

## Financial Assistance Policy

**Policy**

McKenzie County Healthcare Systems Inc.’s mission is to provide professional care with a personal touch. As part of that commitment, McKenzie County Healthcare appropriately serves patients experiencing financial difficulties and offers financial assistance to those who have an established need to receive medically necessary services. All McKenzie County Healthcare medical providers, nurses, physicians’ assistants, etc. fall under and are covered under the Financial Assistance Policy.

**Purpose**

Financial assistance is defined as healthcare services provided at no charge or at a reduced charge to patients who do not have or cannot obtain adequate financial resources or other means to pay for their medical care. This is in contrast to bad debt, which is defined as patient and /or guarantor demonstrated by their actions an unwillingness to resolve a bill. The granting of financial assistance shall be based on an individualized determination of financial need and shall not take into account race, creed, gender, national origin, disability, age, social immigrant status or sexual orientation.

**Definitions**

This policy serves to establish a fair and consistent method for uninsured and underinsured patients to apply and be considered for financial assistance related to emergency and other medically necessary care. For the purpose of this policy, terms below are defined as follows:

Applicant: Patient or other individual responsible for payment of the patients care who seeks financial assistance.

Bad Debt: The cost of providing care to persons who are able to but unwilling to pay all or some portion of the medical bills for which they are responsible.

Financial Assistance: The cost of providing free or discounted care to individuals who cannot afford to pay all or a portion of their medical bills based on the eligibility rules identified in this policy.

Gross Charges: The full established price for medical care provided to patients.

Income: Family income is determined using the Census Bureau definition which uses the following income when computing federal poverty guidelines:  
Earnings, unemployment compensation, workers compensation, social security, supplemental security income, public assistance, veteran’s payments, survivor benefits, pension or retirement income, interest, dividends, rents, royalties, income from estates, trusts, educational assistance, alimony child support, assistance from outside the household and miscellaneous sources; noncash benefits (such as food stamps and housing subsidies) do not count. Determined on a before tax basis; excludes

capital gain or losses; if a person lives with a family, includes the income of all family members (non-relatives) such as housemates, do not count.

Uninsured: The patient has no level of insurance or third party assistance to assistance with meeting his/her payment obligations.

Underinsured: The patient has some level of insurance or third party assistance but still has out of pocket expenses that exceed his/her financial abilities.

Medically Necessary: As determined by Medicare (services or items reasonable and necessary for the diagnosis or treatment of illness or injury).

**Publicize**

Measures to Publicize the Financial Assistance Policy

Notification about charity care available from McKenzie County Healthcare Systems, Inc. which shall include a contact number shall be disseminated by McKenzie County Healthcare by various means, which may include, but are not limited to the publications of notice in patient bills and by posting notices in emergency rooms, admitting and registration department, business office. McKenzie County Healthcare also shall publish a summary of this Financial Assistance Policy on the facility website. Such notices and summary information shall be provided in the primary language spoken and any other language spoken by 5% of the community population serviced by McKenzie County Healthcare systems, Inc.

**Procedure**

For purposes of this policy, financial assistance refers to health care services provided by McKenzie County Healthcare without charge or at a discount to qualifying patients. The following healthcare services are eligible for financial assistance:

1. Emergency medical services provided in an emergency room setting.
2. Services for a condition which if not promptly treated would lead to an adverse change in the health status of an individual.
3. Non-elective services provided in response to life threatening circumstances in a non-emergency room setting.
4. Medically necessary services are evaluated on a case-by-case basis.

Eligibility for financial assistance will be considered for those individuals who are uninsured, ineligible for any government healthcare program and who are unable to pay for there are based upon a determination of financial need in accordance with this policy. The granting of financial assistance shall be based on individualized determination of financial need, and shall not take into account age, gender, race, social immigrant status, sexual orientation or creed. McKenzie Healthcare shall determine whether or not patients are eligible to receive financial assistance for deductibles, co-insurance, or co-payment responsibilities.

**Eligibility**

Eligibility for Financial Assistance requires the complete cooperation of the applicant during the application process including:

**McKenzie County Healthcare Systems, Inc.**

1. Completion of the application process for all available assistance, including Medical Assistance or Medicaid.
2. Completion of the Financial Assistance Application including all required documents.
  - a. Identification, previous year's tax return, last 3 payroll statements, Proof of Medicaid denial, other pertinent documents.
3. Meet annual household income and family size criteria as set forth in the Federal Poverty guidelines for the previous tax year.
4. A demonstrated inability to pay for services.

**Method**

It is preferred but not required that a request for financial assistance and a determination of financial need occur prior to rendering non-emergent medically necessary services. However, the determination may be done at any point in the collection cycle. The need for financial assistance shall be re-evaluated every six months.

**Accounts Generally Billed**

The amount the patient is expected to pay and the amount of financial assistance offered depends on the patient's insurance coverage, income and assets. The Federal Income Poverty Guidelines will be used in determining the amount of the write-off and the amounts charged to the patients. Amounts charged for emergency and medically necessary medical services to patients will not be more than the amount generally billed to individuals with insurance covering such McKenzie County Healthcare Systems chose the look-back method as the basis for calculating amounts charged to patients based on actual past claims paid to McKenzie County Healthcare by either Medicare fee for services only or Medicare fee for service together with all private health insurers. McKenzie County Healthcare will provide an itemized statement to the patient showing the charges and the discount amount applied to the patients account. The discount will be applied once the patient has submitted a complete application for financial assistance. McKenzie County Healthcare's values of human dignity and stewardship shall be reflected in the application process, financial need determination and granting of charity. Requests for charity shall be processed promptly and McKenzie County Healthcare shall notify the patient or applicant in writing within 30 days of receipt of a completed application. There are instances when a patient may appear eligible for charity care discounts but there is no financial assistance on file due to lack of supporting documentation. Often there is adequate information provided by the patient through other sources which could provide sufficient evidence to provide the patient with assistance. In the event there is no evidence to support a patient's eligibility for charity care McKenzie County Healthcare could use outside agencies in determining estimate income amounts for the basis of determining charity care eligibility and potential discount amounts. Presumptively eligibility may be determined on the basis of individual life circumstances that may include:

1. State funded prescription programs
2. Homeless or received care from a homeless clinic
3. Participation in Women, Infants and Children programs (WIC)

4. Food Stamp Eligibility
5. Subsidized school lunch program eligibility
6. Eligibility for other state or local assistance program that are unfunded (e.g. Medicaid)
7. Low income/subsidized housing is provided as a valid address; and
8. Patient is deceased with no known estate.

Services eligible under this policy will be made available to the patient on a sliding scale, in accordance with financial need, as determined in reference to Federal Poverty Levels (FPL) in effect at the time of determination. The basis for the amounts McKenzie County Healthcare will charge patients qualifying for financial assistance as is shown on our sliding fee schedule.

McKenzie County Healthcare's management shall develop policies and procedures for internal and external collection practices (including actions the hospital may take in the event of non-payment, including collections action and reporting to credit agencies) that take into account the extent to which the patient qualifies for charity, a patient's good faith effort to apply for a governmental program or for charity from McKenzie County Healthcare Systems, and a patient's good faith effort to comply with his or her payment agreements with McKenzie County Healthcare. For patients who qualify for charity and who are cooperating in good faith to resolve their discounted hospital bills, McKenzie County Healthcare may offer extended payment plans, will not send unpaid bills to outside collection agencies and will cease all collection efforts. McKenzie County Healthcare will not impose residences, or other legal actions for any patient without first making reasonable efforts to determine whether that patient is eligible for charity care under this financial assistance policy. Reasonable efforts shall include:

1. Validating the patient owes the unpaid bills and that all sources of third party payment have been identified and billed by the hospital.
2. Documentation that McKenzie County Healthcare has or has attempted to offer the patient the opportunity to apply for charity care pursuant to this policy and that the patient has not complied with the hospital's application requirements.
3. Documentation that the patient has been offered a payment plan but has not honored the terms of that plan.

#### Collection Activity

McKenzie County Healthcare will not engage in extraordinary collection actions before it makes a reasonable effort to determine whether a patient is eligible for financial assistance under this policy.

Reasonable efforts shall include:

1. Validating that the patient owes the unpaid bills and that all sources of third party payment have been identified and billed by the hospital;
2. Documentation that McKenzie County Healthcare has offered or has

attempted to offer the patient the opportunity to apply for charity care pursuant to this policy and that the patient has not complied with the hospital's application requirements

3. Documentation that the patient has been offered a payment plan but has not honored the terms of that plan.

If our collection agency(s) identify a patient is meeting financial assistance eligibility criteria, the patients account may be considered for financial assistance. Collection activity will be suspended on accounts and the financial assistance application will be reviewed. If the entire account balance is adjusted the account will be returned to the facility. If a partial adjustment occurs the patient fails to cooperate with the financial assistance process or if the patient is not eligible for financial assistance collection activity will resume.

In implementing this policy McKenzie County Healthcare management shall comply with all federal, state and local laws rules and regulation what may apply to activities conducted pursuant to this policy.