



TITLE: Confluence Health Compassionate Care Program
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MBA, CCS, CCS-P HIM

Approved By: _____
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POLICY: Confluence Health is committed to the provision of health care services to all persons in need of medically necessary care regardless of ability to pay. In order to protect the integrity of operations and fulfill this commitment, the following criteria for the provision of financial assistance and charity care, consistent with the requirements of the Washington Administrative Code (WAC), Chapter 246-453, are established. These criteria will assist staff in making consistent objective decisions regarding eligibility for financial assistance and charity care while ensuring the maintenance of a sound financial base.

1. COMMUNICATIONS TO THE PUBLIC:

- A. Information about Confluence Health’s financial assistance and charity care policy also known as Compassion Care Program (CCP) shall be made publicly available as follows:
 - a. A notice advising patients that Confluence Health provides financial assistance and charity care shall be posted in key public areas of Central Washington Hospital (CWH) and Wenatchee Valley Hospital and their Clinics (collectively “Hospitals”), including Admissions, the Emergency department and Financial Services.
 - b. Confluence Health will distribute a written notice about the availability of financial assistance and charity care to all patients. This is done at the time that Confluence Health requests information pertaining to third party coverage. The written notice also shall be verbally explained at this time. If for some reason, for example in an emergency situation, the patient is not notified of the existence of financial assistance and charity care before receiving treatment; he/she shall be notified in writing as soon as possible thereafter.

- c. Both the written notice and the verbal explanation shall be available in any language spoken by more than ten percent of the population in the confluence health service area, interpreted for other non – English speaking or limited – English speaking patients and for other patients who cannot understand the writing and/or explanation. Confluence Health finds that following non – English translation(s) of the notice shall be made Available: Spanish, Russian
- d. Confluence Health shall train front line staff to answer financial assistance and charity care questions effectively or direct such inquiries to the appropriate department in a timely manner.
- e. Written notice about Confluence Health’s financial assistance and charity care policy shall be made available to any person who requests the information, either by mail, by telephone or in person. Confluence health’s sliding fee schedule, if applicable, shall also be made available upon request.

2. ELIGIBILITY CRITERIA:

- A. Financial assistance and charity care are 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.
- B. Patients will be granted financial assistance and charity care regardless of race, creed, color, national origin, sex, sexual orientation, or the presence or any sensory, mental or physical disability or the use of a trained dog guide or service animal by a disabled person.
- C. Financial assistance and Charity care for non-emergent services shall be limited to those residing within the Confluence Health Service area, which includes Chelan, Douglas, Grant, Okanogan counties and the city of Othello.
- D. Financial assistance and charity care shall be limited to “appropriate hospital – based medical services” as defined in WAC 246-453-010(7).
- E. In those situations where appropriate primary payment sources are not available, patients shall be considered for financial assistance and charity care under this policy based on the following criteria:
 - a. All responsible parties with family income equal to or below one hundred percent of the federal poverty standard, adjusted for family size, shall be determined to be indigent persons qualifying for charity sponsorship for the full amount of hospital and/or Clinic charges related to appropriate hospital-based medical services that are not covered by private or public third-party sponsorship.
 - b. All responsible parties with family income between one hundred one and two hundred percent of the federal poverty standard, adjusted for family size, shall be determined to be indigent persons qualifying for discounts from charges related to

appropriate hospital and/or clinic-based medical services in accordance with the hospital's sliding fee schedule and policies regarding individual financial circumstances.

- c. Hospital and clinics may classify any individual responsible party whose income exceeds two hundred percent of the federal poverty standard, adjusted for family size, as an indigent person eligible for a discount from charges based upon that responsible party's individual financial circumstances. WAC 246-453-040.1.2.3

Confluence Health Compassionate Care Federal Poverty Guidelines

Persons in Family	48 Contiguous States and D. C.	Alaska	Hawaii
1	\$11,880	\$14,840	\$13,670
2	16,020	30,020	18,430
3	20,160	25,200	23,190
4	24,300	30,380	27,950
5	28,440	35,560	32,710
6	32,580	40,720	37,470
7	36,730	45,920	42,230
8	40,890	51,120	47,010
For each additional person, add	4,160	5,200	4,780

<https://www.federalregister.gov/articles/2016/01/25/2016-01450/annual-update-of-the-hhs-poverty-guidelines>

- F. **Family** means a group of two or more persons related by birth, marriage, or adoption who live together. All such related persons are considered as members of one family;
- G. **Initial determination of sponsorship status means** an indication, pending verification, that the services provided by the hospital and/or clinics may or may not be covered by third party sponsorship, or an indication from the responsible party, pending verification, that he or she may meet the criteria for designation as an indigent person qualifying for charity care.
- H. **Final determination of sponsorship status means** the verification of third party coverage or lack of third party coverage, as evidenced by payment received from the third party sponsor or denial of payment by the alleged third party sponsor, and

verification of the responsible party's qualification for classification as an indigent person, subsequent to the completion of any appeals to which the responsible party may be entitled and which on their merits have a reasonable chance of achieving third-party sponsorship in full or in part.

- I. **Catastrophic Charity.** Confluence Health may write off as charity care, amounts for patients with family income in excess of 300 % of the federal poverty level when circumstances indicate severe financial hardship or personal loss.
- J. The responsible party's **financial obligation** which remains after the application of any sliding fee schedule shall be payable as negotiated between Confluence Health 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.
- K. Confluence Health shall not require a disclosure of the existence and availability of family assets from financial assistance and charity care applicants whose income is **less than 100%** of the current federal poverty level but may require a disclosure of the existence and availability of family assets from financial assistance and charity care applicants whose income is at or **above 101%** of the current federal poverty level.
- L. **Sliding Scale Fee Schedule:**
 - a. The sliding fee schedule shall consider the level of charges that are not covered by any public or private sponsorship in relation to or as a percentage of the responsible party's family income.
 - b. The sliding fee schedule shall determine the maximum amount of charges for which the responsible party will be expected to provide payment, with flexibility for hospital management to hold the responsible party accountable for a lesser amount after taking into account the specific financial situation of the responsible party.
 - c. The sliding fee schedule shall take into account the potential necessity for allowing the responsible party to satisfy the maximum amount of charges for which the responsible party will be expected to provide payment over a reasonable period of time, without interest or late fees. Hospital policies and procedures regarding the sliding fee schedule shall specify the individual financial circumstances which may be considered by appropriate hospital personnel for purposes of adjusting the amount resulting from the application of the sliding fee schedule, such as extraordinary nondiscretionary expenses relative to the amount of the responsible party's medical care expenses.
 - d. The existence and availability of family assets, which may only be considered with regard to the applicability of the sliding fee schedule, the responsible party's future income earning capacity, especially where his or her ability to work in the future may be limited as a result of illness; and the responsible party's ability to make payments over an extended period of time.
 - e. Sliding fee schedules which address the guidelines in the previous subsection are:

- i. A person whose annual family income is between one hundred one and two hundred percent of the federal poverty standard, adjusted for family size, shall have his/her hospital charges that are not covered by public or private sponsorship limited to forty percent of the excess of that person's annual family income over one hundred percent of the federal poverty standard, adjusted for family size. This responsibility may be adjusted by appropriate hospital personnel after taking into consideration the individual financial circumstances of the responsible party. The responsible party's financial obligation which remains after the application of this sliding fee schedule may be payable in monthly installments over a reasonable period of time, without interest or late fees, as negotiated between the hospital and the responsible party.
- ii. A person whose family income is between one hundred one and two hundred percent of the federal poverty standard, adjusted for family size, shall have his/her hospital charges that are not covered by public or private sponsorship reduced according to the schedule below. The resulting responsibility may be adjusted by appropriate hospital personnel after taking into consideration the individual financial circumstances of the responsible party. The responsible party's financial obligation which remains after the application of this sliding fee schedule may be payable in monthly installments over a reasonable period of time, without interest or late fees, as negotiated between the hospital and the responsible party. The schedule is as follows: (FPL 101%-133%, 75%; FPL 134%-166%, 50%; FPL 167%-200%, 25%) The provisions of this section and RCW 70.170.060(5) shall not apply to the professional services of the hospital's medical staff, provided that the charges for such services are either submitted by the individual medical staff or are separately identified within the hospital's billing system.

3. PROCESS FOR ELIGIBILITY DETERMINATION

A. Initial Determination:

- a. Confluence Health shall use an application process for determining eligibility for financial assistance and charity care. Referrals to provide financial assistance and charity care will be accepted from sources such as physicians, community or religious group, social services, financial services personnel and the patient, provided that any further use or disclosure of the information contained in the request shall be subject to the Health Insurance Portability and Accountability Act privacy regulations and Confluence Health's privacy policies. All requests shall identify the party that is financially responsible for the patient as the "responsible Party"
- b. There are two applications: "Emergency Room" and "Standard" Application.
 - i. If Patient is seen in the Emergency room they will be offered a 'quick' application. If the application is not turned in on date of service the application is null and void. Patient must be compliant with requests from CCP team on all supporting household and financial documentation.
 - ii. The standard application is available to all patients in the Hospital and clinics. The Hospitals and clinics will make every reasonable effort to reach initial and

final determinations of charity care designation in a timely manner; however, the Hospital and Clinics shall make those designations at any time upon learning of facts or receiving documentation, as described in WAC 246-453-030. Patient must be compliant with requests from CCP team on all supporting household and financial documentation. The Patient shall provide the documentation no later than 14 days, after it has been requested.

- B. The initial determination of eligibility for financial assistance and charity care shall be completed at the time of admission or as soon as possible following initiation of services to the patient, but no later than 14 days after the time of admission or the initiation of services.
- C. Pending final eligibility determination, Confluence Health will not initiate Collection efforts or request deposits, provided that the responsible party is cooperative with Confluence Health's efforts to reach a final determination of sponsorship status.
- D. If Confluence Health becomes aware of factors which might qualify the patient for financial assistance or charity care under this policy, it shall advise the patient of this potential and make an initial determination that such account is to be treated as qualified to receive financial assistance or charity care.

4. **FINAL DETERMINATION:**

- A. Prima Facie Write-Offs. In the event that the responsible party's identification as an indigent person is obvious to Confluence Health personnel, and Confluence Health can establish that the applicant's income is clearly within the range of eligibility, Confluence Health will grant charity care based solely on this initial determination. In these cases, Confluence Health is not required to complete full verification or documentation. WAC 246-453-030(3).
 - a. Confluence Health will screen all Indigent persons for Medicaid and/or VA/TriCare benefits prior to release from facility.
- B. Financial assistance and charity care forms, instructions, and written applications shall be furnished to the responsible party when financial assistance or charity care is requested, when need is indicated, or when financial screening indicates potential need. All applications', whether initiated by the patient or Confluence Health, should be accompanied by documentation to verify information indicated on the application form. One or more of the following documents shall be considered sufficient evidence upon which to use the final determination of charity care eligibility:
 - a. A 'W-2' withholding statement; Bank Statement for social security verification
 - b. Pay Stubs from all employment during the relevant time period
 - c. An income tax return from the most recent calendar year
 - d. Forms approving or denying eligibility for Medicaid and/or state-funded medical assistance
 - e. Forms approving or denying unemployment compensation
 - f. Written statements from employers or DSHS employees
 - g. Veterans Benefits
 - h. Child / Spousal Support – court order
 - i. Property Income/ Tenants
 - j. Unemployment Compensation
 - k. Workmen's Comp (L&I)
 - l. Retirement

- m. Pension
 - n. 401K Plans
 - o. 403 Plan
 - p. 457 Plans
 - q. Annuity Payments
 - r. Profit and Loss statement
 - s. Any additional information which may assist in the determination.
- C. During the initial request period, the patient and Confluence Health may pursue other sources of funding, including Medical Assistance and Medicare. The responsible party will be required to provide written verification of ineligibility for all other sources of funding. Confluence Health may not require that a patient applying for a determination of indigent status seek bank or other loan source funding.
- D. Usually, the relevant time period for which documentation will be requested will be three months prior to the date of application. However, if such documentation does not accurately reflect the applicant's current financial situation, documentation will only be requested for the period of time after the patients financial situation has changed.
- a. Proof of financial hardship will be required.
- E. In the event that the responsible party is not able to provide any of the documentation described above, Confluence health shall rely upon written and signed statements from the responsible party for making a final determination of eligibility for classification as an indigent person. (WAC 246-453-030(4))
- F. **Time frame for final determination and appeals:**
- a. Each financial assistance and charity care applicant who has been initially determined eligible for charity care shall be provided for an applicant within at least fourteen (14) calendar days, or such time as may reasonably be necessary, to secure and present documentation in support of his or her charity care application prior to receiving a final determination of sponsorship status.
 - b. Confluence Health shall notify the applicant of its final determination within fourteen (14) days of receipt of all application and documentation material.
 - c. The responsible party may appeal a denial of eligibility for charity care by providing additional verification of income or family size to the CCP staff of Confluence Health within 30 days of receipt of notification.
 - d. The timing of reaching a final determination of charity care status shall have no bearing on the identification of charity care deductions from revenue as distinct from bad debts, in accordance with WAC 246-453-020(10)
 - e. If the patient or responsible party has paid some or the entire bill for medical services and is later found to have been eligible for financial assistance or charity care at the time 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. The patient has thirty (30) days to notify Confluence Health of status change, and Confluence Health has thirty (30) days to reimburse patient after receiving financial assistance or charity care designation and supporting documentation.
 - i. Co-pay, deductibles and coinsurance are eligible for CCP write offs if the patient is approved for CCP.

G. Adequate notice of denial:

- a. When an application for financial assistance and charity care is denied, the responsible party shall receive a written notice of denial which includes:
 - i. The reason or reasons for the denial
 - ii. The date of the decision; and
 - iii. Instructions for appeal or reconsideration.
- b. When the applicant does not provide requested information and there is not enough information available for Confluence Health to determine eligibility, the denial notice shall also include:
 - i. A description of the information that was requested and not provided, including the date the information was requested;
 - ii. A statement that eligibility for charity care cannot be established based on information available to Confluence Health; and
 - iii. That eligibility shall be determined if, within thirty days from the date of the denial notice, the applicant provides all specified information previously requested but not provided.
- c. All appeals will be reviewed by the Compassionate Care review board. If this review affirms the previous denial of financial assistance and charity care, written notification will be sent to the responsible party and the Department of Health in accordance with state law.
- d. If a patient has been found eligible for financial assistance or charity care and continues receiving services for an extended period of time without completing a new application, Confluence Health shall re-evaluate the patient's eligibility for financial assistance and charity care every ninety (90) days to confirm that the patient remains eligible.

4. DOCUMENTATION AND RECORDS

- A. Confidentiality: All information relating to the application will be kept confidential. Copies of documents that support the application will be kept with the application form.
- B. Documents pertaining to financial assistance and charity care shall be retained for five (5) years.

5. FRAUD

- A. False Statements
 - a. Including but not limited to;
 - i. Falsifying household size
 - ii. Falsifying Marital status
 - iii. Falsifying Income status and sources
 - iv. Falsifying any documents asked for as part of application
- B. Concealing Information
 - a. This includes financial status change within thirty (30) days of occurrence
 - b. Change in household size/ marital status
- C. Consequences of a falsified account
 - The account will be reviewed with the accurate information and a decision will be based on the new information.
- D. Notification of possible Fraud
 - a. The patient will be notified in writing of an 'audit' on their account.
 - b. The patient will have thirty (30) days to provide the documentation proving status.

6. SERVICES EXCLUDED FROM CCP

- A. Preventative care including Sports physicals and routine well care
- B. Circumcision
- C. Vasectomy
- D. Tubal ligation
- E. Dermatology
 - a. Skin tag removal
 - b. Lesions
 - c. Mole and wart removal
- F. Vaccines
- G. Drug screening
- H. ROUTINE OB Care (must apply for Pregnancy Medical through DSHS)
 - a. OB Ultra sounds
- I. Birth control including office visits for prescription
- J. Infertility
- K. Eye exams and refractions
- L. Contact lens fittings and hardware
- M. Nutritional therapy
- N. Allergy therapy
- O. Cosmetic surgery
- P. Varicose veins for treatment of pain only
- Q. Bunion surgery for treatment of pain only
- R. Pulmonary Rehab, unless prior approval obtained
- S. OT, PT and Speech, unless prior approval obtained

References:

WAC 246-453-010(7) "Appropriate hospital-based medical services" means those hospital services which are reasonably calculated to diagnose, correct, cure, alleviate, or prevent the worsening of conditions that endanger life, or cause suffering or pain, or result in illness or infirmity, or threaten to cause or aggravate a handicap, or cause physical deformity or malfunction, and there is no other equally effective more conservative or substantially less costly course of treatment available or suitable for the person requesting the service. For purpose of this section, "course of treatment" may include mere observation or, where appropriate, no treatment at all.

WAC 246-453-030.3 In the event that the responsible party's identification as an indigent person is obvious to hospital personnel, and the hospital 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 hospital's sliding fee schedule, the hospital 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.

WAC 246-453-030.4 In the event that the responsible party's identification as an indigent person is obvious to hospital personnel, and the hospital 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 hospital's sliding fee schedule, the hospital 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.

WAC 246-453-020.10 Hospitals should make every reasonable effort to reach initial and final determinations of charity care designation in a timely manner; however, hospitals shall make

those designations at any time upon learning of facts or receiving documentation, as described in WAC 246-453-030, indicating that the responsible party's income is equal to or below two hundred percent of the federal poverty standard as adjusted for family size. The timing of reaching a final determination of charity care status shall have no bearing on the identification of charity care deductions from revenue as distinct from bad debts.

Reviewed By:

Executive Committee: 12/2015