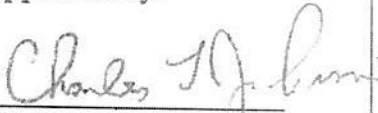
	<b>Subject:</b>  <b>Financial Assistance Policy</b>	
<b>Issuing Department:</b>  <b>Finance/Revenue Cycle Services</b>  <b>Subject Matter Consultation:</b> <b>Legal Services</b>	<b>File Under:</b> _____ <b>Section -</b> _____	<b>Original Date:</b> 12/16/2010
<b>Latest Revision Date:</b> January 1, 2016	1) <b>Page 1 of 13</b>	<b>Approved By:</b>   <hr/> Charles L. Johnson, III HHC Executive Vice President & Chief Financial Officer

**Purpose:** The purpose of this Policy is to set forth the Hartford HealthCare (HHC) policy for the provision of free or discounted Health Care Services to patients who meet the criteria for Financial Assistance. This Policy describes: (i) the eligibility criteria for Financial Assistance, and whether such assistance includes free or discounted Health Care Services; (ii) the basis for calculating amounts charged to patients; (iii) the method for applying for Financial Assistance; (iv) the collection actions that may be initiated in the event of non-payment, including civil collections actions and reporting to consumer credit reporting agencies; and (v) the Hospital's approach to presumptive eligibility determinations and the types of information that the Hospital will use to assess presumptive eligibility.

This Policy is intended to comply with Section 501(r) of the Internal Revenue Code and the billing and collection requirements described in Chapter 368z of the Connecticut General Statutes and any regulations promulgated thereunder and must be interpreted and applied in accordance with those laws and regulations. This Policy will be adopted by the governing body of Hartford HealthCare on behalf of its affiliates.

**Scope:** This Policy applies to all Health Care Services provided by a Hartford HealthCare hospital facility.

**Definitions:**

*"Eligibility Criteria"* means the criteria set forth in this Policy to determine whether a patient qualifies for Financial Assistance for the Health Care Services provided.

*"EMTALA"* means the Emergency Medical Treatment and Labor Act, 42 USC 1395dd.

*"Extraordinary Collection Activity"* means a collection action requiring a legal or judicial process, involving selling debt to another party, reporting adverse information to credit agencies or bureaus, or deferring or denying, or requiring a payment before providing, medically necessary care because of an individual's nonpayment of one or more bills for previously provided care covered under HHC's Financial Assistance Policy. The actions that require legal or judicial process for this purpose include 1) placing a lien; 2) foreclosing on real property; 3) attaching or seizing of bank accounts or other personal property; 4) commencing a civil action against an individual; 5) taking actions that cause an individual's arrest; 6) taking actions that cause an individual to be subject to body attachment; and 7) garnishing wages.

*"Family"* means, pursuant to the Census Bureau definition, a group of two or more people who reside together and who are related by birth, marriage, civil union or adoption. For purposes of this Policy, if the patient claims someone as a dependent on the patient's income tax return, that person may be considered a dependent for purposes of the provision of Financial Assistance.

*"Family Income"* means the following income when calculating Federal Poverty Level Guidelines of liquid assets: earnings, unemployment compensation, workers' compensation, Social Security, Supplemental Security Income, public assistance, veterans' payments, survivor benefits, pension or retirement income, interest, dividends, rents, business income, royalties, income from estates, trusts, educational assistance, alimony, child support, assistance from outside the household, and other miscellaneous sources of income.

*"Federal Poverty Level Guidelines"* means the federal poverty level guidelines established by the United States Department of Health and Human Services in effect on the date of the provision of the Health Care Service for awards of Financial Assistance under this Policy.

*"Financial Assistance"* means free or discounted Health Care Services provided to persons who, pursuant to the Eligibility Criteria, HHC has determined to be unable to pay for all or a portion of such Health Care Services and to be eligible for free or discounted Health Care Services under this Policy.

*"Free Bed Funds"* means any gift of money, stock, bonds, financial instruments or other property made by any donor to a HHC hospital facility for the purpose of establishing a fund to provide medical care to a patient.

*"Health Care Services"* means (i) emergency medical services as defined by EMTALA; (ii) services for a condition which, if not promptly treated, will result in adverse change in the health status of the individual; (iii) non-elective services provided in response to life-

threatening circumstances in a non-emergency department setting; and (iv) medically necessary services as determined by HHC on a case-by-case basis at the provider's discretion.

*"Medically Indigent"* means a person who HHC has determined to be unable to pay some or all of his or her medical bills because the medical bills exceed a certain percentage of the person's Family Income or Family Assets even though they have income or assets that otherwise exceed the generally applicable eligibility criteria for free or discounted care under the policy. Refer to Appendix A.

*"Patient"* means person receiving or registered to receive medical treatment or in context of the policy refers to the person liable for payment.

*"Uninsured"* means a patient who has no level of insurance or third party assistance to assist in meeting his or her payment obligations for Health Care Services and is not covered by Medicare, Medicaid, Tricare, or any other health insurance program of any nation, state, territory or commonwealth, or under any other governmental or privately sponsored health or accident insurance or benefit program including, but not limited to workers' compensation and awards, settlements or judgments arising from claims, suits or proceedings involving motor vehicle accidents or alleged negligence.

*"Underinsured"* means the patient has some level of insurance or third-party assistance but still has out-of-pocket Health Care Service expenses such as high deductible plans that exceed the patient's level of financial resources.

**Policy:** Consistent with its mission, it is Hartford HealthCare's policy to provide Financial Assistance to all eligible individuals who are Uninsured or Underinsured, ineligible for a government payer program, and otherwise unable to pay for Health Care Services due to their limited financial resources. It is also HHC's policy to provide without discrimination care for emergency medical conditions (as defined by EMTALA) to individuals regardless of their eligibility for Financial Assistance under this Policy or for government assistance. Finally, it is the policy of HHC to prohibit any action that discourages individuals from seeking emergency medical care, such as by demanding that Emergency Department patients pay before receiving treatment for emergency medical conditions. Nothing in this Policy shall be deemed to limit the Hospital's obligations under EMTALA to treat patients with emergency medical conditions.

## **I. Determining Eligibility.**

In determining eligibility for Financial Assistance, it is important that both HHC and the patient work collaboratively. Specifically, HHC will do its best to apply the Eligibility Criteria in a reasonable manner and the patient will do his or her best in responding to requests for information in a timely, complete, and accurate manner. If the documentation provided by the patient or his/her family is incomplete or inconsistent with the application we will request clarification to assist in making a decision about eligibility for financial assistance.

**1. Eligibility for Financial Assistance.** Individuals who are Uninsured or Underinsured, ineligible for any government health care benefit program and unable to pay for their Health Care Services may be eligible for Financial Assistance pursuant to this Policy. Financial Assistance also may be available for individuals who are Medically Indigent. The granting of Financial Assistance shall be based upon an individualized determination of financial need, and shall not take into account age, gender, race, color, national origin, marital status, social or immigrant status, sexual orientation or religious affiliation. The Financial Assistance Application outlines the documents required to verify family size and income.

Further, to be eligible for Financial Assistance, an individual must cooperate with HHC, provide the requested information and documentation in a timely manner, complete the required application form truthfully, and notify HHC promptly of any change in his or her financial situation so that HHC can assess the change's impact on the individual's eligibility for financial assistance.

**2. Process for Determining Eligibility for Financial Assistance.** In connection with determining eligibility for Financial Assistance, HHC (i) will require that the patient complete an application for Financial Assistance and provide other financial information and documentation relevant to making a determination of financial eligibility; (ii) may rely upon publicly available information and resources to verify the financial resources of the patient or a potential guarantor; (iii) may pursue alternative sources of payment from public and private payment benefit programs; and (iv) may review the patient's prior payment history.

**3. Processing Requests.** HHC will use its best efforts to facilitate the determination process before rendering services so long as the determination process does not interfere with the provision of emergency medical services as defined under federal law. However, eligibility determinations can be made at any time during the revenue cycle. During the eligibility determination process, HHC will at all times treat the patient or their authorized representative with dignity and respect and in accordance with all state and federal laws.

**4. Financial Assistance Guidelines.** Eligibility criteria for Financial Assistance may include family size, liquid and non-liquid assets, employment status, financial obligations, amount and frequency of healthcare expense (i.e. Medically Indigent) and other financial resources available to the patient. Family size is determined based

upon the number of dependents living in the household. In particular, eligibility for Financial Assistance will be determined in accordance with the following guidelines:

(a) ***Uninsured Patients:***

- (i) Published rates will be reduced by the percentage defined by the IRS as the amount generally billed using a “look back” retrospective calculation to calculate the amount allowed by governmental and commercially insured patients. This percentage will be updated on an annual basis. The annual calculation methodology and the percentage will be available on hospital websites, and will be provided to patient in writing at their request.
- (ii) If Family Income is verified to be at or below 250% of the Federal Poverty Level Guidelines, the patient will qualify for a 100% discount of the amount generally billed.
- (iii) If Family income is verified between 250% and 400% of the Federal Poverty Level Guidelines, the patient will qualify for a 25-75% discount of the amount generally billed.
- (iv) A patient may also qualify for Free Bed Funds in accordance with the Hospital’s Free Bed Funds criteria.
- (vi) Payment plans will be extended for any patient liability identified in a manner consistent with the Hartford HealthCare’s Payment Plan Policy, a copy of which is available from the Financial Assistance team as provided below and on the Hartford HealthCare and subsidiary websites.
- (vii) Refunds will be issued for any payments of \$5.00 or more that exceed the patient’s personal liability.

(b) ***Underinsured Patients:***

- (i) If Family Income is verified to be at or below 250% of the Federal Poverty Level Guidelines, the patient will qualify for a 100% discount against the patient’s account balance after insurance payments from third-party payors are applied. Amounts generally billed to uninsured patients will be compared to the insured patient’s balance to assure that their personal liability does not exceed that of an uninsured patient.
- (ii) If Family Income is verified between 250% and 400% of the Federal Poverty Level Guidelines, the patient will qualify for a 25-75% discount against the patient’s account balance after insurance payments from third-party payers are applied.

- (iii) A patient also may qualify for Free Bed Funds in accordance with the Hospital's Free Bed Funds criteria.
- (v) Payment plans will be extended for any patient liability identified in a manner consistent with HHC's Payment Plan Policy, a copy of which is available from the Financial Assistance team as provided below.
- (vi) Refunds will be issued for any payments of \$5.00 or more that exceed the patient's personal liability

(c) **Medically Indigent:**

A Patient will be required to submit a Financial Assistance Application along with other supporting documentation, such as medical bills, drug and medical device bills and other evidence relating to high-dollar medical liabilities, so that Hartford Health Care can determine whether the patient qualifies for Financial Assistance due to the patient's medical expenses and liabilities. This discount will be considered after other discounts have been applied and the patient is still unable pay for the Health Care Service provided. This discount will be applied as described in Appendix A.

(d) **Presumptive Eligibility:** Eligibility for Financial Assistance may be presumed based on the patient's life circumstances. The list below is representative of circumstances under which a patient is deemed to be eligible for a 100% discount without further need to complete a Financial Assistance Application:

1. The patient's receipt of state-funded prescription programs
2. Participation in Women, Infants and Children programs
3. Food stamp eligibility (SNAP)
4. Subsidized school lunch program eligibility
5. Subsidized housing or other public assistance eligibility
6. Patient states that he/she is homeless and additional due diligence on such status performed and documented
7. Patient is identified to have an income of 250% of the Federal Poverty Level or less, as verified by electronic industry standard software

**II. Method for Applying for Financial Assistance.** Copies of the Financial Assistance Application and instructions are available online at [[www.HartfordHealthCare.org](http://www.HartfordHealthCare.org), or on each hospital facility's website], by requesting a copy in person at any of the HHC hospitals' patient admission or registration areas as identified in Appendix B, or by

requesting a free copy by mail by contacting the HHC hospitals' Patient Access Services department. Additional contact information is provided below. In addition, patients may ask any nurse, physician, chaplain, or staff member from Patient Registration, Patient Financial Services, Office of Professional Services, Case Coordination, or Social Services about initiating the Financial Assistance Application process.

To apply for Financial Assistance, a patient must complete HHC's Financial Assistance Application Form. The individual will provide all supporting data required to verify eligibility, including supporting documentation verifying income described below.

Patients may submit an application up to 240 days from the date on which HHC issues its first, post-discharge billing statement. If an individual has not submitted an application within the first 120 days from the date on which HHC issues its first, post-discharge billing statement, then HHC may begin engaging in the collection actions described below.

Before HHC initiates any collection actions, it will issue a written notice to the last known address of record for the patient (or his/her family) that describes the specific collection activities it intends to initiate (or resume), provides a deadline after which such action(s) will be initiated (or resumed), and includes a plain-language summary of this Policy. HHC may initiate collection activities no sooner than 30 days from the date on which it transmits this written initiation notice, either by mail or electronic mail.

If HHC receives an incomplete application form, it will provide the patient (or his or her legal representative) with a list of the missing information or documentation and give the patient 30 days to provide the missing information. If the patient does not provide the missing information within this period, HHC may commence collection actions (assuming it has provided the written notice described above).

If HHC receives a completed application form, it will make and document eligibility determinations in a timely manner. If an application is deemed complete HHC will provide to the patient or his or her legal representative, a written determination of financial eligibility within fifteen (15) business days. Decisions by HHC that the patient does not qualify for Financial Assistance may be appealed by the patient, or his or her legal representative, within fourteen (14) calendar days of the date of the written determination. If the patient or his or her legal representative appeals the determination, the Director of Patient Access (or designee) will review the determination along with any new information and make a final decision within fifteen (15) business days.

Signage and written information regarding how to apply for Financial Assistance will be available in the Hospital emergency service departments and patient registration areas.

Once a patient or his or her legal representative requests information about Financial Assistance, a financial counselor will provide the patient or his or her legal representative with the Financial Assistance Application along with a list of the required documents that must be provided to process the application.

Approved Financial Assistance Applications will be valid for six months from the date HHC's makes its eligibility determination.

Patients may apply for Financial Assistance at any time during the collection cycle process or within 240 days from the date of the first Self Pay notice.

### **III. Calculating Amounts Charged to Patients**

Notwithstanding anything else in this Policy, no individual who is determined to be eligible for financial assistance will be charged more for emergency or other medically necessary care than the amount generally billed to individuals who have insurance covering such care. The basis to which any discount is applied is equivalent to the billed charges posted to a patient account minus any prior insurance payments and adjustments from the patient's insurance (if applicable).

### **IV. Relationship to Hartford HealthCare's Collection Practices.**

In the event a patient fails to qualify for Financial Assistance or fails to timely pay his or her portion of discounted charges pursuant to this Policy, HHC reserves the right to institute and pursue Extraordinary Collection Actions (ECA) and remedies such as imposing wage garnishments or filing liens on primary or secondary residences, bank or investment accounts, or other assets, instituting and prosecuting legal actions and reporting the matter to one or more credit rating agencies. For those patients who qualify for Financial Assistance and who, in HHC's sole determination, are cooperating in good faith to resolve the outstanding accounts, HHC may offer extended payment plans to eligible patients. For patients who meet the terms of the payment plan HHC will not impose wage garnishments or liens on primary residences, and will not send unpaid bills that are part of the payment plan to outside collection agencies.

No ECA will be initiated during the first 120 days following the first post-discharge billing statement to a valid address or during the time that the patient's Financial Assistance Application is processing. Before initiating any ECA, a notice will be provided to the patient 30 days prior to initiating such event.

If the patient applies for assistance within 240 days from the first notification of the self-pay balance, and is granted assistance, any ECA's such as negative reporting to a credit bureau or liens that have been filed will be removed.

**V. Publication and Education.** HHC will provide information about its Financial Assistance Policy as follows: (i) provide signs regarding this Policy and written plain language summary information describing the Policy along with Financial Assistance contact information in the Emergency Department, Labor and Delivery areas and other patient registration areas; (ii) provide to each patient written plain language summary information describing the Policy along with Financial Assistance contact information in admission, patient registration, discharge, billing and collection written communications; (iii) make paper copies of the Policy, financial assistance application, and plain language summary of the Policy available upon request and without charge, both by mail and in public locations in the hospital facility, including the emergency room (if any) and admissions areas; (iii) post the Policy, plain language summary and financial assistance application on the website with clear linkage to such documents on the HHC's home page;

(iv) educate all admission and registration personnel regarding the Policy so that they can serve as an informational resource to patients regarding the Policy; and (v) include the tag line "Please ask about our Financial Assistance Policy" in HHC written publications.

**VI. Covered/Non-Covered Provider List.** Attached as Appendix C to this Policy is a list of providers independent of HHC that deliver emergency or other medically necessary care in HHC's facility and identifies whether the care they provide is (or is not) covered by this Policy. The Board of Directors of HHC delegates the authority to update Appendix C as needed to the Executive Vice President and Chief Financial Officer.

**VII. Relation to Free Bed Funds.** If a patient applies for Financial Assistance, the Hospital will determine his or her eligibility for Financial Assistance and or Free Bed Funds.

**VIII. Regulatory Compliance.** The Hospital will comply with all state and federal laws, rules and regulations applicable to the conduct described in this Policy.

APPENDIX A

Federal Poverty Guidelines Effective January 2015

		250%** FPG	275%** FPG	300%** FPG	325%** FPG	400%** FPG
Size of Family	Poverty Guideline	100% Awarded	75% Awarded	50% Awarded	25% Awarded	25% Awarded
1	\$11,770	\$29,425	\$32,368	\$35,310	\$38,253	\$47,080
2	\$15,930	\$39,825	\$43,808	\$47,790	\$51,773	\$63,720
3	\$20,090	\$50,225	\$55,248	\$60,270	\$65,293	\$80,360
4	\$24,250	\$60,625	\$66,688	\$72,750	\$78,813	\$97,000
5	\$28,410	\$71,025	\$78,128	\$85,230	\$92,333	\$113,640
6	\$32,570	\$81,425	\$89,568	\$97,710	\$105,853	\$130,280
7	\$36,730	\$91,825	\$101,008	\$110,190	\$119,373	\$146,920
8	\$40,890	\$102,225	\$112,448	\$122,670	\$132,893	\$163,560

\*In no case will the Patient's Balance Due after Discount is applied be more than 10% of annual gross family income

\*\*For families with more than 8 members, add \$4,160 (\*\* multiplying factor) for each additional member

Medically Indigent/Catastrophic Financial Assistance\*

Medically Indigent/Catastrophic Eligibility:	
Balance Due	Discount
Balance due is $\geq$ 100% of patient's annual gross family	90% of balance due
Balance due is $\geq$ 90% of patient's annual gross family	85% of balance due
Balance due is $\geq$ 80% of patient's annual gross family	80% of balance due
Balance due is $\geq$ 70% of patient's annual gross family	75% of balance due
Balance due is $\geq$ 60% of patient's annual gross family	70% of balance due
Balance due is $\geq$ 50% of patient's annual gross family	65% of balance due

\*In no case will the Patient's Balance Due after Discount is applied be more than 10% of annual gross family income

APPENDIX B

Contact Information for Financial Assistance

Hartford HealthCare  
Customer Service  
1-877-HHC-Bill  
hartfordhealthcare.org

Hartford Hospital  
Financial Assistance Clearance Team  
Main Admitting Department  
80 Seymour Street  
Hartford, CT 06102  
1-877-545-3914  
hartfordhospital.org

The Hospital of Central Connecticut  
Financial Counselors  
Main Admitting Department  
100 Grand Street  
New Britain, CT 06050  
860-224-5181  
thocc.org

MidState Medical Center  
Financial Counselors  
Main Admitting Department  
435 Lewis Avenue            or            455 Lewis Avenue  
Meriden, CT 06451                      Meriden, CT 06451  
203-694-8213                                203-694-8456  
midstatemedical.org                      midstatemedical.org

William W. Backus Hospital  
Financial Counselors  
Financial Counseling Unit  
326 Washington Street  
Norwich, CT 06030  
860-889-8331 x 2917  
backushospital.org

Windham Memorial Hospital  
Financial Counselors  
Main Admitting Department  
112 Mansfield Avenue  
Willimantic, CT 06226  
860.456.6706 or 860.456.6109  
windhamhospital.org

Natchaug Hospital  
189 Storrs Road  
Mansfield, CT 06250  
1-800-426-7792  
nathaug.org

Rushford  
1250 Silver Street  
Middletown, CT 06457  
1-877-577-3233  
rushford.org

## APPENDIX C

### List of Providers Independent of HHC Which Are Covered/Not Covered by the HHC Financial Assistance Policy

With respect to the provision of emergency and medically necessary care in HHC's facility, care provided by the following independent providers is covered by this Policy:

1. Hartford Medical Group (HHC MG)
2. Employed Physicians of Hartford Healthcare

With respect to the provision of emergency and medically necessary care in HHC's facility, care provided by the following independent providers is not covered by this Policy:

1. Services provided by Hartford Healthcare affiliates other than those listed in Appendix B are not covered by this policy.
2. A complete listing of our independent providers is located on our entity specific websites.

WINDHAM COMMUNITY MEMORIAL HOSPITAL, INC

Pt Access Policy #  
Windham Hospital Policy Manual

DEPARTMENT: Patient Access

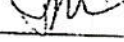
SUBJECT: BAD DEBT

TITLE: Policy to Write-Off Accounts to Bad Debt Status

POLICY: It is the policy of Windham Hospital to transfer self-pay accounts from Accounts Receivable to a Bad Debt status after it has been determined the account is uncollectible by the self-pay collectors.

- A. The account is considered uncollectible using the following criteria:
1. The age of the account is at least 120 day from the date of discharge.
  2. The guarantor has received no less than two monthly statements clearly stating the balance due is their responsibility as well as intermittent pre-collection letters.
  3. The account has been discharged via bankruptcy action.
  4. The account has a balance of \$24.99 or more and meets the criteria stated in #1 and #2.
- B. Prior approval for write-offs will be obtained and recorded on a Pre Bad Debt listing report as follows:
1. Account will be approved by the Access Services Manager.
- C. Once approval has been obtained and the Finance Department is notified, the accounts to be written off are processed. The current balance if approved accounts is transferred to Bad Debt status.
- D. After review of the delinquent accounts, the Collector Code changes are made in the AS400. The Access Service Manager handles the processing of these accounts from Accounts Receivable to Bad Debt status.

Prepared By: Francine Boulay

Approved: 

Effective Date: 1996  
Review: Annually

Reviewed, Not Revised:  
Reviewed & Revised: 12/07