

 <b>St. Mary's Healthcare</b>  <b>ST. MARY'S Organizational Policy Manual</b>	<b>Policy # PR 4.9</b>	
	<b><u>Title:</u></b>	<b>Financial Assistance Policy</b>
	<b><u>Replaces Policy:</u></b>	<b>PR 4.7</b>
	<b><u>Policy Originator:</u></b>	Director, Patient Accounts
<b>Chapter Patient Financial</b>	<b><u>Concurrence:</u></b>	VP, Finance/CFO
	<b><u>Effective Date:</u></b>	08/01/2024
	<b><u>Reviewed/ Revised Date:</u></b>	07/15/2024
	<b><u>Approval:</u></b>	St. Mary's Board of Directors
	<b><u>Date:</u></b>	August 2024

## I. Policy Statement:

St. Mary's Healthcare ("Organization") wants to ensure a socially just practice for providing Emergency or other Medically Necessary care at the Organization's facilities. The Organization has designed this policy to address the financial assistance eligibility for patients who are burdened financially and receive care from the Organization.

1. All financial assistance will reflect the Organization's commitment to, and reverence for, individual human dignity and the common good, our special concern for and solidarity with persons living in poverty and other vulnerable persons, and our commitment to distributive justice and stewardship.
2. This policy applies to all Emergency and other Medically Necessary services provided by the Organization, including employed physician services and behavioral health. This policy does not apply to payment arrangements for elective procedures and other care that is not Emergency care or otherwise Medically Necessary.
3. Appended to this policy is a list of providers delivering care within the Organization's facilities and which providers are covered and not covered under this financial assistance policy.

## II. Definitions:

For the purposes of this Policy, the following definitions apply:

- “501(r)” means Section 501(r) of the Internal Revenue Code and the regulations promulgated thereunder.
- “Amount Generally Billed” or “AGB” means, with respect to Emergency or other Medically Necessary care, the amount generally billed to individuals who have insurance covering such care.
- “Emergency Care” means care to treat a medical condition manifesting itself by acute symptoms of sufficient severity (including severe pain) such that the absence of immediate medical attention may result in serious impairment to bodily function, serious dysfunction of any bodily organ or part, or placing the health of the individual in serious jeopardy.
- “Homeless” means an individual or family who lacks fixed, regular, and adequate nighttime residence, meaning (i) has a primary nighttime residence that is a public or private place not meant for human habitation, (ii) Is living in a publicly or privately-operated shelter.
- “Household Income” means wages, salaries, unemployment compensation, workers’ compensation, Social Security, Supplemental Security Income, public assistance, veterans’ payments, survivor benefits, pension or retirement income, rents from property, profits and fees from their own business, interest, dividends, rents, royalties, income from estates, trusts, alimony, child support and other miscellaneous sources. Family Income is determined on a before-tax basis and excludes capital gains or losses. If a person lives with a family, the income of all members may be considered. (Unrelated household members do not count). Non-cash benefits, such as food stamps and housing subsidies, are not considered income.
- “Medically Necessary Care” means as defined by section 1867 of the Social Security Act (42 U.S.C. 1395dd), also known as the Emergency Medical Treatment and Active Labor Act (“EMTALA”), a medical condition manifesting itself by acute symptoms of sufficient severity such that the absence of immediate medical attention could reasonably be expected to result in: (i) placing the health of the individual in serious jeopardy; (ii) serious impairment to bodily functions; or (iii) serious dysfunction of any bodily organ part. EMTALA also defines an Emergency medical condition to include a pregnant woman who is having contractions.
- “Organization” means St. Mary’s Healthcare.
- “Patient” means those persons who receive Emergency or Medically Necessary care at the Organization and the person who is financially responsible for the care rendered.

### III. Policy

#### Financial Assistance Provided

The Organization makes financial assistance available to all underinsured and uninsured individuals who qualify for assistance with their medical bills. No person who is found eligible for financial assistance will be charged more for Emergency or Medically Necessary care than the applicable discounted amount outlined in IRS regulations 26 CFR 1.501(r).

The Organization offers financial assistance in accordance with this Financial Assistance Policy (FAP). This FAP was developed to comply with all federal and state regulations, including IRS regulations 26 CFR 1.501(r) and NYS Public Health Law 2807-k(9-a).

1. Eligibility determination is based on the following:
  - a. Household Income and family size
  - b. Patients' gross monthly income cannot exceed 400% of the Federal Poverty Guidelines (Attachment A).
  - c. Patients must have accrued a medical cost share of more than 10% of their gross monthly income in the previous 12 months.

Attachment A will be regularly revised to reflect updates in the Federal Income Poverty Guidelines as issued by the Secretary of the Department of Health and Human Services without need for further approval of this policy.

2. Homeless Patients are automatically eligible for financial assistance.
3. The Organization may consider the Patient Presumptively Eligible if there is sufficient information identified to qualify the Patient for financial assistance.
4. Covered Services and Service Area: Covered services include all the Organizations locations that provide services deemed Medically Necessary. These services are covered based on the Patient's primary address located on their account. The Organization will accept applications for all zip codes. Approval will be at the discretion of the Organization to approve applications not included in our primary covered service area, as noted below:

12032  
12835  
12117  
12134  
13470  
12010  
12025  
12068

12069  
12070  
13339  
12078  
12086  
12095  
13452

### **Excluded Services**

Patient Financial Assistance will be utilized for all Medically Necessary services rendered by the Organization, except for elective or cosmetic procedures. Charges from private Physicians/Providers (not employed) who provide services at the Organization are not covered under the program. FAP will not be applied to Patient balances due to coordination of benefits issues, or the Patient's inability to provide the insurance with documentation they request or to provide the facility with the information needed to bill an insurance/carrier. Patients who opt out of available insurance coverage will not be eligible for Financial Assistance, absent cultural prohibition. When evaluating Patient eligibility for Financial Assistance the Organization may consider a Patient's eligibility for other available sources of payment and a Patient's cooperation with securing such additional sources of payment (e.g., Medicaid and/or any available co-pay or deductible assistance programs such as Botox One Savings and Vyepti Co-pay Assistance). Services more than one hundred and eighty (180) days retrospectively from date of application receipt are excluded.

### **Calculations**

Financial assistance is provided in the form of a cost share percentage for underinsured Patients and a percent of the current Medicaid rate for uninsured Patients. The Organization uses the current methodology represented in IRS Section 501(r) to determine financial discounts for those who have applied for financial assistance. The percentage discount provided is based on Household income and family size utilizing cost share methodology of up to 400% of the Federal Income Poverty Guidelines in effect at the time of the eligibility decision and annually updated. To become eligible for financial assistance the Patient must have accrued medical costs sharing more than 10% of their gross monthly income in the last 12-months (e.g., medical, and dental statements with cost share amount).

#### **Example: Underinsured Patient**

Patient Balance	50.00
Medical Cost Share (previous 12 months)	200.00
Gross monthly Income (Family of 1)	2,000.00
Accrued Medical Cost Share Compared to Gross Monthly Income	10%
Patient Responsibility	10% of Current Patient Balance

### Example: Uninsured Patient

Patient Balance	50.00
Medical Cost Share (previous 12 months)	200.00
Gross Monthly Income (Family of 1)	2,000.00
Accrued Medical Cost Share Compared to Gross Monthly Income	10%
Patient Responsibility	10% of Current NYS Medicaid Rate

## IV. Procedure

Patients have a maximum of one hundred and eighty (180) days to apply for financial assistance from the date noted on the first “post-discharge” billing statement. As per Internal Revenue Service guidelines, a billing statement for care is considered “post-discharge” if it is provided to an individual after the patient received care, whether inpatient or outpatient, and the individual has left the hospital. Approved applications are valid for one hundred eighty (180) days from the date of approval and one hundred eighty (180) days retrospectively. Accounts that have been placed in bad debt status prior to the financial assistance application submittal date will not be considered for financial assistance.

Those seeking financial assistance will be asked to provide the following:

- Completed application.
  - Accrued medical bills (e.g., dental, medical billing statements with cost-share amounts)
  - Copies of one month’s current pay stubs or proof of alternate income source
  - Copies of last two bank statements
  - Most recent federal tax return
  - Completed application for Medicaid, along with copy of denial letter if Patient’s income is more than Medicaid income levels.
1. When appropriate, patients will be asked to apply for Medicaid or other publicly sponsored insurance programs. Resources will be available to assist patients in that process. The patient may be required to meet a spend down amount in order to have services covered by Medicaid. Any payments the patient is required to make to the Organization may include, but are not limited to, the spend-down amount and co-pay and/or deductible amounts, which are eligible for consideration in our FAP. Failure to apply or comply with the Medicaid application requirements will result in denial of financial assistance.
  2. Incomplete applications will be held, and the applicant will be notified of the missing required information which must be supplied within 30 days from the date of the

written notification. If the patient does not meet this requirement, the application will be denied, and the Organization will resume billing and collection activities. The patient retains the option to provide the required information after the 30-day deadline.

3. A determination of whether a patient is qualified will be made within 30 days of receipt of a completed application. If a patient is qualified for Financial Assistance, he/she will receive written notification of the Financial Assistance discount amount as well as a Financial Assistance Approval letter indicating the coverage period, discount amount, and all eligible Household dependents.
4. Approved patients will be permitted to establish a reasonable monthly payment plan on any balance remaining after the Financial Assistance Discount. In no event will the monthly installments exceed 5% of the eligible Patient's gross monthly income or contain an acceleration clause or interest penalty. Financial counseling is available to arrange affordable monthly payment plans that can extend up to 2 years.
5. Financial assistance eligibility will be effective on the date of the covered service which the patient/guarantor applied for. The coverage period will extend for one hundred eighty days from the date the approval was granted. The Organization may ask Patients to reapply for financial assistance when there is a change in financial status.

### **Uninsured Patients/Anabaptist Christian Group**

Patients are who are not eligible for Financial Assistance will not be charged individually more than AGB, or the amounts generally billed for the same services by Organization's highest volume commercial payor, for emergency and other medically necessary care and not more than gross charges for all other medical care. The Organization will calculate an AGB percentage using the "look-back" method and including Medicare fee-for-service and all private health insurers that pay claims to the Organization, all in accordance with 501(r). A free copy of the AGB calculation and percentage may be obtained from the Organization, Finance Department, 518-841-7434. Uninsured Patients will be provided with the AGB discount based on the time of services rendered along with a prompt pay discount of 10% if the total account balance paid in full within 30 days of the first statement mailed.

Members of the Amish community will also be provided the AGB discount at the time services are rendered and will be eligible for a prompt pay discount of 10% if the full portion of the balance on the account is paid within 30 days of the first statement mailed.

Additional discounts for those of the Anabaptist Christian Group who cannot meet the financial assistance requirements for a successful application will be determined by the Chief Financial Officer.

# V. Appendix

## Exhibit A

		Patient Responsibility			
		100% Discount	10%	20%	20%
Family Size		Annual Gross Income			
1		\$15,060	\$30,120	\$45,180	\$60,240
2		\$20,440	\$40,880	\$61,320	\$81,760
3		\$25,820	\$51,640	\$77,460	\$103,280
4		\$31,200	\$62,400	\$93,600	\$124,800
5		\$36,580	\$73,160	\$109,740	\$146,320
6		\$41,960	\$83,920	\$125,880	\$167,840
7		\$47,340	\$94,680	\$142,020	\$189,360
8		\$52,750	\$105,500	\$158,250	\$211,000
9		\$58,100	\$116,200	\$174,300	\$232,400
10		\$63,480	\$126,960	\$190,440	\$253,920
Each Additional		\$5,380	\$5,380	\$5,380	\$5,380
		100%	200%	300%	400%
		Poverty Level			
<b>Uninsured</b>	Percent of Current Medicaid Rate				
<b>Underinsured</b>	Cost Share Percentage				

Patients are eligible for NYS Medicaid with Household Income up to 138% of the Federal Poverty Level (FPL). Pregnant women and infants are eligible up to 218% of the FPL.

Household Income guidelines are derived from the Federal Poverty Income Levels published in the Federal Register.

Applicants that meet these criteria will have their application reviewed by the Organization for approval and applicable cost share or current Medicaid rate percent responsibility.



**Exhibit B**

**ST. MARY’S HEALTHCARE (“Organization”)**

**LIST OF PROVIDERS COVERED BY THE FINANCIAL ASSISTANCE POLICY**

April 1, 2024

Per Reg. Sec. 1.504(r)-4(b)(1)(iii)(F) and Notice 2015-46, this list specifies which providers of emergency and medically necessary care delivered in the hospital facility are covered by the Financial Assistance Policy (FAP).

<b><u>Providers Covered by FAP</u></b>		
Arminio-Swartz, Stacy CNM	Gilston, Mary LCSW-R	Reddy, Sarada MD
Ashley, Christopher C. MD	Godoy, Heidi MD	Rooney, Danielle MD
Bellen, Byren NP	Hardies, Michael MD	Russell, Maureen FNP
Beyer, Sarah PA	Hinch, Phrances NPP	Salmon, Randie CFNP
Burnsby, Crystal, NP	Hollis, Jesse DO	Santiago, Nichole FNP
Cappadocia, Shane CRNA	Hotaling, Maddie CRNA	Sarwer, Wafia MD
Carlson, Joshua MD	Howland, Ashley PMHNP	Savery, Patrick DO
Carondelet Regional Medical, PC	Izzano, James MD	Savoie, Jeri Lynne FNP
Catalano, Kathleen DO	Iris Telehealth Medical Group, PA (Behavioral Health telemedicine and diagnostic services only)	Saxena, Parul MD
Chan Galapon, Monina	Jajoor, Nagaraj MD	Schriner, Lori FNP
Charland, James M. MD	James, Philip MD	Sculco, Deborah MD
Cirilla, Dennis DO	Jean, Geraldine DO	Selby, Linda NP
Comber, Paul MD, PhD	Johnson, Abigail PA	Sheridan, Michael DO
Conjalka, Michael MD	Kapusniak, Monika CRNA	Signor, Gary PA
Cope, Kevin MD	Kimball, Carrie PMHNP	Sinchak, Joseph MD
Cummings, Walter DO	Klausner, Theresa NP	Sohail, Muhammad Adnan MD
DeStefano, Nicholas CRNA	Lawrence, Anthony Gilbert MD	Sohns, Chelsea FNP
Detweiler, Samuel Dean MD	Lee, Sean MD	Sparks, Cheryl ANP
Dionne, Abigail PA-C	Lee, Sharon MD	Sumigray, Megan MD
Droege, Robert MD	Loeber, Russell MD	Surh, Myung MD
Dutcher, Jacob CRNA	Majeed, Mahvash MD	Sweet, Meagan FNP
Dutcher, Joseph CRNA	Marsh, Ronald MD	Syta, Cheryl NP
Edeh, Chinonye PMHNP	Maslack, Bruce MD	Tournas, Anthansios MD
Elma, Elmer PMHNP	Mayer, William MD	Upstate NY Emergency Physicians, PLLC (Services rendered at Urgent Care locations only)
Elnagar, Khalid, MD	Mehling, Jennifer FNP	Venditti, Thomas RPA-C
Fedullo, John L. DO	Mian, Badar MD	Venerosa, Joan PA
Fiorini, Jennifer NP	Mumtaz, Choudhry MD	Wachtmeister, Erika DO
Forlano, William MD	O’Neill, Rita FNP	Wajeeh Sana Physicians, PC (Services rendered at Urgent Care locations only)
Fraser, Albert MD	Opese, Alpha DPM	Weis, George DO
Gagliardi, Diane ANP	Patillo, Melissa ANP	Yoon, Hannah MD
Galea, Patricia ANP	Pride-Boone, Janice MD	
Garcia, Alexander MD		
Ghazi-Moghadam, Mohammad Reza, MD		

**Providers Not Covered by FAP**

Amsterdam Pathology Associates, P.C.
Cardiology Associates of Schenectady, P.C./St. Peter's Health Partners
Robert Dicaprio, DPM
Emily Etzkorn, M.D., P.C.
John R. Kearney, MD
Soo Gil Lee, MD
Millennium Medical Imaging, P.C.
Mohawk Valley Orthopedics, P.C.
Nathan Littauer Hospital
New York Oncology Hematology, P.C.
Northeast Foot Care, PLLC
Schenectady Pulmonary & Critical Care Associates
Karen Tan, MD
Upstate NY Emergency Physicians, PLLC (Services rendered at Emergency Room locations only)
Upstate NY Hospital Physicians, PLLC
Wajeeh Sana Physicians, PC (All Services rendered other than at Urgent Care locations)
Adam Weiss, DDS