

WellSpan Health Manual of Administrative Policy

Policy #118 - WellSpan Health Financial Assistance



WellSpan Health adopts the following policy and procedure for the following specifically-named entities

- York Hospital • WellSpan Surgery and Rehabilitation Hospital • The Good Samaritan Hospital of Lebanon • WellSpan Pharmacy
- The Gettysburg Hospital • Ephrata Community Hospital • WellSpan Medical Group • Apple Hill Surgical Center
- VNA Home Health and Services • WellSpan Medical Equipment • WellSpan Philhaven • Good Samaritan Physician Services
- Northern Lancaster County Medical Group/Physician Specialists of Northern Lancaster County Medical Group

NOTE: Independent providers and entities providing services within WellSpan Hospitals are not required to adopt this policy and may not apply the same discounts for services provided. See Attachment C for a list of provider groups who may not offer financial assistance under this policy.

PURPOSE

Consistent with its charitable mission of “working as one to improve health through exceptional care for all, lifelong wellness and healthy communities,” WellSpan Health provides financial assistance to eligible patients who are in need. The Financial Assistance Policy will be fair, efficient and accessible to all patients and will be consistently applied across all WellSpan Health entities.

POLICY AND PROCEDURE

I. SCOPE AND GUIDING PRINCIPLES

- A. WellSpan Health will provide essential care to patients regardless of their ability to pay.
- B. WellSpan Health will provide discounts to patients according to the patient’s financial status.
- C. WellSpan Health determines financial eligibility based upon income, disposable assets and other forms of health insurance.
- D. WellSpan Health’s ability to provide discounted services to patients may vary depending on its own financial status.
- E. WellSpan Health provides assistance for the Medical Assistance application process.
- F. WellSpan Health provides patients the opportunity to enter into payment plans for patient balances.
- G. The HealthyCare Card Program is also available to provide financial assistance to those individuals with long-term, ongoing chronic health conditions, or to those requiring financial assistance to help with the cost of pharmaceuticals. Information regarding this program can be found at www.healthycommunitynetwork.org.
- H. The requirements for grants for certain populations may supersede WellSpan Health’s financial assistance policy guidelines, including grantee community partner provider organizations approved by WellSpan Health.

- I. WellSpan Health will develop and distribute easy-to-understand financial assistance materials through Customer Service, Patient Financial Services, hospital and office registration areas, internal postings and through the website, www.wellspan.org. Staff will be trained to answer financial assistance questions or direct such inquiries to an appropriate department in a timely manner.

II. ELIGIBILITY DETERMINATION AND APPLICATION PROCESS

- A. A written or verbal request for WellSpan financial assistance may be made at any time. In the event of a verbal request, a signature may not be required.
- B. WellSpan Health will provide assistance to all patients whose income falls within 400 percent of the federal poverty guidelines and within the asset limits listed on Attachment A. Those patients qualifying for financial assistance will receive a discount based on the amount generally billed (AGB), which is applicable to the facility at which services were provided. The AGB is calculated by the look-back method, in accordance with IRS Regulation 501(r). This is based on payment received from Medical Assistance and all private payors, in the most recently completed 12 months.
- C. Uninsured patients are eligible to receive an uninsured discount of 20 percent on eligible services.
- D. If it has been determined that a patient has been approved for Medical Assistance with an active billable category, all accounts currently delinquent (30 days unpaid) will be written off for Financial Assistance.
- E. The patient must accurately complete, in writing or verbally, the WellSpan Financial Assistance Application, provide documentation and return it to the designated patient financial representative. The patient must sign the last page of the application, unless it is determined that acquiring a signature will be a hardship.

- F. All patients applying for WellSpan financial assistance must provide proof of income for all exemptions claimed on IRS Form 1040 with the completed application. Proof of income includes three (3) current pay stubs, Social Security, disability, unemployment or workers' compensation income, pension, investment income, real estate income and all other sources of income. Three (3) consecutive months bank statements (all pages) will be required for all accounts. Six (6) consecutive months bank statements (all pages) will be required for any self-employed applicants. Tax returns (all schedules) may be requested for all applicants but are required for any self-employed applicants. In the absence of these documents, patients may be required to provide other evidence of income.
- G. Patients must exhaust all other insurance resources, for which they are eligible, including but not limited to private insurance, cost sharing plans, Pennsylvania Medical Assistance, Veterans Affairs benefits and other state or federal programs, prior to being accepted for financial assistance, and provide documentation to this effect, for example, Medical Assistance rejection. If patients are eligible, they must apply for a qualified health plan under the Affordable Care Act (ACA), or show rejection or exemption from such plan. Failure to apply for coverage under the ACA will result in exemption from financial assistance. Additionally, patients who fail to comply with reasonable insurance requirements, such as obtaining authorizations or referrals, may not be provided financial assistance.
- H. Liquid assets (cash, savings, checking accounts, PayPal accounts, CDs, HSA funds, annuities, stocks, bonds or Christmas/Vacation Club) may need to be "spent down" depending on possible level of approval before financial assistance is considered (See Liquid Asset Guidelines on Attachment A). In general, non-liquid assets (residence, automobile and other personal property), as well as retirement or life insurance funds (401(k), 403(b), IRA or Rollover IRA) need not be considered. If retirement account is being accessed or drawn from, the full value of the resource will be considered in determining eligibility.
- I. Household size will be the number of individuals eligible to be claimed as dependents on the patient's latest Federal Income Tax return.
- J. Eligibility for WellSpan financial assistance could be maintained for one (1) year from date of determination. Eligibility may be backdated for accounts in active accounts receivable with open balances. Prior accounts in bad debts should be reclassified as charity if sent to collection within the current and previous fiscal year (July 1 through June 30). Financial Assistance may be discontinued if patient's primary insurance coverage was voluntarily terminated.
- K. Patients/responsible parties will be notified of the available options for financial assistance prior to an account referral to a third-party collection agency, **per IRS regulation 501(r). Methods of notification include but are not limited to:**
- Posting of legible signage
 - Development of a plain language summary
 - Distributing informational brochures at hospital and office registration areas
 - Distributing informational brochures throughout its communities
 - A copy of the Financial Assistance Policy plain language summary offered during the registration/discharge process
 - Conspicuous notice regarding the Financial Assistance Policy printed on all account statements
 - Copy of the Financial Assistance Policy plain language summary provided with last billing statement (at least 30 days prior to taking third-party collection action)
- L. In the event of non-payment, accounts will be referred for third-party collection action, which generally includes extraordinary collection actions.

III. ELIBILITY DETERMINATIONS

- A. If a patient is unable to provide all required documentation for obvious reasons (e.g., homeless) WellSpan may categorize write-offs associated with the patient's account(s) as charity consistent with internal facility procedures, and must document the rationale for the decision.
- B. Where no insurance information is available, third-party information sources used for determining financial assistance eligibility, i.e. Payment Assistance Rank Ordering (PARO) or Acumen will be used. These sources provide a patient account scoring mechanism, which uses patient demographic data to estimate the financial status of patients by accessing numerous publicly available databases. These sources provide an estimate of the patient's household income and size, thus allowing WellSpan entities to estimate the patient's income per Federal Poverty Guidelines. This estimate, along with other information received from the database, such as overall charity score, may be used to provide financial assistance. When third-party information is used

and the discount provided is not at the highest level available, the patient/responsible party will be given an opportunity to provide additional financial information to increase the amount of financial assistance.

- C. In cases where the patient is non-responsive and/or other sources of information are readily available to perform an individual assessment of financial need, i.e. existing eligibility for Medical Assistance or scoring, these sources of information can be used to support and/or validate the decision for qualifying a patient for a full or partial financial assistance write-off.

IV. ELIGIBLE SERVICES

- A. WellSpan Health offers financial assistance for all medically necessary and emergency care services. Medically necessary is generally defined as the need for an item(s) or service(s) to be reasonable and necessary for the diagnosis or treatment of disease, injury or defect. All WellSpan entities' services are eligible (unless excluded below). Financial assistance may not be available to individuals who reside outside of WellSpan Health's primary service areas.
- B. Dental services are eligible under this policy – see Attachment B.

V. SERVICES NOT ELIGIBLE FOR FINANCIAL ASSISTANCE

- A. Professional fees for diagnostic services, when physicians are not employed by WellSpan entities (some non-WellSpan entities may honor WellSpan's financial policy)
- B. Cosmetic procedures
- C. Infertility services
- D. Power lift chairs and power mobility equipment (e.g., scooters, van lifts and power wheel chairs)
- E. Check-up for lock up
- F. Bariatric-related services
- G. Genetic testing
- H. Reference labs and handling fees
- I. Flat rate services under arrangements
- J. Services for which the patient "opted out" or for which the patient assumed financial responsibility via signed waiver
- K. Services received by patients with a Non-Par insurance (exception: emergent services in Emergency department)
- L. Pharmacy Prescription co-pays

- M. Services denied or not covered by patient's insurance coverage (example: not medically necessary, experimental)

- N. Services resulting from criminal/illegal activity

VI. PLAIN COMMUNITY HARDSHIP AID DISCOUNT PROGRAM

- A. Due to religious beliefs, Plain Community members have difference qualifications for financial assistance and are not subject to requirements of this policy.

SCOPE:

This policy applies to all entities governed by WellSpan Health.

ATTACHMENTS:

Attachment A: WellSpan Financial Assistance Policy Guidelines

APPROVED BY:

Senior Leadership Team

POLICY CROSS REFERENCES

Billing and Collection Policy
Payment Plan Policy
Financial Assistance Plain Language Summary
Emergency Medical Care Policy (EMTALA)

CREATED DATE:

07/13/04

REVIEW/REVISE DATES:

10/04; 3/05; 4/06; 8/06; 3/07; 8/07; 4/7/08; 4/23/08; 7/9/08; 7/10; 8/10; 2/11; 7/11; 4/12; 6/12, 4/1/3, 3/14, 7/16, 9/16, 6/18

SEARCH KEYWORDS:

MAP, Free Care, Uncompensated Care, Indigent Care. Financial Assistance

- Category I: Write-off of all eligible charges for patients' whose income is less than or equal to 300% of Federal Poverty Guideline **(100% discount)**
- Category II: Patients between 301% and 350% of poverty level receive a **70%** discount on services.
- Category III: Patients between 351% and 400% of poverty level receive a **40%** discount on services
- Category IV: Patients 401% of poverty level and greater do not qualify for financial assistance. However, all uninsured patients qualify for a 20% "no insurance" discount, regardless of income.

Poverty Guidelines 2018

# of Family Members	2018 Federal Poverty Guidelines	Up to 300% of Poverty Level (100% Reduction)	301% and 350% (70% Reduction)	351% and 400% (40% Reduction)
1	\$12,140	\$36,420	\$42,490	\$48,560
2	\$16,460	\$49,380	\$57,610	\$65,840
3	\$20,780	\$62,340	\$72,730	\$83,120
4	\$25,100	\$75,300	\$87,850	\$100,400
5	\$29,420	\$88,260	\$102,970	\$117,680
6	\$33,740	\$101,220	\$118,090	\$134,960
7	\$38,060	\$114,180	\$133,210	\$152,240
8	\$42,380	\$127,140	\$148,330	\$169,520

For families with more than eight members, add \$4,320 for each additional member.

Liquid Asset Guidelines

1 individual - \$25,000 asset limit

Couple - \$30,000 asset limit

WellSpan will use discretion in applying these asset limits based on the patient account balance

**WellSpan York Hospital Dental Center / Hoodner Dental Center
Sliding Fee Scale for Eligible Patients**

Under the WellSpan Health Financial Assistance Policy, patients of the WellSpan York Hospital Dental Center and Hoodner Dental Center will receive discounts under the following categories as outlined in the Sliding Fee Scale-Dental Services.

- Category I: Patients whose income is less than or equal to 300% of Federal Poverty Guideline
- Category II: Patients between 301% and 350% of Federal Poverty Guideline
- Category III: Patients between 351% and 400% of Federal Poverty Guideline
- Category IV: Patients 401% of poverty level and greater do not qualify for financial assistance. However, all uninsured patients qualify for a 20% “no insurance” discount, regardless of income.

Sliding Fee Scale – Dental Services

Procedure Types	Category I	Category II	Category III	Category IV
<i>General Procedures (preventive, basic restorative, root canals, and extractions)</i>	70% discount	40% discount	30% discount	Uninsured 20% discount available
<i>Procedures with Lab Costs (crowns, dentures, bridges, etc.)</i>	50% discount	40% discount	30% discount	
<i>Esthetic procedures & Dental implants</i>	No discounts available			

Financial Assistance Policy: Non-participating Providers**Apple Hill Surgical Center**

Anesthesia Associates of York PA, Inc
Apple Hill Eye Center
Apple Hill Gynecology
Apple Hill Podiatry
Beech Tree Podiatry
Children's Dental Centre of York
David J. Bene, MD
East Berlin Foot and Ankle Center, PC
Jeffrey M. Witman, DPM
Just Kids at Gettysburg Dental Associates
Keystone Eye Care Group
Kreiger Eye Institute
Leader Heights Eye Center
Leader Surgical Associates
Martin Foot and Ankle
Memorial Surgical Specialists
Ophthalmology Associates of York, LLP
OSS Health
Plastic and Reconstructive Surgery
Plastic Surgery of York
Poplar Church Anesthesia, Inc.
Premier Ankle & Foot Specialists, PC
Progressive Dental Care Center
Seitz Oral & Maxillofacial Surgery Associates LLC
Surgical Residency Program - Dept of Surgery
VTiruchelvam MD
Women's Healthcare Group
Women's Institute for Gynecology and Minimally Invasive Surg
York ENT Associates
YorkTowne Urology, PC

WellSpan Ephrata Community Hospital

Allergy & Asthma Center
Anesthesia & Pain Associates of Northern Lancaster County
Argires Marotti Neurosurgical Associates of Lancaster
BACA Pediatrics
Birth Care & Family Health Services
Cardiology Care for Children
Center for Heart Care
Center for Wound Care and Hyperbaric Services
Charles S Yeager DPM
Children's Heart Group
Cocalico Dental Offices
David R Cioffi DPM
Dermatology Physicians, Inc.
Drs. May-Grant Associates
Ephrata Radiology Associates
Eye Group of Lancaster County Ltd

WellSpan Ephrata Community Hospital (continued)

Geriatric Specialists
Gettysburg Diagnostic Imaging, PC
Hartman Rehabilitation Associates
Hospice and Community Care
Hypertension & Kidney Specialists
John F Perry, MD
Lancaster Cardiology Group
Lancaster County Podiatry
Lancaster Maternal Fetal Medicine
Lancaster Orthopedic Group
Lancaster Urology
Lebanon Valley Midwifery & Women's Health
Nemours duPont Pediatrics
Neurology and Stroke Associates
Onsite Neonatal Partners Inc
Otolaryngology Physicians of Lancaster
Palliative Medicine Consultants
Penn State Hershey Neurology
Penn State Hershey Neurosurgery
Penn State Medical Group - Cornerstone
Pennsylvania Institute of Endocrinology, LLC
Persila H V Mertz, MD, PC
Peter C Smith, DPM
Procirca - BioTronics
Regional GI
Simple HomeBirth Midwifery Services
Virtual Radiologic Professionals LLC
Welsh Mountain Health Centers
Workplace Partners

WellSpan Gettysburg Hospital

Adams Hanover ENT
Adams Oral Surgery
Adams-Hanover Urology Associates, PC
Advanced Otolaryngology & Allergy LLC
Allergy & Asthma Consultants
Apple Ridge Family Medicine
Atlantic Foot and Ankle Specialist
Cancer Care Associates of York, Inc
Children's Heart Group
Complete Family Foot Care Center
Cumberland Valley Retina Consultants
Dermatology Associates of York
Epiphany Psych Services
Foot and Ankle Specialist of the Mid-Atalantic, LLC
Gettysburg Cancer Center
Gettysburg Diagnostic Imaging, PC
Gettysburg Family Practice

WellSpan Gettysburg Hospital (continued)

Gettysburg Lung Center, PC
Gettysburg Ophthalmology Associates, P.C.
Gettysburg Pediatrics
Greater Potomac Retina
H. Fred Martin, MD
Hanover Anesthesiology & Pain Medicine
Just Kids at Gettysburg Dental Associates
Kanagasabapathy Arumugarajah, MD
KPMA, PC, d/b/a Biglerville Foot & Ankle Center
KPMA, PC, d/b/a Londonderry Foot & Ankle Center
KPMA, PC, d/b/a Paxtonia Foot & Ankle
Michael T. Sullivan, MD
Mid Maryland Urologic SRVC
Mokhtar Nasir, MD
Rajesh Bajaj, MD
Ray K Drum DDS
Virtual Radiologic Professionals LLC

WellSpan Good Samaritan Hospital

Allcare Family Health P.C.
Allergy and Asthma Center
AO Orthopedics Inc
Associates in Oral and Maxillofacial Surg
Balaci Oral & Facial Surgery
Barbara A Klatchko, MD
Bouquet Mulligan DeMaio Eye Prof.
Children's Dentistry
Cornerstone Dermatology
David H. Stachowicz, DMD
David L. Streisfeld, MD
Denyse M Allen, MD
Dermatology Associates
Earl H Brinser, DO
EMG-Neurology Center
Fava and Maria Eyecare Associates
Fredericksburg Community Health Center
Gene P Otto III, MD
Hartman Rehabilitation Assocs
John L. Salahub, DPM
Jonestown Health Center
Lebanon Anesthesia Associates
Lebanon Imaging Associates, P.C.
Lebanon Internal Medicine Associates
Lebanon Nephrology/Endocrinology Assoc
Lebanon Ophthalmic Associates
Lebanon Pathology Associates
Lebanon Valley Family Medicine
Lebanon Valley Foot and Ankle Center
Melnick, Moffitt and Mesaros ENT Assoc
Musaddiq N. Nazeeri M.D.
Myerstown Family Practice P.C.
Oral Surgery Associates

WellSpan Good Samaritan Hospital (continued)

Penn State Hershey Medical Group
Philip D Stieg, MD
PHMG Annville
Primary Practice Name
Samuel H. Sim DDS
Schaefferstown Family Practice
Sleep Apnea Solutions
Thomas W. Clark, DPM
Tower Health/Infectious Diseases
Urology Associates of Lebanon PA
Virtual Radiologic Professionals (vRad)
WellSpan Hospitalists
Welsh Mountain Health Centers
Women's Health Center of Lebanon Ltd
Yocum Associates, P.C.

WellSpan Surgery and Rehabilitation Hospital

Anesthesia Associates of York PA, Inc
James J Sullivan DO
Martin Foot and Ankle
Nephrology Associates of York
OSS Health
Plastic and Reconstructive Surgery
Poplar Church Anesthesia, Inc.
Premier Ankle & Foot Specialists, PC
Urology Associates of York, PC
Vision Therapy Associates of York
York ENT Associates
York Rehabilitation Associates, PC

WellSpan Surgical Center - Gettysburg

Hanover Anesthesiology & Pain Medicine

WellSpan York Hospital

Advanced Eye Specialists LLC
Allergy & Asthma Consultants
Anesthesia Associates of York PA, Inc
Apple Hill Eye Center
Apple Hill Gynecology
Apple Hill Podiatry
Associates in Family Medicine
Beech Tree Podiatry
Bruce D. Klaskin, DO
Cancer Care Associates of York, Inc
Carroll W Ehrhart, DDS
Children's Center Department of Pediatrics
Children's Dental Centre of York
Children's Heart Group
Christian N Carlisle, DDS, PC
Christianne Schoedel, MD
Dallastown Medical Associates

WellSpan York Hospital (continued)

Daniel G Laux DMD
Davenshire Medical Center
David J. Bene, MD
Delta Family Practice
Dermatology & Skin Surgery Center of York
Dermatology Associates of York
Douglas A Schmitt, DDS
Douglas R Rubelmann, MD
East Berlin Family Care Center
East Berlin Foot and Ankle Center, PC
Family Center for Allergy and Asthma
Family First Health
Family Health Associates
Gastroenterology Associates of York, PC
Geriatric and Adult Medicine
Greater York Family Dentistry
Hanover Medical Group
Hoodner Dental Clinic
Isett-Chronister-Wise
Jacobus Medical Center
James J Sullivan DO
Jeffrey A Frey, MD
John A Di Casimirro
Jonathan E. Rhoads, Jr., MD
Leader Heights Eye Center
Leader Surgical Associates
Lung Asthma & Sleep Assoc PC
Market Street Dental PC
Market Street Family Practice
Martin Foot and Ankle
Memorial Family Medicine at Greenbrier
Memorial Surgical Specialists
Nephrology Associates of York
Ophthalmology Associates of York, LLP
OSS Health
Palliative Medicine Consultants
Partners in Family Health
Pediatric Gastroenterology Associates
Pediatric Surgery
Penn State Medical Group - White Rose
Periodontal and Implants Center of York
Plastic and Reconstructive Surgery
Plastic Surgery of York
Premier Ankle & Foot Specialists, PC
Procirca - BioTronics
Progressive Dental Care Center
Queen Street Family Practice, PC
Queensgate Family Dental
Red Lion Health Care
Robina Santaniello, MD
Russel H Etter, MD
Sarah M Lynch DMD

WellSpan York Hospital (continued)

Scott M Cherry, MD
Security Family Medicine, LLC
Seitz Oral & Maxillofacial Surgery Associates LLC
Southern Family Medicine, LLC
Spring Garden Family Practice
Stephen M Concino, DPM
Surgical Residency Program - Dept of Surgery
Surgical Specialists of York
Susquehanna Oral and Maxillofacial Surgery
The Fertility Center, LLC
Thomas J Corsaro, DDS
Timothy G Coughlin, DDS
TLC Cancer Clinic
Urology Associates of York, PC
V Tiruchelvam MD
Veasey B Cullen, Jr, DMD
Virtual Radiologic Professionals LLC
Walter M Krajewski, DO
Women's Healthcare Group
Women's Institute for Gynecology and Minimally Invasive Surgery
York County Nursing Home
York Dermatology
York Endodontics, PC
York ENT Associates
York Family Internal Medicine
YorkTowne Urology, PC