

May 28, 2024

Isaac Steinberg
Director of Planning & Development
Four Seasons Nursing & Rehabilitation Center

Dear Mr. Steinberg,

Jeffrey A. Sachs Associates, Inc. (Sachs Policy Group/SPG) is pleased to submit our proposal for the completion of a Health Equity Impact Assessment (HEIA) for Four Seasons Nursing & Rehabilitation Center.

This proposal outlines the key components and processes SPG will use to execute the HEIA, drawing upon the expertise of SPG's consultant team, inclusive of individuals with extensive experience in health equity, stakeholder/community engagement, and health policy.

BACKGROUND

Starting June 22, 2023, New York State law (S1451/A191) mandates a HEIA along with certificate of need (CON) applications for Article 28 healthcare facilities. This assessment evaluates if a project affects service access, enhances health equity, and reduces disparities for medically underserved groups, and includes meaningful community input and independent analysis. The HEIA requirement ensures that community voices are considered and provides an objective, independent assessment of the anticipated impact of the project on the public health of, service delivery of, or access to hospital and health services for historically medically underserved groups.

The proposed project seeks to close the Lakeside Adult Day Health Center in Brooklyn and shift the slots to the Sunrise Adult Day Health Center, which is 10 blocks away.

SPG RELEVANT EXPERIENCE

The HEIA team at SPG is a diverse and experienced group dedicated to addressing health disparities and promoting equitable access to care. The team has been deeply involved in the HEIA process since it was rolled out by New York State, having already been engaged on numerous HEIAs for a variety of stakeholders, including hospitals, Article 28 outpatient facilities, and nursing homes.

The team comprises experts with extensive backgrounds in health policy, population health, data analysis, community engagement, and anti-racism. We are committed to understanding and improving how social, environmental, and policy factors impact health equity, particularly for historically marginalized communities.

The team collaborates with a wide range of health care organizations, government agencies, and communities to provide strategic support with an overarching goal of advancing diversity, equity, and

inclusion. Our work encompasses research and evaluation of health programs and initiatives, stakeholder engagement, policy analysis, and development of mitigation and monitoring strategies.

In particular, the team has experience analyzing policy proposals that impact medically underserved groups, such as Medicaid programs serving older adults with long-term care needs and maternal health initiatives that aim to reduce pre- and post-partum health disparities. We are dedicated to supporting organizations that serve vulnerable populations, including safety net hospitals, community health centers, long-term care organizations, behavioral health providers, child welfare agencies, and providers that support individuals with intellectual and developmental disabilities.

SPG is well-positioned to provide the required HEIA services for Four Seasons Nursing & Rehabilitation Center. Our approach includes a comprehensive demographic profile of the facility's primary service area, meaningful stakeholder engagement, and a detailed analysis of the project's potential impacts on community residents, focusing on medically underserved groups. We will complete the HEIA process and provide all required documentation, ensuring compliance with the State's guidelines and conflict-of-interest requirements.

SCOPE OF WORK

The following generally outlines the activities necessary to conduct and successfully complete the HEIA as required by the State Department of Health (DOH). The expected duration of this engagement is 4-6 weeks.

1. Comprehensive Review and Analysis

SPG will use both publicly available data and data requested from Four Seasons to conduct a comprehensive review of the service area and to identify populations, specifically medically underserved groups, that may be impacted by the proposed project. Using descriptive statistics and data visualizations, SPG will efficiently paint a picture of the community and its patient profiles. Examples of data may include, but are not limited to, the following:

- Data provided by Four Seasons
- New York State DOH
- Statewide Planning and Research Cooperative System (SPARCS)
- US Census Bureau Data
- Community Health Assessments
- Health Facilities Information System (HFIS)
- Health Resources and Services Administration (HRSA) shortage area data
- Area Deprivation Index
- Supplemental claims data as needed/by request
- Publicly available medical literature, grey literature, publications, and reports
- Stakeholder interviews, focus groups, community forums, and/or surveys
- Additional sources as identified/available such as RWJ, Kaiser Family Foundation, etc.

2. Meaningful Stakeholder and Community Engagement

SPG will perform meaningful, culturally competent, and sensitive engagement to obtain diverse stakeholder and community feedback on how the proposed project impacts the unique health needs or

quality of life of historically medically underserved group(s). From our experience, SPG understands that meaningful engagement with the community and stakeholders is crucial for a successful HEIA. We recognize that this process requires thoughtful planning, dedicated time, and resources to ensure an inclusive and impactful approach that effectively captures the diverse perspectives, experiences, and needs of those most affected by the proposed project. The types of activities that may be performed include, but are not limited to:

- Create culturally appropriate and engaging communications materials to promote participation in the HEIA stakeholder engagement process, including translation into up to one (1) language to ensure access for individuals with limited English proficiency (if SPG's data analysis determines that additional translations are needed to effectively gather community input, SPG will provide those services and be reimbursed at cost, approximately \$500/language).
- Develop culturally competent community surveys and/or host community forms to gather input on the potential impacts of the project related to health equity.
- Conduct interviews or focus groups with key stakeholders, including the local health department, community members, health care professionals, and public health experts.

SPG will work closely with Four Seasons staff and its community partners to promote these engagement opportunities, with a focus on reaching historically underserved and marginalized groups. SPG will carefully review and synthesize all feedback, looking for common themes, concerns, and recommendations that can inform the project's planning and implementation. We will also prepare a summary of the engagement conducted and feedback received, which will be included in the HEIA data tables and final report.

The final community engagement plan will reflect the needs of the underlying project.

3. Health Equity Impact and Mitigation Strategy with Recommendations

SPG will utilize the insights gathered from our research/data analysis and stakeholder/community outreach to support the development of a mitigation strategy for any impacts identified. We will also provide recommendations to support programs and interventions that support health equity and quality of care for the impacted medically underserved group(s). This strategy will include:

- Data-informed interventions and new or expanded collaborations with health-related and/or community-based organizations.
- Evidence-based ways to reduce potential negative impacts as a result of the project, as applicable.
- Specific changes to the project to better meet the needs of medically underserved groups, as applicable.
- Approaches for monitoring and tracking progress on health equity, including the use of performance and quality measures such as access to screenings for historically medically underserved groups, timely to access care, processes and referrals with partner organizations, and general health outcomes for impacted groups.

4. Support of Delivery of Required HEIA Documents

SPG will organize and summarize findings in a final health equity impact assessment report that supports the completion of the following documents for Four Seasons Nursing & Rehabilitation Center:

- HEIA Template
- HEIA Data Tables
- HEIA Conflict of Interest
- HEIA Contract (Independent Entity and Facility)

The following forms will need to be completed by Four Seasons Nursing & Rehabilitation Center, and SPG will be available to advise in complying with these requirements according to DOH:

- HEIA Requirement Criteria
- HEIA Template SECTION C: Acknowledgement and Mitigation Plan
- Dissemination of Results and Recommendations: Public Posting of Redacted full CON Application and HEIA Online and NYSE-CON System

5. Additional Services Performed During the Course of the Engagement

During the engagement, SPG will monitor the availability of, and offer strategic guidance regarding, any updates in HEIA policy and requirements for the Four Seasons Nursing & Rehabilitation Center.

Notwithstanding any other engagements between SPG and Four Seasons Nursing & Rehabilitation Center, SPG will have no formal or informal involvement with any CON (or the related underlying project) for which SPG is performing a HEIA.

PROJECT COST

The project cost of completing the HEIA activities and required documents as required by the New York State DOH will be \$15,000 – paid in two installments: \$5,000 at the start of the project and \$10,000 upon delivery of the required HEIA documents.

AGREED AND ACCEPTED BY:

By: _____
Dr. Jeffrey A. Sachs, President
Sachs Policy Group

By: _____
Isaac Steinberg
Four Seasons Nursing & Rehabilitation Center