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Author:	<i>George Halama: CFO</i>
Policy Area:	<i>Patient Accounts</i>
References:	

FINANCIAL ASSISTANCE POLICY

I. Purpose

Provide detailed steps to determine a patients' eligibility for financial assistance under Grant Memorial Hospital's Charity (Financial Assistance) guidelines.

II. Applicability:

- Entities and Physicians exclusively covered under this Policy include the following:
 - Grant Memorial Hospital (excluding Extended Care Unit)
 - Grant Memorial Hospital - Emergency Room Professional Services
 - Grant Memorial Hospital Family Medicine Clinic - Solomon Mutetwa, MD
 - Grant Memorial Hospital Orthopedic Clinic - Scott Roberts, MD
 - Grant Memorial Hospital Pediatric Clinic - Nishat Ally, MD
 - Grant Memorial Hospital Pediatric Clinic - Eleanor Feaster Berg, MS, APRN, C-PNP, C-FNP, C-ANP
 - Grant Memorial Hospital Surgical Clinic -Anil Makani, MD
 - Grant Memorial Hospital Women & Maternal Care Clinic - Amanda Borrer, DO
- Physicians that practice under Grant Memorial Hospital but not covered under this policy:
 - Dewey Bensenhaver, MD
 - Becky Calhoun-Harman, RN, MSN, FNP-C
 - Bruce Leslie, MD
 - Stephen Thompson, DO
 - Caroline Armstrong, DO
 - Love Memorial Clinic
 - E.A Hawse
 - Regional Eye
 - Sentara Rockingham Medical Center
 - Joseph Hahn, MD
 - Jong Kim, MD
 - Myung-Sup Kim, MD
 - Clinical Colleagues (Anesthesia)
 - Bilal Itani, MD
 - Benjamin Leslie, DO
 - John Hahn, MD - OB/Gyn
 - WVU Medicine (Emergency Room Physicians)

III. Policy

Grant Memorial Hospital (GMH) recognizes that not all patients meet eligibility requirements for federal and state programs for the payment of inpatient and outpatient hospital services not including services provided on the extended care unit. Additionally, the Marketplace may provide insurance coverage; however, high dollar patient responsibilities may not be affordable to some patients. Therefore, in addition to assisting patients in determining eligibility for these programs and being consistent with its mission and values, GMH offers Financial Assistance (FA) to eligible individuals and families. As such, patients who do not have the ability to pay for services provided to the applicable GMH entities, noted within this policy, may request financial assistance for emergency and medically necessary care.

- GMH will make reasonable efforts to identify patient who may need to apply for Patient Financial Assistance.
- The patient has 120 days to become aware of the hospital's FA Program and the completed application must be returned by the patient within one hundred twenty (120) calendar days from the date the FA application is mailed or handed to the patient. Therefore, it is possible that the patient may have 240 days to complete the application process.
- FA is based on income levels and liquid assets at the time of the initial application. If the applicant's income level changes during the six (6) month period, an updated application is required.
- GMH will require patients to be evaluated for Medicaid except for patients receiving Medicare and those whom do not live in the state of West Virginia.
- FA application may be retroactively approved for active accounts when the discharge date (uninsured) or last insurance payment date is not greater than six (6) months from the application date.
- FA determination must be returned to applicant within fifteen (15) calendar days of receipt of completed application and supporting documentation. Determination is valid for six (6) consecutive months, not to surpass the last day of the current year. After the initial six (6) month period or calendar year end, a new application and determination is required. Patients having only non-changing income such as Social Security, Social Security Disability, SII and/or Private Pension are required to complete a new application for each calendar year.
- Certain medical procedures are excluded; some examples include all types of cosmetic surgery, sterilization reversal, Cardiac Rehab Phase III and other procedures not deemed medically necessary.
- GMH's FA may include employed physicians' charges, as well as Hospital services. GMH does not have the authority to waive any charges from physicians or other health professionals who are not employed by GMH.
- Certain financial situations do not require a FA application, See D and E below.
- The Hospital reserves the right to determine the maximum amount of FA benefits granted in a given fiscal year.

IV Procedure

A. Process as Follows:

1. Patients may request a prior determination for FA within 30 days of treatment, throughout the course of treatment and/or up to the resolution of the account through the billing process.
2. Patients must complete a Financial Information Sheet (FIS) for GMH and provide supporting documentation of income. Acceptable documentation for validating income and liquid assets for the past two (2) months includes:

- Copies of paystubs, Social Security Administration Letter, pension, disability, workers compensation or unemployment checks, and alimony and/or child support payments.
 - In rare situations, signed federal or state tax returns may be substituted for income verification. Also, notarized letters from an employer may be used with approval.
 - Copies of liquid assets including bank accounts and certificates of deposits.
3. Patients applying for FA must provide proof of United States citizenship or legal immigration. Acceptable documents: driver's license, military identification, birth certificate, passport or approved legal immigration documents. In order to receive assistance in completing the Financial Assistance Application, call 1-304-257-1026 and ask to speak with the Financial Counselor. If the Financial Counselor is not available, you may ask to speak with a Patient Financial Services representative.
 4. Applicants will have one hundred twenty (120) calendar days to respond to any request for additional information. FA may not be approved, if no response is received. The financial counselor assigned to the account will evaluate the documentation for completeness and will work with the applicant to secure any missing documentation.
 5. Once all documentation is complete, the financial counselor will compute the income, family size of the applicant and other relevant information. If the applicant falls within the criteria, all accounts within the time frame and approval levels specified in the guidelines will be adjusted at approved rate. A letter will be sent to applicant outlining the approved assistance.
 6. If patient's request of financial assistance is denied, a denial letter will be mailed informing the patient. A new application for financial assistance may be requested after six (6) months of denial.
 7. In the event of a significant change in the financial status of a patient, the six (6) month waiting period requirement before reapplying for financial assistance can be waived by the CFO. This will be documented in writing and kept with the patient's financial assistance application.
- B. The FA Income Guidelines will be adjusted annually to coincide with the poverty guidelines as published annually in the Federal Register and will be raised as illustrated below:
1. Patients with Gross Annual family Income less than or equal to 138% of the Current HHS Poverty Guidelines; these patients should qualify and apply for Medicaid. However, if the patient refuses to apply for Medicaid, the patient should not qualify for FA and should be handled as a self pay patient. Exceptions may apply and the Hospital reserves the right to determine if exceptions will be granted.
 2. Patients with Gross Annual Family Income up to 200% of Current HHS Poverty Guidelines will qualify for 100% Financial Assistance (Charity Care).
 3. Patients with Gross Annual Family Income in excess of 200% of the current HHS Poverty Guidelines may qualify for a sliding scale discount on that portion of the charges for services provided for which the patient is responsible following payment by an insurer, if any. A Patient eligible for the sliding scale discount will not be charged more than the calculated AGB charges. The sliding scale discount is as follows:
 - a. 201% - 250% Federal Poverty Level = 50% write off
 - b. 251% - 300% Federal Poverty Level = 25% write off
 - Note: if the patient's assets, less one month's income, exceed the hospital's current and active accounts, balance due, FA may be denied.
 4. These patients should qualify for the Marketplace. However, if the patient refuses to obtain coverage via the Marketplace, the patient may qualify for FA and is eligible to complete an FA application.

Patients with coverage in the marketplace may be approved for FA as "under insured" patients for coverage of patient liabilities determined after insurance claim processing.

5. A patient qualifying for financial assistance may not be charged more than the Hospital Amounts Generally Billed (AGB) for other patients. In determining the AGB, the amount of discounts provided to the Medicare/Medicaid determined on a retrospective basis will be utilized and calculated on an annual basis.

If a patient does not complete a FA Application, the patient may be charged gross charges even though the hospital has made reasonable efforts to determine eligibility.

C. Catastrophic Events, Deceased Patients and Bankruptcies

1. Grant Memorial Hospital will consider FA for hardship cases that involve, but are limited to:
 - Extraordinary medical bills, extended unemployment that does not result in satisfying other income criteria, or projected, continued chronic medical care. Such cases must be approved by the entity's Chief Financial Officer or designee.
 - Deceased patients without an estate for payment or uncooperative and/or no family to assist with FA application process.
 - Notices of bankruptcy may qualify the patient and associated accounts balances as FA.

D. Self Pay Early Out Agency

1. Accounts returned by the Self Pay Early Out agency as qualifying presumptive charity will be adjusted off as charity via the Presumptive Charity write off code. The Hospitals "Early Out" vendor has developed a "Presumptive" Charity based upon other financial elements that have been effective in identifying patients eligible for financial assistance. This policy is based upon proprietary data developed by the company that is based upon other data resources, scorecard development and other data elements that determines household number and income to adjust formulas to administer this program.

E. Management Approvals

1. FA write-offs approval levels are as follows:
 - Patient Balances > \$10,000 PFS Supervisor
 - Patient Balances > \$25,000 Chief Financial Officer

F. Supporting Documents

- Charity-Financial Assistance Approval Letter
- Charity-Financial Assistance Denial Letter
- Charity-Financial Assistance FIS Cover Letter
- Charity-Financial Assistance FIS
- Charity-Financial Assistance Income Guidelines Table
- Charity-Financial Assistance Letter for Application in Process

G. Communication

1. GMH's Financial Assistance Policy, Financial Assistance FIS Cover Letter, and Financial Assistance FIS are available to patients at no cost in English and Spanish. These documents are available free

- of charge at our facilities, by mail, and online at www.grantmemorial.com.
2. To access any of these documents at our facilities, please ask one of our registration representatives, Financial Counselor or call 304-257-5815 ext. 2161.
 3. It may be beneficial to note internal financial counseling staff or external community representatives who are bilingual and able to help with the financial assistance application.
 4. In addition to the above, GMH communicates the availability of financial assistance through means which include:
 - Posting signs within waiting rooms and check-in desks, as well as emergency room, applicable physician offices, and Patient Financial Services (Customer Service and Financial Counselor)
 - Providing a FA FIS Cover letter and FA FIS Sheet within waiting rooms and check-in desks, as well as emergency room, applicable physician offices, Patient Financial Services (Customer Services and Financial Counselor) and our Self Pay Early Out Vendor.
 5. The Financial Assistance policy, application form, and the plain language summary can be offered in English and Spanish. For information about GMH's Financial Assistance Program and translation services, please call a Patient Financial Services representative at 1-304-257-1026.
 6. The actions the Hospital may take in the event of non-payment are described in a separate billing and collections policy. To obtain a copy of the billing and collections policy, please call a Patient Financial Services representative at 1-304-257-1026.

Attachments:

2017 FA - PLAIN LANGUAGE SUMMARY 2017 R.pdf
 2018 FA app .docx
 2018 FA Denial Letter.docx
 2018 FA Version.docx
 2018 Financial_Assistance_Application.pdf
 2018 Income FA Eligibility Chart.xls

Approval Signatures

Approver	Date
Lynsey Berg: Director	10/2018
George Halama: CFO	10/2018

Applicability

Grant Memorial Hospital