

PURPOSE:

Columbia County Health System is committed to the provision of health care services to all persons in need of medical attention regardless of ability to pay. No person in need of necessary health care shall be denied service from this health system based on ability to pay.

Definitions:

Charity Care and/or Financial Assistance means medically necessary hospital or rural health clinic health care services rendered to indigent persons when Third-Party Coverage, if any, has been exhausted, to the extent that the persons are unable to pay for the care or to pay deductible or coinsurance amounts required by a third-party payer based on the criteria in this policy.

Third-Party Coverage means an obligation on the part of an insurance company, health care services contractor, health maintenance organization, group health plan, government program (Medicare, Medicaid or medical assistance programs, workers compensation, veteran benefits), tribal health benefits, or health care sharing ministry as defined in 26 U.S.C. Sec. 5000A to pay for the care of covered patients and services, and may include settlements, judgments, or awards actually received related to the negligent acts of others (for example, auto accidents or personal injuries) which have resulted in the medical condition for which the patient has received hospital health care services.

POLICY:

In order to protect the integrity of operations and fulfill this commitment, the following criteria for the provision of Charity Care/Financial Assistance, consistent with the requirements of Washington Administrative Code, Chapter 246-453, are established. These criteria will assist staff in making consistent objective decisions regarding eligibility for Charity Care/Financial Assistance while ensuring the maintenance of a sound financial base.

Charity Care/Financial Assistance will be granted to all persons regardless of age, race, color, creed, ethnicity, religion, national origin, marital status, sex, sexual orientation, gender identity or expression, disability, veteran or military status, or any other basis prohibited by federal, state, or local law. In an attempt to ensure that no one within our service area goes without healthcare, Charity Care will be offered to those that demonstrate eligibility for either hospital or rural health clinic services.

PROCEDURE:

Columbia County Health System's Charity Care/Financial Assistance policy shall be made publicly available through the following elements:

1. A notice advising patients that the health system provides Charity Care/Financial Assistance shall be posted in English and Spanish in key public areas of the hospital and rural health clinics, including Admissions and/or Registration, the Emergency Department, Billing and Financial Services offices.
2. The health system will distribute a written notice of the health system's Charity Care/Financial Assistance policy to patients at the time the health system requests information pertaining to third party coverage. This written information shall also be verbally explained if an inquiry is made by the patient. Every patient will be given notification of the existence of Charity Care/Financial Assistance either before receiving treatment, or in the event of an emergency, upon discharge.
3. Annually Columbia County Health System will publish a notice in the local newspaper of availability of uncompensated services and amount provided.
4. The health system has established a standardized training program on its Financial Assistance and Charity Care policy and the use of interpreter services to assist persons with limited English proficiency and non-

English-speaking persons in understanding information about its Financial Assistance and Charity Care policy. The health system will provide regular training to front-line staff who work in registration, admissions and billing, and any other appropriate staff, to answer Financial Assistance and Charity Care questions effectively, obtain any necessary interpreter services, and direct inquiries to the appropriate department in a timely manner.

5. Written information about the health system’s Charity Care/Financial Assistance policy shall be made available to any person who requests the information, either by mail, by telephone, email, or in person. The hospital’s mandatory Charity Care write-off schedule, if applicable, shall be made available upon request.
6. The written notices, the verbal explanations, the policy summary and the application form will be available in any language spoken by more than ten percent of the population in the health system’s service area, and interpreted for other non-English speaking or limited-English speaking patients and for other patients who cannot understand the writing and/or explanation. The following non-English translation(s) of these are currently made available in Spanish
7. This Charity Care/Financial Assistance Policy applies to services rendered at the following facilities: Dayton General Hospital, Columbia Family Clinic, College Place Health Clinic, and Waitsburg Family Clinic. Services rendered at Rivers Walk Assisted Living Facility are not eligible for financial assistance.

Notification to the Public

Charity Care is generally secondary to all other financial resources available to the patient, including: group or individual medical plans; Worker’s Compensation; Medicare; Medicaid or medical assistance programs; other state, federal, or military programs; third party liability situations (e.g. auto accidents or personal injuries); or any other situation in which another person or entity may have a legal responsibility to pay for the costs of medical services.

The health system will assist patients or their guarantors in identifying and applying for available assistance programs including Medicaid and coverage available on the Washington Health Benefit Exchange. Patients must apply to such programs before they are accepted for Charity Care. If the patient does qualify for state assistance for this episode of care, then the health system will bill Medicaid through its normal process.

The health system will not consider the existence, availability or value of assets for patients in order to reduce the charity care discount.

Columbia County Health System shall require a disclosure of resources from Charity Care applicants regardless of income. In situations where the responsible party is not able to provide any of the documentation requested, the hospital shall rely upon written and signed statements from the responsible party for making a final determination of eligibility for classification as an indigent person. The health system will not deny Charity Care based on immigration status (WAC-453-030 (4)). All other patients shall be considered for Charity Care under this policy based on the following criteria:

- The full amount of hospital and rural health clinic charges will be determined to be Charity Care for a patient whose gross family income is at or below 200 percent of the current federal poverty level (consistent with WAC-246-453).
- A mandatory Charity Care write-off schedule shall be used to determine the amount that shall be written off for patients with incomes between 201 and 300 percent of the current federal poverty level.
- The following mandatory scale outlines the discount percentage based on the percent of the current federal poverty level (FPL) for a Tier 2 hospital:

% of FPL	up to 200%	201%-250%	251%-300%
Discount	100%	75%	50%

Catastrophic Charity Care allows for the hospital to write off as Charity Care amounts outside of the above schedule and for patients with family income in excess of 300 percent of the federal poverty level when circumstances indicate severe financial hardship or personal loss.

Presumptive Charity Care allows for the hospital to write off as Charity Care amounts in instances when a patient may appear eligible, but there is either an incomplete financial assistance application on file or a lack of supporting documentation provided. Once determined, due to the inherent nature of the presumptive circumstances, the only discount that can be granted is a 100% write off of the account balance. Presumptive Charity Care is a one-time write off that does not apply to future visits. For accounts to be approved for a charity approval period, a complete application with supporting documentation is required and processing will follow the normal Charity Care guidelines.

In the event there is no evidence to support a patient's eligibility for charity care, the hospital could determine eligibility on the basis of individual life circumstances that may include:

- State-funded prescription programs
- Homeless, received care from a homeless clinic, or temporarily resides in a homeless shelter
- Participation in Women, Infants, and Children program (WIC)
- Food stamp eligibility
- Subsidized school lunch program eligibility
- Eligibility for other state or local assistance programs that are unfunded (i.e., Medicaid)
- Low income/subsidized housing is provided as a valid address
- Patient is deceased with no surviving spouse and no known estate

In order to be approved for Presumptive Charity, applicants must have a minimum of three (3) qualifying life circumstances or is deceased with no spouse/surviving spouse and no known estate.

The responsible party's financial obligation which remains after the application of any mandatory Charity Care write-off schedule shall be payable as negotiated between the health system and the responsible party. The responsible party's account shall not be turned over to a collection agency unless payments are missed or there is some period of inactivity on the account, and there is no satisfactory contact with the patient.

Process for Eligibility Determination

All patients are considered as being able to pay until information is provided that indicates otherwise. Any indication of an inability to pay will be considered a request for uncompensated services.

This Charity Care/Financial Assistance Policy applies to services rendered at the following facilities: Dayton General Hospital, Columbia Family Clinic, and Waitsburg Family Clinic. Services rendered at College Place Health Clinic and River's Walk Assisted Living are not eligible for financial assistance.

During the patient admission, discharge, or collection process, Columbia County Health System will make an initial determination of eligibility based on verbal or written application for Charity Care/Financial Assistance. Should patients choose not to apply for Charity Care/Financial Assistance, they shall not be considered for Charity Care unless other circumstances are indicated or intent becomes known to Columbia County Health System. Pending final determination, Columbia County Health System will not initiate collection efforts or requests for deposits, provided that the responsible party is cooperative with Columbia County Health System's efforts to reach a determination of eligibility status, including return of applications and documentation within 14 days of receipt of application or such time as the person's medical condition may require, or such time as may reasonably be necessary to secure and to present documentation as described with WAC-246-456-030 prior to receiving a final determination. Requests to provide Charity Care/Financial Assistance will be accepted from sources such as a physician, family, community or religious groups, social services, financial service personnel, or the patient. If the health system becomes aware of factors which might qualify the patient for Charity Care/Financial Assistance under this policy, the patient will be advised of this potential and make an initial determination that such account is to be treated as Charity Care. A person may make a request more than once for the same services where there is a change in eligibility. However, a patient

may not make a request on the same services if their financial status has not changed. For the purpose of reaching an initial determination of sponsorship status, the health system shall rely upon information provided orally by the responsible party. The health system may require the responsible party to sign a statement attesting to the accuracy of the information provided to the health system for purposes of the initial determination of sponsorship status as per WAC 246-453-030(1).

Any one of the following documents shall be considered sufficient evidence upon which to base the final determination of charity care sponsorship status, when the income information is annualized as may be appropriate:

1. W-2 withholding statements for the prior year
2. Payroll check stubs for relevant time period
3. Income tax return from the most recent filed year
4. Forms approving or denying unemployment compensation
5. Forms approving or denying Medicaid coverage or Medical assistance (Medicaid application required prior to approving charity care)
6. Written statements from welfare/social services agencies

In the event that the responsible party's identification as an indigent person is obvious to health system personnel, and the health system personnel are able to establish the position of the income level within the broad criteria described in WAC 246-453-040 or within income ranges included in the health system's mandatory discount standards, the health system is not obligated to establish the exact income level or to request the aforementioned documentation from the responsible party, unless the responsible party requests further review.

In the event that the responsible party is not able to provide any of the documentation described above, the health system shall rely upon written and signed statements from the responsible party for making a final determination of eligibility for classification as an indigent person.

The health system will make a written, conditional, or final determination of eligibility or denial within fourteen (14) calendar days of receiving information in accordance with WAC-246-453-030; such notification must include a determination of the amount for which the responsible party will be financially accountable.

Timing of Income Determinations

Annual Family Income of the Applicant will be determined at of the time the appropriate hospital-based or rural health clinic medical services were provided, or at the time of application for Charity Care or Financial Assistance if the application is made within two years of the time the appropriate hospital-based or rural health clinic medical services were provided, the Applicant has been making good faith efforts towards payment for the services, and the Applicant demonstrates eligibility for Charity Care and/or Financial Assistance.

Instructions for Appeal or Reconsideration

All responsible parties denied Charity Care sponsorship under WAC-246-453-040 (1) or (2) shall be provided with, and notified of, an appeals procedure that enables them to correct any deficiencies in the documentation or request review of the denial and results in review of the determination by the hospital's Chief Financial Officer or equivalent.

Responsible parties shall be notified that they have thirty (30) calendar days within which to request an appeal of the final determination of sponsorship status. Within the first fourteen days of this period, the hospital may not refer the account at issue to an external collection agency. After the fourteen day period, if no appeal has been filed, the health system may initiate collection activities.

Refund of Payments to those Parties Granted Charity Care Status

In the event that responsible party pays a portion or all of the charges related to appropriate hospital-based or rural health clinic medical care services, and is subsequently found to have met the Charity Care criteria at the time that services were provided, any payments in excess of the amount determined to be appropriate in accordance with WAC-246-453-040 shall be refunded to the patient within thirty working days of achieving the Charity Care designation.

Documentation and Records

All information provided shall be kept confidential. Copies of documentation used to support the application shall be kept with the application at all times. All Charity Care/Financial Assistance documentation will be retained by Columbia County Health System for five (5) years.