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## **Policy Statement:**

M Health Fairview has a long history of providing quality health care to patients within our community and provides emergent care to patients regardless of their ability to pay. M Health Fairview recognizes that some patients may be unable to pay all, or a portion of the cost of emergency or medically necessary health care services received because they did not have health insurance coverage or because their health care costs exceed their ability to pay. In order to provide appropriate financial assistance to those in need, M Health Fairview has a process to evaluate patient eligibility for financial assistance programs. This policy addresses the various components of the M Health Fairview financial assistance process.

## **Purpose:**

M Health Fairview is committed to improving the health of the community. The guiding principles behind this policy are in accordance with the Minnesota Attorney General Agreement and are in compliance with 501r and state law

## **Definitions:**

- I. Emergency Care
  - A. The Emergency Medical Treatment and Labor Act (EMTALA) requires hospitals with emergency departments to provide a medical screening examination to any individual who comes to the emergency department and requests such an examination and prohibits hospitals with emergency departments from refusing to examine or treat individuals with an emergency medical condition. The term "hospital" includes critical access hospitals.

## II. Medical Necessity

- A. Health care services or products that a prudent physician would provide to a patient for the purpose of preventing, diagnosing, or treating an illness, injury, disease, or its symptoms in a manner that is:
  - In accordance with generally accepted standards of medical practice.
  - Clinically appropriate in terms of type, frequency, extent, site, and duration; and
  - Not primarily for the economic benefit of the health plans and purchasers or for the convenience of the patient, treating physician, or other health care provider
- III. Experimental Interventions
  - A. Experimental interventions are treatments and interventions not generally accepted as safe and effective by experts in the relevant field in diagnosing, preventing, or treating the health condition under consideration. When determining that an intervention is experimental, relevant factors include but are not limited to:

- 1. whether the intervention is only available as part of a clinical study;
- 2. whether relevant articles in peer reviewed journals call for further study of the intervention for the health condition under consideration; or
- 3. whether the intervention would be used in a different body area, in a significantly different way, and/or for a different health condition, than is generally accepted by other experts in the relevant field [within M Health Fairview, the Twin Cities, Minnesota, the US, etc.].
- IV. Fiscally Unsustainable Burden
  - A. A situation where there is a significant cost to a M Health Fairview tax-exempt entity to provide the service and the incidence of potential patient need for the service is such that the entity could not provide the same service without adequate reimbursement to all similarly situated patients and remain fiscally responsible.
- V. Family
  - A. For the purposes of this policy, a family is:
    - 1. A married couple and any dependents, as defined by IRS guidelines.
    - 2. An individual with dependents as defined by IRS guidelines.
    - 3. An unmarried person with no dependents.
  - B. Poverty guidelines will be applied separately to each family within a household if the household includes more than one family unit.
- VI. Provision of Care
  - A. M Health Fairview will provide medical screening exams and stabilizing services for emergency medical conditions without regard to ability to pay. (See <u>Emergency Medical Services, EMTALA</u>)
  - B. M Health Fairview provides non-emergency services that, in the opinion of a M Health Fairview credentialed ordering physician, are medically necessary. M Health Fairview may require that payment arrangements have been established to their satisfaction before non-emergency services are provided. Payment arrangements may include cash or credit card payment, insurance of a kind accepted by M Health Fairview, an uninsured discount and, where applicable, financial assistance (discounted or free care) approved by M Health Fairview. Select services may not be eligible for financial assistance. In non-emergency situations, M Health Fairview reserves the right to review individual cases or requests for specific services to establish the most appropriate course of treatment from a medical and ethical perspective.

#### Procedure:

- I. Financial Assistance
  - A. M Health Fairview offers financial assistance for eligible services in the form of discounted care to individuals who meet qualification criteria. Emergency care and non-emergency services ordered by a M Health Fairview credentialed physician that, in the opinion of the ordering physician, are medically necessary, are eligible for financial assistance, as is care provided in the hospital facility by a partnership or LLC in which the hospital owns a capital or profits interest.
  - B. Non-employee third-party providers who deliver emergency or other medically necessary care in the hospital facility are listed in an attachment to this Financial Assistance Policy. The attachment explains whether care provided by these providers is covered by this policy.
  - C. M Health Fairview reserves the right to review financial assistance requests for non-emergency

services to explore alternative treatments or service locations and to refuse financial assistance requests that would establish a precedent creating a fiscally unsustainable burden for the entity.

- D. Patients who receive care at M Health Fairview are expected to contribute to the cost of their care based on their ability to pay. M Health Fairview financial assistance is not a substitute for employer-sponsored, public, or individually purchased insurance. In order to qualify for financial assistance, patients are expected to:
  - Access public or private insurance options for which they are eligible, including providing M Health Fairview with any and all information needed to enroll in a publicly sponsored insurance program.
  - 2. Comply with financial assistance application requirements, including the production of necessary documentation.
- II. Financial Assistance Eligibility
  - A. M Health Fairview bases eligibility for financial assistance on household income and assets. The <u>financial assistance application</u> form must be accompanied by a form of verification of family income and assets. Acceptable verification of income and assets includes the following for all adult members of the family: payroll stubs from the most recent month, statements demonstrating Social Security, unemployment, disability and spousal/child support benefits, bank and brokerage account statements (for cash or stock), and the most recent year's tax return. An income statement for self-employed applicants is required. In the absence of income, a Declaration of No Income statement will be accepted.
  - B. Income guidelines will be revised in conjunction with the Federal Poverty Guideline updates published by the Center for Medicare and Medicaid Services. Income guidelines for financial assistance eligibility at M Health Fairview are as follows:

Family income as % of Federal Poverty Guidelines	% Discount from Gross Charges	
0-200%	100%	
201-400%	AGB or uninsured discount, whichever is higher	

- C. Asset guidelines for financial assistance eligibility at M Health Fairview are as follows: If a family has total assets in bank accounts, stock assets, and retirement totaling more than \$100,000 they are not eligible for Financial Assistance. Exceptions may be made on a case-by-case basis for catastrophic situations, where the outstanding balances exceed the patient's household asset totals.
- D. For patients who are determined to have current eligibility for Medical Assistance or Minnesota Care (together "MA"), any patient balance incurred prior to the MA effective date will be eligible for financial assistance.
- III. Processing Financial Assistance Applications
  - A. M Health Fairview will provide financial counseling to patients and their families to assist with identifying appropriate options for meeting financial obligations. Patients who express financial

hardship will be offered a financial assistance application.

- B. To apply for financial assistance, a person must complete a <u>financial assistance application</u> and provide the required documentation regarding family income and assets (see <u>Financial Assistance Program</u>). A financial assistance application can be obtained free of charge by calling M Health Fairview Customer Service at 612-672-6724, Grand Itasca Clinics & Hospitals 218-999-1710 or Fairview Range Customer Service at 218-362-6624. Assistance with the application can be obtained by calling these numbers as well.
- C. A Patient who has not previously indicated an inability to pay may contact M Health Fairview Customer Service, Fairview Range Customer Service, or Fairview Grand Itasca Customer Service after receiving a bill, or a Financial Counselor may contact the patient. Customer Service Representatives will refer the patient to the appropriate staff to apply for any appropriate public assistance programs and screen the patient for financial aid eligibility. Candidates for financial assistance will be provided with an application form.
  - 1. Completed application forms will be forwarded to the appropriate staff.
  - 2. If an incomplete application is returned to M Health Fairview, a letter will be sent to the responsible party explaining what is required.
  - 3. The patient is responsible for any remaining balance after the financial assistance discount has been applied. If the balance is not paid within the standard internal billing process, the account will be handled through the external collections process. Both are described in Billing and Collections policy, also available at <u>www.mhealthfairview.org</u>. M Health Fairview does not condone or allow its agents to engage in abusive or illegal collection practices.
- IV. Publication of Financial Assistance Availability
  - A. M Health Fairview will make the public aware of its financial assistance policy through various means, such as publishing the financial assistance policy, the <u>financial assistance application</u> form, and a plain language summary of the financial assistance policy on the M Health Fairview web site (<u>www.mhealthfairview.org</u>), through electronic (with patient consent) or printed materials available to patients in public locations in the hospital and by mail or email (with patient consent), through conspicuous public displays in the hospital emergency room and admitting areas, and on patient billing statements. M Health Fairview will inform and notify members of the community served by M Health Fairview about its financial assistance policy through their website and by distributing copies of financial assistance brochures to community members by way of the M Health Fairview Clinics.
- V. Financial Assistance Reclassification
  - A. M Health Fairview may decide not to seek payment for a patient account balance based on an inability to pay established through the usual collection process. Where our decision not to seek payment is based on a patient's financial hardship, these balances will be re-classified by M Health Fairview as financial assistance, with approval of the appropriate System Director of Revenue Cycle or designee.
- VI. Costs in Excess of Government Reimbursement
  - A. Uncompensated costs resulting from Medicare, Medicaid and state/local indigent care programs are included as community benefit because of the significant difference between actual costs and reimbursement.
- VII. Financial Assistance Program

- A. Qualifications for Financial Assistance
  - 1. Only emergency and medically necessary services qualify for Financial Assistance. M Health Fairview reserves the right to determine on a case-by-case basis whether services meet the definition of "medically necessary" for the purpose of eligibility for Financial Assistance.
  - 2. To qualify for Financial Assistance, a patient must meet income and asset guidelines as follows:
    - a. Income Level: The patient's combined annual household income must be at or below 400% of the Federal Poverty Level (FPL).

Family Size	Annual Gross Income (200% FPL = 100% charity	Annual Gross Income (201%-400% FPL)
	Insured or uninsured	Insured or uninsured
		AGB or uninsured discount,
		whichever is higher
48 United States including District of Columbia		
1	\$27,180	\$54,360
2	\$36,620	\$73,240
3	\$46,060	\$92,120
4	\$55,500	\$111,00
5	\$64,940	\$129,880
Alaska Income Limits		
1	\$36,420	\$72,840
2	\$49,280	\$98,560
3	\$62,140	\$124,280
4	\$75,000	\$150,000
5	\$87,860	\$175,720
Hawaii Income Limits		
1	\$33,540	\$67,080
2	\$45,360	\$90,720
3	\$57,180	\$114,360
4	\$69,000	\$138,000
5	\$80,820	\$161,640

#### Income Limits by Family Size

- b. Asset guidelines for financial assistance eligibility at M Health Fairview are as follows: If a family has total assets in bank accounts, stock assets, and retirement totaling more than \$100,000 they are not eligible for Financial Assistance. Exceptions may be made on a case-by-case basis for catastrophic situations, where the outstanding balances exceed the patient's household asset totals.
- c. Details regarding the required documentation to verify income and assets are found above in the "Financial Assistance Eligibility" section.
- 3. Calculation of Income:

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- a. For adults, the term "Total Yearly Income" on the Financial Assistance Application refers to the sum of yearly gross income of the applicant and the applicant's spouse from all sources. If the applicant is a minor, the term "Total Yearly Income" refers to the combined gross income of the applicant's parent(s) and/or legal guardian. The "Total Yearly Income" figure used on the Financial Assistance Application refers to the documented income annualized over 12 months. A minimum of the last one month of income verification will be requested to assist in calculating current annual income. If the last one month of income verification is not available, the patient may provide the most recent amount of the documented total yearly income. Financial Assistance cannot be granted if the patient receives a third-party financial settlement associated with the care rendered by M Health Fairview sufficient to cover the outstanding claims as such funds are expected to be used to satisfy the balance owed to M Health Fairview by the patient. A patient applying for Financial Assistance will report the number of people in the patient's household to determine household size, income, and assets as follows:
  - i. Adults: In calculating the number of people in an adult applicant's household, M Health Fairview will include the applicant, the applicant's spouse, and any legal dependents.
  - ii. Minors: In calculating the number of people in a minor applicant's household, M Health Fairview will include the applicant, the applicant's father/guardian, mother/guardian, and any dependents of the father, mother or minor.
  - iii. Parents living in the home with their adult child will not count toward the household size or income of that child unless legal guardianship/conservatorship can be proven through official legal documentation.
- 4. Undocumented individuals or non-permanent residents living in the United States are eligible for Financial Assistance.
- B. Financial Assistance Timelines:
  - 1. M Health Fairview will accept applications for Financial Assistance for a minimum of 240 days after the date the first post-discharge billing statement is provided to the patient.
  - 2. M Health Fairview will provide written notice of its Financial Assistance determinations within 30 calendar days of receiving a complete Financial Assistance application. This notification will include the level of reduction consistent with the patient's ability to pay. Denials will include the reason for denial and instructions for the process by which the patient may apply for reconsideration. A denial of MN medical assistance and/or financial assistance screening and/or financial assistance application will be effective prospectively for six months; however if the patient indicates a change in financial circumstance they can reapply at any time. A determination of qualification for Financial Assistance signifies retroactive and prospective Financial Assistance applied to eligible accounts.
    - a. Retroactive Financial Assistance: M Health Fairview will apply the approved Financial Assistance discount to any open balance that exists at the time of application approval.
    - b. Prospective Financial Assistance: M Health Fairview will apply the approved Financial Assistance discount to any eligible balances occurring at a maximum of 180 days after application approval.
      - i. Patients seeking Financial Assistance for services rendered after the Prospective

Financial Assistance timeline has ended will need to reapply for Financial Assistance.

- 3. The patient may request reconsideration of the determination of eligibility for M Health Fairview financial assistance by submitting in writing additional information, such as income verification or an explanation of extenuating circumstances, to the designated approver within 30 days of the denial notification. If the previous denial of eligibility for financial assistance is reaffirmed, written notification will be sent to the responsible party. Collection follow-up on accounts will be suspended through the reconsideration process.
- 4. If a patient makes payment on an account prior to Financial Assistance approval and that account is within 240 days from the first post-discharge billing statement date when Financial Assistance is approved, any overpayment amount will first be applied to any open patient responsible balance as appropriate and with proper approval.
  - a. If there is no other open patient responsible balance due, the patient will be refunded the overpayment amount unless the overpayment is less than \$5.00.
- C. Falsification of Information
  - Falsification of income information or a refusal to cooperate with M Health Fairview through the application process will result in denial of the Financial Assistance Application. If, after an applicant is granted Financial Assistance and M Health Fairview learns that a material provision of the Financial Assistance application is untrue, the Financial Assistance application and any Financial Assistance granted may be withdrawn as determined in M Health Fairview's sole discretion.
- D. Cooperation and Use of Insurance
  - Individuals who have the financial ability to purchase health insurance should do so to assure their ongoing access to health services. Persons seeking financial assistance through the Program are expected to cooperate with M Health Fairview's procedures for determining eligibility and to contribute to the cost of services to the extent of their individual ability. Applicants may be required to apply through MNsure for Medicaid, MinnesotaCare, Qualified Health Plan or other acceptable form of healthcare coverage as outlined in the Affordable Care Act (ACA). Out of state Medicaid is not a requirement prior to applying for financial assistance.
    - a. If a patient is potentially eligible for a third-party funding source but is unable to access it due to extenuating circumstances beyond the patient's control, the patient will be required to submit a letter of explanation. The letter will be reviewed by M Health Fairview management.
    - b. A patient will not be eligible for Financial Assistance if a patient has a third-party payer and does not submit the payer information to M Health Fairview within a timely manner resulting in a denial to M Health Fairview.
    - c. If a patient elects not to bill his/her insurance for a particular procedure or date of service, that visit will not be eligible for Financial Assistance.
- E. Financial Assistance Exclusions
  - 1. M Health Fairview Financial Assistance Programs do not cover the following:
    - a. Patients who do not comply with the Financial Assistance application process may be denied Financial Assistance.
    - b. If a patient's account is pending with an insurance company, Financial Assistance will be

denied if the applicant fails to cooperate with claims filing or collecting from potential third-party resources.

- c. Services from non-M Health Fairview providers, other M Health Fairview providers not covered by this policy.
- d. Expenses related to M Health Fairview transportation, personal transportation, or personal living expenses.
- e. Transplant related charges due to the procedure through one-year post transplant are not eligible for a Financial Assistance discount. Any recommendation for an adjustment to these charges must go through the Financial Exception process.
- f. Non-United States citizens including patients on a visa or international students, or United States citizens living outside of the United States are not eligible for Financial Assistance.
- g. M Health Fairview Free Standing Clinics, including M Health Fairview Clinic Maple Grove, do not participate with out of state Medical Assistance, with the exception of Wisconsin. Therefore, patients with free-standing clinic charges who have out-of-state Medicaid coverage are not eligible for Charity Care.
- h. Services considered non-covered by most insurance providers unless it is considered standard of care.
- Because of the retail nature of the business, M Health Fairview Home Medical Equipment and M Health Fairview Orthotics & Prosthetics are not covered under this policy.
- j. M Health Fairview Homecare and M Health Fairview Pharmacy have their own Financial Assistance policies and are not covered under this policy.
- k. M Health Fairview affiliated locations which are separate corporate entities and not subject to this policy: Crosstown Surgery Center, Ridges Surgery Center, Maplewood Surgery Center, Vadnais Heights Surgery Center, South Health Ambulatory Surgery Center.
- I. Professional services provided at non-M Health Fairview entities are not covered under this program.
- F. Other Discount Options
  - 1. Financial Exceptions
    - a. Designated M Health Fairview Management shall evaluate all exceptions to determine the patient's ability to pay. Only exception cases pertaining to patients without the financial resources to pay shall be processed and reported as Financial Assistance. All other cases shall be processed and reported as administrative adjustments and not Financial Assistance or Bad Debt, as defined under state and federal guidelines. An applicant who exceeds FPL guidelines and has total outstanding medical debt which exceeds the gross household income for the past year may be allowed to apply for Financial Assistance through a Financial Exception.
  - 2. Medicare Partners
    - a. M Health Fairview Medicare Partners is a partnership between M Health Fairview and the Seven County Senior Federation Senior Community Services. M Health Fairview has agreed to waive hospital and clinic co-insurances and deductibles for members of this

program. Members of this program understand that they are responsible for any items not covered by Medicare, such as take-home drugs.

- b. Applications for enrollment
  - All applications are sent to and processed by Seven County Senior Federation Senior Community Services or the outlying State offices. Patients may request an application or more information by calling 320-679-4700 or visiting <u>www.seniorcommunity.org</u> for the metro area or calling 1-866-679-4700 for Range.
- c. Eligibility Criteria
  - i. Patient must be enrolled in Medicare parts A and B and not be on a replacement plan.
  - ii. Cannot have a Medicare supplement.
  - iii. Household income and assets guidelines.
- 3. Retro Financial Assistance/ Medically Indigent Charity Care
  - a. If a patient has current MA or MinnesotaCare and all previous dates of service are not covered by MA/MinnesotaCare, any account incurred prior to the MA approval date may be eligible for Financial Assistance. Any Financial Assistance eligible accounts identified will be adjusted 100%.
  - b. Medically Indigent Charity Care adjustments do not apply to third party liability, workers compensation, employer related services, or special guarantor account types.
- 4. Uninsured Discount
  - a. In addition to the programs available under the Financial Assistance Policy, uninsured United States residents will be eligible for the uninsured discount. This discount is based on the Attorney General Collection Standards agreement and is not a Financial Assistance program.
- G. Billing and Collections
  - M Health Fairview has a separate <u>Billing and Collections</u> policy which is available via the website <u>www.mhealthfairview.org</u> or by calling M Health Fairview Customer Service at 612-672-6724 or toll-free at 1-888-702-4073, Grand Itasca Clinics & Hospitals 218-999-1710 or Fairview Range Customer Service at 218-362-6624 or toll-free at 1-877-390-6624. This policy includes more specific information about:
    - a. Billing Process: M Health Fairview will issue billing statements in accordance with established timelines and will provide a minimum of 120 days from the first post-visit billing statement before initiating extraordinary collection actions on an account.
    - b. Resolving Accounts: M Health Fairview will provide a minimum of 240 days to resolve open accounts through various options, such as identifying eligible insurance or medical assistance, payment arrangements, Financial Assistance, or other means.
    - c. Collection Actions: In the event of non-payment, M Health Fairview may refer accounts to collection agencies and/or legal collection firms for follow up. M Health Fairview will provide patient notification at least 30 days before initiating extraordinary collections actions on an account.
- H. Amount Generally Billed (AGB)
  - 1. Following a determination of financial assistance eligibility, a financial assistance eligible individual will not be charged more than the <u>amount generally billed (AGB)</u>. The AGB is

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calculated for each hospital using the look-back method for reimbursement received from all commercial and Medicare accounts for the previous fiscal year. An information sheet stating M Health Fairview's amount generally billed percentage may be obtained free of charge by M Health Fairview Customer Service at 612-672-6724, Grand Itasca Clinics & Hospitals 218-999-1710 or M Health Fairview Range Customer Service at 218-362-6624.

- 2. When the patient applies and qualifies for financial assistance and their household income is between 201%-400% of Federal poverty guidelines, the patient will receive the higher of the two discounts:
  - a. Amount Generally Billed (AGB)
  - b. Uninsured Discount
    - i. M Health Fairview: 57.0%
    - ii. Fairview Range and Grand Itasca Clinics & Hospitals: 41.0%
- 3. M Health Fairview must ensure that the patient is billed no more than the Amount Generally Billed for Hospital and Hospital Based services. This does not include free-standing clinic services. The AGB percentage in the resources section below represents M Health Fairview, Grand Itasca, and Fairview Range. It is calculated for each hospital on an annual basis within 30 days of the end of the fiscal year. The amount of the discount (AGB or Uninsured) will be determined based on the year the patient was approved for Financial Assistance.

#### VIII. Provider List

A. M Health Fairview has a list of all provider groups that provide emergency and medically necessary services to patients at a M Health Fairview Hospital facility. The list identifies which providers are and are not covered by M Health Fairview's Financial Assistance Policy (see <u>https://mhealthfairview.org/providers?page=1)</u>

#### **Resources:**

AGB for Hospital or Hospital-Related Services (SmartWorks #524582) Financial Assistance Application (FOD #2266) Financial Assistance Policy Plain Language Summary Patient Education (FOD #4454)- additional languages available on FOD

#### **References:**

None.

#### Applies to but is not limited to:

Ambulatory hospital-based clinics Grand Itasca Clinic & Hospital M Health Fairview Lakes Medical Center M Health Fairview Northland Medical Center Fairview Range Medical Center

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M Health Fairview Ridges Hospital M Health Fairview Southdale Hospital M Health Fairview St John's Hospital M Health Fairview St Joseph's Campus University of Minnesota Masonic Children's Hospital M Health Fairview University of Minnesota Medical Center M Health Fairview Woodwinds Hospital