

Financial Assistance Policy and Procedure

Purpose

In accordance with our Mission, Vision, and Values Statement, Astria Sunnyside Hospital (ASH) believes it is imperative to provide our patients with not only the best medical care and accessibility that we can provide, but to also extend our commitment to our patients throughout the entire billing process in compliance with 501(r)(4A) and Washington Administrative Code (WAC), Chapter 246-453. It is the goal of ASH to provide quality care regardless of a patient's ability to pay for services. We understand that healthcare costs are usually unexpected and can also be very overwhelming; however, our ability to provide uncompensated care is limited. The application process is not intended to impose an undue burden on the responsible party taking into account any physical, mental, intellectual sensory deficiencies or language barriers which may hinder the responsible party's capability of complying with the application procedures. Applicants shall be given 14 days from the application date to provide documentation, during which time no collection efforts will occur.

Audience

Individuals receiving care at Astria Sunnyside Hospital, Financial Counselors and appropriate Admitting staff.

Key Concepts and Terms

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

Charity Care: Healthcare services that have been or will be provided by a provider and are never expected to result in cash inflows. Charity care results from a provider'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 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, workers' compensation, Social Security, Supplemental Security Income, public assistance, veterans' payments, survivor benefits, pension or retirement income, interest, dividends, rents, income from estates,

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trusts, educational assistance, alimony, child support, assistance from outside the household, and other miscellaneous sources – determined on a before tax basis.

- If a person lives with a family, includes 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.

Gross Charges: The total charges at the organization's full established rates for the provision of patient care services before deduction from revenue are applied.

Emergency Medical Conditions: Defined within the meaning of section 1867 of the Social Security Act (42 U.S.C. 1395dd).

Medically Necessary: As defined by Medicare (services or items reasonable and necessary for the diagnosis or treatment of illness or injury).

Poverty Guidelines: The poverty guidelines are a simplified version of the Federal Government's statistical poverty thresholds used by the Bureau of Census to prepare its statistical estimates of the number of persons and families in poverty. The poverty guidelines are used primarily for statistical purposes. However, the Department of Health and Human Services uses the thresholds for administrative assistance or services under a particular federal program. Other programs, such as our Financial Assistance Program, use the guidelines for the purpose of giving priority to lower income persons or families in the provision of assistance or services. Our poverty guidelines are based on last (calendar) year's increase in prices as measured by the Consumer Price Index. The poverty guidelines are published in the Federal Register and are revised yearly.

Amounts Generally Billed (AGB): No person eligible for financial assistance under the FAP will be charged more for medically necessary care than amounts generally billed (AGB) to individuals who have insurance covering such care. ASH determines AGB based on all claims paid in full to ASH by Medicaid and/or private health insurers over a 12-month period, divided by the associated gross charges for those claims.

Policy

As a courtesy and convenience to our patients, our Financial Services Department offers financial assistance to qualified patients who are exempt from insurance in accordance with the ACA (Affordable Care Act) or are underinsured and do not have adequate resources to pay for medically necessary services that have been provided. See Appendix A for services that are eligible for coverage under the Financial Assistance Program (FAP). Financial assistance applications are processed in accordance with the policy. Any accounts that occurred more than 180 days previously will not be considered for financial assistance. No patient/resident that meets these requirements shall be denied uncompensated health care based upon race, creed, color, sex, national origin, sexual orientation, disability, age, or source of income.

Our program is a payer of last resort and if the patient qualifies for another program, including, but not limited to: government sponsored insurance, Affordable Care Act insurance plans, and has chosen not to utilize the program(s); they are not eligible for our financial assistance program. The Affordable Care Act (ACA) states that everyone must have insurance, but ASH does consider hardship and debt ratio for those who are uninsured and do not qualify for subsidized insurance plans (i.e. Medicaid). If the financial counselor believes that another program could be utilized and was denied, a denial will be requested before consideration can be given. If the denial cannot be obtained, our financial counselors will then work with the patient to arrange payment terms, based on the unique circumstances and in accordance with ASH's payment policy.

ASH's financial assistance program is administered in conjunction with the Federal Poverty Guidelines that are used nationwide and that pertain to medical services provided at ASH only. These guidelines incorporate rationale for age, number and ages of dependents and provide definitions of family and gross income. The United States Department of Health and Human Services sets the Federal Poverty Income Guidelines and applies annual revisions to account for increases in the Consumer Price Index.

ASH utilizes the federal poverty income levels for eligibility purposes. The guarantor's household gross income is compared to this poverty level. If this total is below the 150% level, 100% of the patient responsibility balance on approved accounts will be forgiven. Amounts will be forgiven based on the following sliding scale.

RANGE	ADJUSTMENT PERCENTAGE
0-150%	100%
151-174%	75%
175-224%	50%
225-300%	25%
Above 300%	0%

Procedure

Eligibility Requirements

1. Astria Sunnyside Hospital's Financial Assistance Program shall be consistently and equitably administered in accordance with established eligibility requirements.
2. All patients with a self-pay balance may be eligible for financial assistance which can include free or discounted care as indicated in Attachment B. However, financial assistance generally excludes care found not to be medically necessary, or disallowed by government or third party payers including procedures considered elective, experimental or cosmetic in nature.
3. The full application process must be completed, preferably by the patient/responsible party. Falsification of the application information, failure to fully disclose all assets and/or income, or refusal to cooperate will result in denial of Financial Assistance benefits.

4. All third party resources and non-hospital financial aid programs, including public assistance available through the state Medicaid program must be exhausted before financial assistance can be considered. If an individual has applied for and has not yet received a determination, the eligibility for financial assistance will be postponed until the Medicaid Eligibility determination has been made.
5. Astria Sunnyside Hospital reserves the right to review eligibility status at any time, and to modify or nullify prior benefit determination if financial circumstances have changed.
6. Prima Facie Write Offs: In the event that the responsible party's identification as an indigent person is obvious to Astria Sunnyside Hospital's personnel and they can establish that the applicants income is clearly within the range of eligibility, Astria Sunnyside Hospital will grant Charity Care based solely on this initial determination. In these cases, Astria Sunnyside Hospital is not required to complete a full verification or documentation. (in accordance with WAC 246-453-030(3)).

Method for applying for financial assistance

The Financial Assistance Application (Attachment C) can be completed before or after services are provided. The application must be received within 180 days after discharge. This clause does not comply with WAC 246-453-020(10), which states that a designation can be made at any time.

The forms may be completed by the applicant at home or onsite with the assistance of Patient Financial Services personnel. All required supporting documentation must be included with the application.

The application can be obtained as described in the section below:

1. Telephone: 509-837-1554
2. Address: Astria Sunnyside Hospital, 1016 Tacoma Avenue, Sunnyside, WA 98944
3. Website: <https://www.astria.health>

A patient will not be deferred or denied medically necessary care based on the non-payment of previously provided care, if financial assistance has not yet been determined.

Extraordinary Collection Actions (ECA):

Astria Sunnyside Hospital will not take any ECA actions without making a reasonable effort to determine at patient's financial assistance eligibility in accordance with limitations outlined in the policy.

Measures to widely publicize this policy within the community served by the facility

1. Financial Counselors will make paper copies of the financial assistance policy, application, attachment B) and plain language summary (Attachment A).
 - The paper copies are available upon request and without charge.

- Documents are readily available during normal business hours either directly from the Financial Counselor or by mail.
 - Each document is available in English and in the primary language of any populations with limited proficiency in English that constitutes more than either (a) 1,000 individuals or (b) 5% of the residents of the community services by the facility.
2. As part of the intake or discharge process, patients are offered a Patient Information Packet that outlines payment plan options and Financial Assistance Policy information including the Plain Language Summary (Attachment A).
 3. Notify and inform members of the community served by the hospital facility about the Financial Assistance Policy with the information available on each billing statement.
 4. ASH's financial assistance contact information is posted on the home page of the facility website at <https://www.astria.health>
 5. The financial assistance documents can be accessed, downloaded, viewed and printed from the website.

Administration/Guidelines of Financial Assistance Program:

1. Astria Sunnyside Hospital (ASH) Financial Assistance Program will be administered according to the following guidelines:
 - a. The hospital will make an initial determination of potential eligibility based on the verbal request for charity care. Pending final eligibility determination, the hospital will not initiate collection efforts or requests for deposits, provided that the responsible party cooperates with hospital efforts to obtain payment from other sources, including Medicaid.
 - b. The hospital will furnish an application and instructions to the responsible party when charity care is requested, or when financial screening indicates potential need. The responsible party will return a completed application as soon as possible, but not to exceed 14 days from date of request.
 - c. The application information, along with all the required documentation will be reviewed by the Patient Financial Counselor.
 - d. Patient Financial Counselor will complete the Worksheet for Annual Income, Worksheet for Income and Asset Calculation, and Worksheet for Discount Calculation.
 - e. After reviewing the application, the CFO or designee will determine if the patient/responsible party qualified for financial assistance based on the supporting documentation and the recommendation of the Patient Financial Counselor who verified the information contained in the application.
 - f. Patient Accounts Data Entry personnel will write off approved amounts from the patient's account(s) per established procedures.
 - g. The patient/responsible party will be notified in writing within thirty (30) days from applying (when all documentation has been received) if they were approved for financial assistance.

- h. The application will be kept on file for seven (7) years.
- i. Providing the patient/responsible party's finances change significantly between tax seasons, current income for the household as defined in Attachment C will determine eligibility in lieu of the federal income tax requirements. An approved application will be a one-time grant.
- j. If an applicant is habitually non-compliant with the program guidelines and assistance efforts made by the financial counselors and staff, the applicant will fall under a penalty status and will not be able to reapply for 6 months or may be required to submit a fully completed application with all required documents prior to a non-emergent service(s). During this penalty status period patient balances will be eligible for collection and credit reporting after 30 days from the date of service.

Appeal Process:

1. The patient/responsible party has the right to appeal the financial assistance decision.
2. The appeal must be received with in thirty (30) days of the determination.
3. The appeal must include documented proof justifying why the patient/responsible party is unable to pay.
4. The appeal is forwarded to the Business Office Manager and is reviewed with the CFO.
5. The patient/responsible party will be notified within sixty (60) days from submission of the appeal if they are approved.

Implementation/Education Plan

Policy will be reviewed by staff affected to implement the policy.

Related Documents

Attachment A: Plain Language Document

Attachment B: FA Acuity Indicator

Attachment C: Assistance Application

References

501(r)(4A) and Washington Administrative Code (WAC), Chapter 246-453

WAC 246-453-030(3)

WAC 246-453-020(10)