# V. Attachments

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| Attachment 1a | Annual Public Hearing Written Comments | A-002 |
| Attachment 1b | Annual Public Hearing Presentation     | A-010 |
| Attachment 1c | Shannon Responses to Hearing Comments  | A-034 |

| Reference     | Description                            |  |
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| Attachment 1a | Annual Public Hearing Written Comments |  |

[This Attachment contains proprietary, competitively sensitive information redacted from the public version.]

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| Reference     | Description                        |  |
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| Attachment 1b | Annual Public Hearing Presentation |  |









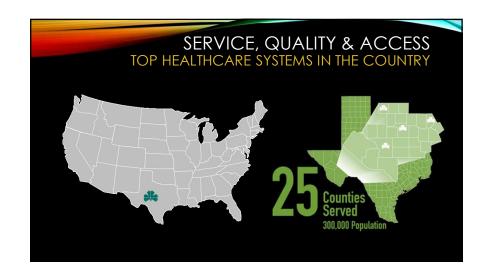
If you want to go fast,
go alone.
If you want to go far,
go together.

Atrican Proverb

















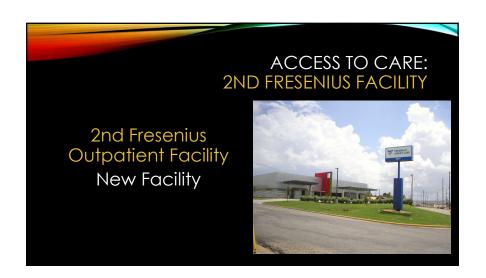


























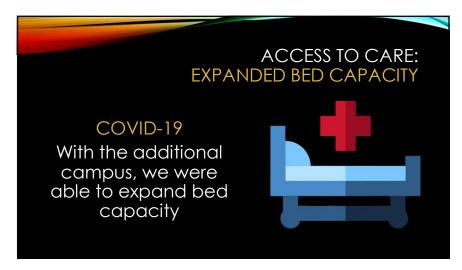




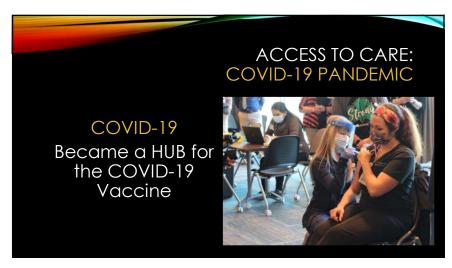


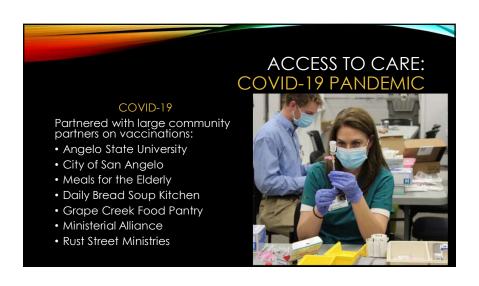


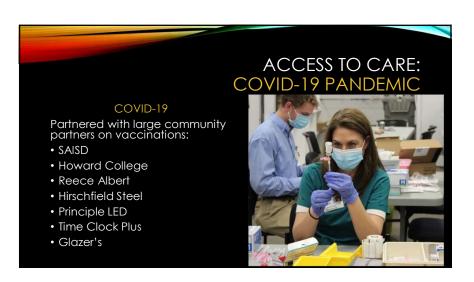
















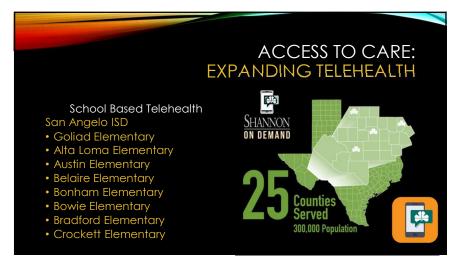






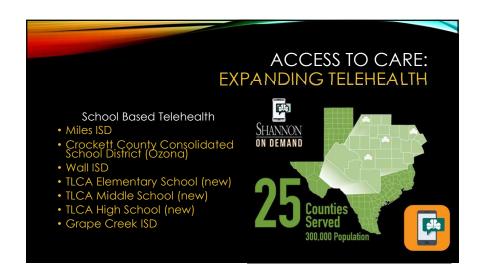










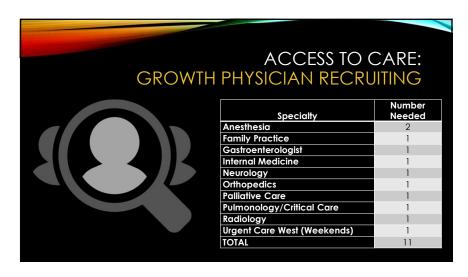


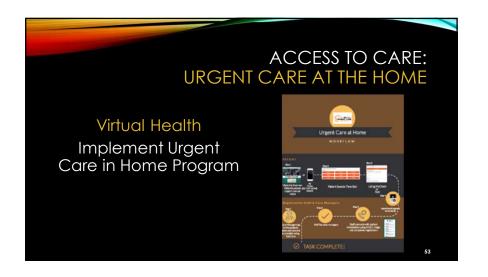


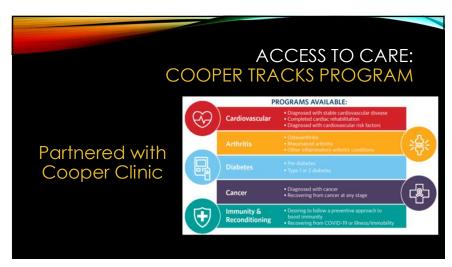


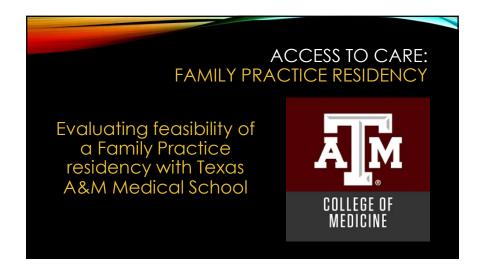


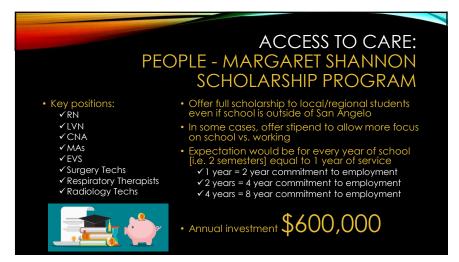


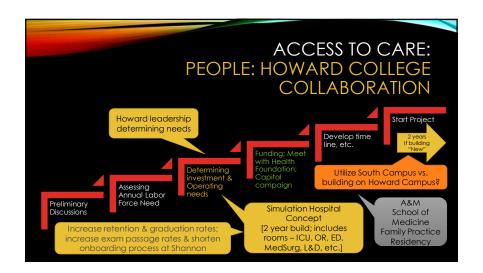






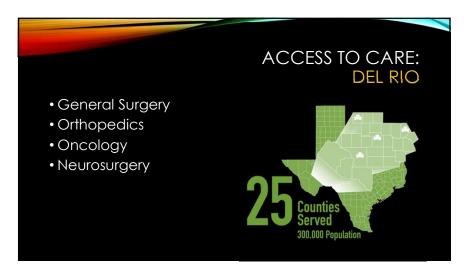




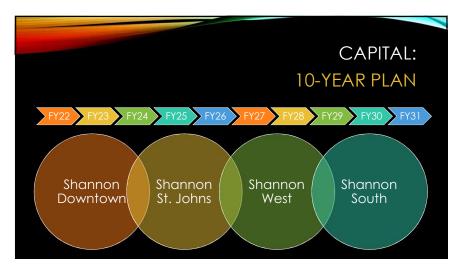




















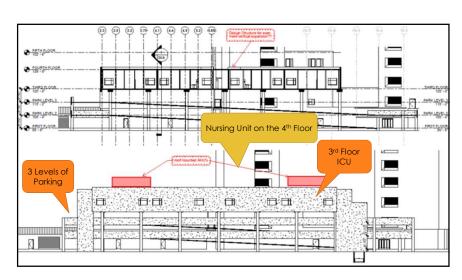


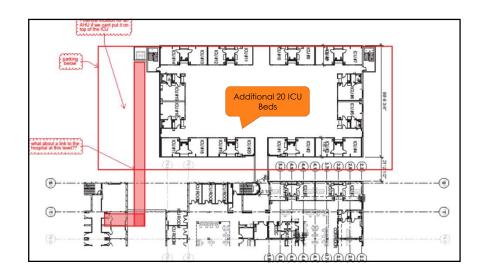






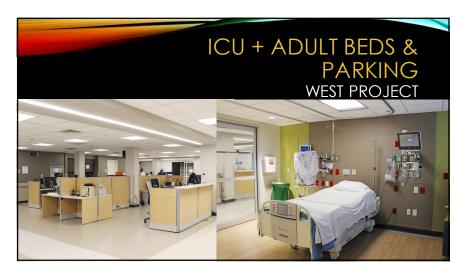










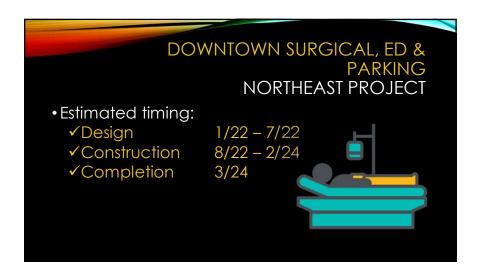


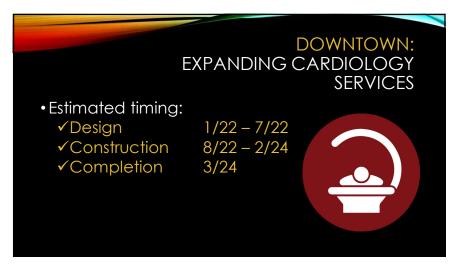










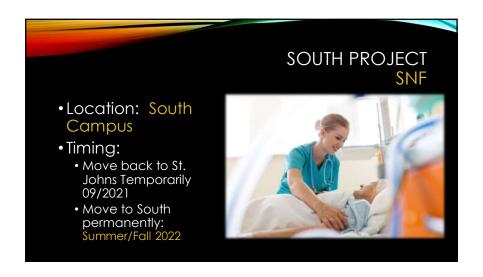


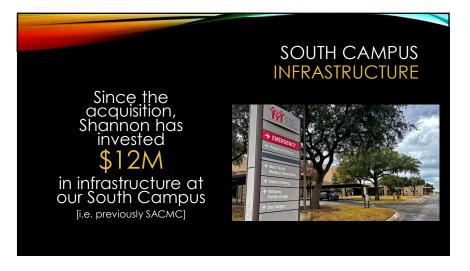




















| Reference     | Description                           |  |
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| Attachment 1c | Shannon Responses to Hearing Comments |  |

At Shannon, it's important to us that we collaborate with and listen to our community, as well as share how we are continually evolving, to enhance services and meet the needs of the people we serve. On September 16, our organization hosted a public meeting regarding its Certificate of Public Advantage (COPA). Shannon provided an overview of the many positive changes and new services since the integration of the South Campus. This meeting was open to anyone within the Shannon service area, and participants had the opportunity to share oral and written comments. There were approximately 40 attendees at the public forum. Shannon has provided all written comments submitted and a transcription of the oral comments provided at the meeting. The PowerPoint presented by Shane Plymell, President and CEO, is included.

Shannon has addressed the items presented in the public comments in the response below. In addition, this response will be shared on <a href="www.CareforSanAngelo.com">www.CareforSanAngelo.com</a>. All attendees that submitted oral and/or written comments and provided an email address will also receive a copy of the response by email.

### Competition and Choice of Healthcare Providers

In late 2020, Shannon Medical Center finalized its acquisition of San Angelo Community Medical Center to preserve and expand access to high quality, community-based healthcare for west Texans.

The primary purpose and the ongoing reporting requirements to Health and Human Services Commission (HHSC) regarding the Certificate of Public Advantage (COPA) is for the advantages to outweigh the disadvantages of having one primary healthcare provider for the community. Expanding Access to Care

- Shannon expanded outpatient neuro rehabilitation that includes expanded floor plan
  with more space for patients and therapists as well as expanded services including stateof-the-art physical therapy equipment.
- Prior to the acquisition, neonatal services at the South Campus hospital facility were facilitated through an affiliate contract with Methodist San Antonio. Shannon received a termination letter from this service provider in 2021. To maintain neonatology service at the facilities, Shannon entered into a partnership with Cook Children's Hospital to provide board-certified, full coverage neonatal services to the Concho Valley.
- Thirteen new providers started with Shannon in 2021, including Pain Management,
   Family Practice, Hospitalists, Wound Care, Emergency Medicine, Orthopedic Surgery,
   and Pediatrics. Nine advanced practice professionals joined Shannon in 2021, including
   Emergency Medicine, Family Practice, OB/GYN, Electrophysiology, Oncology, and
   Neurosurgery.
- Shannon renovated over 50,000 square feet at the South Campus Medical Office building to provide office and exam space for the additional providers joining Shannon.

- Implemented an enterprise Electronic Medical Record system, Epic, across Shannon South Campus. This system connects all facilities and patients through one record to enhance communication and continuity of care among providers to improve patient care.
- Shannon has invested in security infrastructure at SMC South to better ensure the safety
  of patients, visitors, and employees. This includes card readers to manage access points
  and updated doors at entrances.
- Health Club equipment upgrades include improvements to the exercise equipment and facility as a whole.
- Mental Health continues to be a growing need in the Concho Valley. Shannon offers
  inpatient and outpatient behavioral health services, as well as partners with community
  organizations to expand additional access points and provide continuity of care.

#### Private, Non-profit status

As a locally owned, private non-profit healthcare system, Shannon completes annual Community Benefit reporting and completes the American Hospital Association (AHA) Annual Hospital Survey. In 2020, Shannon provided \$38,743,884 in charity care to the patients of our region. This financial contribution would be a burden to the taxpayers of Tom Green County if Tom Green County had a hospital tax. Many communities throughout the state of Texas have a hospital taxing authority, such as Ector County. Shannon was founded to care for all of the citizens of the Concho Valley. Through the support of The Shannon Trust, Shannon is able to maintain its commitment to patients without a hospital tax. The Shannon Trust is instrumental in providing funding to expand access, technology and modernization of facilities.

#### Expanded healthcare services made possible by the Shannon Trust

- Shannon Health, through a joint venture with Encompass Health, opened a freestanding rehabilitation hospital. The Shannon Rehabilitation Hospital includes 40 private inpatient rehabilitation rooms, an expansive therapy gym featuring the latest technologies and equipment, an on-site cafeteria, in-house pharmacy and a four-chair dialysis suite.
- The Trustees of Shannon Medical Center announced an expansion project in March 2021 on the Shannon Downtown campus to update facilities and provide additional space to serve the growing number of patients in the Concho Valley. The project will include a new Outpatient Pharmacy, Cancer Center, office space for support services and a parking garage structure. The new Shannon Cancer Center will bring all outpatient oncology care and treatment services into one location as a comprehensive center of excellence.

#### **COVID-19 Treatment Protocols**

Shannon follows the NIH (National Institutes of Health) COVID-19 Treatment Guidelines. A link to this information can be found here, <a href="https://www.covid19treatmentguidelines.nih.gov/">https://www.covid19treatmentguidelines.nih.gov/</a>. Shannon has a COVID-19 Task Force that is made up of Shannon physicians, administrators, and staff that discuss updates to the NIH Treatment Guidelines, as well review best practices with identified healthcare partners and academic institutions.

There is not a vaccine mandate for Shannon Associates at this time.

There is a visitor policy in place, which includes no visitors allowed in the Emergency Department at this time. There are special circumstances that allow one designated visitor. Visitors are allowed for hospitalized patients, including COVID positive patients.

Shannon cannot speak to COVID-19 policies followed by unaffiliated healthcare organizations, providers or pharmacies.

#### Standards of Care

Through the integration of the providers at the South Campus, Shannon is now working with more than 350 physicians and advanced practice professionals. Maintaining standard of care across the organization includes the existing credentialing requirement of board certification of providers. Prior to the acquisition, Shannon and San Angelo Community Medical Center both had these expectations in their by-laws for many years. Only about 10 of the 350 total providers did not meet this qualification at the time of acquisition. Shannon Leadership worked directly with these individuals to allow adequate time to work towards meeting this standard and to achieve board certification.

Shannon was the first level II neonatal unit in in this region to be surveyed by the Texas EMS Trauma and Acute Care Foundation (TETAF), and received level II neonatal designation in 2017. San Angelo Community Medical Center received level II neonatal designation from TETAF in 2018. At acquisition, the CMS Certification Number (CCN) for the Shannon South campus changed, which also causes a re-designation for all accredited services (neonatal, trauma, etc.). This affected the neonatal designation among others. Shannon initiated the process to become designated as a level I for neonatal services at Shannon South because a level II and higher require an on-site survey prior to the state application. To achieve a level II or higher, one to three years of data and monitoring are required, along with Quality Assurance and Performance Improvement (QAPI) initiatives. Some of these efforts were not maintained prior to the acquisition; therefore, Shannon is working on program development and data collection to re-apply in the future. However, the State guidelines allow neonatal facilities to care for

babies of any gestational age as long as they have the resources available to meet the baby's specific care needs. Even with a level I designation, a facility can continue to care for level II infants in the neonatal facility as long as it can provide the level of care for these patients. Shannon continues to maintain the standard of care for these patients.

It is the policy of Shannon Medical Center to maintain a list of on-call physicians for all specialties represented on the medical staff of the hospital to assist in the evaluation and stabilization of all patients presenting at this facility. All physicians, by virtue of obtaining and maintaining medical staff privileges, assume the responsibility to participate in the on-call system, unless specifically excepted by the rules and regulations. This standard of care ensures physicians are available and respond timely to trauma and emergent situations. In emergent situations, it is not likely that a provider of choice will be available to present due to the fact that no single physician can be available 24 hours per day, seven days per week. The opportunity to request a surgeon is more feasible for an elective or planned procedure.

Shannon does not have a system-wide policy regarding unvaccinated children. Each provider in the Shannon network has the choice to set their practice guidelines regarding patients seen and treated. Shannon does have identified Pediatricians that accept children who are unvaccinated, including Dr. Josiah Ward. The acquisition did not have any impact on this practice.

Shannon does not have a system-wide policy regarding accepting or maintaining patients on a providers' individual patient panel. We work through our patient access team to help place patients with a provider that best meets their clinical needs and individuals preferences.

Shannon continuously supports and develops health prevention programs and strives to improve the health of the community.

- Shannon is committed to helping our community stay well. To illustrate this
  commitment, Shannon recently launched a new program in partnership with Cooper
  Wellness Strategies to help individuals manage chronic health conditions. Cooper Tracks
  is a proven exercise and educational program designed to guide and support individuals
  through exercising, increasing confidence and developing habits to improve their overall
  quality of life. Targeted health conditions will include cardiovascular health, diabetes,
  cancer care and immunity support. The goal is to give participants a strong exercise and
  health foundation that can help meet the chronic disease management needs of our
  community and prevent future hospital readmissions.
- Shannon provides a host of community education events related to topics such as
  cancer prevention and screenings, fitness and nutrition, childbirth and childcare, weight
  management, stroke prevention and cardiovascular health. Through educational events
  and various community events, health professionals relay current health information to
  the public. Representatives from different departments provide support and participate
  in local health fairs and health-related community events where they provide various
  health screenings and educational material.

• Shannon partners with the American Heart Association to educate, raise awareness and prevent heart disease and stroke. Shannon understands that continued education and awareness is crucial for women and men to fight this deadly disease.

#### **Customer Service**

Shannon implemented a system-wide Customer Service training called The Shannon Way, as communication and the patient experience continue to be a paramount priority for the organization. We know this an opportunity that needs continuous focus and work to create a culture and enhance service to our patients and their families.

Shannon providers and staff are trained to address specific needs and provide accommodations for patients, as needed.

## Staffing

Shannon is launching a new scholarship program where we will annually invest \$600,000 to support future healthcare professionals. This program will be available to local/regional students for these key positions: RN, LVN, CNA, MA, EMS, Surgery Tech, Respiratory Therapist, Radiology Tech. Students who receive this scholarship will have a commitment to work at Shannon two years for every year of school funding.

Based on market analysis that is performed periodically and role specific, Shannon has recently increased pay for new graduate registered nurses and licensed vocational nurses. In addition, Shannon increased base minimum pay from \$10/hour to \$12/hour.

Shannon has contracts with staffing agencies to bring in clinical personnel during times of high patient census when the organization experiences staffing shortages and/or is short staffed in hard-to-fill positions. There is a requirement that an individual must not live within a 100-mile radius of San Angelo to work as a contract employee so that we can maintain our local workforce. Shannon has diligently worked to provide appropriate staffing and maintain patient services throughout the COVID-19 pandemic, especially during peak times of high patient census. During these peak times, patient wait times often increase as we work to move each patient to the appropriate unit or care setting. Shannon received help from a number of nurses from the state of Texas during peak periods of COVID. Texas developed this program because healthcare systems across the state were experiencing significant staffing shortages to meet the healthcare demands of the COVID-19 pandemic. Unfortunately, staffing shortages are not unique to Shannon and we are continuously working to develop programming and benefits to meet the needs of the Shannon workforce.

Shannon took steps to mitigate the increased need for contract staffing by offering seasonal contracts for Shannon RNs and LVNs working on COVID-related units during peak periods of the COVID-19 pandemic. This provided an opportunity for RNs and LVNs to receive increased pay and benefits if they were willing to work extended hours.

#### Cost of Care

Shannon is committed to caring for our patients' health and well-being, and that includes providing healthcare that is accessible and affordable. We know patients are increasingly more interested in being well informed about their healthcare costs prior to and after they receive care in order to make financially reasoned decisions.

Healthcare costs can be complicated and depend on many factors including patient's individual insurance coverage, the circumstances of their medical care and eligibility for financial assistance. On our website, www.shannonhealth.com, we provide an extensive list of the standard charges for each service we provide. In addition, we created the Shannon Price Estimator tool, which allows patients to obtain a projected cost of their specific healthcare needs based on service, procedure and insurance provider.

Medically necessary is a term used by health insurers and plans. The process called prior authorization, prior approval or precertification is defined as a decision by your health insurer or plan that a health care service, treatment plan, prescription drug or durable medical equipment is medically necessary. There are many instances where the physician that has ordered the test or treatment is required to have what is called a peer to peer with a physician from the identified health plan to explain the medical necessity or reasoning for prescribed product or service.

Shannon recently brought additional physicians and providers at the South Campus, including emergency services providers, in-house to be employed by the Shannon Clinic so they would be part of our network. This approach will help our patients as it reduces unexpected out-of-network charges for providers, services and procedures.

Shannon recently started a new partnership with MD Save. MD Save is an online tool designed to make healthcare accessible to everyone by changing the way patients shop for care. MD Save partners with healthcare providers to offer affordable rates on procedures for patients to purchase directly online. Customers pay for their procedure up front using "vouchers," which will allow Shannon to provide quality care to more patients in a way that is financially achievable for them. This tool will be especially beneficial to patients who are self-pay or have high deductible insurance plans.