



## **Financial Assistance and Charity Care Policy**

### **NORTHWEST MEDICAL CENTER, INC.**

#### **Article I. Scope, Parties, and Purpose**

**Section 1.01** Scope. This Financial Assistance and Charity Care Policy (“Policy”) applies to Northwest Medical Center, Inc., a member of Curae Health System, and all entities substantially controlled by Northwest Medical Center, Inc. (collectively, Northwest Medical Center”).

**Section 1.02** Responsible Parties. All employees of Northwest Medical Center whose responsibilities include any aspect of calculating charges for services received by patients, billing patients, or collecting amounts billed to patients are expected to be familiar and comply with the basic procedures and requirements designated herein.

**Section 1.03** Purpose. Under the Patient Protection and Affordable Care Act and Internal Revenue Code Section 501(r), non-profit hospitals must establish a written financial assistance policy, adopted by the governing board of the hospital and implemented by the hospital leadership and personnel. This Policy applies to patients who may need Charity Care (as defined below) or Financial Assistance (as defined below) and makes clear that Northwest Medical Center provides, without discrimination, necessary medical care regardless of the patient’s ability to pay for the services.

**Section 1.04** Available Benefits. Charity Care and Financial Assistance are available to patients who qualify under this Policy. Underinsured and uninsured patients who do not meet charity guidelines may qualify for Financial Aid (as defined below). This Policy addresses only the most common situations that may arise, and it is not intended to be all-inclusive.

**Section 1.05** Policy Outline. This Policy shall clarify Northwest Medical Center’s available assistance by providing the following information:

- (a) Includes eligibility criteria for Financial Aid;
- (b) Describes the basis for calculating discount amounts to patients eligible for Financial Aid under this Policy;
- (c) Describes the method by which patients may apply for Financial Aid;
- (d) Describes how Northwest Medical Center will widely publicize this Policy within the

community served by Northwest Medical Center; and

- (e) Limits the amounts that Northwest Medical Center will charge for emergency and other medically necessary care provided to individuals eligible for Financial Aid to the amount generally billed for medically necessary care.

## **Article II. Definitions.**

**Section 2.01**            Board. The Board of Directors of Northwest Medical Center.

**Section 2.02**            Charity Care. Free care for people who are uninsured for the services they need; cannot receive governmental or other insurance coverage; and have family income at such standard that they would qualify under the Financial Ability standard below.

**Section 2.03**            Emergency Medical Condition. A medical condition manifesting itself by acute symptoms of sufficient severity, including severe pain, psychiatric disturbances, or symptoms of substance abuse such that the absence of immediate medical attention could reasonably be expected to result in placing the individual's health, or the health of an unborn child, in serious jeopardy, serious impairment to bodily functions, or serious dysfunction of bodily organs. With respect to a pregnant woman who is having contractions, an "Emergency Medical Condition" means that there is inadequate time to effect a safe transfer to another hospital before delivery; or that transfer may pose a threat to the health or safety of the woman or the unborn child. (Or as otherwise defined under the federal Emergency Medical Treatment and Active Labor Act, 42 U.S.C. §1395dd (EMTALA).)

**Section 2.04**            Extraordinary Collection Actions. Selling an individual's debt to another party (except as provided in 26 C.F.R. § 1.501(r)-6(b)(2)); reporting adverse information about the individual to consumer credit reporting agencies or credit bureaus; deferring or denying, or requiring a payment before providing, medically necessary care because of an individual's nonpayment of one or more bills for previously provided care; and actions that require a legal or judicial process, including but not limited to, placing a lien on an individual's property (except as provided in 26 C.F.R. § 1.501(r)-6(b)(3)), foreclosing on an individual's real property, attaching or seizing an individual's bank account or any other personal property, commencing a civil action against an individual, causing an individual's arrest, causing an individual to be subject to a writ of body attachment, and garnishing an individual's wages.

**Section 2.05**            Family Income. The sum of all earnings, interest and dividend income, rents, royalties, estate and trust income, pension or retirement income, disability pensions and annuities, survivor pensions and annuities, Social Security, unemployment compensation, workers' compensation, veterans' payments, public assistance, Supplemental Security Income, federal earned income credit, educational assistance, Supplemental Nutrition Assistance Program (SNAP), public housing and rent subsidies, alimony, child support, assistance from outside the household, and other miscellaneous sources; determined on a before-tax basis; excludes capital gains or losses; and includes the income of all family members (Non-relatives, such as housemates, do not count).

**Section 2.06**            Financial Aid. Charity Care and Financial Assistance, collectively, available to patients of Northwest Medical Center.

**Section 2.07**            Financial Assistance. Care at a discounted rate for people who are uninsured or Underinsured for the services they need, cannot receive governmental or other insurance coverage, and have family income at such standard that they would qualify under the Financial Ability standard below.

### **Article III.    Eligibility Criteria.**

After an assessment of Medical Necessity and Financial Ability, Northwest Medical Center may provide Financial Aid to patients who qualify under this Policy. Northwest Medical Center will follow standard procedures in determining eligibility for Financial Aid as follows:

**Section 3.01**            Medical Necessity.

- (a) Any patient seeking care for Emergency Medical Conditions at Northwest Medical Center facility shall be treated without discrimination and without regard to a patient's ability to pay for care. Northwest Medical Center shall operate in accordance with all federal and state requirements for the provision of urgent or emergency health care services, including screening, treatment, and transfer requirements under EMTALA.
- (b) In addition to services provided pursuant to EMTALA, Northwest Medical Center will extend Financial Aid to eligible individuals for all other non-elective medically necessary services.
- (c) Financial Aid will not be awarded for certain services or patient responsibilities, which are not emergency or medically necessary, including but not limited to cosmetic procedures that are not medically necessary; Ventricular Assist Devices (VADs), transplants, and other elective procedures.

**Section 3.02**            Financial Ability.

- (a) To be eligible for Charity Care, the patient's Family Income, adjusted retrospectively and prospectively for the six months from the determination, must be less than or equal to 200% of the current Federal Poverty Guidelines.
- (b) To be eligible for Financial Assistance, the patient's Family Income, adjusted retrospectively and prospectively for the six months from the determination, must be greater than or equal to 201% but not more than 300% of the Federal Poverty Guidelines.
- (c) Patients eligible for Medicaid or other federal or state indigent care programs may be presumptively eligible for Charity Care or Financial Assistance for emergency or medically necessary services.

**Section 3.03**            Rates.

- (a) If the patient's Family Income is between 0%-200% of the Federal Poverty Guidelines, 100% discount (Charity Care).
- (b) If the patient's Family Income is between 201%-250% of the Federal Poverty Guidelines, 60% discount (Financial Assistance).
- (c) If the patient's Family Income is between 251%-300% of the Federal Poverty Guidelines, 40% discount (Financial Assistance).

**Section 3.04**      Amounts Generally Billed. Northwest Medical Center determines the amount generally billed ("AGB") by multiplying the gross charges for any emergency or other medically necessary care it provides to a Financial Aid-eligible individual by an AGB percentage relative to Northwest Medical Center. Northwest Medical Center calculates the AGB percentage based on all claims allowed by Medicare and private health insurers over a specified 12-month period, divided by the associated gross charges for those claims. In all situations, once a patient is determined to be Financial Aid-eligible, that individual will not be charged more for emergency or other medically necessary care. Northwest Medical Center may adjust the AGB as needed as determined by Northwest Medical Center administration. See Exhibit A, attached hereto.

#### **Article IV.    Determination and Screening Process**

**Section 4.01**      Financial Aid Application. All patients seeking Financial Aid are required to complete the Northwest Medical Center Financial Aid Application. Patients will be instructed to complete the forms and return them by mail or in person to a Financial Aid Specialist at the address specified in the Application. Patients must cooperate with Northwest Medical Center to provide information and documentation necessary to apply for Financial Aid and to establish a reasonable payment plan. A patient's failure to complete a Financial Aid Application will not prohibit him or her from receiving Financial Aid, if he or she provides the required information to a Financial Aid Specialist orally. As Family Income and other relevant factors (as further identified below) change, an applicant is required to supplement, amend, update, or revise his or her Application to reflect his or her current Financial Ability. Failure to do so will render the applicant ineligible for Financial Aid.

**Section 4.02**      Factors in Assessing Financial Need. The granting of Financial Aid shall be based on an individualized determination of Financial Ability and Medical Necessity. Factors that may be considered include, but are not limited to, Family Income, household size, short-term layoffs, debts, prior eligibility for Financial Aid, other federal and state indigent care program benefits, and other available means of payment. By completing a Financial Aid Application or providing a Financial Aid Specialist the required information, the patient is authorizing Northwest Medical Center to perform a credit check on the applicant.

**Section 4.03**      Prior Eligibility. In the event that Northwest Medical Center deems an applicant eligible for Financial Aid and the applicant is then readmitted to Northwest Medical Center or other Curae facility for emergency or medically necessary services within one hundred twenty (120) days of being discharged from the previous admission, such applicant will be deemed presumptively eligible for Financial Aid for the qualifying services he or she receives

during the latter admission. In any event, the applicant has the responsibility of supplementing, amending, updating, or revising his or her Application as stated in Section 4.01 above.

**Section 4.04**      Application Assistance. Uninsured or Underinsured patients will be asked to complete a Northwest Medical Center Financial Aid Application upon admission or discharge. Financial Aid counseling communication will be clear, concise, and considerate of the patient and family members. Patients may be required to provide additional information, including information about their assets and monthly expenses in order for Northwest Medical Center to consider all of the factors in assessing the patient's Financial Ability. Patients may obtain a copy of this Policy, a plain language summary of this Policy, and a Financial Aid Application in the Business Office of Northwest Medical Center, located at the address as stated on the Financial Aid Application.

**Section 4.05**      Grant or Denial of Assistance. Determination of eligibility for Financial Aid will be communicated to the responsible party within thirty (30) days of receipt of all required documentation. The granting of Financial Aid shall be based on an individualized determination of Financial Ability and Medical Necessity.

#### **Article V.      Relationship to Billing and Collection Policy.**

Northwest Medical Center maintains a separate policy outlining its billing and debt collection procedures. In accordance with its Billing and Collection Policy, Northwest Medical Center will not engage in, nor will it authorize its collection agencies to engage in, Extraordinary Collection Actions without verifying that patients have been given the opportunity to apply for Financial Aid. Copies of the Billing and Collection Policy may be made available, upon request, by contacting the Business Office of Northwest Medical Center, located at the address as stated on the Financial Aid Application

#### **Article VI.      Record Keeping**

**Section 6.01**      Maintenance of Records. A record, paper or electronic, will be maintained reflecting authorization of Financial Aid, along with copies of the Northwest Medical Center Financial Aid Application and other documentation provided upon request.

**Section 6.02**      Retention of Records. Summary information regarding Northwest Medical Center Financial Aid Applications processed and Financial Aid provided will be maintained for a period of seven (7) years. Summary information includes the number of patients who applied for Financial Aid, how many patients received Financial Aid, the amount of Financial Aid provided to each patient, and the total bill for each patient.

**Section 6.03**      Reporting. The cost of Financial Aid will be reported annually in Northwest Medical Center's Community Benefit Report. Financial Aid will be reported as the cost of care provided, not charges, using the most recently available operating costs and the associated cost to charge ratio.

#### **Article VII.      Additional Information.**

**Section 7.01** Providers Covered Under this Policy. Attached hereto as Exhibit B is a list of providers delivering emergency or medically necessary care at Northwest Medical Center that are not covered by this Policy. Please note that charges for services provided by these providers are not subject to this Policy and will not be eligible for Financial Aid.

**Section 7.02** Communication of Assistance Available. Notification about Financial Aid available from Northwest Medical Center shall be disseminated to the community by various means, which may include, but are not limited to, publishing this Policy, the Financial Aid Application, and a plain language summary of this Policy on Northwest Medical Center's websites; making paper copies of this Policy, the Financial Aid Application, and a plain language summary of this Policy, available, without charge and upon request by mail and in public locations at Northwest Medical Center; making patients aware of this Policy by providing a plain language summary of this Policy at admission or discharge, including a notice on the billing statements that Financial Aid may be available; and making brochures available at all patient registration areas through a conspicuous display in a manner reasonably calculated to reach community members most likely to need Financial Aid.

**Section 7.03** Regulatory Requirements. In implementing this Policy, Northwest Medical Center will comply with all other federal, state, and local laws, rules, and regulations that may apply to activities conducted pursuant to this Policy.

Approved by the unanimous Written Consent of the Board of Directors as of the 23rd day of September, 2015.

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**Sarah N. Moore, Secretary**

**Exhibit A**

**AGB Calculation**

AGB: 19%

AGB%=(all claims allowed by Medicare and private insurers)/gross charges

## Exhibit B

### **Providers Not Covered Under the Curae Financial Assistance and Charity Care Policy**

Abele	Matthew K.	MD	Dermatology
Adams	Kelly L.	DO	Emergency Medicine
Adkins	James R.	CRNA	Anesthesiology
Agrawal	Gautam A.	MD	TeleRadiology
Anakwenze	David	MD	Psychiatry
Anderson	Jeffrey K.	MD	Cardiovascular
Ashley	David H.	MD	Emergency Medicine
Bagwell	Leah F.	CRNA	Anesthesiology
Baker	Monnette S.	MD	Pathology
Ballard	Brent G.	MD	Family Practice
Billano	Omar R.	MD	Emergency Medicine
Bolling	Robert P.	MD	Plastic Surgery
Boyett	Joseph P.	DO	Orthopedic
Bunch	Laura	MD	Oncology
Cannon	Derek S.	MD	Emergency Medicine
Fowler	Gary M.	MD	Family Practice
Garvey	David	MD	Emergency Medicine
George	Milton A. II	DO	Emergency Medicine
Giadrosich	Kevin S.	MD	Pathology
Hubbard	Lou Ann	CRNP	Family Practice
Hura	Stefan A.	MD	TeleRadiology
Husain	Muhammad Z.	MD	Psychiatry
Jacob	Saji C.	MD	Cardiovascular
Johnson	Gregory L.	MD	TeleRadiology
Jordan	Timothy B.	MD	Emergency Medicine
Kalthia	Rupesh H.	MD	TeleRadiology
Kelley	Weddington B.	MD	Sleep Medicine
Lawrence	William D.	DO	Orthopedic
Lenahan	William L.	MD	Gynecology
Lobert	Philip F.	MD	TeleRadiology
Loveless	Scott B.	MD	Radiology
Lyerly	Ralph T.	MD	Gastroenterology
Manord	Jeffrey D.	MD	General Surgery/Vascular Surgery
McCurdy	Donald P.	MD	Ophthalmology
McGough	Billy W.	MD	Orthopedic
Miller	John T.	DO	Family Practice
Moss	James R.	MD	Internal Medicine
Nagi	Kamal	MD	Psychiatry
Nesmith	Ricky D.	CRNA	Anesthesiology

Nowell	Mark D.	MD	General Surgery/Emergency Medicine
Nwabunor	David	MD	Emergency Medicine
Powell	Anthony F.	MD	TeleRadiology
Proctor	James B.	MD	Cardiovascular
Ragland	Brian D.	MD	Pathology
Randall	Mark L.	MD	General Surgery
Raquib	Farouk A.	MD	Family Practice
Romero	Cesar D.	MD	Internal
Rubley	Charles D.	CRNP	Family Practice
Salehuddin	Mohammed	MD	Emergency
Sanford	Shelby P.	MD	Oncology
Sapkota	Ram P.	MD	Cardiovascular
Sartain	Jarred L.	MD	Family Practice
Seay Jr.	Wallace J.	MD	Emergency Medicine
Settipalli	Srilakshmi	MD	Family Practice
Shah	Amit K.	MD	Cardiovascular
Shah	Rakesh	MD	Emergency Medicine
Thomas	Jerill K.	MD	Internal Medicine
Thompson	Zachary M.	MD	TeleRadiology
Waldo	John P.	MD	Radiology
Wilkes	Joe N. II	CRNA	Anesthesiology
Zak	Dmitriy	MD	Oncology/Hematology