

MOAB REGIONAL HOSPITAL

DATE OF ORIGIN 02-14-11

DEPARTMENT: ALL

APPROVED BY \_\_\_\_\_

SUBJECT: Financial Aid

REVIEWED BY \_\_\_\_\_

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REVISED: 11/22/2021

POLICY: Charity Care Policy

**POLICY STATEMENT:**

In order to serve the health care needs of our community, **Moab Regional Hospital and Providers Clinic ("The Hospital")**, as articulated in Exhibit A, will provide "Charity Care" to patients ("Responsible Party" or "Indigent Person(s)") without financial means to pay for "Appropriate Hospital-based Medical Services" (terms defined below).

Specific to this policy, "Charity Care" means appropriate hospital-based medical services provided to patients. Charity Care will be provided to all persons without regard to race, religion, color, sex, age, disability, sexual orientation, gender identity, or national origin who are classified as Indigent Persons according to The Hospital's eligibility criteria.

Specific to this Policy, "Indigent Persons" means those patients who have exhausted any third party sources, including Medicare and Medicaid, and whose income is equal to or below 400% of the federal poverty standards, adjusted for household size (determined based on IRS definition, including the tax filer, the tax filer's spouse (if married filing jointly), and any dependents) and is otherwise not sufficiently able to pay for the care or to pay deductibles or coinsurance amounts required by a third-party payor. As used in this Policy, "Responsible Party" means the individual who is responsible for the payment of any Hospital charges, which are not covered by a third-party payor.

Specific to this Policy, "appropriate hospital-based medical services" means hospital services which are reasonably calculated to diagnose, correct, cure, alleviate, or prevent the worsening of conditions that endanger life, or cause suffering or pain, or result in illness or infirmity, or threaten to cause or aggravate a handicap, or cause physical deformity or malfunction, and there is no other equally effective more conservative or substantially less costly of treatment available or suitable for the person requesting the service and may include mere observation or, where appropriate, no treatment at all.

**PURPOSE:**

To properly identify Indigent Persons, those who do not qualify for state and/or government assistance, and to provide assistance with medical expenses consistent with the guidelines for Charity Care.

## ELIGIBILITY FOR CHARITY CARE:

Eligibility determinations regarding Charity Care and decisions regarding the collection of amounts owed to The Hospital by the Responsible Party shall be made in accordance with this Policy and the Procedures contained in this Policy. The Hospital shall not impose unreasonably burdensome application procedures upon the Responsible Party in order to determine eligibility for Charity Care and will take into account any physical, mental, intellectual, or sensory deficiencies and/or language barriers that may hinder the Responsible Party's ability to complete their application. The Hospital will make every reasonable effort to determine the existence or nonexistence of any available third-party coverage that might cover, in full or in part, the charges for services provided to each patient. The Hospital may deny Charity Care to any person who is uncooperative with The Hospital in the Charity Care eligibility determination process including, without limitation, a Responsible Party's failure to apply for applicable third-party coverage that may be available. Responsible Parties will be considered for Charity Care on the following basis:

### 1) FINANCIALLY INDIGENT:

- A. To be eligible for charity care as a financially indigent patient, the patient's total household income shall be at or below 400% of the current Federal Poverty Income Guidelines. The Hospital will use the Federal Poverty Income Guidelines issued by the U.S. Department of Health and Human Services to determine an individual's eligibility for charity care as a financially indigent patient. The Sliding Fee Schedule shall be updated annually in accordance with the Federal Poverty Guidelines published in the Federal Register.
- B. All Responsible Parties with household income equal to or below the federal poverty standard that are also not covered by private or public third-party coverage shall be determined to be Indigent Persons qualifying for Charity Care with a cost reduction extended to third-party payers.
- C. Reasonable Parties with household income between one hundred and three hundred percent of the Federal Poverty standard, adjusted for household size, shall be determined to be Indigent Persons qualifying for discounts from charges related to appropriate hospital-based medical services in accordance with the Sliding Fee Schedule and such additional amounts as the Hospital shall determine in its sole discretion, depending on individual financial circumstances and including asset limits.
- D. The Hospital shall also take into account any other outstanding medical debt and shall deduct the amount of payments from the Responsible Party's income.
- E. The Hospital may classify Responsible Parties, whose income exceeds three hundred percent of the federal poverty standard, adjusted for household size, as an Indigent Person eligible for a discount, as described in the following section.

## 2) **MEDICALLY INDIGENT:**

- A. The Hospital, in its sole discretion, may classify any individual Responsible Party whose income exceeds 400% of the federal poverty standard, as adjusted for household size, as “Medically Indigent” and eligible for Charity Care, as described in this section.
- B. In addition to income, The Hospital will also take into account any other outstanding medical debt and deduct the amount of payments for other outstanding medical debt from the Responsible Party’s income. The Responsible Party’s income level will be reduced by their debt owed.
- C. A Medically Indigent patient is a person whose medical bills, after third-party payments, exceed a specified percentage of the person’s annual gross income as defined herein and who is unable to pay the remaining bill.
- D. If a determination is made that a patient has the ability to pay the remainder of the bill, such a determination does not prevent a reassessment of the patient’s ability to pay at a later date should there be a change in the patient’s financial status.
- E. Responsible Parties receiving discounts under this Charity Care Policy shall remit the balance of the discounted charges in accordance with The Hospital’s ordinary billing and collection practices of 120 days from the 1<sup>st</sup> billing statement.

## **PROCESS**

### 1) **IDENTIFICATION OF CHARITY CASES:**

- A. Patients and Responsible Parties may qualify for Charity Care at any time, once their paperwork is completed and processed. In the event of the death of the guarantor prior to filing for assistance or paperwork completion, a financial assessment will take place with all available financial information. This will include all estate information published or non-published. Where dependent children are present within the household there will be a state Medicaid assessment where past and present coverage will become the determining factor regarding eligibility.
- B. The Hospital shall make reasonable efforts to determine whether an individual is eligible before engaging in extraordinary collection efforts against the individual. The hospital shall accept a completed application even after having made reasonable efforts to determine whether an individual is eligible. The Hospital shall also continue to communicate with the Responsible Party regarding the Charity Care program for a period of 180 days from the date of first billing. The Hospital will suspend all extraordinary collection efforts for a period of 180 days from the date the applicant receives their financial aid application.
- C. The Hospital may request a down payment at the time of service and/or monthly payments, as determined by the Financial Navigators during the application screening process, if it is deemed by the Financial Navigator (based on information received by the patient) that the recipient would not qualify for full financial assistance.

- D. All self-pay accounts will be screened for potential Medicaid eligibility as well as coverage by other sources, including other governmental programs. During this screening process, a financial assistance form, (“Exhibit C”) will be completed if it is determined that the patient does not appear to qualify for coverage under Medicaid or other governmental program.
- E. The Hospital will rely on information provided by the Responsible Party to make an initial determination of Charity Care eligibility. Charity Care forms and instructions shall be furnished to patients when Charity Care is requested, when need is indicated, or when financial screening indicates potential need.
- F. Any of the following documents will support a final determination of Charity Care eligibility: W-2 withholding statement for the most recently-filed calendar year; two (2) recent pay stubs; an income tax return from the most recently-filed calendar year; notices approving or denying eligibility for Medicaid and/or state funded medical assistance; notices approving or denying unemployment compensation; or a written statement from employers or welfare agencies. The Hospital will request further financial information should it consider extending Charity Care to a Responsible Party in excess of the amount indicated by the sliding schedule (“Exhibit B) including but not limited to copies of current monthly expenses/bills, proof of any other income, copies of all bank statements for prior 3 months, and copies of all other medical bills.
- G. Information requested shall not be so burdensome as to discourage applications for Charity Care and duplicate forms of verification shall not be demanded from Responsible Parties. In the event that The Hospital is unable to complete the charity care application it may employ and utilize alternative charity documentation. This alternative charity documentation process is outlined in Exhibit D.
- H. Once an application is received, the financial class for the patient will be changed to the appropriate financial class until the application is approved and any adjustments are posted to the patient’s account.
- I. An application for Charity Care may be reopened and reconsidered at any time once the required information is received.

2) **DENIAL OF CHARITY CARE:**

In the event that The Hospital denies an application for Charity Care, The Hospital shall notify the Responsible Party in writing of the denial and the basis for the denial. All Responsible Parties denied Charity Care shall be provided with, and notified of, an appeals procedure that enables them to correct any deficiencies in documentation or request review of the denial and by The Hospital’s Chief Financial Officer (CFO) or equivalent. The Responsible Party shall be notified that they have thirty (30) calendar days within which to request an appeal of the final determination of Charity Care eligibility. Within that thirty (30) day period, The Hospital may not refer the account to an external collection agency during the first fourteen (14) days. After the fourteen (14) day period, if no appeal has been filed by the patient, The Hospital may initiate collection activities. If The Hospital initiates collection activities and thereafter discovers that an appeal has been filed, it will cease collection efforts until the appeal is finalized.

In the event The Hospital’s final decision on appeal upholds the previous denial of Charity Care eligibility, the Responsible Party will be provided with copies of the documentation upon

which the decision was based. The Hospital will make every reasonable effort to reach Charity Care eligibility determinations in a timely manner, and shall make such determinations at any time upon learning of facts or receiving financial documentation identified above indicating that the Responsible Party's income is equal to or below 400% of the federal poverty standard, as adjusted for household size.

3) **BASIS FOR CALCULATING AMOUNTS CHARGED TO PATIENTS**

Moab Regional Hospital will not charge patients eligible for Financial Assistance under this policy for emergency or other medically necessary care more than the Amounts Generally Billed (AGB) to individuals who have insurance. Individuals may request the AGB percentage in effect at any particular time by contacting a Financial Navigator or the Billing office at the phone number on exhibit C. Moab Regional Hospital will use the look back method to calculate the AGB percentage at least annually by dividing the sum of all claims that have been paid in full by Medicare and all private health insurers together as the primary payer of those claims during the prior twelve (12)-month period by the sum of the associated gross charges for those claims.

4) **FAILURE TO PROVIDE APPROPRIATE INFORMATION**

Failure on the part of the Responsible Party to cooperate with The Hospital in the Charity Care eligibility process shall be grounds for denial of Charity Care.

5) **EXCEPTIONS TO CHARITY CARE POLICY**

The CFO may approve a case for Charity Care at their sole discretion based on their belief the patient may qualify for Charity Care. In such cases, the amount or percentage of Charity Care will be left to the CFO's discretion. Waiver of the documentation requirements should be noted in the comments sections on the patient's account, as well as the percent or dollar amount approved for Charity Care, printed out and attached to the Responsible Party's application.

6) **TIME FRAME FOR ELIGIBILITY DETERMINATION**

The Hospital must notify Responsible Parties applying for Charity Care in writing of the final eligibility determination within 30 days of receiving the **completed** application, including one or more of the financial documents identified on the application. Eligibility determination must also include the amount for which the Responsible Party will be held financially accountable.

7) **DOCUMENTATION OF ELIGIBILITY DETERMINATION AND APPROVAL OF WRITE-OFF**

Once the eligibility determination has been made, the results will be documented in the comments section on the patient's account and the completed and approved application will be filed with the adjustment sheet attached and shall be maintained for audit purposes. The CEO, CFO, or Business Office Manager (BOM) will note their review and approval of the write-off by signing the appropriate accounts receivable adjustment sheet. These requirements will be made consistent with Hospital financial policy for approving adjustments.

## 8) ACTIONS IN THE EVENT OF NON-PAYMENT

Moab Regional Hospital will make certain efforts to provide uninsured/underinsured patients with information about our financial assistance policy, including a summary with each billing statement. Our collection agencies take certain actions to collect payment, however, no extraordinary collection actions will be pursued against any patient within 150 days of issuing the initial bill or without first making reasonable efforts to determine whether that patient is eligible for financial assistance. Reasonable efforts shall include, but not be limited to, validating that the patient owes the unpaid bills and that all sources of third-party payments have been identified and billed. Reasonable efforts also include a prohibition on collection actions pursued against an uninsured/underinsured patient until the patient has been made aware of the MRH website's financial assistance policy and has had the opportunity to apply for it or has availed themselves of a reasonable payment plan. We will refrain from extraordinary collection actions against a patient if she/he provides documentation that she/he has applied for health care coverage under Medicaid, or other Market Place health care programs. The policy regarding care for emergency medical conditions prohibits demanding payment prior to receiving services or permitting collection activities that could interfere with provision of emergency medical care. The policy requires that information on financial assistance be included in all statements sent to patients informing them of any outstanding balance due. Additionally, business associates shall contact non-responsive patients, using oral and written means of communication, to inform them of outstanding balances owed and to discuss eligibility for financial assistance or reasonable payment options. As outlined in separate billing and collection policy, MRH may pursue collection actions against patients found ineligible for financial assistance, patients who received discounted care or medical hardship discounts but are no longer cooperating in good faith to pay the remaining balance, or patients who have established payment plans but are not in accordance with the payment plan.

## 9) CONFIDENTIALITY

All information relating to Charity Care applications will be kept confidential, consistent with HIPAA requirements. Copies of documents that support the application will be kept with the application. All records will be retained for 7 years or such other time period as may be required by applicable law.

## Exhibit A

### Hospital

Moab Regional Hospital

### Family Medicine

Dr. Dylan Cole  
Dr. Kenneth Williams  
Dr. Jonas Munger  
Dr. Katherine Williams  
Dr. Whitney Mack  
Dr. Pablo Johnson  
Dr. Kathleen Bartczak  
Dr. Julia Heaton  
Eve Maher-Young, PA-C  
Keely Hanson, PA-C  
Desiree Westfall, PA-C  
Hannah Bodenhamer, PA-C  
Michael Henderson, PA-C

### Specialty Medicine

Dr. Lauren Prest  
Dr. Kim Brandau  
Dr. Kimberly Franke  
Dr. Michael Quinn  
Dr. Eric Hanly  
Dr. Michael White  
Dr. Amir Beshai  
Dr. Kristin Becker  
Pam Marsing, LCSW  
Antje Rath, Counselor  
Janel Arbon, Dietician

### Emergency Medicine

Dr. Patrick Scherer  
Dr. Paul Reay  
Dr. Angela Alexander  
Dr. Michael Kueber  
Dr. Holly Williams  
Georgia Russell, APRN  
Angela Mercier, APRN

### Anesthesia

Dr. Phillip Kopell  
Laird Clark, CRNA  
Daniel Roush, CRNA

Any provider who is not listed and has assigned billing rights to Moab Regional Hospital and Moab Regional Health Clinic will also be covered in the Financial Aid Policy. These providers might be temporary, visiting, locums, etc.

Any visiting provider that sees patients in Moab Regional Hospital or Moab Regional Health Clinic but bills for their services are not covered in this Financial Aid Policy.

**Exhibit B**

<b>Household Size</b>	<b>Yearly Income Range - 2021</b>										
<b>1</b>	\$12,760	\$16,588	\$19,140	\$22,330	\$22,968	\$23,606	\$25,520	\$28,710	\$31,900	\$44,660	\$51,040
<b>2</b>	\$17,240	\$22,412	\$25,860	\$30,170	\$31,032	\$31,894	\$34,480	\$38,790	\$43,100	\$60,340	\$68,960
<b>3</b>	\$21,720	\$28,236	\$32,580	\$38,010	\$39,096	\$40,182	\$43,440	\$48,870	\$54,300	\$76,020	\$86,880
<b>4</b>	\$26,200	\$34,060	\$39,300	\$45,850	\$47,160	\$48,470	\$52,400	\$58,950	\$65,500	\$91,700	\$104,800
<b>5</b>	\$30,680	\$39,884	\$46,020	\$53,690	\$55,224	\$56,758	\$61,360	\$69,030	\$76,700	\$107,380	\$122,720
<b>6</b>	\$35,160	\$45,708	\$52,740	\$61,530	\$63,288	\$65,046	\$70,320	\$79,110	\$87,900	\$123,060	\$140,640
<b>7</b>	\$39,640	\$51,532	\$59,460	\$69,370	\$71,352	\$73,334	\$79,280	\$89,190	\$99,100	\$138,740	\$158,560
<b>8</b>	\$44,120	\$57,356	\$66,180	\$77,210	\$79,416	\$81,622	\$88,240	\$99,270	\$110,300	\$154,420	\$176,480
<b>% poverty</b>	100%	130%	150%	175%	180%	185%	200%	225%	250%	350%	400%
<b>Patient's Share</b>	0%	10%	20%	30%	40%	50%	60%	70%	80%	90%	95%
<b>Portion of other medical bills that will be used to reduce total annual household income</b>	100%	90%	80%	70%	60%	50%	40%	30%	20%	10%	5%

Note: For families with more than 8 persons, add \$4,480 for each additional person.





## Exhibit C

### FINANCIAL AID APPLICATION

If you need any assistance to complete this form please contact our Financial Navigator, Connie Beason, at 435-719-3542. Please review our website ([www.mrhmoab.org](http://www.mrhmoab.org)) for additional information including frequently asked questions, plain language summary, and our Financial Assistance Policy.

### INSTRUCTIONS TO COMPLETE THIS FORM:

Please fill out the form completely and returned all required documents to our financial assistance department. Financial assistance will not be awarded to those who do not complete the application process; including the requirement for the patient to apply for other programs for which they may qualify. (e.g. Medicaid).

**Please refer to the checklist (separate document) of all required information to be submitted with this application form.**

### INFORMATION ABOUT YOU

Patient Name		Social Security Number	
Date of Birth	Daytime Phone Number	Other Phone Number	
Person Responsible for Bill	Relationship to Patient	Social Security Number of Responsible Person	
Spouse Name	Spouse Date of Birth	Spouse Social Security Number	
Street Address	City	State	Zip Code
Mailing Address (if Different from Street)	City	State	Zip Code
Length of Time at Above Address	Employer Name	Work Phone Number	

### ADDITIONAL HOUSEHOLD MEMBERS

Name	Date of Birth	Relationship	Name	Date of Birth	Relationship

**MONTHLY INCOME OF YOUR ENTIRE HOUSEHOLD**

If you are unable to provide copies of the verified information; please provide 2 months of bank statements with an explanation on the back of the form.			
Type	Responsible Party Income	Spouse Income	Type of Income Verification Required
Employment Income (Monthly Before Taxes)	\$	\$	<input type="checkbox"/> Provide paycheck stubs for the last two pay periods or 2 months bank statements or most recent W2
Self-Employment Income (Monthly Before Taxes)	\$	\$	<input type="checkbox"/> Provide IRS wage and tax statement for self-employed (Form 1099) or bank statements for 2 months
Pension, Retirement, Social Security Monthly Income	\$	\$	<input type="checkbox"/> Provide your Pension/Retirement statement, and/or Social Security award letter
Unemployment, Disability Income, etc. (Monthly) Copy of check if Disabled/Unemployed longer than 6 months	\$	\$	<input type="checkbox"/> Provide Unemployment, disability award letter, or 2 months bank statements
Child Support, Alimony (Monthly)	\$	\$	<input type="checkbox"/> Provide a copy of your divorce decree, legal separation notice or custody agreement
Other (Please list Source):	\$	\$	<input type="checkbox"/> Provide 2 months bank statements with an explanation of your income source(s)

**OUTSTANDING MEDICAL BILLS:**

Please itemize your outstanding medical expenses and, if known, indicate the amount still owed after the insurance company pays. Attach a separate sheet if necessary.

Name of Provider (Hospital/Physician/Pharmacy)	Your Monthly Payments	Balance Due
	\$	\$
	\$	\$
	\$	\$
	\$	\$

We also ask patients who apply for financial assistance to report other funding. Please check "Yes" or "No".

Does your employer or spouse's employer offer group health insurance? <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, list insurance company here:
Do you have other types of insurance such as Allstate, AFLAC, etc.? <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, list insurance company here:
Do you have a Health Savings/Flex Spending Account <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, what is the available balance:
Does your employer reimburse you for any deductible or healthcare costs? <input type="checkbox"/> Yes <input type="checkbox"/> No	Terms of reimbursement:
Were you denied for Medicaid? <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, please attach copy of the Medicaid denial.
Have you applied for state assistance programs (CHIP, PCN, Crime victims, etc.)? <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, which program?
Are you eligible for COBRA through a previous employer? <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, please provide your insurance information here.
Do you have family or church assistance? <input type="checkbox"/> Yes <input type="checkbox"/> No	If Yes, please provide detail here.
Is this related to a car accident? <input type="checkbox"/> Yes <input type="checkbox"/> No	If Yes, please provide information about the car insurance here.

Please explain any situation that we should be informed of in order to understand your inability to pay the medical balance. You may attach a separate sheet if more space is needed. Additional verification may be required.

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Is there any other information that you would like us to know to help us make a decision?

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I hereby state that the information given herein is true and correct. I authorize any required verification, including a credit bureau report. I understand that if this information is determined to be false or deceptive, I will be liable for payment of charges for all services rendered. I understand that this request for financial assistance may not pertain to other healthcare providers.

Responsible Party Signature \_\_\_\_\_ Date \_\_\_\_\_

**QUESTIONS? Please contact our financial navigation team: 435-719-3500.**

**FINANCIAL ASSISTANCE PROGRAM CHECKLIST**

**PATIENT NAME:** \_\_\_\_\_ **DATE:** \_\_\_\_\_

*If you have difficulty providing these documents, please discuss alternatives with your Financial Navigator.*

**PROOF OF INCOME:**

- Complete most recent Federal Tax Returns including all schedules
- If employed: Paycheck stubs for the last 2 pay periods or 2 bank statements
- If self-employment: Please provide at least one of the following:
  - 1. IRS Wage and Tax Statement for Self Employed (Form 1099).
  - 2. Bank statements for 2 months
- Unemployment, Disability Income, etc. (monthly). Copy of check if disabled/unemployed longer than 6 months
- Child Support, Alimony (monthly): copy of your divorce decree, legal separation notice or custody agreement
  
- Other (as requested by your Financial Navigator): \_\_\_\_\_  
\_\_\_\_\_

**MEDICAL BILLS**

- Copies of all outstanding medical bills from all sources
- Documentation of any payment plans for medical bills outstanding

**MEDICAID APPLICATION**

- Completed Medicaid Application
- Denial letter from Medicaid

**OTHERS:** \_\_\_\_\_  
\_\_\_\_\_

**QUESTIONS? Please contact our financial navigation team: 435-719-3500**

## EXHIBIT D

Moab Regional Hospital  
Patient Financial Services  
Effective Date:

### **SUBJECT:**

Presumptive Charity Care (alternative charity documentation)

### **PURPOSE:**

PFS (Patient Financial Services) staff process Charity Care requests in accordance with the MRH Charity Care Policy. In the event that the primary Charity Care requirements are not met, accounts may undergo a charity review process wherein the complete financial assistance application may not be available, but substitute documentation establishing financial need will attempt to be obtained.

The hospital/clinic may offer Charity Care discounts on the basis of individual life circumstances without requiring the patient to complete a financial assistance application (presumptive eligibility). Presumptive charity describes this situation where need has already been established and the patient therefore is presumed eligible for assistance. Patients may be reviewed for presumptive charity after all other sources of funding have been exhausted.

### **PROCEDURE:**

Accounts will be screened for charity as outlined in the Charity Care policy. Patients may be identified as qualified under presumptive charity, examples include, but are not limited to:

- 1) Patient did not have Medicaid coverage at the time of service, but was eligible for Medicaid within twelve months of that date of service.
  - Documentation: Medicaid eligibility verification showing effective dates of coverage.
- 2) Patient is receiving food stamps, is participating in subsidized school lunch programs, and/or is receiving assistance from Women's, Infants, and Children's (WIC) programs.
  - Documentation: copies of the financial assistance determination from the local/state/county program or agency showing that the patient's need for charity care has been established.
- 3) Patient is deceased with no estate (the spouse can fill out the application, providing required documentation) or no surviving spouse (The Charity Committee and Administration will review the situation and make a determination).
  - Documentation: record of the death certificate on file, account records regarding status of surviving spouse, record of at least four probate inquires with the court.
- 4) Patient's street address is for "homeless" or for a local shelter.
  - Documentation: assessment supporting a "lack of housing" and a record of account notes showing attempts to locate a place of address for the patient.
- 5) Patient's self-attestation
  - Documentation: Patient written statement of need for financial assistance.

Presumptive Charity will only be offered after the MRH Charity Care Policy has been fully exhausted.