

2. You can call the Financial Assistance Department if you have questions or need help applying. You can also call if you need help in another language. Call: (410) 821-4140

Revised 6/2016

Appendix 5



Mission

University of Maryland Rehabilitation & Orthopaedic Institute delivers innovative, highquality, and cost effective rehabilitation and surgical services to the community and region. We provide:

- An interdisciplinary continuum of care including inpatient and outpatient surgery, rehabilitation and additional services as required.
- A proactive environment for patient safety, implementing improvements as patient safety risks are identified.
- A site for public and professional health care education and research.

Vision

UM Rehabilitation & Orthopaedic Institute's vision is to become widely recognized as an integral component of the University of Maryland Medical System in its role as:

- A regional hospital specializing in the provision of acute, chronic and outpatient rehabilitation services;
- A regional hospital specializing in the provision of a full array of orthopaedic services for adults and children;
- A high quality provider of specialized medical/surgical programs.

Values

Quality and Compassionate Care Excellence in Service Respect for the Individual Patient Safety Quality in Research and Education Cost Effectiveness