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THE GRIFFIN HOSPITAL FINANCE DEPARTMENT STANDARD OPERATING POLICIES

SUBJECT: BAD DEBT POLICY (ALL PAYORS)

EFFECTIVE DATE: 11/1/2006 SUPERCEDES: 7/1/2001

RESPONSIBLE DEPT: Business Services APPROVED BY:

Administrator

POLICY:

To identify all patient accounts that have been billed and paid by primary and/or secondary insurance and have self pay balances remaining and not paid (or an arrangement to pay) by the patient within a 90 day time frame (120 days for Medicare patients) of the account being in a self pay status. To complete the bad debt turnover process to external collection agencies.

PROCEDURE:

- 1. All accounts processed and worked by the Business Services staff as identified in the Remittance Review Self Pay/Co-pay/Bad Debt policy and procedure dated 11/1/2006. All payors are considered in this review. The self pay account must receive three hospital data mailers or at a 90 day time frame (120 days for Medicare) and reflect no payment on the self pay balance by the patient. At this time, the account will be made a bad debt and forwarded to the Business Services Collection Supervisor to be processed and sent to an external collection agency.
- 2. A bad debt turnover letter will be processed by the financial advisory staff. The data as to the turnover letter will be assigned in the system. The account will reflect a status of (BD Bad Debt). The account will be turned over to a financial advisor who will finalize the account to be turned over to an outside collection agency.
- 3. The Collection Supervisor is responsible for completing a review of all accounts identified by the financial advisor as being unpaid prior to processing to collection agency.
- 4. The Supervisor will verify that all policies and procedures outlined in the Remittance Review Self pay/Co-pay/Bad Debt policy and procedure have been completed and meet all outlined guidelines.
- Upon completion of this review by the Business Services Collection Supervisor, all accounts will be identified as bad debts and forwarded to the appropriate collection agency. All accounts turned over to the outside collection agency will be reflected in the

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THE GRIFFIN HOSPITAL FINANCE DEPARTMENT STANDARD OPERATING POLICIES

SUBJECT: BAD DEBT POLICY (ALL PAYORS)

hospital system as a BD - Bad Debt Account - and will identify the date and collection agency name the account was turned over to.

- 6. The Business Services Collection Supervisor will monitor all collection agency activity monthly and will complete a quarterly review with all agencies identifying those accounts deemed uncollectible and returned to the hospital as uncollectible accounts. This report will be forwarded to the Business Office Director and CFO.
- 7. For all payments recurring after the account has been returned/deemed uncollectible by the collection agency, the Collection Supervisor will review the collection batch summary report to identify payments made on a returned account. The Collection Supervisor will maintain a payment log for all payments posted for auditing review purposes.

Reviewed 2/2005; 12/2006 - : Business Services

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THE GRIFFIN HOSPITAL BUSINESS OFFICE STANDARD OPERATING POLICIES

SUBJECT: UNINSURED PROCESS/FREE CARE ASSISTANCE/FREE BED FUNDS

EFFECTIVE DATE: 4/2013 SUPERCEDES: 1/2010

RESPONSIBLE DEPT: Business Services APPROVED BY:

Administrator

Reviewed/revised; 4/2013 – M. Milardo, Jr.

POLICY:

The following policy represents Griffin Hospital's procedures for the Uninsured Patient, Free Care Assistance, and Free Bed Funds available for patients who do not have medical insurance.

Uninsured Patient Procedure

- 1. Patients that are either scheduled or registered with no active insurance will import onto the three Financial Advisors ONTRAC worklist.
- Patients that are registered will receive a state application packet from the Patient Access staff. This consists of the Financial Advisor's business card, state application, and list of documents needed to complete the state application. A listing of the DSS offices is included in the packet.
- 3. All patients identified will receive a call or a direct visit, if admitted to the hospital, by a Financial Advisor.
- 4. The Financial Advisor will screen the patient for any current sponsorship and discuss all eligibility options with the patient.
- 5. If the patient meets criteria, the Financial Advisors will begin the Husky application process with the patient.
- 6. A due diligence process will be followed by the Financial Advisors to ensure that the patients are pursuing active coverage. The Financial Advisors will monitor the DSS website to track the progress of the application with the state.
- 7. Once eligibility has been determined, all appropriate accounts will be updated to the Husky insurance and billed accordingly.
- 8. All uninsured patients not granted state/Husky coverage will have the CHA uninsured rate applied to their account. The uninsured rate was determined by the hospital to represent the Connecticut not-for-profit hospital discount policy as adopted by the Connecticut Hospital Association 4/10/2006.

THE GRIFFIN HOSPITAL BUSINESS OFFICE STANDARD OPERATING POLICIES

SUBJECT: UNINSURED PROCESS/FREE CARE ASSISTANCE/FREE BED FUNDS

Free Care Assistance

- 1. Any patient requesting consideration for free care assistance in paying their Griffin Hospital bills or financial responsibility after insurance payment should contact the hospital's Financial Advisory staff.
- 2. The Financial Advisor will obtain the following information from the patient in order to complete the Free Care application. The information required from the patient to complete the free care application is as follows:
 - Patient W-2 form or most current and completed tax return.
 - Or three consecutive paystubs from the patient's current employment/proof of Social Security.
 - Dependent information (spouse and minor children only).
 - Any or all bank and checking account statements.
- 3. The Financial Advisor will refer to the Griffin Hospital sliding scale. This is based on the Federal Government Poverty Income Guidelines (see attached sliding scale). The Financial Advisor will make a determination of the patient's free care eligibility status.
- 4. If the patient qualifies for free care assistance, the applicable discount percentage will be applied to the patient's account balance. Then a letter (attached) will be sent out reflecting the patient's new adjusted balance.
- 5. If a patient does not qualify for free care assistance, the Financial Advisor will attempt to:
 - Obtain payment in full
 - Send to an outside agency to set up a monthly payment arrangement
- 6. If the patient does not maintain the agreed upon payment schedule, the account will be forwarded to an outside collection agency at the full remaining balances.
- 7. If it is later determined by the Griffin Hospital or a collection agency acting on behalf of Griffin Hospital that the patient's financial conditions have changed and the patient was unable to pay the outstanding account balances, an Administrative Override may be applied by the Business Services Collection Supervisor or Director of Business Services. All Administrative Overrides will be signed off by each of those parties.
- 8. The Business Services Collection Supervisor will maintain all monthly spreadsheets that will identify all applied Free Bed Funds, Uninsured, and Free Care Assistance allocated on a monthly basis.

THE GRIFFIN HOSPITAL BUSINESS OFFICE STANDARD OPERATING POLICIES

SUBJECT: UNINSURED PROCESS/FREE CARE ASSISTANCE/FREE BED FUNDS

FREE BED FUNDS:

The hospital has the following Free Bed funds available for patients who meet the following outlined criteria for each fund:

- 1. The ENO Fund: The applicant must be a worthy Protestant woman, 60 years of age or older, and be a resident of Ansonia, Derby or Seymour.
- 2. Pine Trust: The fund is available to indigent patients of Griffin Hospital who reside in the City of Ansonia.
- 3. DN Clark: The fund is available to Shelton residents.

All Free Bed Funds granted are processed through the hospital's Financial Advisor staff.

Griffin Hospital Sliding Scale

For the Insured and Uninsured Patient - Responsible for an Account Balance on or February 1, 2013

of 400% HHS Poverfy Income Guldelines; 30% FreeCare 70% Patient Share	(Up to	45,960	62,040	78,120	94,200	1 (0,280	126,380	142,440	158,520		
of 400% HHS Pove Income Guldelines: 30% FreeCare 70% Patlent Share	Greater Then	42,514	57,388	72,262	87,136	102,010	116,884	131,758	146,632		
IS Poverly delines: are I Share	Up to	-42,613	57,387	72,261	87,135,	102,009	118,883	131,757	146,631	*	•
of 370% HHS Poverty Income Guidelines; 35% FreeCare 65% Palient Share	Greater /	39,067	62,735	. 66,403	80,074	93,739	107,407	121,075	134,743		
1S Poverty delines; are t Share	Up to	39,086	52,734	66,402	. 80,070	93,738	107,406	121,074	134,742		
of 340% HHS Poverty Income Guldelines; 50% FreeCare 50% Patient Share	Greater	35,620	48,082	60,544	73,007	85,468	97,930	110,392	122,854		
of 310% HH s Poverty income Guldelines; 76% FreeCare 26% Patient Share	Up to	35,619	48,081	60,543	73,006	65,467	97,929	110,391	122,853	g scale is e 2013 y y to 1014 e 48 auto and olumbia	
of 310% HH s Pove income Guidelines: 76% FreeCare 26% Patient Share	Greater Than	32,173	43,429	54,685	65,941	761,77	88,453.	602'66	110,965	3. This sliding scale is based on the 2013 HHS Poverty Guidelines for the 48 continous states and District of Columbia	:
rs Poverty delines: are t Share	Unito	32,172	43,428	54,684	65,940	.,77,196	98,462	99,708	110,964	unily size with an eight (8) s add \$4,020 additional	
of 280% HHS Poverly Income Guidelines: 85% FreeCare 15% Patient Share	Greater /	28726	38,776	48,826	68,876	68,926	, 78,976	89,026	92,076	2. For family size with more than eight (8) members add \$4,020 for each additional member.	
of 250% HHS Poverty Income Guidelines: 100% FreeCare	Greater / Up to	. 0.28,725	0.38,775	0-48,825	0-58,875.	0-68,925	. 0-78,975	0-89,025	0-89,075	1, Source: Federal Register, Vol.76, No.13, January 24, 2013, PP 3637-3638	
	Size of Family	₩.	2	æ	4	ಬ	9	_	œ		

Effective 2/1/2013

For the Insured and Uninsured Patient - Responsible for an Account Balance on or February 1, 2014 Griffin Hospital Sliding Scale

18 Poverty delines: are t Share	Up to	46,680	62,920	79,160	95,400	111,640	127,880	144,120	160,360	
of 400% HHS Poverty Income Guidelines: 30% FreeCare 70% Patient Share	Greater	43,180	58,202	73,224	88,246	103,268	118,290	133,312	148,334	
Poverty elines: a share	Up to	43,179	58,201	73,223	88,245	103,267	118,289	133,311	148,333	014
of 370% HHS Poverty Income Guidelines: 35% FreeCare 65% Patient Share	Greater / Than	39,679	53,483	67,287	81,091	94,895	108,699	122,503	136,307	Effective 2/1/2014
IS Poverty delines: are Share	Up to	39,678	53,482	67286	81,090	94,894	108,698	122,502	136,306	4
of 340% HHS Poverty Income Guidelines: 50% FreeCare 50% Patient Share	Greater / Than	36,178	48,764	61,350	73,936	86,522	99,108	111,694	124,280	
of 310% HH s Poverty Incorne Guldelines: 75% FreeCare 25% Patient Share	Up to	36,177	48,763	61,349	73,935	86,521	99,107	111,693	124,279	g scale is 2014 I the 48 ates and
of 310% HH s Powe Income Guidelines: 75% FreeCare 25% Patient Share	Greater	32,677	44,045	55,413	66,781	78,149	89,517	100,885	112,253	3. This sliding scale is based on the 2014 HHS Poverty Guidelines for the 48 continous states and metric of Continous
HHS Poverty Guidelines: eCare ient Share	Up to	32,676	44,044	55,412	66,780	78,148	89,516	100,884	112,262	size with ght (8) d \$4,060 for nal
of 280% HHS Pove Income Guidelines: 05% FreeCare 15% Palient Share	Greater Than	29,176	39,326	49,476	59,626	9/1/69	926'62	90,076	100,226	2. For family size with more than eight (8) members add \$4,060 for each additional member.
of 250% HHS Poverty Income Guidelines: 100% FreeCare	Greater / Up to	0-29,175	∉0-39,326	0-49,475	0-59,626	0-69,775	0-79,925	0-90,025	0-100,225	1. Source: Federal Register, Vol.76, No.13, January 22, 2014. PP 3637-3638
	Size of Family	~	2	ю	4	5	မွ	1	CD.	

Griffin Hospital Sliding Scale
For the Insured and Uninsured Patient - Responsible for an Account Balance on or after
February 1, 2015

	of 250% HHS Poverty Income Guidelines: 100% FreeCare	of 280% HHS Pove Income Guidelines: 85% FreeCare 15% Patient Share	of 280% HHS Poverty Income Guidelines: 85% FreeCare 15% Patient Share	of 310% HH s Pove Income Guidelines: 75% FreeCare 25% Patient Share	of 310% HH s Poverty Income Guidelines: 75% FreeCare 25% Patient Share	of 340% HHS Pové Income Guldelines: 50% FreeCare 50% Patient Share	of 340% HHS Poverty Income Guidelines: 50% FreeCare 50% Patient Share	of 370% HHS Pove Income Guidelines: 35% FreeCare 65% Patlent Share	of 370% HHS Poverty Income Guidelines: 35% FreeCare 65% Patlent Share	of 400% HHS Pove Income Guidelines: 30% FreeCere 70% Patient Share	of 400% HHS Poverty Income Guidelines: 30% FreeCare 70% Patient Share
Size of Family	Greater / Up to	Greater Than	/ Up to	Greater Than	/ Up to	Greater Than	/ Up to	Greater	/ Up to	Greater Than	J Up to
-	0 * 28,425	29,426	32,956	32,957	36,487	36,488	40,018	40,019	43,549	43,550	47,080
8	0 - 39,825	39,826	44,604	44,605	49,383	49,384	54,162	54,163	58,941	58942	63,720
ю	0 - 50,225	50,226	56,252	56,253	62,279	62,280	68,306	68,307	74,333	74,334	80,360
4	0 - 60,625	60,626	67,900	67,901	75,175	75,176	82,450	82,451,	69,725	89,726	97,000
£	0 - 71,025	71,026	79,548	79,549	88,071	88,072	96,594	96,595	105,117	105,118	113,640
9	0 - 81,425	81,426	91,196	91197	100,967	100,968	110,738	110,739	120,509	120,510	130,280
1	0 - 91,825	91,826	102,844	102,845	113,863	113,864	124,882	124,883	135,900	135,902	146,920
œ	0 - 102,225	102,226	114,492	114,493	126,759	126,760	139,026	139,027	151,293	151,294	163,560
a s	Source: Federal Register, Vol 80, Number 14 (Thursday,January 22,2015), Pages 3236-3237	2. For family size w more than eight (8) members add \$4,14 for each additional member.	2. For family size with more than eight (8) members add \$4,160 or each additional member.	3. This sliding scale is based on the 2015 HHS Poverty Guidelines for the 48 continous states and District of Columbia	3.This sliding scale is based on the 2015 HHS Poverty Guidelines for the 48 continuous states and Ulstrict of Columbia			Effective 9/4/2045	d 1904 s.		

GRIFFIN HOSPITAL SLIDING SCALE FOR INSURED PATIENTS HAVING COPAY AND DEDUCTIBLE PATIENT BALANCES FEBRUARY 2016

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	Poverty Income	Income guidelines:	elines:	Income guidelines:	elines:	Income guidelines;	elines:	Income guidelines:	elines:	Income guidelines:	elines:
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	100 % FREE CARE	85 % FREE	EE CARE	75 % FRE	75 % FREE CARE	50% FRE	50% FREE CARE	35 % F	35 % FREE CARE	30% FR	30% FREE CARE
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	0- 29,700	29,701	33,264	33,265	36,828	36,829	40,392	40,393	43,956	43,957	47,520

, 2	0- 40,050	40,051	44,856	44,857	49,662	49,663	54,468	54,469	59,274	59,275	64,080
3	0- 50,400	50,401	56,448	56,449	62,496	62,497	68,544	68,545	74,592	74,593	80,640
4	0- 60,750	60,751	68,040	68,041	75,330	75,331	82,620	82,621	89,910	89,911	97,200
							•				
5	0- 71,100	71,101	79,632	79,633	88,164	88,165	969,96	269,96	105,228	105,229	113,760
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9	0- 81,450	81,451	91,224	91,225	100,998	100,999	110,772	110,773	120,546	120,547	130,320
7	0.91,825	91,826	102,844	102,845	113,863	113,864	124,882	124,883	135,901	135,902	146,920
∞	0- 102,225	102,226	114,492	114,493	126,759	126,760	139,026	139,027	151,293	151,294	163,560

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Source: Federal Register, Vol.81, Issue 15, January 25, 2016, PP. 4037
For family size with more than eight (8) MEMBERS, add \$ 4,160for each additional member.
This sliding scale is based on the 2016 HHS Poverty guidelines for the 48 configuous states and the District of Columbia.

Griffin Hospital Sliding Scale For the Insured and Uninsured Patient - Responsible for an Account Balance on or after February 1, 2017

of 400% HHS Poverty Income Guidelines: 30% FreeCare 70% Patient Share	<u>Greater / Up to</u> <u>Than</u>	44,623 - 48,240	60,089 - 64,960	75,555 - 81,680	91,021 - 98,400	106,487 - 115,120	121,953 - 131,840	137,419 - 148,560	152,885 - 165,280	
of 370% HHS Poverty Income Guidelines: 35% FreeCare 65% Patient Share	Greater / Up to Than	41,005 - 44,622	55,217 - 60,088	69,429 - 75,554	83,641 - 91,020	97,853 - 106,486	112,065 - 121,952	126,277 - 137,418	140,489 - 152,884	Effective 2/1/2017
of 340% HHS Poverty Income Guidelines: 50% FreeCare 50% Patient Share	Greater / Up to Than	37,387 - 41,004	50,345 - 55,216	63,302 - 69,428	76,261 - 83,640	89,219 - 97,852	102,177 - 112,064	115,135 - 126,276	128,093 - 140,488	
of 310% HH s Poverty Income Guidelines: 75% FreeCare 25% Patient Share	Greater / Up to Than	33,769 - 37,386	45,473 - 50,344	57,177 - 63,302	68,881 - 76,260	80,585 - 89,218	92,289 - 102,176	103,993 - 115,134	115,697 - 128,092	3.This sliding scale is based on the 2017 HHS Poverty Guidelines for the 48 continous states and
of 280% HHS Poverty Income Guidelines: 85% FreeCare 15% Patient Share	Greater / Up to Than	30,151 - 33,768	40,601 - 45,472	51,051 - 57,176	61,501 - 68,880	71,951 - 80,584	82,401 - 92,288	92,851 - 103,992	103,301 - 115,696	2. For family size with more than eight (8) members add \$5,230 for each additional member.
of 250% HHS Poverty Income Guidelines: 100% FreeCare	Greater / Up to Than	0-30,150	0-40,600	0-51,050	0-61,500	0-71,950	0-82,400	0-92,850	0-103,300	1. Source: Federal Register, Vol 82, Number 19 (Thursday,January 31,2017),, Page 8832
	Size of Family	τ	2	ю	4	5	9	7	ω	