

ASCENSION MEDICAL GROUP ST VINCENT'S

FINANCIAL ASSISTANCE POLICY

June 30, 2021

POLICY/PRINCIPLES

It is the policy of the organizations listed below this paragraph (each one being the "Organization") to ensure a socially just practice for providing emergency and other medically necessary care at the Organization's facilities. This policy is specifically designed to address the financial assistance eligibility for patients who are in need of financial assistance and receive care from the Organization. This policy applies to Ascension St Vincent's Medical Group.

1. All financial assistance will reflect our commitment to and reverence for individual human dignity and the common good, our special concern for and solidarity with persons living in poverty and other vulnerable persons, and our commitment to distributive justice and stewardship. We do not discriminate in the provision of services on the basis of the individual's race, color, national origin, disability, religion, age, sex, sexual orientation or gender identity.
2. This policy applies to all emergency and other medically necessary care provided by the Organization, including employed physician services and behavioral health. This policy does not apply to charges for care that is not emergency and other medically necessary care.
3. The List of Providers Covered by the Financial Assistance Policy provides a list of any providers delivering care within the Organization's facilities that specifies which are covered by the financial assistance policy and which are not.

DEFINITIONS

For the purposes of this Policy, the following definitions apply:

- "**501(r)**" means Section 501(r) of the Internal Revenue Code and the regulations promulgated thereunder.
- "**Amount Generally Billed**" or "**AGB**" means, with respect to emergency and other medically necessary care, the amount generally billed to individuals who have insurance covering such care.
- "**Community**" means the (5) counties of Northeast Florida which included: Baker, Clay, Duval, Nassau, St. Johns and the ten (10) counties of Southeast Georgia which include: Appling, Bacon, Brantley, Camden, Charlton, Coffee, Glynn, Pierce, Ware and Wayne. A Patient will also be deemed to be a member of the Organization's Community if the emergency and medically necessary care the Patient requires is continuity of emergency and medically necessary care received at another Ascension Health facility where the Patient has qualified for financial assistance for such emergency and medically necessary care.
- "**Family**" means the applicant for financial assistance, the applicant's spouse, and the dependents of the applicant and spouse who qualify as dependents under Internal Revenue Service requirements.
- "**Income**" means annual gross income from any form of employment, government assistance of

any kind (excluding food assistance), or investment funds of any kind

- **“Emergency care”** means a medical condition manifesting itself by acute symptoms of sufficient severity (including severe pain) such that the absence of immediate medical attention could reasonably be expected to result in:
 1. Placing the health of the individual or, with respect to the pregnant woman, the health of the woman or her unborn child in serious jeopardy;
 2. Serious impairment of bodily functions; or
 3. Serious dysfunction of a bodily organ or part; or
 4. With respect to a pregnant woman who is having contractions;
 - a. That there is adequate time to affect a safe transfer to another hospital before delivery; or
 - b. That transfer may pose a threat to the health or safety of the woman or unborn child.
- **“Medically necessary care”** means care that is (1) appropriate and consistent with and essential for the prevention, diagnosis, or treatment of a Patient’s condition; (2) the most appropriate supply or level of service for the Patient’s condition that can be provided safely; (3) not provided primarily for the convenience of the Patient, the Patient’s family, physician or caretaker; and (4) more likely to result in a benefit to the Patient rather than harm. For future scheduled care to be “medically necessary care,” the care and the timing of care must be approved by the Organization’s Chief Medical Officer (or designee). The determination of medically necessary care must be made by a licensed provider that is providing medical care to the Patient and, at the Organization’s discretion, by the admitting physician, referring physician, and/or Chief Medical Officer or other reviewing physician (depending on the type of care being recommended). In the event that care requested by a Patient covered by this policy is determined not to be medically necessary by a reviewing physician, that determination also must be confirmed by the admitting or referring physician.
- **“NHSC”** means National Health Service Corps, a program of the federal Health Resources & Services Administration that supports skilled health care workers serving in high-need areas.
- **“Organization”** means Ascension St Vincent’s Medical Group.
- **“Patient”** means those persons who receive emergency and other medically necessary care at the Organization and the person who is financially responsible for the care of the patient.

Financial Assistance Provided

Financial assistance described in this section is limited to Patients that live in the Community:

1. Subject to the other provisions of this Financial Assistance Policy, Patients with income less than or equal to 250% of the then current Federal Poverty Level income (“FPL”), will be eligible for 100% charity care on that portion of the charges for services for which the Patient is responsible following payment by an insurer, if any, if such Patient determined to be eligible pursuant to presumptive scoring (described in Paragraph 5 below) or submits a financial assistance application (an “Application”) on or prior to the 240th day after the Patient’s first discharge bill and the Application is approved by the Organization. Patient will be eligible for up to 100% financial assistance if Patient submits the Application after the 240th day after the Patient’s first discharge bill, but then the amount of financial assistance available to a Patient in this category is limited to Patient’s unpaid balance after taking into account any payments made on Patient’s account. A Patient eligible for this category of financial assistance will not be charged more than the calculated AGB charges. Pursuant to NHSC requirements, the request for and use of a Patient’s Social Security number will not include determination of citizenship status.

2. Subject to the other provisions of this Financial Assistance Policy, Patients with incomes above 250% of the FPL but not exceeding 400% of the FPL, will receive a sliding scale discount on that portion of the charges for services provided for which the Patient is responsible following payment by an insurer, if any, if such Patient submits an Application on or prior to the 240th day after the Patient's first discharge bill and the Application is approved by the Organization. Patient will be eligible for the sliding scale discount financial assistance if Patient submits the Application after the 240th day after the Patient's first discharge bill, but then the amount of financial assistance available to a Patient in this category is limited to Patient's unpaid balance after taking into account any payments made on Patient's account. A Patient eligible for this category of financial assistance will not be charged more than the calculated AGB charges. The sliding scale discount is as follows:

- Patients between 251% FPL and 300% FPL will receive 90% assistance
- Patients between 301% FPL and 350% FPL will receive 85% assistance
- Patients between 351% FPL and 400% FPL will receive 80% assistance

Level of Financial Assistance & FPL%						
		100%	90%	85%	80%	58%
		Income Level not Exceeding	Income Level Exceeding			
Family Size		250%	250%	300%	350%	400%
1	\$	32,200.00	\$ 32,200.00	\$ 38,640.00	\$ 45,080.00	\$ 51,520.00
2	\$	43,550.00	\$ 43,550.00	\$ 52,260.00	\$ 60,970.00	\$ 69,680.00
3	\$	54,900.00	\$ 54,900.00	\$ 65,880.00	\$ 76,860.00	\$ 87,840.00
4	\$	66,250.00	\$ 66,250.00	\$ 79,500.00	\$ 92,750.00	\$ 106,000.00
5	\$	77,600.00	\$ 77,600.00	\$ 93,120.00	\$ 108,640.00	\$ 124,160.00
6	\$	88,950.00	\$ 88,950.00	\$ 106,740.00	\$ 124,530.00	\$ 142,320.00
7	\$	100,300.00	\$ 100,300.00	\$ 120,360.00	\$ 140,420.00	\$ 160,480.00
8	\$	111,650.00	\$ 111,650.00	\$ 133,980.00	\$ 156,310.00	\$ 178,640.00
9	\$	123,000.00	\$ 123,000.00	\$ 147,600.00	\$ 172,200.00	\$ 196,800.00
10	\$	134,350.00	\$ 134,350.00	\$ 161,220.00	\$ 188,090.00	\$ 214,960.00

3. Subject to the other provisions of this Financial Assistance Policy, a Patient with income greater than 400% of the FPL may be eligible for financial assistance under a "Means Test" for some discount of Patient's charges for services from the Organization based on a Patient's total medical debt. A Patient will be eligible for financial assistance pursuant to the Means Test if the Patient has excessive total medical debt, which includes medical debt to Ascension and any other health care provider, for emergency and other medically necessary care, that is equal to or greater than such Patient's household's gross income. The level of financial assistance provided pursuant to the Means Test is the same as is granted to a patient with income at 400% of the FPL under Paragraph 2 above, if such Patient submits an Application on or prior to the 240th day after the Patient's first discharge bill

and the Application is approved by the Organization. Patient will be eligible for the means test discount financial assistance if such Patient submits the Application after the 240th day after the Patient's first discharge bill, but then the amount of financial assistance available to a Patient in this category is limited to Patient's unpaid balance after taking into account any payments made on Patient's account. A Patient eligible for this category of financial assistance will not be charged more than the calculated AGB charges.

4. Pursuant to NHSC requirements, patients with income less than or equal to 200% of the FPL will be eligible for financial assistance based solely on their income and family size and no other factor. Patients with income equal to or greater than 201% of the FPL may not be eligible for the financial assistance described in Paragraphs 1 through 3 above if such Patient is deemed to have sufficient assets to pay pursuant to an "Asset Test." The Asset Test involves a substantive assessment of a Patient's ability to pay based on the categories of assets measured in the FAP Secondary Application. A Patient with such assets that exceed 250% of such Patient's FPL amount may not be eligible for financial assistance. Note, the FPL guidelines are updated with annual federal updates within the first quarter of each year.
5. Eligibility for financial assistance may be determined at any point in the revenue cycle and may include the use of presumptive scoring for a Patient with a sufficient unpaid balance within the first 240 days after the Patient's first discharge bill to determine eligibility for 100% charity care notwithstanding Patient's failure to complete a financial assistance application ("FAP Application"). If Patient is granted 100% charity care without submitting a completed FAP Application and via presumptive scoring only, the amount of financial assistance for which Patient is eligible is limited to Patient's unpaid balance after taking into account any payments made on Patient's account. A determination of eligibility based on presumptive scoring only applies to the episode of care for which the presumptive scoring is conducted.
6. For a Patient with income greater than 200% FPL that participates in certain insurance plans that deem the Organization to be "out-of-network," the Organization may reduce or deny the financial assistance that would otherwise be available to Patient based upon a review of Patient's insurance information and other pertinent facts and circumstances.
7. In order to facilitate patient access and utilization, eligibility for discounts for patients with income less than or equal to 200% of the FPL is based on income and family size and no other factor (e.g. assets, insurance status (including Medicaid and Medicaid eligibility), participating in the Health Insurance Marketplace, citizenship, population type), pursuant to National Health Service Corporations guidelines.
8. The Patient may appeal any denial of eligibility for Financial Assistance by providing additional information to the Organization within fourteen (14) calendar days of receipt of notification of denial. All appeals will be reviewed by the Organization for a final determination. If the final determination affirms the previous denial of Financial Assistance, written notification will be sent to Patient. The process for Patients and families to appeal the Organization's decisions regarding eligibility for financial assistance is as follows:
 - a. Patient or family should submit an appeal directly to the Financial Counselor with

whom they are working. Patient or family should include detailed letter/form indicating specific financial circumstances that warrant appeal, and all financial and legal documents supporting the letter.

- b. All appeals will be considered by the Organization's financial assistance appeals committee, and decisions of the committee will be sent in writing to the Patient or family that filed the appeal.

Other Assistance for Patients Not Eligible for Financial Assistance

Patients who are not eligible for financial assistance, as described above, still may qualify for other types of assistance offered by the Organization. In the interest of completeness, these other types of assistance are listed here, although they are not need-based and are not intended to be subject to 501(r) but are included here for the convenience of the community served by the Organization.

1. Uninsured Patients who are not eligible for financial assistance will be provided a discount based on the discount provided to the highest-paying payor for that Organization. The highest paying payor must account for at least 3% of the Organization's population as measured by volume or gross patient revenues. If a single payor does not account for this minimum level of volume, more than one payor contract should be averaged such that the payment terms that are used for averaging account for at least 3% of the volume of the Organization's business for that given year.
2. Uninsured and insured Patients who are not eligible for financial assistance may receive a prompt pay discount. The prompt pay discount may be offered in addition to the uninsured discount described in the immediately preceding paragraph.

Limitations on Charges for Patients Eligible for Financial Assistance

Patients eligible for Financial Assistance will not be charged individually more than AGB for emergency and other medically necessary care and not more than gross charges for all other medical care. The Organization calculates one or more AGB percentages using the "look-back" method and including Medicare fee-for-service and all private health insurers that pay claims to the Organization, all in accordance with 501(r). A free copy of the AGB calculation description and percentage(s) may be obtained on the Organization's website or be obtained by requesting a mailed copy from Ascension Wisconsin's Customer Service Department.

Applying for Financial Assistance and Other Assistance

A Patient may qualify for financial assistance through presumptive scoring eligibility or by applying for financial assistance by submitting a completed FAP Application. The FAP Application and FAP Application Instructions are available on the Organization's website, by contacting Ascension St. Vincent's Medical Group HOPE Program, request in person at clinic registration areas, or requesting from any Ascension St. Vincent's Medical Group financial counselor. A Patient may be denied financial assistance if the Patient provides false information on an FAP Application or in connection with the presumptive scoring eligibility process, if the patient refuses to assign insurance proceeds or the right to be paid directly by an insurance company that may be obligated to pay for the care provided. The Organization may consider an FAP Application completed less than six months prior to any eligibility determination date in making a determination about eligibility for a current episode of care. The Organization will not consider an FAP Application completed more than six months prior to any

eligibility determination date. Note, this six-month timeframe is the frequency of which family eligibility would be evaluated.

As stated in the Financial Assistance application cover letter, patients are asked to provide a copy of at least one of the following items as proof of income:

- Copies of 3 most recent pay stubs from employer
- Copies of most recent yearly tax return (if self-employed, include all schedules)
- Social Security and/or Pension Retirement Award letter
- Parent of Guardian's most recent yearly tax return, if applicant is a dependent listed on their tax form and under the age of 25 years old
- Other income validation documents
- Copy of receipt of unemployment benefits

Billing and Collections

The actions that the Organization may take in the event of nonpayment are described in a separate billing and collections policy. A free copy of the billing and collections policy may be obtained on the Organization's website or by calling Ascension St. Vincent's Medical Group.

Interpretation

This policy, together with all applicable procedures, is intended to comply with and shall be interpreted and applied in accordance with 501(r) except where specifically indicated, and NHSC requirements.

Advertisement of Financial Assistance Program

Ascension locations will make all financial assistance/sliding fee schedule policies publicly available on location specific websites. Financial Assistance Policy and Application documents will be available at each location and readily available to staff working with patient insurance and billing information. Additionally, pursuant to NHSC requirements, NHSC sites will specifically display signage visible in patient waiting areas that Ascension does not discriminate in the provision of services to an individual because:

- the individual is unable to pay
- payment for services would be made under:
 - Medicare
 - Medicaid
 - Children's Health Insurance Program (CHIP)

Signage will also indicate that there is a Financial Assistance/Sliding Fee program available.