



COLORADO
Department of Health Care
Policy & Financing

Hospital Community Benefit Accountability Annual Report (CY 2024)

Hospital Name:	Valley View Hospital Association
Date:	9/6/2024
Submitted to:	Department of Health Care Policy & Financing

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IMPORTANT NOTES:

Please use the latest version provided to you through the portal. Prior versions will be rejected by the portal.

Do not drag and drop contents of cells. This will cause issues, and you will be asked to resubmit your survey.

Hospital Community Benefit Accountability Report

I. Overview

House Bill (HB) 23-1243, Hospital Community Benefit, expands on the previous legislation of HB 19-1320 by including changes to hospitals' Community Benefit activity requirements and imposes certain requirements on public meetings regarding hospitals' Community Health Needs Assessments (CHNA) and Community Benefit Implementation Plans (CHIP). HB 23-1243 still requires non-profit tax-exempt hospitals to complete a CHNA every three years and a CHIP every year (footnote 1). Each reporting hospital is required to convene a public meeting at least once a year to seek feedback regarding the hospital's Community Benefit activities. These hospitals are required to submit a report to the Department of Health Care Policy & Financing (HCPF) that includes but not limited to the following:

- * Information on the public meeting held within the year
- * The most recent Community Health Needs Assessment
- * The most recent Community Benefit Implementation Plan
- * The most recent submitted IRS form 990 including Schedule H
- * A description of investments included in Schedule H
- * Expenses included on form 990

More information can be found on the Hospital Community Benefit Accountability webpage at:

[Hospital Community Benefit Accountability Webpage](#)

Please direct any questions to the following email address:

[hcpf_hospitalcommunity@state.co.us?subject=Hospital Community Benefit Accountability](mailto:hcpf_hospitalcommunity@state.co.us?subject=Hospital%20Community%20Benefit%20Accountability)

¹ Long Term Care and Critical Access hospitals are not required to report.

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II. Checklist

A. Sections within this report

Sections	
yes	Public meeting reporting section completed
yes	Investment and expenses reporting section completed
yes	URL of the page on the hospital's website where this report will be posted, paste URL in cell C10 below:
	https://www.vvh.org/about/publications/

B. Attachments submitted with report

Attachments	
yes	Most recent Community Health Needs Assessment
yes	Most recent Community Benefit Implementation Plan
yes	List of representatives, organizations, and state agencies invited to the public meeting
yes	List of public meeting attendees and organizations represented
yes	Public meeting agenda
yes	Content of meeting discussion - any Community Benefit priorities discussed and the decisions made regarding those discussed Community Benefit decision priorities
yes	Most recent submitted form 990 including Schedule H or equivalent
yes	Evidence that shows how the investment improves Community health outcomes (Attachment is optional if description of evidence is provided within this report)

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III. Public Meeting Reporting

Provide the following information on the public meeting held during the previous twelve months:

Date:	14-Aug-24
Time:	1pm

Location (place meeting held and city or if virtual, note platform):

Valley View hosted its meeting virtually, using the Zoom platform. Valley View invested in real-time interpretation services for the event so that English and Spanish-speakers could understand content presented, comments/questions from participants and personally engage. Valley View also utilized an external facilitator to lead the meeting. A recording of the meeting, including personal Valley View contacts, was posted to the Valley View website.

When was communication(s) sent out and in what format?

Communications for the event launched July 15, 2024. Numerous formats were used including paid print advertising, paid digital advertising, public relations, e-newsletter and internal outreach. Communications occurred in both English and Spanish.

Describe your outreach efforts for the public meeting being reported:

Please enter responses below using a new row for each item.

1 Paid advertising outreach for the public meeting included half page English ad in Glenwood Springs Post Independent newspaper, and Spanish ad in el Sol de Valle newspaper.

2 Paid advertising outreach for the public meeting also included ads in English and Spanish on FaceBook and Instagram from July 19 through August 14

3 Public relations for the public meeting included: Personal email invitations to stakeholders of the Valley View Community Health Needs Assessment; personal email invitations to HCPF-required entities; and e-newsletter sent to Valley View donors and contacts. 24 total media placements for the meeting resulted in 4 million media impressions.

4 Internal outreach for the public meeting included: ads on digital signs inside of Valley View Hospital and promotion on Valley View's intranet.

5 Publicizing the event on VVHA's website and FaceBook page

Describe the actions taken as a result of feedback from meeting participants:

Please enter responses below using a new row for each item.

1 The discussion from the meeting was shared with the executive team at Valley View.

[Empty text box]

2 Rob Nelson had the requested follow-up conversation with the attendee. No follow-up items were identified from that conversation.

[Empty text box]

3 As a result of feedback from the meeting, Valley View is reaching out to the attendees from Valley Meals & More and Mountain Valley Developmental Services to explore enhanced collaborations.

[Empty text box]

4

[Empty text box]

5

[Empty text box]

6

[Empty text box]

7

[Empty text box]

8

[Empty text box]

9

[Empty text box]

10

Hospital Community Benefit Accountability Report

IV. Investment and Expenses Reporting

Provide the following information on the expenses included on submitted form 990:

Amount

Total expenses included on Line 18 of Section I of submitted form 990	\$ 389,294,451.00
Revenue less expenses included on Line 19 of Section I of submitted form 990	\$ 9,845,331.00

Reporting Hospitals not required to complete form 990 shall provide the above information as described on Lines 18 and 19 of form 990.

In the table below provide a brief description of each investment made that was included in Parts I, II, and III of Schedule H and include the following:

- Cost of the investment. For this reporting purpose, "investment" means the hospital's expense net of offsetting revenue for financial assistance and means-tested government programs, other community benefits such as community health improvement services and community benefit operations, and/or community building activities. See the IRS instructions for Parts I, II, and III of Schedule H of Form 990 at www.irs.gov/pub/irs-pdf/f990oh.pdf.

For each investment that addressed a Community Identified Health need, identify each specific investment activity within the following applicable categories:

- Free or Discounted Health Care Services
- Programs that Address Behavioral Health
- Programs that Address the Social Determinants of Health
- Programs that Address Community Based Health Care
- Programs that Address Provider Recruitment, Education, Research, and Training
- All "other" services and programs that addressed Community Identified Health Needs

See Appendix A for definitions.

[Appendix A - Definitions](#)

See Appendix B for a Schedule H Crosswalk.

[Appendix B - Sch. H Crosswalk](#)

For each investment that addressed a Community Identified Health Need briefly describe available evidence that shows how the investment improves Community health outcomes or provide the evidence as an attachment.

Categories	Amount for Free or Discounted Health Services	Amount for Behavioral Health	Amount for social Determinants of Health	Amount for Community Based Health Care	Amount for Provider Recruitment, Education, Research, and Training	All "Other" Services and Programs that Addressed Community Identified Health Needs	Does the Total Match the Sum of its Parts?	Do All Investment Activities Have Supporting Evidence Added?	All Investment Dollars Identified?	
Totals (Formula)	\$ 24,304,866.00	\$ -	\$ 244,837.00	\$ 434,412.00	\$ 934,363.05	\$ 334,381.00	Yes			
Investment Activity	Amount for Free or Discounted Health Services	Amount for Behavioral Health	Amount for Social Determinants of Health	Amount for Community Based Health Care	Amount for Provider Recruitment, Education, Research, and Training	All "Other" Services and Programs that Addressed Community Identified Health Needs	Identify Which Community Identified Need Each Investment Corresponds With	Supporting Evidence	Investment Dollars (i.e. Direct Cash, Philanthropic Efforts, or Cash Expenditures from In-kind Contributions)	Schedule H Categories
1 Financial Assistance Policy	\$ 7,116,623.00						Coverage and total cost of care	Our generous financial assistance program encourages community members to seek care regardless of their ability to pay in full. Our financial counselors provide advocacy support to patients and families having difficulty paying their medical bills and they assist with applying for federal, state and local benefit programs.	Direct Cash	Financial Assistance Policy
2 Unreimbursed Medicaid and CHIP	\$ 16,988,243.00						Coverage and total cost of care	Although reimbursement for services rendered is critical to the operation and stability of Valley View hospital, it is recognized that not all individuals possess the ability to purchase essential medical services, therefore, in keeping with the hospital's commitment to serve all members of its community, free care and subsidized care are provided to patients covered by governmental programs at below cost, and health activities and programs to support the community will be considered where the need and/or individual's inability to pay exists. As a rural hospital our organization is critical in providing healthcare services to all community members including many at risk populations which medical staff in the surrounding area resist. Accessible, high-quality healthcare service is needed for the overall health of all of our residents even if our reimbursement does not meet the cost of providing that care.	Direct Cash	Financial Assistance Policy
3 Meals on Wheels				\$ 3,542.00			Coverage and total cost of care	Meals were served during 2022 to community members who may not otherwise eat because they are homebound or experiencing acute illness or disability leading to food insecurity.	Direct Cash	Community Support
4 Athletic Trainers				\$ 430,870.00			Coverage and total cost of care	Supporting local athletics at every practice and every game. VV athletic trainers had several thousand of direct student interactions in 2022. These interactions range from preventative services to emergency care, therapeutic intervention, and rehabilitation of injuries and medical conditions. Without support from our program, the school districts would need to find extra budget funds to employ an in-house trainer(s) and certain regular programs that require an athletic trainer may no longer be sustainable. Also, athletes with concussions must be assessed for return to play which is done by our athletic trainers. In addition to the common responsibilities of an athletic trainer our team also serves as medical liaison(s) and student mentors. Our trainers help connect students with primary care provider providers when they haven't established that relationship, often times this need surfaces when a physical is required. They also help connect students with a wide spectrum of care outside of athletic injuries through their close relationships with the students.	Direct Cash	Community Support
5 Community Education					\$ 625,494.05		Behavioral and Mental Health	In 2022, numerous and broad communication channels were utilized to educate the public about health issues. From in-person and virtual events led by providers about breast health, orthopaedics, and smoking to social media content campaigns on a variety of health issues, community education leads to address behaviors and factors to improve health.	Direct Cash	Community health improvement adv

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V. Additional Investments

Please provide any additional information you feel is relevant to the items being reported on. This could include investments that are non-reportable to the IRS in form 990, but still work towards a community-identified health need. If you are including non-reportable IRS investments within this section provide the program, investment dollar amount, the community-identified health need associated with this investment, and the HCBA category most aligned with this program (e.g. Social Determinants of Health, Behavioral Health, Community Based Health Care, etc.)

Enter responses below using a new row for each new note.

	Additional Information
Note 1	
Note 2	
Note 3	
Note 4	
Note 5	
Note 6	
Note 7	
Note 8	
Note 9	
Note 10	

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VI. Schedule H (Optional)

Part I

	7 Financial Assistance and Means-Tested Government Programs	a) Number of Activities or Programs (optional)	b) Persons Served (optional)	c) Total Community Benefit Expense	d) Direct Offsetting Revenue	e) Net Community Benefit Expense	f) Percent of Total Expense
a	Financial assistance at cost (from worksheet 1)					\$ -	0.00%
b	Medicaid					\$ -	0.00%
c	Cost of other means-tested government programs (from worksheet 3, column b)					\$ -	0.00%
d	Total Financial Assistance/Mean Tested	0	0	\$ -	\$ -	\$ -	0.00%
	Other Benefits	a) Number of Activities or Programs (optional)	b) Persons Served (optional)	c) Total Community Benefit Expense	d) Direct Offsetting Revenue	e) Net Community Benefit Expense	f) Percent of Total Expense
e	Community health improvement services and community benefit operations (from worksheet 4)					\$ -	0.00%
f	Health professions educations (from worksheet 5)					\$ -	0.00%
g	Subsidized health services (from worksheet 6)					\$ -	0.00%
h	Research (from worksheet 7)					\$ -	0.00%
i	Cash and in-kind contributions for community benefit (from worksheet 8)					\$ -	0.00%
j	Total Other Benefits	0	0	\$ -	\$ -	\$ -	0.00%
k	Grand Total (add lines 7d and 7j)	0	0	\$ -	\$ -	\$ -	0.00%

This is an optional sheet that hospitals may fill out and utilize as a means to submit a pro-forma Schedule H to the Department for those that are required to submit pro-forma items. NOTE: If a hospital chooses to prepare a separate Schedule H for submission, this sheet is not required.

Instructions: fill out columns A through D of the table with the appropriate information for Parts I and II. Total lines will sum the inputs. Column E will auto-calculate based on inputs from columns C and D. Column F will auto-calculate based on values from column E and Total Expenses (Line 18 of Section 1 of the 990) reported on tab "IV. Investments & Expenses".
For Part III, utilize the "amount" column for any lines requiring a dollar value and the "yes" and "no" columns for any lines requiring a yes or no response. Simply type in the letter "x" within the "yes" and "no" columns to indicate the hospital's response.

Part II

#	Activity	a) Number of Activities or Programs (optional)	b) Persons Served (optional)	c) Total Community Benefit Expense	d) Direct Offsetting Revenue	e) Net Community Benefit Expense	f) Percent of Total Expense
1	Physical Improvements and housing					\$ -	0.00%
2	Economic development					\$ -	0.00%
3	Community support					\$ -	0.00%
4	Environmental improvements					\$ -	0.00%
5	Leadership development and training for community members					\$ -	0.00%
6	Coalition building					\$ -	0.00%
7	Community health improvement advocacy					\$ -	0.00%
8	Workforce development					\$ -	0.00%
9	Other					\$ -	0.00%
10	Total Activity	0	0	\$ -	\$ -	\$ -	0.00%

Part III

#	Section A. Bad Debt Expense	Amount	Yes	No
1	Did the organization report bad debt expense in accordance with Healthcare Financial Management Association Statement No. 15?			
2	Enter the amount of the organization's bad debt expense			
3	Enter the estimated amount of the organization's bad debt expenses attributable to patients eligible under the organization's financial assistance policy.			
#	Section B. Medicare	Amount	Yes	No
5	Enter total revenue received from Medicare (including DSH and IME)			
6	Enter Medicare allowable costs of care relating to payments on line 5			
7	Subtract lines 6 from 5. This is the surplus (or shortfall)	\$ -		
8	Check the box that describes the method used to determine the amount from line 6.	Cost accounting system	Cost to Charge ratio	Other
8	Check boxes:			
#	Section C. Collection Practices	Amount	Yes	No
9a	Did the organization have a written debt collection policy during the year?			

9b	If "yes", did the organization's collection policy that applied to the largest number of its patient during the tax year contain provisions on the collection practices to be followed for patients who are known to qualify for financial assistance?			
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VII. Report Certification

Hospital Community Benefit Accountability Report

VII. Report Certification

I certify that the information in this report is provided according to all requirements set forth by the Department's regulations found in the Code of Colorado Regulations (CCR) at 10 CCR 2505-10, Section 8.5000.

I agree to provide additional explanation or documentation at the Department's requests within 10 business days of the request.

Hospital Name:	Valley View Hospital Association
Name:	Stacey Gavrell
Title:	Chief Community Relations Officer
Phone Number:	970.384.6620
Email Address:	stacey.gavrell@vvh.org

Hospital Community Benefit Accountability Report

Appendix A - Definitions

Community - the community that a hospital has defined as the community that it serves pursuant to 26 CFR § 1.501(r)-(b)(3).

Community Based Organization - means a public or private nonprofit organization of that represents a community or significant segments of a community or work towards community-focused goals beyond one particular community and provides educational or related services to individuals in the community under 20 USC § 7801(5).

Community Benefit - means the actions that hospitals take to qualify as an organization organized and operated for the charitable purpose of promoting health pursuant to § 501(c)(3) of the federal Internal Revenue Code. These actions include demonstrating that the hospital provides benefits to a class of persons that is broad enough to benefit the Community, and that it operates to serve a public rather than private interest. Community Benefit may also refer to the dollar amount spent on the community in the form of Free or Discounted Health Care Services; Provider Recruitment, Education, Research and Training; and Community spending activities.

Community Benefit Implementation Plan - a plan that satisfies the requirements of an implementation strategy as described in 26 CFR § 1.501(r)-3(c).

Community Benefit Priorities - means Community Benefit activities that are documented within the Reporting Hospital's Community Health Needs Assessment or otherwise established pursuant to the IRS Form 990, Schedule H and its instructions.

Community Health Center - a federally qualified health center as defined in 42 U.S.C. sec. 1395x(aa)(4) or a rural health clinic as defined in 42 U.S.C. sec. 1395x (aa)(2).

Community Health Needs Assessment - a community health needs assessment that satisfies the requirements of 26 CFR § 1.501(r)-3(b).

Community Identified Health Need - a health need of a Community that is identified in a Community Health Needs Assessment.

Financial assistance policy (FAP) - a written policy that meets the requirements described in 26 CFR § 1.501(r)-4(b)

Free or Discounted Health Care Services - health care services provided by the hospital to persons who meet the hospital's criteria for financial assistance and are unable to pay for all or a portion of the services, or physical or behavioral health care services funded by the hospital but provided without charge to patients by other organizations in the Community. Free or Discounted Health Care Services does not include the following:

1. Services reimbursed through the Colorado Indigent Care Program (CICP),
2. Bad debt or uncollectable amounts owed that the hospital recorded as revenue but wrote off due to a patient's failure to pay, or the cost of providing care to such patients,
3. The difference between the cost of care provided under Medicaid or other means-tested government programs or under Medicare and the revenue derived therefrom,
4. Self-pay or prompt pay discounts, or
5. Contractual adjustments with any third-party payers.

Examples of Free or Discounted Health Care Services

* Charity care or financial assistance program excluding CICP

* Free services such as vaccination clinics or examinations

Health System - a larger corporation or organizational structure that owns, contains, or operates more than one hospital.

Local Public Health Agency - means a county or district public health agency established pursuant to C.R.S. § 25-1-506, or a local department of public health.

Medicaid Shortfall - means the cost of Medicaid reflected on the IRS Form 990, Schedule H, Worksheet 3.

Programs that Address Behavioral Health - means funding or in-kind programs or services intended to improve an individual's mental and emotional well-being and are reportable on the IRS Form 990, Schedule H and its instructions. Programs that Address Behavioral Health are designed to address, but are not limited to:

1. Mental health disorders;
2. Serious psychological distress;
3. Serious mental disturbance;
4. Unhealthy stress;
5. Tobacco use prevention; and
6. Substance use

Programs that Address Community Based Health Care - means funding or in-kind programs or services that improve types of person-centered care delivered in the home and community and are not billable to a third party. A variety of health and human services can be provided. Community Based Health Care addresses the needs of people with functional limitations who need assistance with everyday activities such as getting dressed or bathing.

Programs that Address the Social Determinants of Health - funding or in-kind programs or services that improve social, economic, and environmental conditions that impact health in the Community. Social and economic conditions that impact health include education; employment; income; family and social support; and Community safety. Environmental conditions that impact health include air and water quality, housing, and transit. Programs that Address the Social Determinants of Health include but are not limited to the following:

1. Job training programs,
2. Support for early childhood and elementary, middle, junior-high, and high school education,
3. Programs that increase access to nutritious food and safe housing,
4. Medical Legal Partnerships, and
5. Community-building activities that could be included in Part II of Schedule H of the Form 990.

Provider Recruitment, Education, Research and Training - "Workforce development", "Health professions education," and "Research" defined within the Internal Revenue Service form 990 as:

1. "Workforce development" means the recruitment of physicians and other health professionals to medical shortage areas or other areas designated as underserved, and collaboration with educational institutions to train and recruit health professionals needed in the Community (other than the health professions education activities entered on Part I, line 7f);

2. "Health Professions Education" means educational programs that result in a degree, a certificate, or training necessary to be licensed to practice as a health professional, as required by C.R.S. 12-240-110, or continuing education necessary to retain state license or certification by a board in the individual's health profession specialty;

a. Health Professions Education does not include education or training programs available exclusively to the organization's employees and medical staff or scholarships provided to those individuals. However, it does include education programs if the primary purpose of such programs is to educate health professionals in the broader community. Costs for medical residents and interns can be included, even if they are considered employees for purposes of Form W-2, Wage and Tax Statement.

3. "Research" means any study or investigation the goal of which is to generate increased generalized knowledge made available to the public (for example, knowledge about underlying biological mechanisms of health and disease, natural processes, or principles affecting health or illness; evaluation of safety and efficacy of interventions for disease such as clinical trials and studies of therapeutic protocols; laboratory-based studies; epidemiology, health outcomes, and effectiveness; behavioral or sociological studies related to health, delivery of care, or prevention; studies related to changes in the health care delivery system; and communication of findings and observations, including publication in a medical journal). The organization can include the cost of internally funded research it conducts, as well as the cost of research it conducts funded by a tax-exempt or government entity.

Reporting Hospital means,

1. A hospital licensed as a general hospital pursuant to Part 1 of Article 3 of Title 25 of the Colorado Revised Statutes and exempt from Federal taxation pursuant to Section 501(c)(3) of the Federal Internal Revenue code, but not including a general hospital that is federally certified or undergoing federal certification as a long-term care hospital pursuant to 42 CFR § 412.23(e) or that is federally certified or undergoing federal certification as a critical access hospital pursuant to 42 CFR § 485 Subpart F,

2. A hospital established pursuant to § 25-29-103 C.R.S., or

3. A hospital established pursuant to § 23-21-503 C.R.S.

Safety Net Clinic - a Community clinic licensed or certified by the Department of Public Health and Environment pursuant to Section § 25-1.5-103 (1)(a)(I) or (1)(a)(II), C.R.S.



Hospital Community Benefit Accountability Report

Appendix B - Schedule H Crosswalk

Schedule H Part II Categories	Description	Community Benefit Report Category (Where more than one category may apply please refer to the definitions to determine how to report)
Physical Improvements and housing	The provision or rehabilitation of housing for vulnerable populations, such as removing building materials that harm the health of the residents, neighborhood improvement or revitalization projects, provision of housing for vulnerable patients upon discharge from an inpatient facility, housing for low-income seniors, and the development or maintenance of parks and playgrounds to promote physical activity	Programs that address the social determinants of health
Economic development	Assisting small business development in neighborhoods with vulnerable populations and creating new employment opportunities in areas with high rates of joblessness	Programs that address the social determinants of health
Community support	Child care and mentoring programs for vulnerable populations or neighborhoods, neighborhood support groups, violence prevention programs, and disaster readiness and public health emergency activities, such as community disease surveillance or readiness training beyond what is required by accrediting bodies or government entities	Programs that address health behaviors or risk; Programs that address the social determinants of health



Schedule H Category Crosswalk

<p>Environmental improvements</p>	<p>Activities to address environmental hazards that affect community health, such as alleviation of water or air pollution, safe removal or treatment of garbage or other waste products, and other activities to protect the community from environmental hazards. The organization cannot include on this line or in this part expenditures made to comply with environmental laws and regulations that apply to activities of itself, its disregarded entity or entities, a joint venture in which it has an ownership interest, or a member of a group exemption included in a group return of which the organization is also a member. Similarly, the organization cannot include on this line or in this part expenditures made to reduce the environmental hazards caused by, or the environmental impact of, its own activities, or those of its disregarded entities, joint ventures, or group exemption members, unless the expenditures are for an environmental improvement activity that (i) is provided for the primary purpose of improving community health; (ii) addresses an environmental issue known to affect community health; and (iii) is subsidized by the organization at a net loss. An expenditure may not be reported on this line if the organization engages in the activity primarily for marketing purposes</p>	<p>Programs that address the social determinants of health</p>
<p>Leadership development and training for community members</p>	<p>Training in conflict resolution; civic, cultural, or language skills; and medical interpreter skills for community residents</p>	<p>Programs that address health behaviors or risk; Programs that address the social determinants of health</p>
<p>Coalition building</p>	<p>Participation in community coalitions and other collaborative efforts with the community to address health and safety issues</p>	<p>Programs that address health behaviors or risk; Programs that address the social determinants of health</p>
<p>Community health improvement advocacy</p>	<p>Efforts to support policies and programs to safeguard or improve public health, access to health care services, housing, the environment, and transportation</p>	<p>Programs that address health behaviors or risk; Programs that address the social determinants of health</p>
<p>Workforce development</p>	<p>Recruitment of physicians and other health professionals to medical shortage areas or other areas designated as underserved, and collaboration with educational institutions to train and recruit health professionals needed in the community (other than the health professions education activities reported in Part I, line 7f of Schedule H)</p>	<p>Will be considered on a case by case basis. Submit information and justification to the Department as to how it meets the Community Benefit category</p>
<p>Other</p>	<p>Community building activities that protect or improve the community's health or safety that aren't described in the categories listed in Part II, lines 1 through 8 of Schedule H</p>	<p>Programs that address health behaviors or risk; Programs that address the social determinants of health; Free or discounted health care services</p>



Other categories	Description	Community Benefit Report Category
Financial assistance policy	A policy describing how the organization will provide financial assistance at its hospital(s) and other facilities, if any. Financial assistance includes free or discounted health services provided to persons who meet the organization's criteria for financial assistance and are unable to pay for all or a portion of the services. Financial assistance doesn't include: bad debt or uncollectible charges that the organization recorded as revenue but wrote off due to a patient's failure to pay, or the cost of providing such care to such patients; the difference between the cost of care provided under Medicaid or other means-tested government programs or under Medicare and the revenue derived therefrom; self-pay or prompt pay discounts; or contractual adjustments with any third-party payors	Free or discounted health care services