

 <p>POLICY/PROCEDURE</p>	
Approved: BOD 03/11 DD 03/11 CC 03/11, 07/13, 05/14, 02/18, 08/18 P&P 03/11, 07/13, 05/14, 02/18, 08/18	Effective Date: 03/11,
Attachments: A – Charity Care and Self Pay Discount Guidelines B – Financial Assistance Eligibility Discount Guidelines/Worksheet C – List of Covered Providers	Revised Date: 07/13, 05/14, 06/17, 02/18, 08/18
Forms: CC 06 F1 – financial Assistance Application (FAA)	Reviewed Date:

Subject: Charity Policy for Medical Services

Rationale: To provide guidelines for determining potential eligibility for financial relief to patients who do not qualify for state or federal assistance and are unable to pay their balance or establish partial payment arrangements.

Scope: Clinical Care Managers (CCM), Patient Account Representative (PAR), Accounts Receivable (A/R) Manager, Controller, Vice President of Finance (VPF)

Definitions: None

Equipment: None

POLICY: Charity discounts result from a determination of a patient’s ability to pay. The charity care assistance offered under this policy does not apply to physician or other professional fees billed separately from the hospital fees.

PROCEDURE:

- I. Criteria to determine eligibility
 - A. Colorado Law SB 134 states that the following three criteria automatically qualify a patient to apply for charity care:
 - 1. An individual who is uninsured.
 - 2. Family income is not more than 250 percent of the Federal Poverty Level (FPL).

3. The services provided are not eligible for discount under the Colorado Indigent Care Program (CICP).
- B. At Craig Hospital, any patient with an outstanding account balance is eligible for consideration for charity care assistance. Criteria to be considered in determining eligibility include but are not limited to the following:
1. Household income post injury
 2. Family size
 3. Net worth and liquidity
 4. Current care needs
 5. Employment status and capacity for future earnings
 6. Other living expenses and financial obligations including expectations of future care needs
 7. Exhaustion of all other available resources, including Medicaid, CICP, Victims Assistance, 3rd Party Liability and Liquid Assets
- C. Taking this information into consideration, the attached Financial Assistance Eligibility Discount Guidelines (FAEDG) are utilized to determine what, if any, percentage of the patient's bill will be discounted. In certain situations when a patient's circumstances do not satisfy the requirements under the FAEDG, a patient may still be able to obtain assistance. These situations will be reviewed on a case by case basis.
- D. The hospital shall limit the amounts charged for medically necessary care provided to individuals eligible for assistance under this law to no more than the lowest negotiated rate from a private health plan.
- E. After the initial statement, subsequent billing statements are sent to the patient at the following intervals: Every 30 days if partial payment is received, every 15 days if payment is not made before 60 days has elapsed since the first statement. If no payment or communication is made to the Patient Account Representative noted on the statement, the fourth and final statement will include a blank copy of the Financial Assistance Application that the patient may complete and submit for consideration.
- F. Non-payment of self-pay account balances will not result in credit agency reporting. Balances over 240 days past due may be referred to a collection agency only after reasonable efforts have been made to collect the amount due or at least 60 days after the patient has received copies of the Financial Assistance Policy, Financial Assistance Application and the Plain language summary. Patients may be responsible for the amount due prior to receiving any future elective services from Craig Hospital. Urgent medically necessary services are provided regardless of ability to pay an outstanding balance. Charity care discounts may be applied retroactively.
- II. Application for charity Care Assistance

- A. Financial counseling or screening for payment assistance eligibility is available from the Clinical Care Management Department.
 - B. The patient may request the Financial Assistance Application (FAA) in person, over the phone, by mail or by accessing the electronic version via the Craig Hospital website.
 - C. Craig Hospital CCM staff may initiate the application on behalf of the patient under circumstances where the patient may be unable to complete the application. It is ultimately the patient's responsibility to provide the necessary information for the determination.
 - D. In order to process the FAA supporting documentation will be required from the patient and may include the following:
 - 1. Household information:
 - a) Family size
 - b) Dependents
 - c) Physical address
 - 2. Income documentation (one or more of the following):
 - a) Income tax return
 - b) IRS form W-2
 - c) Paycheck stub
 - d) Bank statements
 - e) Signed attestation to income
 - 3. Liquid Assets:
 - a) Investments
 - b) Trust funds
 - c) Money market accounts
 - E. In cases where a reasonable effort has been made to provide Craig Hospital with documentation and none is available or the patient is not able to provide information; the VPF can override any missing documents in order to approve charity.
- III. Applications are reviewed by the VPF and/or A/R Manager and when it is determined that charity is appropriate, the VPF or A/R Manager will communicate the decision to the A/R Manager who will oversee the process of notifying the patient and applying the appropriate adjustments to the outstanding accounts. The FAA and supporting documents will be scanned into the relevant accounts.
- IV. List of Covered Providers included in charity Policy
- A. As part of Section 501(r)(4) of the Internal Revenue Code, we are required to provide a list of providers that are included and excluded from this policy. The list will be updated annually and can be found in Attachment C to this policy.

Attachment A – Charity Care and Self-Pay Discount Guidelines

Craig Hospital provides rehabilitation care to people affected by spinal cord and traumatic brain injury. As a non-profit 501(c) 3 corporation, we are able to offer programs to assist our patients if they need support.

There are several programs that are available to the community when seeking financial assistance for medical services provided at Craig Hospital. All programs have criteria to be considered in order to qualify for financial assistance. It is the patient's responsibility to apply and provide the necessary information to determine eligibility. If you believe you need financial assistance for hospital charges for services you have received at Craig Hospital, please review the following information.

Government Sponsored Program Assistance

There are several government-sponsored programs which can assist with medical bills of our patients when their income is insufficient to support their current and future medical care needs. Please contact your Patient and Family Counselor to discuss these programs.

Charity Care

Craig Hospital provides financial relief in the form of charity care discounts. Charity care assistance is based on a patient's annual income level and employment capacity for future earnings, number of household members including dependents, and the amount of medical bills including current obligations and expectations of future care needs. An application for charity care must be completed and will fall into one of three categories: Traditional, Medically Indigent and Presumptive. Traditional charity is defined when a patient or responsible party's annual income is less than 300% of Federal Poverty Guidelines based on household size. Medically Indigent is available to patients who are uninsured or are under-insured and have out of network penalties, non-covered services, day limits or lifetime maximums and do not qualify for traditional charity care. Based on income level and household size, a sliding scale is used based on Federal Poverty Guidelines to determine the amount of the discount that is available. Presumptive charity is used by our Patient Account Representatives during collection efforts when certain life events have occurred subsequent to receiving services.

Administrative Discount

A prompt pay discount of 25% for services provided at Craig Hospital will be offered to all patients regardless of financial status if the payment is received prior to admission, during the inpatient stay, or within 30 days of discharge. This discount can not be combined with any other discount and is applied to the billed charges as shown on the final bill. If you do not qualify for any of the above programs, we expect you to pay the balance or establish partial payment arrangements by contacting the Business Office Patient Account Representatives.

Attachment B – Financial Assistance Eligibility Discount Guidelines (FAEDG)
 Financial and Medically Indigent Charity and Self-Pay Discount Worksheet

Code	FPL	Patient Portion	Discount	Number of people in Household					Increment/ Person
				1	2	3	4	5	
FPL				12,140	16,460	20,780	25,100	29,420	4,320
C1	0-300%	0%	100%	36,420	49,380	62,340	75,300	88,260	12,960
A1	301-350%	10%	90%	42,490	57,610	72,730	87,850	102,970	15,120
A2	351-400%	20%	80%	48,560	65,840	83,120	100,400	117,680	17,280
A3	401-450%	30%	70%	54,630	74,070	93,510	112,950	132,390	19,440
A4	451-500%	40%	60%	60,700	82,300	103,900	125,500	147,100	21,600

C1 CHARITY
 A1-A4 ADMINISTRATIVE SELF PAY DISCOUNT

Note: Adjust Income by known or estimated future out of pocket expenses such as Home health, equipment, attendant care and any other costs related to patient's medical care. Income should be adjusted on household income post-injury.

FPL = Federal Poverty Level per Department of Health and Human Services effective in 2018 for 48 Contiguous States

Attachment C –

List of Providers Included in the Craig Hospital Financial Assistance (Charity) Policy

All hospital department personnel that are included in Craig Hospital billable services including: Physical Therapy, Occupational Therapy, Speech Therapy, Psychology, Patient Education, Pharmacy, Nursing and Respiratory Therapy

Nurse Practitioners seen in the Outpatient Clinic including:

Bruno, Mary Ann
Lauer, Pam
Pacheco, Vivian
Radak,
Shannon
Staples, Patricia
Tebben,
Cherisse

Services provided in the Outpatient and Urology Clinic will be covered; however physician billing related to these services is not billed by the hospital and therefore not covered.

List of Providers Excluded in the Craig Hospital Financial Assistance (Charity) Policy

Please contact the provider directly regarding their policies

Agarwala, Amit O.	Bogaert, Yolanda E.	Clary, Matthew S.	Enkiri, Sean A.
Ali, Maysun N.	Bogitch, Ray M.	Clemmons, Richard S.	Fairbanks, Kyrsten D.
Alvarez, Raul	Bosworth, Cortney R.	Cohn, Aaron	Falci, Scott P.
Ambler, Andrew W.	Bracht, Kirsten A.	Cohn, Matthew D.	Fanale, Christopher V.
Amiel, Howard	Britton, Eric N.	Conner, Donald J.	Faro, Frances D.
Arenson, Edward B.	Brown, Courtney W.	Cooper, Michael A.	Feehs, Robert S.
Asarch, Richard G.	Brubaker, Morgan L.	Damle, Roger S.	Fenton, James J.
Assini, Joseph B.	Buchanan, Colin C.	Daniali, Lily N.	Fine, Ananda S.
Atchie, Benjamin	Burchenal, Joseph EB.	Dauber, Ira M.	Finigan, James H.
Augspurger, Richard R.	Burdi, Tamara M.	Davis, Kent F.	Foss, Carol A.
Baer, David A.	Burke, Kelly L.	De Line, James R.	Foster, Clayton L.
Bailey, Grant J.	Burrell, Christian	Dietz, Alexander R.	Frei, Donald F.
Balazy, Thomas E.	Buzan, Randall D.	Dillingham, Mark A.	Frey, George A.
Barnkow, David S.	Caragol, Laura A.	Diorio, Michael K.	Friedrich, Steven P.
Bartt, Russell E.	Carpenter, Benjamin T.	Doloto, Pawel	Garrett, Raymond E.
Bateman, Cinthia T.	Carreira, Fernando S.	Dooley, Kelly M.	Garside, Julie L.
Beharry, Stacy L.	Carstensen, Stefany R.	Eison, Robert C.	Gasienica, Margaret I.
Bellon, Richard J.	Carter, Elizabeth J.	Eldridge, Joan E.	Goldberg, Carol A.
Beltinck, Tammy L.	Ceraso, Mark J.	Elles, Mark E.	Graham, Adam K.
Bennett, Alicia E.	Chang, Ira	Elliott, John P.	Griggs, Sean M.
Berliner, Jeffrey C.	Chasnow, Nicole K.	Ellis, Madison E.	Groth, Whitney K.
Beutz, Michelle A.	Cheyfitz, Caryn S.	Elmquist, April	Guber, Myles S.
Bisarya, Sameer	Choe, William C.	Ende, Alexander R.	Gutzwiller, Clare

 List of Providers Excluded (Continued)

Hagan, Douglas S.	Levene, Arthur	Politzer, Thomas A.	Sundaram, Srikanth A.
Hammond, Kendra M.	Lewis, Frederick W.	Poole, Barbara K.	Swinehart, James M.
Harogiannis,	Link, Jean M.	Powers, Bernard J.	Swize, Lisa R.
Hawes, Michael J.	Livsey, Charles T.	Proctor, Gregory S.	Sychev, Dmitri
Heppe, Richard K.	Loomis, Samantha	Pulikkottil, Benson J.	Syre, Peter P.
Heyman, Philip	Luethke, James M.	Pyle, Ashley L.	Taryle, David A.
Holt, Charles K.	Macdonald, Lee A.	Rashid, Ahmad M.	Thomas, Herbert J.
Horiuchi, Kimberly A.	Macfarlane, Daniel J.	Ratigan, Emmett D.	Thomas, Jeffrey B.
Howell, Kathryn T.	Mackinnon, Ellen R.	Reeves-Sandoval, Tamar	Tillett, John W.
Hsu, Elias I.	Maerz, Gary A.	Reister, John A.	Tillquist, Richard L.
Hupp, Colleen S.	Makley, Michael J.	Repine, Karen T.	Trevarthen, David R.
Huser, Elizabeth M.	Malden, Eric S.	Rieks, Jeremy A.	Tripathi, Sanjay P.
Indeck, Charlotte A.	Malik, Vipin	Rocklin, Michael A.	Vahabzadeh, Babac
Jakowich, Jill J.	Mathew, Jehu S.	Rollert, Michael K.	Vanbenthuyzen, Karyl M.
Jamell, Gary A.	Mathew, Lisa	Roman, Richard M.	Vanhorne, Barbara A.
Janssen, Michael E.	Matthews, Dennis J.	Rosenberg, Laura N.	Wade, Michael D.
Jensen, Geoffrey S.	Maulitz, Robert M.	Rubin, Benjamin A.	Wagner, Jeffrey C.
Jensen, Judd M.	May, Donald J.	Ruyle, Stephen R.	Wang, Jason J.
Jeter, Fiona R.	McDermott, Paula A.	Sachar, Kulvinder	Warner, Mary L.
Johansen, Mark R.	McGraw, Catherine L.	Sanders, Thomas C.	Wasserman, Marc Y.
Johnson, Wayne W.	McMenomy, Theodore	Scelza, William M.	Weinstein, Eric S.
Jones, Marklyn J.	Montoya, Juan D.	Scheckenbach, Bonnie L.	Weintraub, Alan H.
Jordan, Jamie R.	Morse, Leslie R.	Scheider, David M.	Wilson, Duandelyn C.
Joymon, Jess	Mountain, Richard D.	Schuchman, David	Wink, Jennifer S.
Kasper, Crystal E.	Muckle, Robert P.	Schuchman, Harvey	Wischmeyer, Amy M.
Kassab, Duried M.	Mueller, Ferdinand J.	Schwappach, John	Woodrow, James P.
Kaufman, Dimitri A.	Murgel, Meagan C.	Scott, Jonathan W.	Woodward, John S.
Kaufman, Gabriela S.	Murphy, Terrence P.	Seidler, Kirsten A.	Wychgram, Annette V.
Kelmenson, Richard	Musgrove, Shane C.	Sheehan, Mark W.	Yadlapati, Ajay
Kian, Kaveh	Nandi, Santosh S.	Sirota, Jeffrey C.	Yarnell, Philip R.
Kim, Lawrence S.	Nelson, Steven R.	Small, Amanda L.	Zabel, Troy W.
Kim, Richard K.	Nguyen, Tina	Smith, Adam P.	Zimmer, Donald J.
Kovalak, Mary A.	Nichols, Matthew T.	Smith, Barry R.	
Krebs, Troyann J.	Nieman, Shari L.	Smith, Brian R.	
Kret, Marcus R.	Nolde-Lopez, Grace A.	Smith, Rebecca K.	
Kugelmas, Marcelo	Oprea, Simona F.	Snively, Steven L.	
Kurian, Ashwin A.	Oswald, Tanya M.	Snyder, Taryn L.	
Lafosse, Jose M.	Patel, Vishal R.	Spees, Alan J.	
Lallinger, Myriam M.	Patt, Cary H.	Spencer, Byron R.	
Laudermilk, Mark R.	Pawlowski, Sean W.	Spier, Eric T.	
Le, Peter	Pearson, Gail	Springer, Kathryn L.	
Lee, Erika M.	Peck, Susan E.	Staab, Michael E.	
Lee, Theresa M.	Pellerin, James M.	Staples, Patricia A.	
Leman, Kori J.	Petrosky, Patricia R.	Stepp, Evan L.	
Lemos-Filho, Luciano B.	Pieramici, Erik J.	Stowe, Rachel M.	

