



STROUDWATER

**NYS CON – Health Equity Impact
Assessment**

**SUBMITTED TO
Westfield Memorial Hospital**

July 24, 2024

July 24, 2024

Rodney Buchanan, MSN, RN, CFRN
Hospital Administrator, Westfield Memorial Hospital
189 East Main Street
Westfield, NY 14787

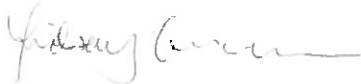
Re: New York State Certificate of Need – Health Equity Impact Assessment
Via E-Mail: rodney.buchanan2@ahn.org

Dear Mr. Buchanan:

On behalf of Stroudwater Associates, we are pleased to provide you with this proposal outlining Stroudwater's proposed approach to and qualifications for assisting Westfield Memorial Hospital (WMH) with the Health Equity Impact Assessment (HEIA) assistance related to Rural Emergency Hospital (REH) designation Certificate of Need (CoN). Based on our prior work with WMH, experience working with hundreds of hospitals and health systems nationally, Certificate of Need work and an expert on health equity, we are well equipped to assist WMH with these matters.

Based on our conversations with you last week, we have developed a proposed approach to assist WMH with this HEIA process. This consulting engagement will provide WMH with the required data and completion assistance for the Health Equity Impact Assessment, a component to the CoN application to designate WMH as a REH. This engagement has been structured to be flexible and accommodate the uncertainties involved in regulatory processes.

Sincerely,



Lindsay Corcoran
Principal, Stroudwater Associates

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OUR UNDERSTANDING OF THE SITUATION

Westfield Memorial Hospital (WMH) is located in western New York, approximately 62 miles south of Buffalo and approximately 31 miles north of Erie, Pennsylvania. Westfield Memorial Hospital serves patients from the surrounding communities of Westfield, Ripley, Brocton, Sherman, Clymer, Bemus Point, Mayville, Chautauqua, Stockton, Portland, Dewittville, Hartfield, and Ashville. Westfield Memorial is a member of the Allegheny Health Network (AHN), an eight-hospital health system based in Pittsburgh, Pennsylvania, serving 29 counties in Pennsylvania, portions of New York, Ohio, and West Virginia. Westfield Memorial Hospital is a 4-bed, not-for-profit, short-term acute care hospital, with an acute average daily census (ADC) of 1.8 in 2023 and an average length of stay (ALOS) of 3.3 days in 2023.

WMH previously engaged Stroudwater in 2021 to evaluate and understand market demographics and market potential to support the growth of current inpatient operations and to further define/clarify the types of patients that can and should be admitted to WMH. In addition, Stroudwater assisted WMH in a Certificate of Need (CoN) application related to adding acute-care beds to Westfield's license in 2022. Since then, WMH has pivoted their strategy and is pursuing Rural Emergency Hospital (REH) designation as a preferred operating structure. As an Article 28 facility in the State of New York, the reduction of inpatient beds at WMH and the REH designation would enact a Certificate of Need application, inclusive of a Health Equity Impact Assessment. This proposal speaks to Stroudwater's proposed approach to assisting WMH as an Independent Entity in the completion of the Health Equity Impact Assessment.

PROPOSED APPROACH

Scope of Services

Stroudwater, acting as the Independent Entity, will collaborate with key members of WMH and AHN to complete the scope of services outlined below.

Pre-work:

1. As the acting Independent Entity for WMH and as a regulatory criterion of the HEIA, Stroudwater will complete the HEIA Conflict-of-Interest form and produce a HEIA agreement between WMH and Stroudwater as a required document.
2. In partnership with WMH, Stroudwater will identify the proposed service area that is being utilized throughout the CoN application – this service area will guide in data collection.

Data Collection:

1. Stroudwater will access public and private data files such as U.S. census data, hospital discharge data, insurance claim data, survey information, stakeholder interviews, secondary sources, medical literature, etc. to obtain the following information related to the defined service area. This data will be included in the required 'Scoping' component of the HEIA application.
 - a. Demographics

- b. Medically underserved groups
 - c. Current and Expected Utilization
 - d. Historical and Projected Market share
 - e. Availability of similar services or care nearby
2. Stroudwater will describe the sources, data and information utilized whenever possible.

Document Completion

1. In partnership with key WMH staff, Stroudwater will complete the following HEIA components:
 - a. Scoping
 - b. Potential Impact
 - c. Mitigation
 - d. Monitoring
 - e. Dissemination
2. Stroudwater, in partnership with WMN will leverage multiple communication methods (phone calls, community forums, surveys, email, written statements) to engage and gain the perspectives of key stakeholders within the project's service area to meet the meaningful engagement requirement

Timeline: Once scope of work is finalized, Stroudwater will consult with the WMH team to establish a project timeline and deliverables based on the target date for CoN application submission to NYS.

- a. Stroudwater proposes scheduling weekly project team (Stroudwater/WMH) check in calls, to assess progress,


ABOUT STROUDWATER ASSOCIATES

Stroudwater Associates is a private healthcare consulting firm with corporate offices in Portland, Maine, Atlanta, Georgia, and Nashville, Tennessee, and experience working in all 50 states. We serve a national healthcare market consisting of government and quasi-government agencies, community-based organizations, major academic and tertiary centers, rural and community hospitals, physician groups, and provider organizations. Our consulting teams offer deep expertise and broad experience in strategic, financial, clinical, and operational areas.

At Stroudwater, we have an all-encompassing devotion to rural healthcare nationwide. Our team is driven each day by the conviction that every rural community deserves a compassionate and quality healthcare delivery system. From Alaska to Maine, we partner with healthcare leaders to sustain and strengthen the vital role hospitals and clinics play in rural America. Our experience with hundreds of rural hospitals serves as our inspiration and expertise base in creating solutions for resilient institutions to provide the very best care in their communities for the long haul. Our counsel is down-to-earth and actionable. We pride ourselves in offering the education, motivation, and practical tools clients need to implement our recommendations without breaking the bank. Our rural team’s passion for facilitating customized solutions for each client fuels us. We thrive when our clients thrive.

Currently, Stroudwater has active engagements and client relationships in over thirty states encompassing every region of the country. Our consultant expertise and comprehensive service complement are ideal for meeting the needs of rural and underserved communities.

We offer, among others, the following services:

 Data & Analytics	 Capital Planning & Access	 Mergers, Affiliations & Partnerships
 Performance Improvement	 Physician-Hospital Alignment	 Population Health & Employer Health Strategy
 Clinical & Quality	 Revenue Cycle Management	 Rural Practice
 Provider Compensation	 Strategic Planning	 Strategic Master Facility Planning

Stroudwater Associates assists numerous rural providers to improve operational performance and meet the needs of underserved populations more effectively. To that end, Stroudwater worked with the Federal Office of Rural Health Policy (FORHP) and the NRHRC to develop the Rural Healthcare Provider Transition Project (RHPTP) (formerly the Small Rural Hospital Transition Project), funded by the FORHP, for which Stroudwater has been the lead consulting firm for the past eight years. Through the RHPTP Project, Stroudwater assists hospitals with transitioning to a new healthcare environment. Similarly, with the support of the Delta Regional Authority (DRA) and the FORHP, Stroudwater has partnered with the NRHRC since 2017 to provide selected rural Mississippi Delta providers and their communities with technical assistance through the Delta Region Community Health Systems Development Program (DRCHSD). Stroudwater's consulting services have grown and evolved to meet the healthcare needs of rural communities and the varied organizations that impact access to healthcare. In addition, Stroudwater Associates has worked with the Federal Office of Rural Health Policy, the Department of Housing and Urban Development, and the United States Department of Agriculture to implement financing vehicles that would enable rural hospitals access to capital markets.

Stroudwater consultants are active in the movement to improve rural quality and operational performance, including developing models of collaboration between FQHCs and rural hospitals; participation on the Institute of Medicine's committee on rural health; involvement with the National Rural Health Association's Rural Health Congress and Governmental Affairs Committee; and the Federal Office of Rural Health Policy's Rural Hospital Issues Group. We present regularly at national, regional, and state conferences offering thought leadership in rural hospital operations, financial improvement, clinical service development, physician practice management, and FQHC operations.

PROJECT TEAM

The project team will consist of the following Stroudwater consultants: Lindsay Corcoran, Keith Bubblo and Clare Kelley. Biographical summaries are available in the Appendix. Additionally, the team will have access as needed to the broad range of multidisciplinary expertise of the entire Stroudwater Associates team.



Lindsay Corcoran



Keith Bubblo




Clare Kelley

COSTS AND ARRANGEMENTS

If you agree to the engagement described in this proposal, please sign below and return one copy with a check for the initial payment, care of:

Gail Belt, Administrator
Stroudwater Associates
1685 Congress Street, Suite 202
Portland, ME 04102
admin@stroudwater.com

By signing this proposal, you agree to [Stroudwater's Terms and Conditions](#) (linked here and attached separately), which are hereby incorporated into this proposal.



Rodney Buchanan, MSN, RN, CFRN
Hospital Administrator, Westfield Memorial Hospital

8-19-2024
Date



Gail Belt, Administrator
Stroudwater Associates

8/20/24
Date

APPENDIX: PROJECT TEAM BIOS

Please see the following page.



LINDSAY L. CORCORAN,
MHA
Principal

AREAS OF FOCUS

- Quality and performance improvement
- Practice management
- Strategic planning for rural providers and systems
- Affiliation advisory
- Six Building Blocks

EDUCATION

Lindsay is a graduate of the University of Southern Maine and earned her Master of Healthcare Administration degree from Seton Hall University.

She is a member of the American College of Healthcare Executives.

OUTSIDE THE OFFICE

Outside of work, Lindsay enjoys camping and hiking in the great state of Maine with her husband, two children, and their dogs, Zeke and Zoe.

CONTACT

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Lindsay Corcoran is a compassionate change agent and strong advocate for sustainability and access in rural healthcare. With over 12 years in healthcare and a background in practice management, Lindsay was drawn to consulting as a means to help others both locally and on a larger scale. At Stroudwater, Lindsay focuses on supporting and sustaining healthcare access for rural communities through hospital and medical practice operational assessment, affiliation strategies, and quality improvement; she has assisted rural and community hospitals and clinics across the country to improve operational and financial performance. As a member of Stroudwater's Opioid Management Team, she helps primary care clinics and provider practices understand and implement the Six Building Blocks program, an evidence-based approach to treating chronic pain patients on long-term opioid therapy.

Her experience as a healthcare administrator gives Lindsay a unique perspective on practice operations, customer service, and patient-centered care. Before joining Stroudwater, Lindsay worked in an outpatient physical therapy setting as a practice administrator for three clinics in southern Maine.

REPRESENTATIVE ACCOMPLISHMENTS

- Assisted health clinics in preparation for RHC designation, including onsite clinic evaluation, policy manual review, and survey readiness assessment
- Developed a multi-specialty physician practice financial improvement plan, which included practice collaboration, patient access, and optimization, with subsequent implementation
- Provided strategic, financial and operational assessments to critical access hospitals and small rural hospitals
- Assessed rural hospitals for improvements in care management, care transitions and overall quality performance
- Completed market analyses to support strategic and facility planning at community and critical access hospitals
- Assisting rural hospitals in the evaluation of strategic partnership opportunities
- Participates in multiple state Flex network and state hospital association financial and quality improvement training/projects
- Delivered compliance assessment (HIPAA) for 1000+-provider network
- Developed online OSHA training program for healthcare workers



KEITH M. BUBBLO

Senior Analyst

AREAS OF FOCUS

- Data visualization
- GIS
- Strategic planning
- Facilities planning
- Community health
- Population health

EDUCATION

Keith holds a Certificate in Geographic Information Systems from the Department of Geography-Anthropology at the University of Southern Maine. He attended Arizona State University in Tempe, Arizona, and has a BA in English and Political Science from Wilkes University in Wilkes-Barre, Pennsylvania.

CONTACT

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kbubblo@stroudwater.com

Seeing your data leads to better decisions. Keith joined Stroudwater Associates in 2001, and has helped develop Stroudwater's data-driven approach to client engagements.

His expertise is in the management, analysis, and presentation of healthcare data, and he uses state-of-the-art Geographic Information System (GIS) and visualization software to interpret the components and distribution of patient records, utilization estimates and projections, market share, and demographic data, adding insight to a client's market position and highlighting areas of risk and opportunity. A major focus of his work is helping to answer critical client questions with custom data visualizations that are interactive and easy to understand.

REPRESENTATIVE ACCOMPLISHMENTS

- An enhanced set of utilization, risk, and demographic dashboards for a state health information exchange to deploy to their Medicaid program managers and care coordinators, replacing legacy reporting system;
- A financial benchmarking tool for a large healthcare system in the northeast;
- A claims dashboard of a hospital's self-funded health plan data to identify high cost/high utilization patients and out-of-network leakage;
- A patient throughput and occupancy analysis for a large tertiary medical center building a replacement facility;
- Comprehensive market analysis dashboards, including service area, demographics, competitor analysis, and patient origin by travel time, for multiple clients throughout the country;
- An enhanced community health needs assessment for a rural community in the southwest;
- Custom patient panel analyses for multi-site, multi-specialty physician groups looking to maximize efficiencies and develop new markets;
- Facility relocation/new construction/closing analyses using GIS to model the impact on existing or potential patients; and
- Ambulatory market potential studies using historical market share, business data, daytime/nighttime population trends, and traffic counts.

Stroudwater's data-driven approach is scalable to all types and sizes of projects. Keith has assisted clients ranging from large tertiary centers in dense, urban areas to small rural and community hospitals; from new "greenfield" hospitals under development to ambulatory surgery centers; and from physician groups to employer-sponsored health plans.



Clare is an experienced healthcare consultant providing vision, direction and leadership in Stroudwater's Affiliations & Partnerships, Physician, and Strategy practices, to help ensure sustainable access to healthcare for all communities. Her recent work includes educating larger not-for-profit medical centers on the value of small critical access hospitals (CAHs); developing and evaluating a risk analysis for an independent short-term acute care center; affiliating small critical access hospitals with larger University Medical Centers; advising CAHs on clinic operations and physician need; developing a joint venture for an Ambulatory Surgery Center between a not-for-profit hospital and a physician specialty group; creating and implementing strategic plans for CAHs; and evaluating financial proformas for new hospital facilities.

CLARE KELLEY, MPH Senior Consultant

AREAS OF FOCUS

- Affiliation advisory
- Physician practice improvement
- Strategic planning
- Ambulatory strategy and development
- Data visualization

EDUCATION

Clare earned her Master of Public Health degree from The Dartmouth Institute for Health Policy and Clinical Practice.

She holds a BA in Geography from Middlebury College.

Before joining Stroudwater, Clare interned at The Dartmouth Institute for Health Policy and Clinical Practice; there, she researched and reported on the numerous international representations of healthcare variation. In a similar role at the not-for-profit Partners in Health, Clare assisted in making healthcare facility maps for major sites and analyzing data to aide in the decision-making behind new facility sites. She has created base maps of healthcare facilities in Haiti, Rwanda, and Malawi to be distributed to citizens and presented to organizations.

OUTSIDE THE OFFICE

In her spare time, Clare enjoys soccer, skiing, kayaking or anything active outdoors.

REPRESENTATIVE ACCOMPLISHMENTS

- *Value of a Rural Partner* – Educated a larger not-for-profit hospital on the benefits and value of a rural CAH partner to both organizations resulting in an affiliation.
- *Strategic Risk Analysis* – On behalf of a hospital client, developed a strategic risk analysis to provide guidance to the hospital on their decisions for the future.
- *Physician Practice Operations* – Assisted with the analysis of the clinics of a community hospital and advised on areas for both operational and workflow improvement.
- *Affiliation to larger partners* – Assisted a community hospital in the Northeast with their affiliation to a large University Medical Center.
- *Formation of a Joint Venture Ambulatory Surgery Center* – Assisted in the creation of a joint venture Ambulatory Surgery Center between a large not-for-profit health network and a physician specialty group.
- *Strategic Options Analysis* – On behalf of a hospital district, assisted with determining county-wide health needs and potential for a Greenfield Hospital outside a metropolitan area.
- *Community Health Needs Assessment* – Developed a Community Health Needs Assessment, including strategies for tackling health needs for a rural community hospital, and incorporated it into their strategic plan.

CONTACT

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