

ST. ANDREW'S HEALTH CENTER AND ST. ANDREW'S CLINIC  
BOTTINEAU, ND  
FINANCIAL ASSISTANCE POLICY

## Charity Care Policy

St. Andrew's Health Center and St. Andrew's Clinic mission in union with the Sisters of Mary of the Presentation works for the glory of God by bringing the Word and Healing of Jesus Christ to all, with a special concern for the poor and elderly. As part of that commitment, SAHC and SAC appropriately serve patients in difficult financial circumstances and offer financial assistance to those who have an established need to receive medically necessary medical services.

Charity care is defined as healthcare services provided at no charge or at a reduced charge to patients who do not have nor cannot obtain adequate financial resources or other means to pay for their care. This is in contrast to bad debt, which is defined as patient and/or guarantor who, having the financial resources to pay for health care services, has demonstrated by their actions an unwillingness to resolve a bill. The granting of charity shall be based on an individualized determination of financial need, and shall not take into account race, creed, gender, national origin, disability, age, social immigrant status, or sexual orientation.

## Purpose

To establish policies and procedures necessary to insure that patients of SAHC and SAC, who for economic and financial reasons cannot meet the requirements of the collection policy, are provided with SAHC and SAC Financial Assistance Policy.

For the purpose of this policy, terms below are defined as follows:

**Charity Care:** Healthcare services that have been or will be provided but are never expected to result in cash inflows. Charity care results from the organization's policy to provide healthcare services free or at a discount to individuals who meet the established criteria.

**Family:** Using the Census Bureau definition, a group of two or more people who reside together and who are related by birth, marriage, or adoption. According to the Internal Revenue Service rules, if the patient claims someone as a dependent on their income tax return, they may be considered a dependent for purposes of the provision of financial assistance.

**Family Income:** Family income is determined using the Census Bureau definition, which uses the following income when computing federal poverty guidelines:

- Includes earnings, unemployment compensation, worker's compensation, Social Security, Supplemental Security Income, public assistance, veterans' payments, survivor benefits, pension or retirement income, interest, dividends, rents, royalties, income from estates, trusts, educational assistance, alimony, child support, assistance from outside the household, and miscellaneous sources;
- Noncash benefits (such as food stamps and housing subsidies) do not count;
- Determined on a before-tax basis;
- Excludes capital gain or losses; and
- If a person lives with a family, includes the income of all family members (Non-relatives, such as housemates, do not count).

**Uninsured:** The patient has no level of insurance or third party assistance to assist with meeting his/her payment obligations.

**Underinsured:** The patient has some level of insurance or third-party assistance but still has out-of-pocket expenses that exceed his/her financial abilities.

**Medically necessary:** As defined by Medicare (as: healthcare services or supplies needed to prevent, diagnose, or treat an illness, injury, condition, disease, or its symptoms and that meet accepted standards of medicine.)

### **Services Covered**

This policy and procedure pertains to all St. Andrew's Health Center facilities. Persons and departments covered by this policy include only St. Andrew's Health Center acute, observation, swing-bed, emergency, laboratory, radiology, pharmacy, physical therapy, occupational therapy, cardiac rehab, outpatient facility surgical services, and speech therapy.

This policy does not apply to certain groups of providers that may treat a St. Andrew's Health Center patient. See Appendix A for a listing of those groups or providers.

### **Procedure**

For purposes of this policy, "charity" or "financial assistance" refers to healthcare services provided by SAHC and SAC without charge or at a discount to qualifying patients. The following healthcare services are eligible for charity.

1. Emergency medical services provided in an emergency room setting;
2. Services for a condition which, if not promptly treated, would lead to an adverse change in the health status of an individual;
3. Non-elective services provided in response to life-threatening circumstances in a non-emergency room setting; and
4. Medically necessary services.

Eligibility for charity will be considered for those individuals who are uninsured, underinsured, ineligible for any government health care program, and who are unable to pay for their care, based upon a determination of financial need in accordance with this Policy. The granting of charity shall be based on an individualized determination of financial need, and shall not take into account age, gender, race, social immigrant status, sexual orientation or creed. SAHC and SAC shall determine whether or not patients are eligible to receive charity for deductibles, co-insurance, or co-payment responsibilities.

The basis for calculating amounts charged to patients, SAHC and SAC has chosen to use the Medicaid access method of charging; meaning the billing and coding process used for self-pay patients is the same process used for a Medicaid costs. The discount will be applied once the patient has submitted a complete application for financial assistance. The patient will receive a letter and a Caring Card informing them the amount of their discount.

Financial need will be determined in accordance with procedures that involve an individual assessment of financial need; and may

- Include an application process in which the patient or the patient's guarantor are required to cooperate and supply personal, financial and other information and documentation relevant to making a determination of financial need; Information collected from the application will include.

- Name, address, date of birth and social security number of applicant and spouse
- Marital status
- Employer information, including position and years employed; if less than 3 years name of former employer
- Health Insurance Provider, including group number and insured subscriber number. Medicare number and Medicaid number.
- Monthly Household Income including:
  - Employment (Gross/Net Pay)
  - Part-Time Jobs (Gross/Net Pay)
  - Farm or Self-Employment
  - Social Security/Disability
  - Veteran Pension
  - Military Family Allotments
  - Retirement (all sources)
  - Unemployment Compensation
  - Workers Compensation
  - Union Benefits
  - Inheritance
  - ADC/WIC/Food Stamps
  - Alimony/Child Support
  - Savings Interest Income
  - Investment Income

○ Include a review of the patient's outstanding accounts receivable for prior services rendered and the patient's payment history.

- The patient is required to submit documentation of their financial status. The patient must submit a completed Financial Assistance Application.
  - As a minimum requirement the patient must furnish a copy of last year's tax return, last two month's income or a bank statement for proof of income.
- Accounts eligible for Charity Care are to be addressed within 240 days of first bill.

It is preferred but not required that a request for charity and a determination of financial need occur prior to rendering of non-emergent medically necessary services. However, the determination may be done at any point in the collection cycle. The need for financial assistance shall be re-evaluated at least once per year for eligibility.

SAHC and SAC's values of human dignity and stewardship shall be reflected in the application process, financial need determination and granting of charity. Requests for charity shall be processed promptly and SAHC and SAC shall notify the patient or applicant in writing within 30 days of receipt of a completed application.

There are instances when a patient may appear eligible for charity care discounts, but there is no financial assistance form on file due to a lack of supporting documentation. Often there is adequate information provided by the patient through other sources, which could provide sufficient evidence to provide the patient with charity care assistance. In the event there is no evidence to support a patient's eligibility for charity care. SAHC and SAC could use outside agencies in determining estimate income amounts for the basis of determining charity care eligibility and potential discount amounts. Presumptive eligibility may be determined on the basis of individual life circumstances that may include:

1. State-funded prescription programs;
2. Homeless or received care from a homeless clinic;
3. Participation in Women, Infants and Children programs (WIC);

4. Food stamp eligibility;
5. Subsidized school lunch program eligibility;
6. Eligibility for other state or local assistance program that are unfunded (e.g., Medicaid spend-down);
7. Low income/subsidized housing is provided as a valid address; and
8. Patient is deceased with no known estate.

Services eligible under this Policy will be made available to the patient on the National Health Service sliding fee scale, in accordance with financial need, as determined in reference to Federal Poverty Levels (FPL) in effect at the time of the determination.

Notification about charity care available from SAHC and SAC which shall include a contact number shall be disseminated by SAHC and SAC by various means, which may include, but are not limited to, the publication of notices in patient bills and by posting notices in emergency rooms, admitting and registration departments, hospital business offices. SAHC and SAC also shall publish and widely publicize a summary of this charity care policy on facility website, in brochures available in patient access sites. Such notices and summary information shall be provided in the primary language spoken.

SAHC and SAC's management shall develop policies and procedures for internal and external collection practices (including actions the hospital may take in the event of nonpayment, including collections action and reporting to credit agencies) that take into account the extent to which the patient qualifies for charity, a patient's good faith effort to apply for a governmental program or for charity from SAHC and SAC, and a patient's good faith effort to comply with his or her payment agreements with SAHC and SAC. For patients who qualify for charity and who are cooperating in good faith to resolve their discounted hospital bills, SAHC and SAC may offer extended payment plans, will not send unpaid bills to outside collection agencies, and will cease all collection efforts SAHC and SAC will not impose extraordinary collections actions such as wage garnishments; liens on primary residences, or other legal actions for any patient without first making reasonable efforts to determine whether that patient is eligible for charity care under this financial assistance policy. Reasonable efforts shall include:

1. Validating that the patient owes the unpaid bills and that all sources of third-party payment have been identified and billed by the hospital;
2. Documentation that SAHC and SAC has or has attempted to offer the patient the opportunity to apply for charity care pursuant to this policy and that the patient has not complied with the hospital's application requirements;
3. Documentation that the patient has been offered a payment plan but has not honored the terms of that plan.

In implementing this policy, SAHC and SAC's management shall comply with all other federal, state, and local laws, rules and regulations that may apply to activities conducted pursuant to this Policy.