

2019 Financial Assistance Policy

POLICY:

- Akron Children's Hospital (Children's) and its affiliates are committed to providing quality care to the patients we serve.
- Children's complies with the Emergency Medical Treatment and Labor Act (EMTALA), and the Joint Commission requirements relative to the provision of emergency medical treatment regardless of financial circumstances or their qualification under this Financial Assistance Policy. Furthermore, Children's will not discourage individuals seeking emergency medical treatment and medically necessary care by requiring payment prior to treatment or permitting debt collection activities that interfere with the provision of emergency medical care.
- This Financial Assistance Policy applies to patients or families who are uninsured as well as those who are underinsured.
- This policy will define the Hospital Care Assurance Program (HCAP/Free Care), and Children's own charity care program, and will set forth eligibility criteria, and provide a framework for administering the programs.

DEFINITIONS:

"Family" (HCAP/ or Free Care):

- Includes the patient, the patient's spouse (regardless of whether they live in the home), and all of the patient's children, natural or adoptive, under the age of 18 who live in the home.
- If the patient is under the age of 18 a "family" includes the patient, the patient's natural or adoptive parent(s) (regardless of whether they live in the home), and the parent(s)' children, natural or adoptive under the age of 18 who live in the home.
- If the patient is the child of a minor parent who still resides in the home of the patient's grandparents, a "family" includes only the parent(s) and any of the parent(s)' children, natural or adoptive, who reside in the home.
- Regardless of the living arrangements, any patient aged 18 or over is considered the basis of his/her own "family". Only include his/her spouse, if applicable, and any of his/her natural or adopted children.

"Family" (Children's Charity Care):

- Includes children, parents, step-parents, (step) brothers/sisters who reside in the patient's home.

"Guarantor":

- The individual(s) who are financially responsible for any personal balances related to the services.

"Income":

- Includes total salaries, wages, and cash receipts before taxes; receipts that reflect reasonable deductions for business expenses will be counted for both farm and non-farm self-employment.
- Child support may be counted as income for a family only when the patient is the intended recipient of the child support payment. Income will be calculated by:
 - Multiplying by four the patient's or family's income, as applicable, for the 3 months preceding the date hospital services were provided.
 - Using the patient's or family's income, as applicable, for the 12 months preceding the date hospital services were provided.

“Gross Income” – will be used in the calculation of income:

- Gross income, less business expenses, will be used for self-employed individuals.
 - Business expenses include payroll expense (payroll paid to individuals other than the self-employed individual), payroll taxes, fringe benefits, office supplies, cost of goods sold, and purchased services.
 - No personal living expenses are included as business expenses.

PATIENT RESPONSIBILITY, BILLING CYCLE, PATIENT STATEMENTS, REASONABLE EFFORTS TO COLLECT, AND EXTRAORDINARY COLLECTION ACTIONS (ECA):

Children’s will pursue reimbursement from all third-party payers where available. After third-party payments have been received, the patient responsibility (co-payments, co-insurance, and/or deductibles) will be billed to the guarantor.

Generally, an initial statement of charges will be released to a self-pay guarantor within 5 days after discharge or after all third-party payments have been received, requesting payment in full. The guarantor will have the ability to discuss the charges, request financial assistance and/or make a payment in full. If payment arrangements are not made or the balance is not paid in full, a second statement will go out 28 days later. A third statement will go out to the guarantor 56 days after the initial statement, and a fourth statement will be sent to the guarantor after another 28 days, which will include a copy of The Plain Language Summary and the location of where the guarantor may obtain assistance.

If payment arrangements are not made and there is no success with securing financial assistance or a payment plan, upon approval of the Manager of HBS or the Patient Accounting Supervisor, Children’s may send the account to a third-party collection agency to pursue outstanding balances. While Children’s makes significant attempts to avoid escalated collection efforts, placement with a collection agency could result in the following extraordinary collections actions:

- credit reporting as an unpaid debt
- legal judgment
- wage garnishments
- bank account garnishments
- a lien placed against personal property

Before any ECAs are conducted:

1. Children’s agents will wait at least 120 days after the first post-discharge statement, and
2. Children’s or its agents will make a reasonable effort to orally notify the guarantor of Children’s financial assistance policy, how the guarantor may obtain assistance in completing a financial assistance application, and Children’s intent to initiate an ECA(s), and
3. The Manager of HBS or the Patient Accounting Supervisor must determine that all reasonable efforts to determine financial assistance eligibility have been made.

FINANCIAL ASSISTANCE:

Financial assistance will be extended only after all available third-party resources have been exhausted or the patient is ineligible for third-party benefits.

Financial assistance includes free or discounted services furnished by Children’s to patients and their families deemed unable to pay for all or a portion of these services. Financial Assistance is available for all emergency and basic medically-necessary services furnished by Children’s and its employed physicians and other employed professional providers at any of Children’s locations. Excluded from financial assistance are those services that are provided by other individuals who are approved to see patients at Children’s locations, but who are not

employed by Akron Children's. A roster of those providers is attached and will be made available upon request. (Please see Provider Attachment)

FINANCIAL COUNSELING:

Financial counseling services are provided to assist families with obtaining third-party coverage including commercial insurance, Medicaid, HCAP, BCMH and other state and local programs including grants and other assistance programs to meet their healthcare needs. Where there is no coverage available, and/or personal balances are due that are greater than the ability to pay, the financial counseling staff will assist with pursuing eligibility for Children's financial assistance.

AMOUNTS GENERALLY BILLED (AGB) METHODOLOGY:

Patients eligible for financial assistance will not be charged more for emergency or other medically necessary care than amounts generally billed to those patients who have insurance. The AGB is determined by using the look-back method to Medicare Fee for Service and all private health insurers' rates for hospital facility charges and professional fees for those providers that are employed by Children's. (Please see Attachment C)

HOSPITAL CARE ASSURANCE PROGRAM (HCAP)/FREE CARE:

As a disproportionate share hospital participating in the Ohio Medicaid program, Children's receives funds from the Hospital Care Assurance Program, also referred to as the HCAP or the Free Care Program. As a recipient of these funds, Children's must provide basic, medically necessary, hospital-level services without charge to qualifying individuals. To qualify for HCAP the patient/family must meet the following requirements:

- Resident of Ohio
- Have gross income at or below the federal poverty level <https://aspe.hhs.gov/poverty-guidelines>
- Not be a Medicaid recipient

To be considered for HCAP, also referred to as "free care", a patient or their legal representative must complete the Financial Assistance Application that documents gross income and family size, among other items. Children's will submit claims for hospital services to patients and third party payers in accordance with its customary procedures. If a patient is found to qualify for HCAP, Children's will refund any amounts paid by the patient or family for HCAP-covered services.

HCAP does not cover transplant services, physician charges, ambulance and patient convenience items, such as telephone, parking, television, and personal items. For an HCAP eligible individual, Children's will provide Children's charity care adjustment to any other services that have been billed by Children's. A patient may apply for HCAP up to three years from the second billing statement date for services furnished.

CHILDREN'S CHARITY CARE PROGRAM:

Akron Children's Charity Care Program offers assistance to families who do not qualify for HCAP/Free Care, but whose gross income is between 205% and 300% of the federal poverty level. To qualify for Children's Charity Care Program, an applicant must be:

- A resident of Ohio or Pennsylvania, and
- Not currently on Medicaid, and
- Over income for Medicaid, or
- Over-income for HCAP

APPLYING FOR FINANCIAL ASSISTANCE:

Individuals may apply for financial assistance at any point in the billing and collections cycle. When feasible a preliminary assessment is conducted as part of the pre-admission process and potentially eligible families are referred to a financial counselor for assistance in identifying potential third-party coverage opportunities. After admission and throughout the billing and collection process, financial counselors, patient accounting representatives and authorized vendors may screen accounts and financial information to identify families who may be eligible for financial assistance and contact all such families to offer assistance in the application process.

Applicants must provide documentation to verify information relevant to a determination of eligibility, including information regarding citizenship, residence and income. The following constitute acceptable documentation of income and/or if required when there is a need to validate assets:

- Pay stubs
- Bank statements
- Federal income tax returns or W-2 forms
- A letter from an employer
- In the absence of items above, a verbal or written statement of income made by the patient or legal representative may be accepted. Verbal statements must be witnessed and documented by a financial counselor, or qualifying representative.

A separate financial assistance application must be filed for each inpatient admission, unless a patient is readmitted within 45 days of discharge for the same underlying condition. Applications for outpatient charity are effective for 90 days from the first date of service.

Financial Counseling will help individuals apply for assistance over the phone by calling 330-543-2455. Email our financial counselors at FinCounsel@akronchildrens.org. Additionally, families and patients may visit the Admitting Office on the third floor of the main hospital at One Perkins Square, Akron, OH 44308 and speak with a financial counselor.

INCOMPLETE OR MISSING APPLICATION:

If a financial assistance application is incomplete, the counselor will notify the applicant and offer assistance in completing and resubmitting the application. Upon receipt of an incomplete application, Children's will suspend any extraordinary collection actions, if applicable, while waiting for the patient to respond. If there is no response within 30 days, ECAs will resume. Children's may not deny financial assistance under this Policy for an individual's omission of information that was not requested on the financial assistance application.

NOTIFICATION:

Applications for financial assistance will be processed on an as-received basis. Applicants will be notified of the determination of eligibility for HCAP or Children's Charity Care Program, and if applicable, the discounted amount that they are expected to pay. Any self-pay payments will be refunded or transferred to other outstanding balances (if appropriate) if the applicant is approved for financial assistance.

Applicants who are not eligible for financial assistance will be advised of other assistance options, which may include the 25% self-pay prompt payment discount or the establishment of a payment plan.

CONSIDERATION OF EXTENUATING CIRCUMSTANCES:

If the above criteria are not met, the patient/family may still be eligible for financial assistance on a case by case basis. There may be extenuating circumstances where a family may not be eligible for Children's Charity Care Program based solely on income or residence, but where pursuit of payment would adversely affect the well-

being of the patient or his/her family or cause undue hardship for the patient and/or family (e.g. loss of employment, etc). Applications for patients who have extenuating circumstances will be directly forwarded to the Revenue Cycle Director for consideration. The Director will consider factors including, but not limited to, the relationship of account balance to income, available assets and liabilities, projected medical expenses, living expenses, and earnings potential. If self-pay payments have been made, no refunds or transfers will be processed when extenuating circumstances have resulted in a charity care determination.

OVERSIGHT OF THIS POLICY

Any revisions/changes made to this financial assistance policy must be approved by the Finance Committee of the Board of Directors of Akron Children's Hospital.

Attachments:

Excluded Provider Roster

Attachment C – Financial Assistance Sliding Fee Schedule

Attachment D – Financial Assistance Examples