Patient Financial Clearance Policy

I. PURPOSE:
Provide a detailed overview of the financial clearance and collections processes for hospital patients.

II. POLICY:

Grant Memorial Hospital (GMH) is committed to minimizing the expenses associated with the recovery of patient account balances. It is the intent of GMH to identify and collect all patient account balances, preferably, prior to or at time of treatment or immediately following. Prompt identification and collection of these balances will increase cash flow while minimizing the cost of collections, statements and postage.

DEFINITIONS:

Co-Insurance is a percentage of the total charge that is due from the patient for each service event. These amounts are deducted from the hospital's contracted rate of payment with the expectation that the hospital will recover this portion from the patient.

Co-payment is typically a flat amount or fixed fee due from the patient, based upon their medical plan for specific medical services covered by the plan. Co-payments typically apply to each date of service.

Deductible is typically a flat amount due from the patient, as required by the insurance carrier, based on the provisions of the patient's insurance policy. This amount may apply to each date of service or on an annual basis. Note: This amount may not always be satisfied within one visit.

Insured is any person who is recognized by the federal government as being covered by any health insurance policy.

Non-covered charges refer to hospital charges that will not be reimbursed by a third party payer due to the type of charge, place of service, diagnosis, limits of coverage and effective dates of coverage based upon the provisions of the patients insurance policy.

Non-urgent refers to patients who do not require expedited care. See definition of urgent.

Normal Business Hours are Monday -Friday between the hours of 9AM and 4PM.

Underinsured are patients who have insurance that does not completely cover the fees for medical services.

Uninsured are patients who do not have any insurance coverage for medical services.

Urgent refers to patients who require expedited care (within one business day or the same day) for medical
III. PROCEDURE:

PATIENT ACCESS / FRONT-END PROCESSES

A. Scheduling of Patient Services

1. Scheduled patient services including inpatient, outpatient surgery, and all applicable outpatient services should be scheduled at least one (1) week in advance whenever possible.

2. Preauthorization/certification as defined by the patient's insurance policy for Non-urgent patient services must be obtained before patient is put on the schedule.

3. Any uninsured patient, requiring non-urgent services, should be referred to a Financial Counselor for financial clearance prior to scheduling hospital services.

4. **NOTE:** Urgent uninsured patients that are put on the schedule after hours and come in the next day will be referred to the Financial Counselor after services are provided.

5. Data collected at the point of scheduling must include:
   a. Key patient data
   b. Essential Medical Insurance Information
   c. Ordering Physician
   d. Supporting diagnosis codes for scheduled test/procedure
   e. Applicable Authorization/Referral #'s
   f. Copy of physician's order

B. Pre-registration of Patient Services

1. Scheduled patients should be pre-registered two (2) to three (3) days prior to the expected date of service.
   
   *Note: With the understanding that add-ons will occur on a daily basis.*

2. The pre-registration process should include the following:
   a. Perform insurance verification (IV) on all insurances on the account. The IV process should include confirmation and documentation of:
      i. Insurance ID / Group number
      ii. Effective dates of coverage
      iii. Authorization and referral requirements
      iv. Coverage for specific services provided
      v. Run Price Estimator
      vi. Applicable patient deductibles, co-pays and non-covered amounts
      vii. Scan all applicable paperwork
   b. For Medicare and Medicare Advantage outpatients, check for medical necessity. If medical

**Resident** refers to a person whom resides at GMH with no specific moving date.
necessity requirements are not met, contact ordering physician in an effort to resolve this issue.

c. Contact patient regarding:
   i. Any Medicare/Medicare Advantage medical necessity issues where an Advanced
      Beneficiary Notice (ABN) may be required.
   ii. For urgent patients, any insurance pre-certification/ pre-authorization requirements related
to their policy should be communicated. Inform patient that their ordering doctor must
obtain pre-certification/pre-authorization for their test and/or procedure prior to scheduling
the patient at GMH.
   iii. Collection of any definitive patient responsibility (copay, coinsurance, deductible, deposit,
or amount identified by Financial Counselor).

   \textit{If payment cannot be collected at the time of pre-registration, inform the patient of the}
   \textit{amount due at the time of service and their payment options.}

   \textbf{NOTE: Urgent uninsured patients that are put on the schedule after hours and come in the}
   \textit{next day will be referred to the Financial Counselor after services are provided.}

d. Any patients identified as uninsured or underinsured should be verified for State Medicaid. If no
coverage exists, the patient should be referred to a Financial Counselor for exploration of other
potential payment options prior to the scheduled date of service.

C. Financial Counseling (for uninsured/underinsured patient services)
   1. Patients referred to a Financial Counselor, prior to or at the time of scheduling or preregistration,
should be followed up on the same day or the following business day to determine a means for
payment or assistance. Patients will be referred to the Financial Counselor via the physician office or
scheduling and pre-registration. For uninsured walk-in patients, during "Normal Business Hours",
these patients should be referred to the Financial Counselor before services via Instant Messaging
(IM) when possible.
   2. The Financial Counselor should make every effort to collect any payments.
      a. \textbf{Uninsured/Underinsured – Financially Capable Patients:}
         See Section D below for payment options and also utilize the Price Estimator or Attachment A, if
         the estimator is unavailable.
      b. \textbf{Uninsured/Underinsured – Indigent and Marketplace Applicable Patients}:
         These patients should be asked to complete a Medical Assistance application or go to the
         Marketplace for insurance coverage prior to the expected services. A Financial Assistance
         application should also be completed if the patient:
            i. Is uninsured and refuses to go to the Marketplace
            ii. Has insurance but also has a high patient responsibility and cannot afford identified patient
                liabilities
            iii. Is a Medicare primary patient with a fixed income that qualifies for Financial Assistance
            iv. Is an extraordinary case identified by the state or hospital

   \textbf{NOTE: See the Financial Assistance Policy for additional information}

   For uninsured/underinsured patients, the Financial Counselor should document in the
patient account, the expected payment methodology (discount, deposit, payment plan,
Medical Assistance or Financial Assistance application status).
Note: Hospital approved payment plans should be handled as noted in D.3 below.

D. Guidelines for Patient Discounts. Deposits and Payment Arrangements

1. DISCOUNTS

2. Uninsured patient - once identified total charges will discount 40% automatically.

3. Employee - upon request and following the Guidelines in Section E of this policy the remaining balance after primary insurance, secondary insurance and co-pays have been applied will be discounted 25%

4. Prompt Payment - any account which is paid in full within 30 days of the first statement date may be discounted 20%. For Uninsured patient and Employee this is an additional discount over those granted above.

5. ALL above discounts are not-applicable to Extended Care Unit/Long-Term Care residents.

6. DEPOSITS – For uninsured patients who are scheduled for Non-urgent care, if payment in full cannot be made, a thirty percent (30%) deposit based on estimated charges is required as calculated from the Price Estimator or Attachment A, if the estimator is unavailable. If the patient has bad debt with GMH, refuses to apply for Medical Assistance or meet with the Financial Counselor, cannot produce proof of identification and/or nationality, a 100% deposit may be required.

7. PAYMENT ARRANGEMENTS - If necessary, remaining balances can be paid monthly in adherence with the following schedule:

<table>
<thead>
<tr>
<th>PAYMENT PLANS</th>
<th>Balance Range</th>
<th>Amount or Maximum Months Allowed</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>$25.01 – $250</td>
<td>$25 or 12 months max to pay</td>
</tr>
<tr>
<td></td>
<td>$251.01 – $900</td>
<td>$50 or 18 months max to pay (1)</td>
</tr>
<tr>
<td></td>
<td>$901.01 – $1,800</td>
<td>$75 or 24 months max to pay (1)</td>
</tr>
<tr>
<td></td>
<td>$1,800.01 &amp; Up</td>
<td>24 months max to pay (1)</td>
</tr>
</tbody>
</table>

1. GMH's Healthcare Financing Partner (Health First) may extend payment plans to 36 months, if the guarantor cannot financially meet the payment plan guidelines set above. Any payment plan arrangements beyond 36 months must be approved by the PFS Manager prior to setup. Any payment plan greater than 60 months must be approved by the CFO. Additionally, deposits or discounts approved prior to or at the point of service should be documented in the system account notes (estimated charges should be included in the notes if this was part of the calculation for payment).

Any expected payment plan arrangement should be documented on the patient's account. However, a payment plan should not be established in the hospital's system. All payment plans must be set up and managed by GMH's Self-Pay Early-Out Vendor (SPEOV). As a result, a payment plan arrangement must be emailed to the specified representative at the SPEOV for setup once the account is referred. Via the SPEOV, patient Payment Plan monthly installments are due by the 15th of each month even if the prior month payment exceeded the installment amount. [Payment plans approved by the SPEOV can be up to 24 months in length.] Additionally, these payment plans are set up as a courtesy to the patient with NO interest charges.

i. The SPEOV explains the payment plan guidelines (see paragraph above) for the amount...
due based on the balance. Patients on payment plans are billed 20 days prior to the due
date (a 10 day grace period is granted). If the consumer misses two (2) installments,
account(s) can be reviewed for collections. If an account falls broken, the SPEOV places
phone calls and sends broken promise letters. Additionally, the SPEOV follows up every 15
days on the account until it is either reset or paid. Lastly, the SPEOV requests that the
consumer call if an address or any key information has changed or if they are going to be
late or miss an installment due to financial difficulty.

2. If a guarantor payment plan must exceed 24 months, the guarantor will be referred by the
SPEOV to GMH's HFP for payment plan setup. Once the payment plan is setup and the first
payment is made, the total balance less the HFP fee will be funded to GMH by the HFP.

E. **Guidelines for Employee Discount**

1. Definition of an Employee is anyone who receives a W-2 from GMH.

2. An employee will receive a 25% discount on their account balances after any/all insurance payments
and copays have been paid on the account.

3. Employee may be required to provide proof of the required copay amount.

4. An employee is responsible for requesting their employee discount. A request may be done by
contacting the Patient Accounting Department.

5. An employee's family member's accounts will receive the employee discount if the family member is
claimed as a dependent on the employee's Federal 1040 tax return, and only by request of the
employee. This includes the employee's spouse, dependent children up to the age of 26 and
covered by the hospital's insurance (otherwise, dependent children up to the age of 21 without the
hospital's insurance), and any other dependent family members.

6. An individual must have been an employee on the date of service for the account to be considered
for the employee discount.

7. No refunds will be given to any employees for their failure to request the employee discount.

8. An employee has 30 days from the date of the first patient statement for request the employee
discount; otherwise, the employee forfeits the discount.

9. An account does not have to be paid in full for the employee discount adjustment to be applied to the
account balance.

F. **Registration/Sign-in**

1. Notices are posted throughout the admissions and registration areas to alert patients that payment
for insurance deductibles, coinsurance, co-pays and noncovered charges are expected prior to or at
the time of service. All acceptable forms of payment are included as part of this notice.

   **Note:** *Emergency Room payments should be collected at the point of registration following
physician screening.*

2. At the point of registration/check-in, Patient Access or the department staff will:
   a. Ensure patient's identity (e.g. Patient/Guarantor name, mailing address and birth date match to
driver's license).
   b. Scan all physician orders and applicable authorizations/referrals at time of registration.
      Additionally, update existing scanned information with any new or additional information such as
      patient/guarantor driver's licenses and insurance cards. If patient/guarantor does not have a
driver's license or other acceptable photo ID, a picture can be taken and stored in HMS.

c. For emergent, urgent and walk-in patients that did not go through the pre registration process, verify the insurance as indicated in Section B.2.a of this policy, run the price estimator, and collect all applicable patient responsibilities. Also, see Attachment A.

d. If the patient is a Medicare or Medicare Advantage patient, and was not pre registered, check to ensure medical necessity (contact physician office if medical necessity is not met). If physician provides updated diagnosis information, an updated order must be obtained. If medical necessity cannot be obtained, have the patient sign an Advanced Beneficiary Notice (ABN).

3. For pre-registered patients, review and follow-up on any outstanding items from pre-registration and collect any applicable patient liability identified via the insurance verification process and price estimator that was not collected previously.

   Note: This information should always be checked by reviewing the HMS Notes at the point of intake.

4. During "Normal Business Hours," emergent, urgent and walk-In patients identified as uninsured or underinsured should be referred to a Financial Counselor prior to departing from the hospital.

   After hours, for any patient identified as uninsured or underinsured, the registration representative should print out a face sheet for the patient for referral to the Financial Counselor for follow up within 1-2 business days.

Attachments:

<table>
<thead>
<tr>
<th>Approval Signatures</th>
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<tbody>
<tr>
<td>Approver</td>
</tr>
<tr>
<td>Lynsey Berg: Director</td>
</tr>
<tr>
<td>George Halama: CFO</td>
</tr>
</tbody>
</table>

Applicability

Grant Memorial Hospital