

April 11, 2017

**Via Email and Hand Delivery**

Kevin McDonald, Chief  
Certificate of Need Division  
Maryland Health Care Commission  
4160 Patterson Avenue  
Baltimore, Maryland 21215

**Re: Columbia Surgical Institute, LLC  
Matter No. 17-13-2391**

Dear Mr. McDonald:

Per our conversation, additional information was needed regarding the charity care standard. In adherence to sub-part 2c(ii) of the Charity Care standard, we elaborated on Columbia Surgical Institute's specific plan for achieving the level of charitable care for the population identified in sub-part 2a(iii) - Criteria for Eligibility, to meet the target.

Enclosed please find the required six (6) copies of our response. We will also submit the response electronically, in both Word and PDF format to Ruby Potter, as requested.

If any further information is needed, please let me know.

Sincerely,



Penelope L. Williams, RN  
Healthcare Consultant

Enclosures:

Maura Rossman, MD, Health Officer - Howard County  
Ms. Ruby Potter - Health Facilities Coordination Office  
Scott LaBorwit, MD  
John J. Eller, Esquire - Baker Donelson

## **PART IV – CONSISTENCY WITH GENERAL REVIEW CRITERIA**

### **COMAR 10.24.11.05A General Standards**

#### **The State Health Plan**

#### ***Standard .05A (2) (ii) – It has a specific plan for achieving the level of charitable care provision to which it is committed.***

CSI is committed to providing surgical and non-surgical services at reduced fees or bill forgiveness to persons with financial hardship. The Financial Assistance Policy and Program, is noted as Appendix F in the application submitted February 3, 2017.

#### **Plan for Achieving the Level of Charitable Care Provision**

CSI has a specific plan for achieving the level of charitable care provision to which it is committed. These activities include direct outreach, indirect outreach, community-based outreach, and relationship or collaboration building. While outreach is an ongoing effort, some of the activities accomplished, planned for, or currently underway are described below.

#### **Direct Outreach**

The first indication that a patient may demonstrate financial hardship is at the physician's office, when a patient arrives for examination or initial treatment. Therefore, all patients receive a copy of the Financial Assistance FAQ sheet, from the receptionist, along with other general patient registration materials. If surgery is deemed necessary, a trained surgical coordinator personally reviews surgical fee estimates with the patient and discusses financial concerns. At this time, the written Financial Assistance Program and application are provided when it appears the patient may benefit from the program, or if the patient requests an application. One-on-one counseling about the Financial Assistance Program and support completing the application are available upon request.

Medicare, private insurance and other patient billing and payment history are currently documented in the facility's secured electronic billing system. The system provides the opportunity to record and archive relevant financial information provided by persons who meet the eligibility requirements, and or who have applied for financial assistance. If

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additional treatment or surgical follow-up services are required within 12 months from date of initial application approval the patient remains eligible for free or reduced fee care. However, if services were required after 12 months from date of application approval, the patient will be counseled and re-verified for eligibility.

Some patients present as self-pay (meaning they pay for services with cash or credit card) and many are uninsured or underinsured. In 2016, CSI had 18 self-pay patients and 12 self-pay patients in 2015. Effective January 2017, all patients identified as self-pay are provided information about the program and enrolled, if they meet eligibility qualifications.

### **Indirect Outreach**

Notices about the program and policy are posted at the registration counter. Printed Financial Assistance Program FAQ sheets are available throughout the patient reception area. All associate providers with CSI are provided the same materials and encouraged to post and provide the materials in the same manner. Beginning October 2017, (the next available publication date) CSI will publish annually information regarding the Financial Assistance Program and policy, in the *Howard County Resource - Guide for Aging Adults, Persons with Disabilities and Caregivers*. Direct and paid advertisement about the program will also be included in this resource guide, that is made available free of charge throughout Howard County. CSI will continue to identify local publication sources in which to publish the program and policy, and in languages appropriate for the service area population. Public notice and information regarding CSI's financial assistance program is provided on the CSI website (<http://www.columbia-surgical.com>). Associate providers are encouraged to also post this information on their physician practice websites.

### **Community-Based Outreach**

CSI is collaborating with Holy Korean Martyrs' Catholic Church located in Baltimore County (2015 census data indicates 9.1 percent poverty level) to connect with uninsured and undocumented persons. This collaboration aligns CSI services with persons who are otherwise underserved and at risk for permanent and debilitating eye conditions. Many members of this church identify as "self-pay" and are assumed eligible for the Financial Assistance Program. The program was discussed with church leaders and written information was provided for dissemination to their membership. CSI continues to work

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with church leadership to ensure translators are present throughout the patient care experience and to strengthen outreach efforts. This outreach effort is being replicated and will expand to other faith-based organizations in CSI's service area.

CSI plans to participate in the Howard County sponsored Senior Expo, scheduled for October 2017. Attendance at this event is approximately 4,000. With Medicare approximately 50% of CSI's payer-mix, this provides the opportunity to reach members of the community and connect with those needing supplemental health plan coverage.

In the service area, CSI made contact with Maryland Health Connection to enroll their provider's as resources under "Find a Physician". This should be accomplished by the end of April 2017. In December 2016, optometry practices that refer patients to CSI ophthalmologists received a letter from Dr. LaBorwit that included instructions on how to access an enrollment application, and in January 2017, Anne Arundel County public health nursing personnel received an email about the program. For other outreach, associate providers have their practices around the CSI service area. This casts a wide net for reaching persons living in areas with higher poverty levels, (i.e. Baltimore City with a poverty rate of 23.7).

### **Relationship and Collaboration Building**

CSI is in the early stages of outreach to Howard County Office of Veterans and Military Families, to ease access to care for veterans and their families. Letters describing the Financial Assistance Program will be mailed to the veterans' office by June 2017, with instructions to circulate among the veteran community. Veterans that meet the program income requirements will receive care for free or reduced fee care.

CSI has connected with Howard County Social Services. While direct promotion is not permitted in a government organization, materials about the Financial Assistance Program can appropriately be provided as a resource to case managers and social workers. Materials will be circulated to case managers by the end of May 2017. CSI is contacting individual geriatric case managers who work outside of the government system. Networks are being created to promote the program and provide opportunities that ensure persons requiring quality scheduled or urgent eye care are connected directly with a provider.

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Dr. LaBorwit provides lectures and conferences to local optometrists on various ophthalmic topics. The range of topics will expand to reflect expanded services provided at CSI and include promoting the Financial Assistance Program.

### **Reporting of Charity Care Services**

Each month, CSI's office will prepare a report of charity care provided to the targeted population, (persons living at or below the poverty level). Reports will be provided monthly to the Business Administrator and facility Principals, Scott LaBorwit and Allen Rutzen for review. Quarterly, a summary report will be provided to CSI's Board of Directors, responsible for monitoring and ensuring CSI is meeting, at minimum, the obligation for charitable contributions per Maryland Health Plan and facility policy and requirements. Annually, charitable contributions will be recorded in the annual report. CSI commits to meeting the minimum charity requirements and will report annually on MHCC survey. Information will also be made available to the public, upon request.

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AFFIRMATION

I hereby declare and affirm under the penalties of perjury that the facts stated in this CON Application and its attachments for Columbia Surgical Institute, LLC are true and correct to the best of my knowledge, information and belief.



Penelope Williams, RN

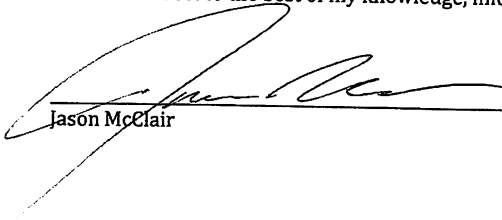
*April 11, 2017*

Date

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AFFIRMATION

I hereby declare and affirm under the penalties of perjury that the facts stated in this CON Application and its attachments for Columbia Surgical Institute, LLC are true and correct to the best of my knowledge, information and belief.



Jason McClair

4/12/17  
Date