

TITLE: **Holland Hospital Financial Assistance Program**

POLICY: Holland Hospital is dedicated to providing emergent and medically necessary health care services regardless of age, gender, cultural background, physical mobility or ability to pay. All billing and collection policies and practices will reflect the mission and values of Holland Hospital. Holland Hospital provides care for medical conditions to individuals, without discrimination and regardless of Financial Assistance eligibility. Holland Hospital provides financial assistance to residents within its Primary and Extended Service Areas.

PURPOSE: To define and establish guidelines by which Holland Hospital will provide financial assistance to those residents within its Primary and Extended Service Areas who are unable to pay for medically necessary health services at our non-profit facilities.

RESPONSIBILITY /SCOPE: All Hospital services and locations.

POLICY AVAILABILITY:

CONTENT:

Information related to the Financial Assistance policy is available:

- a. Online at the Holland Hospital Website: hollandhospital.org
- b. By calling Customer Service at (616) 394-3122
- c. On the billing statement
- d. From any Patient Access Staff by verbal communication or
 - Financial information business card
 - Financial assistance flier/poster

Holland Hospital will make all reasonable efforts to determine whether the patient is eligible for financial assistance and may take the following measures to widely publicize the policy to its patients and the community, including but not limited to:

- a. Posting the policy on the Hospital website.
- b. Referencing the Financial Assistance policy on billing statements.
- c. Posting the opportunity to request Financial Assistance in the Emergency Department waiting room and admission offices, along with how to contact and request a copy of the policy.
- d. Referencing the policy and the opportunity for Financial Assistance upon registration.
- e. Providing the policy upon request.
- f. Referencing the policy and opportunity to request Financial Assistance in brochures and other communications.

METHODS FOR APPLYING FOR ASSISTANCE:

Patients can apply by requesting an application in person or over the phone. The patient may also access www.hollandhospital.org to download a copy of the application. The completed application, including all supporting documentation, may be emailed to: billing@hollandhospital.org, faxed to 616-394-3747, or dropped off in person at the Cashier's Office at the main hospital campus, located at 602 Michigan Avenue, Holland, MI 49423. The application and all supporting documentation may also be mailed to Patient Financial Services, 602 Michigan Ave., Holland, MI 49423. Patients have 240 days from the date listed on their first statement to apply for financial assistance.

LAST REVISION MADE ON: 10/17/22
LAST COMPLETE REVIEW: 10/17/22
PAGE: 2 of 7
ATTACHMENT(S): A, B

QUALIFICATIONS:

Holland Hospital or a designated patient financial advocate will provide the initial screening to determine if a patient is unable to pay for services rendered. Consistent with EMTALA, all applicable Holland Hospital facilities will provide an appropriate medical screening examination and appropriate stabilizing treatment to any individual requesting treatment for a potential emergency medical condition regardless of that individual's ability to pay. If, following an appropriate medical screening examination, Holland Hospital personnel determine that the individual has an emergency medical condition, Holland Hospital will provide services, within the capability of the facility, necessary to stabilize the individual's emergency medical condition, or will effect an appropriate transfer, as defined by EMTALA. Holland Hospital's policy is to provide Emergency and Medically Necessary Care on a non-profit basis to patients without regard to race, creed, or ability to pay. In addition, Holland Hospital disallows actions that discourage individuals from seeking medical care.

Patients who are financially unable to comply with Holland Hospital's payment policy will be screened to determine whether or not they meet basic financial assistance criteria or are determined to be presumptively eligible. Holland Hospital's patient financial advocate will complete a financial assessment when it is determined that a patient is uninsured or underinsured and they do not meet the qualifications for any of the available Medicaid programs, including Healthy Michigan. Accounts that do not qualify for either program may be processed using an automated tool of choice by Holland Hospital to verify income, household size, ability to pay, and/or Federal Poverty Level (FPL). In all other cases, the patient will be asked to complete a financial assistance application and provide the required information.

The applicant's assets may not exceed the Medicaid accepted level, with the exception of the following:

Minimum protected asset levels will be established as follows:

- a. \$2,000 for single individual
- b. \$3,000 for a couple
- c. \$200.00 for each additional dependent (Dependent = under the age of 18)

Financial Assistance Applications are available to any patients who requests one. The following information is required to be submitted with the application:

- a. Proof of residency in Holland Hospital's primary or extended service areas (copy of driver's license, Michigan identification card, or copy of utility bill showing address and name of patient). Exceptions may be made to patients seeking Emergent Medically Necessary care in the setting of the Emergency Department or Urgent Care.
- b. Income Sources
- c. Assets, including:
 - a. Bank statements for the prior two months.
 - b. Money Market accounts
 - c. Health Savings and Flexible Spending accounts
 - d. Retirement accounts
 - e. Stocks/Investment accounts
 - f. Other
- d. Most recent tax returns for applicants who are self-employed or have rental/farm income
- e. Pay stubs for the prior 30 days
- f. If unemployed, a letter of support from the person who is assisting the patient with living expenses.
- g. Documentation of additional assets that are considered above Medicaid guidelines, such as

LAST REVISION MADE ON: 10/17/22
LAST COMPLETE REVIEW: 10/17/22
PAGE: 3 of 7
ATTACHMENT(S): A, B

boats, second vehicles, second homes, motor homes, recreational vehicles, etc.

MEDICAL NECESSITY:

Services eligible for financial assistance will be those considered by Medicare to be medically necessary, which is defined as "healthcare services or supplies needed to diagnosis or treat illness, injury, condition, disease, or its symptoms" and that meet accepted standards of medicine. Services that are cosmetic or elective in nature will not be considered for financial assistance or any self-pay or uninsured discount. Any services provided as a result of illegal activity will not be considered for financial assistance.

PARTICIPATION:

The patient must apply for Medicaid or a Qualified Healthcare Program or provide proof of denial or exemption. A patient who qualifies for Medicare must also enroll in Part B benefits. If Medicare Part B covers the service rendered and the patient does not have coverage, financial assistance will not be considered. If any information is not provided during the application process or the patient is non-compliant, the application process will be discontinued, and any patient balances will remain self-pay.

ELIGIBILITY PERIOD:

The financial assistance eligibility period is six (6) months from the date of the original determination. If the patient's income or assets change within that six-month period, Holland Hospital reserves the right to request a new application and verification materials. The patient is responsible for notifying customer service when there is a new self-pay balance due.

APPEALS:

Denials may be appealed by the applicant in writing within 14 days of the date on the denial letter. First-level appeal determination is made by the Patient Financial Services Customer Service Manager. Second-level appeal determination is made by the Director of Billing and Collections, and this second-level appeal decision is final.

DETERMINATION:

Determination of financial assistance status will be made within 14 business days following the receipt of all of the required information. However, more complex situations may take up to four weeks. All patients will be notified in writing once a determination of the level of financial assistance is made.

Patients who are determined to be presumptively eligible will be processed for financial assistance without the need for completion of the Financial Assistance Application or other additional information from the patient. Holland Hospital need not notify patients determined to qualify for financial assistance based on presumptive eligibility.

Patients who are uninsured and who do not qualify for financial assistance may contact Holland Hospital's customer service at (616) 394-3122 to discuss payment options, including the availability of payment plans.

CATASTROPHIC:

Holland Hospital reserves the right to review catastrophic cases on an individual basis by reviewing medical bills and income for the past three months.

LAST REVISION MADE ON: 10/17/22
LAST COMPLETE REVIEW: 10/17/22
PAGE: 4 of 7
ATTACHMENT(S): A, B

PRESUMPTIVE ELIGIBILITY:

Holland Hospital recognizes that not all patients and guarantors are able to complete the Financial Assistance Application or provide the required documentation. Patient Financial Advocates are available at the hospital to assist any individual seeking application assistance. For patients and guarantors who are unable to provide the required documentation, Holland Hospital may grant Presumptive Financial Assistance based on information obtained from other sources. Presumptive eligibility may be determined based on individual life circumstances that may include:

- Homelessness.
- Mental incapacitation in the absence of a Durable Power of Attorney or Legal Guardian who may act on the patient's behalf.
- Enrollment in one or more governmental programs for low-income individuals having eligibility criteria at or below 200% of the Federal Poverty Guidelines; and/or
- Deceased patient in the absence of a known estate.

Patients who meet any of the foregoing criteria for presumptive eligibility will be deemed to be eligible for 100% discount and will not be asked or required to submit a Financial Assistance Application.

CONFIDENTIALITY:

Holland Hospital understands that the need for financial assistance may be a sensitive issue for patients. Confidentiality of information collected will be maintained for all who seek financial assistance according to this Policy. No information obtained in the patient's financial assistance application process may be released except where authorized by the patient or otherwise required by law.

CALCULATION:

Holland Hospital will use a sliding scale up to 300% of the current Federal Poverty Level Guidelines as the eligibility criteria for financial assistance. This scale will be updated annually.

- a. Total income will be based on the gross total income to match the criteria on the Federal Poverty Guideline, except for the self-employed, whose Schedule C Net Income will be reviewed.
- b. The basis of the amounts charged under this policy will be determined as follows:
 - Holland Hospital will use the Look-Back Method to determine the Amounts Generally Billed (See Appendix B).
 - For hospital claims, a 40% uninsured discount will be applied to gross charges for all uninsured patients regardless of financial assistance eligibility.
 - For professional claims, a 20% uninsured discount will be applied to gross charges for all uninsured patients regardless of financial assistance eligibility.
 - Patients will not be charged more than the Amounts Generally Billed (AGB) for emergency or other medically necessary care provided to individuals with insurance receiving similar care.
 - The financial assistance base will be the lesser of 1) Amounts Generally Billed (AGB) or 2) the amount due after payments and adjustments from other sources, as applicable.
 - Based on the patient's level of qualification, he or she may be eligible for a further reduction according to the sliding scale below.
 - The remainder (if any) will be the patient responsibility under this policy.



POLICY 29.2.3.10

LAST REVISION MADE ON: 10/17/22
LAST COMPLETE REVIEW: 10/17/22
PAGE: 5 of 7
ATTACHMENT(S): A, B

≤225% of Federal Poverty Guidelines	226-250% of Federal Poverty Guidelines	251-275% of Federal Poverty Guidelines	276-300% of Federal Poverty Guidelines
AGB Reduction	AGB Reduction	AGB Reduction	AGB Reduction
Eligible for 100% Reduction based on FPL	75% Additional Reduction based on FPL	50% Additional Reduction based on FPL	25% Additional Reduction based on FPL

PARTICIPATING PROVIDERS:

See Appendix A for a list of participating provider groups.

ACTIONS THAT MAY BE TAKEN IN THE EVENT OF NON-PAYMENT:

The actions taken in the event of non-payment are described in the Billings and Collections Policy. This policy is available free of charge:

- a. On the Holland Hospital website: www.hollandhospital.org
- b. By calling Customer Service at 616-394-3122
- c. By request in person at the Cashier’s Office on the main hospital campus:
602 Michigan Ave.
Holland, MI 49423

ACCOUNTS IN COLLECTIONS:

Accounts that have been placed with a collection agency will be given the same consideration for financial assistance as current accounts and will be adjusted accordingly.

Holland Hospital reserves the right to alter, amend, modify or eliminate this policy/procedure at any time without prior notice.

REFERENCE 29.2.3.12 Spanish Version

AUTHORED BY: Director, Billing and Collections

APPROVED BY: CFO
Board of Directors

APPENDIX A

Holland Hospital
Holland Hospital Hospitalists
Holland Hospital Urgent Care
Holland Hospital Medical Group
Bone and Joint Center
Western Michigan Urological Associates
Holland Hospital Behavioral Health

APPENDIX B

**CALCULATION OF AMOUNT GENERALLY OWED BY INDIVIDUALS
ELIGIBLE FOR FINANCIAL ASSISTANCE**

Holland hospital limits the amount owed by individuals eligible under this Financial Assistance Policy who received services except for cosmetic and elective procedures to an Amount Generally Billed (AGB) to patients covered by Medicare and Private Insurers. In addition, Holland Hospital also limits the eligible patient's financial responsibility to less than total charges. Holland Hospital shall periodically, at least once a year, update the AGB calculation and re-evaluate the method used. The AGB shall be based on all services provided to Medicare and Private Insured patients fully adjudicated as of the end of a recent 12-month look-back period ending no more than 120 days prior to the effective date of the policy or every April 1st thereafter. The calculation of the current AGB is as follows:

$$\frac{\text{Total Medicare and Private Insured Allowed Reimbursement}}{\text{Total Medicare and Private Insured Gross Charges}} = \text{AGB Percentage}$$

(Current AGB is 34.7% effective October 1, 2022)

The eligible individual's financial responsibility is calculated as follows and is applied to the patient liability only (Excluding any portion assumed or paid by insurance or other entities on behalf of the patient):

$$\text{Total Gross Charges for the Services Rendered} \times \text{AGB Percentage} = \text{Patient Financial Responsibility}$$