



COPLEY HOSPITAL, INC.
RESPONSES TO QUESTIONS FROM THE
OFFICE OF THE HEALTH CARE ADVOCATE
JULY 1, 2022

1. Hospital Financial Assistance and Bad Debt during COVID-19

a. Please provide the following updates since last year's hospital budget process:

i. How have you changed your official or unofficial patient financial assistance policies and/or procedures?

RESPONSE: Copley has not modified its official patient financial assistance policies regarding COVID-19, nor have we instituted any unofficial policies.

However, we are working with our patients when they contact us sharing they are having a challenging time with making their payments. As always, we are still encouraging them to apply for our financial assistance program to potentially help them reduce their bill.

ii. How has your handling of patient collections changed?

RESPONSE: Due to COVID-19, Copley suspended sending patients' new bills to collections during the period from April 2020 through October 2020.

iii. Please estimate the most recent quarter when you reviewed whether your free care policy documents (full policy, plain language summary, application, etc.) align.?

RESPONSE: We are currently in the review process for our financial assistances policy which was last reviewed on 05/31/19 or third quarter FY2019.

b. Collecting on patient debt:

i. If a patient is overcharged, please explain your ability to correct a bill once the collection process has begun.

RESPONSE: Copley has the ability to pull back any bill, at any time, correct it and reissue; if necessary it can be sent back to collections as well.

ii. Do you inform patients when patient balances owed are written off as bad debt?

RESPONSE: Copley does notify patients when their bad debts are written off.

iii. How many patients had bills that you sent to a third party to collect the debt during the following timespans: (1) Q4 FY2020 and Q1-Q3 FY2021 and (2) Q4 FY2021 and Q1-Q3 FY2022?

RESPONSE: Copley sent the following number of patient bills to collection agencies:

Q4 FY2020 – 0 and Q1-Q3 FY2021 – 3,688

Q4 FY2021 – 1,173 and Q1-Q3 FY2022 – 1,364



- iv. What is the total dollar amount of bills sent to collections during the following timespans: (1) Q4 FY2020 and Q1-Q3 FY2021 and (2) Q4 FY2021 and Q1-Q3 FY2022?

RESPONSE: Copley sent the following total amount of patient bills to collection agencies:

Q4 FY2020 – \$0.00 and Q1-Q3 FY2021 – \$2,148,385

Q4 FY2021 – \$880,440 and Q1-Q3 FY2022 – \$779,793

- c. Please provide the FY2021 actual and FY2022 projected bad debt by whether the patient who accrued the debt was insured or uninsured. Please split the insured category by whether the patient's primary insurance is Medicaid, Medicare, or a commercial plan.

RESPONSE: FY2021 actual total 3,688: 2,657 insured and 1,031 uninsured.
Insured: 1,916 – Medicare, 29 – Medicaid, 712 – Commercial
FY2022 projected total 2,537: 638 insured and 1,899 uninsured.
Insured: 95 – Medicare, 26 – Medicaid, 517 – Commercial

2. Medicaid Screening Processes

a. Emergency Medicaid

- i. If your organization has written policies regarding screening for emergency Medicaid under HBEE Rule 1702(d), please provide them.

RESPONSE: Copley does not have any written policies regarding screening for emergency Medicaid. If a patient comes into the hospital with no insurance for emergency services they are treated and we work with them after to get on Medicaid, if possible.

- ii. For Q1-Q3 of FY 2022, please provide the number of facility patients screened for emergency Medicaid and the number of facility patients who received emergency Medicaid.

RESPONSE: Copley does not track this statistic.

- iii. For Q1-Q3 of FY 2022, please provide the number of labor and delivery patients screened for emergency Medicaid and the number of labor and delivery patients who were covered by emergency Medicaid.

RESPONSE: Copley does not track this statistic.

- iv. If your organization has outreach materials on the application process and eligibility criteria for Emergency Medicaid, please provide them. Please explain how your patients can access these materials and list the languages into which the materials have been translated.

RESPONSE: Copley does not have any outreach materials regarding the application process and eligibility criteria for emergency Medicaid.



b. Deemed Newborns

- i. If your organization has written policies regarding screening newborns for Medicaid in line with HBEE rule 9.03(b), please provide them.

RESPONSE: Copley does not have any written policies regarding screening newborns for Medicaid. If a deemed newborn does arrive as a patient, we work with the parents to apply for their child, but it is not required and we would bill Medicaid for those services using the mother's Medicaid number.

- ii. For Q1-Q3 of FY 2022, please provide the number of newborns screened for Medicaid without an application and the number of those newborns who received Medicaid.

RESPONSE: Copley does not track this statistic.

- c. Since the passage of "H. 430/Act No. 48 An act relating to eligibility for Dr. Dynasaur-like coverage for all income-eligible children and pregnant individuals regardless of immigration status," what steps have you taken to prepare for the implementation? Do you have outreach materials, and if so, what languages are they translated into? If you have such materials, please provide them.

RESPONSE: We do not have any specific outreach materials for this population. If a patient was curious about billing, we would encourage them to call Vermont Health Connect directly. This would ensure they get the most accurate information and can learn about additional services available to them.

3. Health Equity

- a. Please provide examples of any policies, procedures, and initiatives that your hospital has undertaken, or plans to undertake, to address systemic racism within your institution and community.

RESPONSE: See Equal Employment Opportunity policy attached.

- b. If you have a funded DEI / Racial Equity position or DEI committee at the hospital, what are their primary roles and responsibilities? How is this position empowered and supported within the hospital? If you do not have this type of position, are you planning to create one? What obstacles are preventing you from creating this type of position?

RESPONSE: Copley acknowledges, embraces, and supports our differences and believes that healthcare can be a true equalizer for everyone. As a healthcare organization and employer, we are respectful of all racial, sexual, gender, religious, cultural and socioeconomic backgrounds. At Copley, we provide exceptional care to every person who walks through our doors, period. We work hard to ensure that all employment processes and programs are impartial and fair for every staff member and employment applicant.

To assist us in better understanding and appreciating our differences, we will be developing some new initiatives and re-enforcing some that already exist, including:

- Developing a collaborative Diversity, Equity, and Inclusion (DEI) statement with our staff and volunteers.
- Continuing to offer additional DEI education focused on supporting differences within our patient, family, and co-worker communities.



- Introducing professional signage throughout Copley that re-enforce our above beliefs.

If we understand and accept our differences, our patients, families, and co-workers will be better served with our support.

- c. Please describe the process for how your hospital handles patient complaints related to discrimination.

RESPONSE: Patient complaints related to discrimination would be handled as outlined in our Patient Complaints and Grievance Resolution Policy. The investigation or team that is brought together puts the right people at the table based on the type of complaint: Practitioner complaints are peer reviewed, Nursing care complaints are reviewed by the Nursing Unit Leadership, Billing issue complaints are reviewed by the Director of Patient Access and Financial Services and her team, discrimination complaints by employees are reviewed by Human Resources and discrimination complaints by practitioners are peer reviewed.

- d. How much funding in your current and future budgets has been allocated to DEI and/or racial equity focused projects, trainings, or collaborations?

RESPONSE: DEI and/or racial equity projects, trainings, and collaborations are not separately tracked through our budget process. However, time spent to promote these endeavors is built into the budgets on a department basis.

- e. What percentage of staff and administrative leadership have received training in language access needs, implicit bias, and cultural competency? Does this vary significantly by job category?

RESPONSE: We require all employees including providers to participate in online training around DEI and are in the process of increasing this required awareness for all.

- f. Are patient satisfaction surveys given in languages other than English? In what languages is the survey available? Is race/ethnicity data collected as a part of these surveys?

RESPONSE: Patient satisfaction surveys are provided in English and Spanish. Race/ethnicity data is collected.

- g. Please discuss any analyses or tracking your hospital conducts or is considering conducting regarding access to care, care efficacy, or satisfaction among vulnerable populations including, *but not limited to*:
- i. patients whose primary language is not English,
 - ii. BIPOC patients,
 - iii. patients with no or intermittent broadband and/or cellular telephone service, and
 - iv. patients who are not U.S. citizens.



RESPONSE: Copley currently conducts a Community Health Needs Assessment every 3 years. A component of the survey assesses the Copley service area's vulnerable populations in an effort to ensure appropriate services are available and offered in our community.

Copley offers care and services of the highest quality at an affordable cost, regardless of ability to pay. This is an important part of our not-for-profit heritage. Our Emergency Department is available 24/7 and we turn no one away. Our team of social workers including our financial counselor assist those in need of other services available within our community, such as assistance with food, housing, dental care, etc.

For those patients whose primary language is not English, we have access to interpreters. On occasion, we are able to offer interpreter services in-person as some of the Copley staff speak various languages. Otherwise, the primary interpreter services program is available via the telephone. Through area resources Copley does everything possible to assist patients with limited or no, internet or phone service and in some cases, we will also arrange for transportation.

h. Discuss how you utilize health disparities data to inform hospital policies and procedures.

RESPONSE: Copley prides itself on serving our community without discrimination. Our efforts to reach and treat those patients at a disadvantage such as non-U.S. citizens, BIPOC, gender identity and physically or the developmentally disabled revolves around services made available to aid with care and treatment. The data we track provides insight and allows us the ability to assess in an effort to modify necessary policies and procedures to address potential discrimination. Identification of the disadvantaged mainly comes through our Emergency Department where we have social workers able to assist to find appropriate resources to aid in the care and well-being of our patients. We collaborate with our local partners often to find potential housing and shelters, recovery centers, etc., to help at risk populations.

Internal DEI training is being conducted at Copley to ensure all staff members are given the proper tools to support a more inclusive society.

4. Contingency Planning

a. Please provide a high-level contingency plan detailing how your hospital would amend its business strategy if the Board reduced or denied your charge request.

RESPONSE: Copley calculated the rate increase based on an understanding of expected volumes, necessary services, and patient needs for the area, and then determined the costs to provide these services. If the board reduces or denied our charge request we would need to revisit these assumptions.



Copley Health Systems, Inc.

Effective: 06/25/2009

Last Revision: 05/29/2020

Policy Title: Equal Employment Opportunity

Policy Type: Administrative Patient Care

Policy Scope: Copley Health Systems Copley Hospital Single/Multi-Departmental

Approved by: Senior Leadership Team

Associated Procedure: N/A

Policy:

As an Equal Opportunity Employer, Copley is committed to providing an environment free of discrimination in all aspects of the hiring and employment process.

Policy Provisions:

1. It is the philosophy of Copley to prohibit discrimination on the basis of age, race, creed, color, sex, marital status, national origin, ancestry, disability, veteran status, parental status, medical condition, genetic information, gender identity, or sexual orientation.
2. Copley complies with applicable state and local laws governing non-discrimination in employment in every location in which the company has facilities.
3. Copley prohibits discrimination in all aspects of the employment process including recruitment, hiring, employment, promotions, pay, demotions, lay-offs, recalls, benefits, transfers, training, education, and grievance procedures.
4. Directors, managers and supervisors are responsible for implementing equal employment practices within each department. The Human Resources Department is responsible for Copley's overall compliance, and shall maintain personnel records in compliance with applicable laws and regulations.
5. Employees are required to report to a member of management or Human Resources representative any apparent discrimination. The report should be made within forty-eight hours of the incident.
6. Copley forbids retaliation against any individual who files a charge of discrimination, reports harassment, or who assists, testifies or participates in an equal employment proceeding.
7. Violations of this policy, regardless of whether or not an actual law has been violated, will not be tolerated. Copley will promptly and thoroughly investigate every issue that is brought to its attention in this area and will take appropriate disciplinary action, up to and including termination of employment.
8. Any questions regarding equal opportunity and non-discrimination may be forwarded to Human Resources.

References:

Title 29 Federal Code of Regulations: Equal Opportunity Commission: Part 1600-1699