

EASTERN CONNECTICUT HEALTH NETWORK POLICY AND PROCEDURE

TITLE: Financial Assistance Policy and Procedure

Policy: 500

TOPIC

Financial Assistance / Charity Care

ECHN is committed to providing financial assistance to persons who have healthcare needs and are uninsured, underinsured, ineligible for a government program, or otherwise unable to pay, for medically necessary care based on their individual financial situation. Consistent with their mission to deliver compassionate and high quality healthcare services and to advocate those who are poor and disenfranchised, ECHN strives to ensure that the financial capacity of people who need health care services does not prevent them from seeking or receiving care.

In accordance with the Federal Poverty Level (FPL) guidelines, all other uninsured patient will not be charged more than the amount generally billed to insured patients for emergency or medically necessary care.

PURPOSE

To identify those patients that qualify for charitable assistance and to complete write-off procedures that is in keeping with state and federal regulations.

- A. ECHN is committed to providing financial assistance to persons who have health care needs and are uninsured, underinsured, ineligible for a government program, or otherwise unable to pay, for emergency or medically necessary care based on their individual financial situation.
- B. It is the policy of ECHN to provide Financial Assistance based on indigence or high medical expenses for patients who meet specified financial criteria and request such assistance. The purpose of the following policy is to describe how applications for Federal Assistance should be made, the criteria for eligibility, and the steps for processing each application.
- C. Financial assistance may be extended when a review of a patient's individual financial circumstances has been conducted and documented. This should include a review of the patient's existing medical expenses and obligations (including any accounts having gone to bad debt except those accounts that have gone to lawsuit and a judgment has been obtained) and any projected medical expenses. Financial Assistance Applications may be offered to patients whose accounts are with a collection agency and will apply only to those accounts on which a judgment has not been granted.
- D. Race, gender, sexual orientation, religious or political affiliation, social or immigration status will not be taken into consideration.
- E. To further ECHN's commitment to their mission to provide healthcare to patients seeking emergency care, ECHN will utilize an abbreviated application for financial assistance for their uninsured patients being seen in the Emergency Room. The patients eligible for this financial assistance must not be eligible for any other insurance benefits or have exhausted their insurance benefits, and do not have active medical assistance coverage. Eligibility will be granted in this case for the one visit only.

POLICY: In order to provide the level of aid necessary to the greatest number of patients in need, and protect the resources needed to do so, the following guidelines apply:

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A. Patient

- a. Services are provided under charity care only when deemed emergency or medically necessary and after patients are found to have met all financial criteria based on the disclosure of proper information and documentation.
- b. Any patient who believes that they are qualified may apply for financial assistance under the hospitals' charity care policy or discount policy.
- c. Patients are expected to contribute payment for care based on their individual financial situation; therefore, each case will be reviewed separately.
- d. Charity Care is not considered an alternative option to payment and patients may be assisted in finding other means of payment or financial assistance before approval for charity care.
- e. Uninsured patients who are believed to have the financial ability to purchase health insurance may be encouraged to do so in order to ensure healthcare accessibility and overall well-being.

B. Hospital

- a. ECHN will maintain an understandable, written financial assistance policy, clearly stating the eligibility criteria.
- b. ECHN will ensure that all financial assistance policies will be applied consistently.
- c. In applying the Financial Assistance policy, ECHN will assist the patient in determining if he/she is eligible for government- sponsored programs.

C. COMMUNICATION:

- a. Notices regarding availability of Financial Assistance at ECHN will be posted in public places around the hospital, on patient bills, and on our website.
- b. Financial Assistance Applications are available at all ECHN registration locations as well as on the ECHN Website, ECHN.org.
- c. Copies of this policy as well as the Financial Assistance Application can be obtained via the U.S. mail by calling our Customer Service Representative at 1-888-943-6042 or 860-646-1222 x2768.

D. FEDERAL POVERTY LEVEL GUIDELINES (UPDATED ANNUALLY)

Persons in Household	48 Contiguous States and D.C. Poverty Guidelines (Annual)						
	100%	90%	80%	70%	60%	50%	40%
1	16,988	20,385	23,783	27,180	33,975	40,770	54,360
2	22,888	27,465	32,043	36,620	45,775	54,930	73,240
3	28,788	34,545	40,303	46,060	57,575	69,090	92,120
4	34,688	41,625	48,563	55,500	69,375	83,250	111,000
5	40,588	48,705	56,823	64,940	81,175	97,410	129,880
6	46,488	55,785	65,083	74,380	92,975	111,570	148,760
7	52,388	62,865	73,343	83,820	104,775	125,730	167,640
8	58,288	69,945	81,603	93,260	116,575	139,890	186,520

Add \$4,720 for each person over 8

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E. DISCOUNT GUIDELINES:

	UNINSURED	UNDERINSURED
Basis for calculating discount:	Hospital Gross Charges. Discounts apply to medically necessary services. Patients eligible for financial assistance will not be charged more than the amount generally billed to patients with insurance for emergency or other medically necessary care.	Hospital Gross Charges or the patient’s balance after insurance payments. Discounts apply to medically necessary services. Patients eligible for financial assistance will not be charged more than the amount generally billed to patients with insurance for emergency or other medically necessary care.
Income Requirement for 100% discount	Income at or below 125% of FPL Guidelines	Income at or below 125% of FPL Guidelines
Income Requirements for other discounts	<p>If household gross income is between 125% -400% of the FPL guidelines, the patient may qualify for a discount that is equal to or greater than the average discount received for the same services covered by Medicare, Medicaid and other private insurers.</p> <p><i>Information on the discount calculation can be requested from our financial counselor.</i></p>	<p>If household gross income is between 125% -400% of the FPL guidelines, the patient may qualify for a discount that is equal to or greater than the average discount received for the same services covered by Medicare, Medicaid and other private insurers. This discount will apply to the account balance.</p> <p><i>Information on the discount calculation can be requested from our financial counselor.</i></p>

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Catastrophic Circumstances	Special circumstances are handled on a case-by-case basis. We will take into consideration those circumstances that affect a patient’s ability to pay, such as catastrophic event.	Special circumstances are handled on a case-by-case basis. We will take into consideration those circumstances that affect a patient’s ability to pay, such as catastrophic event.
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DEFINITIONS

The following terms are meant within this policy to be interpreted as follows:

- a. Charity Care means free or discounted health care services rendered by a hospital to persons who cannot afford to pay, including but not limited to, care to the uninsured patient or patients who are expected to pay all or part of a hospital bill based on income guidelines and other financial criteria set forth in statute or in the hospital’s charity care policies on file at OCHA.
- b. Emergency Care: Immediate care which is necessary to prevent putting the patient’s health in serious jeopardy, serious impairment to bodily functions, and serious dysfunction of any organs or parts.
- c. 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 Services rules, if the patient claims someone as a dependent on their income tax return, they may be considered a dependent for purposed of the provision of financial assistance.
- d. Family Income: family income is determined using the census Bureau definition, which uses the following income when computing federal poverty guidelines.
 - i. Includes earnings, unemployment compensation, workers’ 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 other miscellaneous sources.
 - ii. Noncash benefits (such as food stamps and housing subsidies) do not count.
 - iii. Determined on a before-tax basis
 - iv. If a person lives with a family, includes the income of all family members (non-relatives, such as housemates do not count)
- e. Medically Necessary: hospital services or care rendered (both inpatient and outpatient) to a patient in order to diagnose, alleviate, correct, cure or prevent the onset of worsening conditions that endanger life, cause suffering or pain, cause physical deformity or malfunction, threaten to cause or aggravate a handicap or result in overall illness.
- f. Presumptive: other financial assistance, not charity care.
- g. Underinsured: Patients who carry insurance or have third party assistance to help pay for medical services, but who accrue or have the likelihood of accruing out-of-pocket expenses which exceed their financial ability.

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- h. Uninsured: means a patient who is without health insurance for whom the payer responsible for payment of the bill for hospital services rendered is the patient, the patient's parent or guardian or another responsible person, who is not a third party payer and who is not subsequently reimbursed by another payer for the cost of any of the services rendered to the patient. A patient shall not be classified an uninsured patient, if such subsequent reimbursement takes place.
- i. Urgent Care: Services necessary in order to avoid the onset of illness or injury, disability, death, or serious impairment or dysfunction if treated within 12 hours.

PROCEDURE

- a. Services Eligible Under This Policy
 - i. 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, evaluated on a case-by-case basis at ECHN's discretion.
- b. Eligibility for Charity Care
 - 1. Eligibility for Charity Care will be based on an individual's assessment of financial need.
 - 2. Requires an application process.
 - 3. We expect cooperation from patients and guardians.
 - 4. May rely upon publicly available information and resources to determine the financial resources of the patient or a potential guardian.
 - 5. Include a review of the patient's outstanding accounts receivable for prior services rendered and the patient's payment history.
 - 6. The need for financial assistance shall be re-evaluated every six months or at any time additional information relevant to the eligibility of the patient for charity care becomes known.
- c. Presumptive Financial Assistance Eligibility
 - i. There are instances when a patient may appear eligible for charity care discounts, but are unable to provide supporting documentation. Often there is adequate information provided by the patient or through other sources, which could provide sufficient evidence to provide the patient with charity care assistance such as
 1. State-funded prescription programs;
 2. Patient is homeless or received care from a homeless clinic;
 3. Patient files bankruptcy
 4. Participation in Women, Infants and Children programs (WIC);
 5. Patient is eligible for assistance under the Crime Victims Act or Sexual Assault Act

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

F. ASSESSMENT PROCESS

1. The application must be fully completed and signed by the patient / responsible party
2. Proof of income for applicant (and spouse if applicable) is verified by two forms of documentation which could include:
 - a. Last four pay stubs
 - b. Previous Year Federal Income Tax Form
 - c. Previous Year W-2 Form
 - d. Social Security Statement
 - e. Unemployment Benefit Statement
3. Other documentation that may be required:
 - a. Proof of disability compensation
 - b. For Medicare patients a copy of their social security benefits, pension and retirement benefits and/or bank statements showing deposits
 - c. Workers compensation deposits
- i. The level of Charity Care provided will be determined based on the Federal Poverty Level in effect (please refer to the current year's sliding scale).

E. COLLECTION PRACTICES FOR CHARITY CARE PATIENTS

- a. Internal and external collection policies and procedures will take into account the extent to which a patient is qualified for charity care or discounts. In addition, patients who qualify for partial discounts are required to make a good faith effort to honor payment agreements with ECHN, including payment plans and discounted hospital bills. ECHN is committed to working with patients to resolve their accounts, and at its discretion, may provide extended payment plans to eligible patients. ECHN will not pursue legal action for non-payment of bills against charity care patients who have cooperated with the hospital to resolve their accounts and have demonstrated their income and/or assets are insufficient to pay medical bills.
- b. During the eligibility process, other forms of financial assistance will be considered such as Medicare and Medicaid.
- c. All billing is put on hold during the financial assistance application process. Patients are given the opportunity to provide any missing or incomplete information.

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Hospital Billing and Collections Practices can be found on the ECHN Website (ECHN.org) or obtained by calling our Customer Service Representative at 1-888-943-6042.

Addendum: Non Participating providers

Participating providers: Eastern Ct Medical Professionals

INDIVIDUAL RESPONSIBLE FOR REVISION: Director Patient Financial Services & Director Patient Access

ORIGINATED: 07/29/02

REVISION DATE:

11/26/12

04/15/13

08/20/14

06/30/15

02/19/16

02/07/17

9/19/18

10/15/18

1/24/19

2/25/20

2/4/21

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1/20/22

Financial Assistance Policy Addendum

Participating Providers: Eastern CT Medical Professional

Non participating providers

Anesthesiologists

- Fernando,Almenas
- Campagnone,Robert
- Capriles,Manelly
- Kwak,Chan
- DaSilva,John
- Dow,Christopher
- Elbaum,Harry
- Esteghamati,Mohammad
- Foster,Craig
- Gipson,Keith
- Holmgren,Judith
- Janakiraman,Rengarajan
- Kanter,Gary
- Kestur-Rajasekhar,Divya
- King,Brian
- Medina
- Ning,Teresa
- Paro,Roger
- Rizvi,Syed Asad
- Rodriguez,Elvis
- Sayed,Huma
- Stemp,Leo
- Tahir,Naveed

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Trejo,Luis Carlos
Yu,Chen

Certified Registered Nurse Anesthetist

Balaoing,Bievinido
Borden,Roberta
Bourassa,Joseph
Carney,Maureen
Cavanagh,Kevin James
Criniti,Joseph
Dominiguez,Deborah Ann
Domininguez,Yuri
Dorsey,Jennifer
Huta,Tara
King,Shawn
Lord,Wendy
Miarecki,Jennifer
Moschella,kathryn
Murray,Lynette
Musaelian,Nina
Paskewich,Kristen
Reardon,Mark
Rhouddou,Alex
Scoggins,Misty
Smtih,Matthew
Steele,Matthew
Provoncha,Danielle
Wleczonek,Doreen

Radiologists for Eastern CT Imaginig

Anand,Alok
Bramhavar,Deepak
Denstman,Edward
Gershon,Julie
Haber,Marc
Kilkenny,Thomas
Kravetz,Gary
Metzger,Ted
Sawas,Ayman
Shuler,Frederick
Taubes,Chris

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Participating Physicians

Internal Medicine

Pizzuto, David
Delucia, David
Knox, Eileen
Pun, Hector
Aamar, Ali
Abou Ziki, Maen
Bergeron, Lisa
Carroll, Meagan
D'Andrea, Ronald
Daniels, Regina
Delucia, Joseph
Elser, J michael
Grabo, Helena
Gunnoud, Stephanie
Harma, Michael
Koliani, Leonardi
Kothari, Sharad
Lebowitz, Arthur
Levinson, Peter
Mabkhouti, Saloua
Madhani, Kamraan
Maw, Joycelyn
Moschello, John
Mosovich, Jonathan
Newton, Kenneth
Nisbeth, Heather
Pannill, Fitzhugh
Parkhurst, Jonathan
Peterfi, Eszter
Raad, Marc
Riat, Yuliya
Romanik, Elise
Schiliro, Danise
Shah, Riddhi
Silva, Mauricio
Stepczynski, Jadwiga
Sun, Stephanie
Titko, Yelena
Weissberger, Ruth Ellen
Cerreeta, Elysia

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Foster, Celeste
Grover, Alison
Hamila, Lea
Helou, Elie
Krosi, Zife
Lombard, Tess
Makswmiw, Nicole
Marr, Lindsey
Spear, Stephen
Tola, Vicky

1/24/19

mnollez