

St. Vincent Health
St. Mary's Warrick Hospital, Inc. d/b/a St. Vincent Warrick

FINANCIAL ASSISTANCE POLICY
07/01/18

POLICY/PRINCIPLES

It is the policy of St. Mary's Warrick Hospital, Inc. d/b/a St. Vincent Warrick (the "Organization") to ensure a socially just practice for providing emergency or other medically necessary care at the Organization's facilities. This policy is specifically designed to address the financial assistance eligibility for patients who are in need of financial assistance and receive care from the Organization.

1. All financial assistance will reflect our 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 or other care that is not emergency care or otherwise medically necessary.
3. The List of Providers Covered by the Financial Assistance Policy provides a list of any providers delivering care within the Organization's facilities that specifies which are covered by the financial assistance policy and which are not.

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.
- "**Medically Necessary Care**" means care that is determined to be medically necessary following a determination of clinical merit by a licensed provider. In the event that care requested by a Patient covered by this policy is determined not to be medically necessary by a reviewing physician, that determination also must be confirmed by the admitting or referring physician.
- "**Organization**" means St. Vincent Warrick

- “Patient” means those persons who receive emergency or medically necessary care at the Organization and the person who is financially responsible for the care of the patient.

Financial Assistance Provided

1. Patients with income less than or equal to 250% of the Federal Poverty Level (“FPL”), will be eligible for 100% charity care write off on that portion of the charges for services for which the Patient is responsible following payment by an insurer, if any.
2. At a minimum, Patients with incomes above 250% of the FPL but not exceeding 400% of the FPL, will receive a sliding scale discount on that portion of the charges for services provided for which the Patient is responsible following payment by an insurer, if any. A Patient eligible for the sliding scale discount will not be charged more than the calculated AGB charges. The sliding scale discount is as follows:

2018 HHS Poverty Guidelines Calculation Table*							
Hospital Based Services							
Household Size	FPL*	Charity Care		Financial Assistance Program***			Uninsured with Means to Pay***, **** > 400%
		0 to 138%	to 250%	to 300%	to 350%	to 400%	
1	\$ 12,140	\$ 16,753	\$30,350	\$36,420	\$42,490	\$48,560	
2	\$ 16,460	\$ 22,715	\$41,150	\$49,380	\$57,610	\$65,840	
3	\$ 20,780	\$ 28,676	\$51,950	\$62,340	\$72,730	\$83,120	
4	\$ 25,100	\$ 34,638	\$62,750	\$75,300	\$87,850	\$100,400	
5	\$ 29,420	\$ 40,600	\$73,550	\$88,260	\$102,970	\$117,680	
6	\$ 33,740	\$ 46,561	\$84,350	\$101,220	\$118,090	\$134,960	
7	\$ 38,060	\$ 52,523	\$95,150	\$114,180	\$133,210	\$152,240	
8**	\$ 42,380	\$ 58,484	\$105,950	\$127,140	\$148,330	\$169,520	
Classification		CCI	CC2	FAP3	FAP4	FAP5	Self - Pay
Discount		100%	100%	90%	80%	70%	40%****
Discount	1) Financial Assistance for the uninsured and Means to Pay discount is based on total charges.						
Application	2) Insured discount is based on patient liability or balance due.						
	3) Income levels are based on annual household income.						

*based on the Federal Register / document citation: Federal Register Vol. 83 / January 18, 2018 / pgs. 2642-2644

* See <https://www.federalregister.gov/d/2018-00814/page-2644>

** For each additional person at 100% poverty, add \$4320 (then, if necessary, multiply accordingly up to 400%)

*** Maximum owed by any patient per episode of care or account is 10% of gross household income

**** The self-pay discount constitutes other assistance for patients not eligible for financial assistance and is not intended to be subject to 501(r) but is included here for the convenience of the community served.

3. Patients with demonstrated financial needs with income greater than 400% of the FPL may be eligible for consideration under a “Means Test” for some discount of their charges for services from the Organization based on a substantive assessment of their ability to pay. Maximum owed by any patient per episode of care or account is 10% of gross household income.

4. For a Patient that participates in certain insurance plans that deem the Organization to be “out-of-network,” the Organization may reduce or deny the financial assistance that would otherwise be available to Patient based upon a review of Patient’s insurance information and other pertinent facts and circumstances.
5. Eligibility for financial assistance may be determined at any point in the revenue cycle and may include the use of presumptive scoring to determine eligibility notwithstanding an applicant’s failure to complete a financial assistance application (“FAP Application”).
6. Eligibility for financial assistance must be determined for any balance for which the patient with financial need is responsible.
7. The process for Patients and families to appeal an Organization’s decisions regarding eligibility for financial assistance is as follows:
 - a. All appeals will need to be submitted in writing via mail to: St. Vincent Health, Vice President of Revenue Cycle, 10330 North Meridian Street, Suite 220, Indianapolis, IN 46290
 - b. All appeals will be considered by St. Vincent Health’s 100% charity care and financial assistance appeals committee, and decisions of the committee will be sent in writing to the Patient or family that filed the appeal.

Other Assistance for Patients Not Eligible for Financial Assistance

Patients who are not eligible for financial assistance, as described above, still may qualify for other types of assistance offered by the Organization. In the interest of completeness, these other types of assistance are listed here, although they are not need-based and are not intended to be subject to 501(r) but are included here for the convenience of the community served by St. Vincent Health.

Uninsured Patients who are not eligible for financial assistance will be provided a discount based on the discount provided to the highest-paying payor for that Organization. The highest paying payor must account for at least 3% of the Organization’s population as measured by volume or gross patient revenues. If a single payor does not account for this minimum level of volume, more than one payor contract should be averaged such that the payment terms that are used for averaging account for at least 3% of the volume of the Organization’s business for that given year.

Limitations on Charges for Patients Eligible for Financial Assistance

Patients eligible for Financial Assistance will not be charged individually more than AGB for emergency and other medically necessary care and not more than gross charges for all other medical care. The Organization calculates one or more AGB percentages 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 description and percentage(s) may be obtained by visiting any Patient Registration department, or via mail by calling our Customer Service Department.

Applying for Financial Assistance and Other Assistance

A Patient may qualify for financial assistance through presumptive scoring eligibility or by applying for financial assistance by submitting a completed FAP Application. A Patient may be denied financial assistance if the Patient provides false information on a FAP Application or in connection with the presumptive scoring eligibility process. The FAP Application and FAP Application Instructions are available online at www.stvincent.org/billing , visiting any Patient Registration department or via mail by calling our Customer Service Department.

The following guidelines are utilized to determine presumptive eligibility:

- a. For the purpose of helping Patients that need financial assistance, Organization may utilize a third-party to review Patient's information to assess financial need. This review utilizes a healthcare industry recognized, predictive model that is based on public record databases. The model incorporates public record data to calculate a socio-economic and financial capacity score that includes estimates for income, assets and liquidity. The model's rule set is designed to assess each Patient to the same standards and is calibrated against historical financial assistance approvals for the Organization. The predictive model enables the Organization to assess whether a Patient is characteristic of other Patients who have historically qualified for financial assistance under the FAP Application.
- b. After efforts to confirm coverage availability, the predictive model provides a systematic method to grant presumptive financial assistance to Patients with appropriate financial needs. When predictive modeling is the basis for presumptive eligibility, an appropriate discount based upon the score will be granted for eligible services for retrospective dates of service only. For those Patients not awarded 100% charity care, a letter will be generated notifying the Patient of the level of financial assistance awarded and giving instructions on how to appeal the decision.
- c. In addition to the use of the predictive model outlined above, presumptive financial assistance will also be provided at the 100% charity care level in the following situations:
 - i. Deceased Patients where the Organization has verified there is no estate and no surviving spouse.
 - ii. Patients who are eligible for Medicaid from another state in which the Organization is not a participating provider and does not intend to become a participating provider.
 - iii. Patients who qualify for other government assistance programs, such as food stamps, subsidized housing, and Women's Infants and Children's Program (WIC).

Billing and Collections

The actions that the Organization may take in the event of nonpayment are described in a separate billing and collections policy. A free copy of the billing and collections policy may be obtained by visiting any Patient Registration department or via mail by calling our Customer Service Department.

Interpretation

This policy is intended to comply with 501(r), except where specifically indicated. This policy, together with all applicable procedures, shall be interpreted and applied in accordance with 501(r) except where specifically indicated.

Contact Information

St. Vincent Warrick: 812-897-7296

Customer Service Phone Number: 800-572-1619

Mailing Address:

St. Vincent Health, Customer Service Dept.

10330 North Meridian Street, Suite 200

Indianapolis, IN 46290

Exhibit A

St. Vincent Warrick

LIST OF PROVIDERS COVERED BY THE FINANCIAL ASSISTANCE POLICY

07/01/18

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). Elective procedures and other care that is not emergency care or otherwise medically necessary are not covered by the FAP for any providers.

<u>Providers covered by FAP</u>	<u>Providers not covered by FAP</u>
All St. Mary's Medical Group Physicians	Joshua M Aaron MD
All St. Vincent Employed Physicians	Rania G Abou Elenein MD
Team Health, LLC.	Joseph C Adongay MD
Santiago Arruffat MD	Bruce A Adye MD
Mythili Gurram MD	Maqbool Ahmed MD
Vernon H Humbert MD	Syed A Ali MD
William E Lehmkuhler MD	Maria C Aljabi MD
Merral B Lewis MD	Mohammed A Allaw MD
Noah A Taylor MD	Terence A Alvey DPM
Joseph F Waling MD	William A Ante MD
	Jose M Arias MD
	Emilian F Armeanu MD
	Roy M Arnold MD
	Anjum S Ashraf MD
	Anjum S Ashraf MD
	Donald M Bailey MD
	Donald M Bailey MD
	Sridhar Banuru MD
	Cindy M Basinski MD
	Steven C Basinski MD
	Dennis J Beck MD
	Sridhar Bhaskara MD
	John C Bizal MD
	William A Blume MD
	Michael S Boger MD
	Shafe D Boles MD
	Michael B Boyd DO
	Matthew M Boyer MD
	Carla M Brandt MD
	Mallory S Bray MD

	David E Brougher MD
	Mark D Browning MD
	Vaughn E Brummer DDS
	Thomas A Brummer MD
	Edward L Brundick MD
	Christopher M Burket MD
	Kent R Burress DPM
	Todd S Burry MD
	Juan C Cabrera MD
	Louis B Cady MD
	Harold C Cannon MD
	Rebecca G Carey MD
	William G Carey MD
	Jordan E Carlock DO
	Craig T Carter MD
	Marcia L Cave MD
	Dominic C Cefali MD
	Chris E Chacko MD
	Katrina Chaung MD
	Chandrasekhar Cherukupalli MD
	Chandrasekhar Cherukupalli MD
	Syam S Chilukuri MD
	Mike W Chou MD
	Eugene P Chung MD
	Eugene P Chung MD
	Mary S Clayton MD
	Ashley E Cobb DO
	James M Conkright MD
	Vivian C Cook MD
	Sean L Cook DDS
	Timothy M Crowley MD
	Nidal I Dabbasi MD
	Paul T Daines DPM
	Leo T D'Ambrosio MD
	Jason R Denton DPM
	Dion C DePaolis MD
	Richard G D'Mello MD
	Richard G D'Mello MD
	Brandt L Dodson DPM
	John F Doepker MD
	Douglas J Doty DO
	Michael K Drake MD
	Leonid Drozhinin MD
	Omar M Dukar MD
	Dion J Dulay MD
	Franklin J Edge DMD

	Randall S Edwards DDS
	David M Eggers MD
	Stacey O Embry OD
	Quentin B Emerson MD
	Judith A Englert MD
	Craig K Erickson MD
	Kavita K Erickson MD
	Faris M Fadheel MD
	Richard A Falcone MD
	Dusky Rideout A Farmer DPM
	William R Farnsworth DDS
	Robert L Fawcett MD
	Laura B Finch MD
	Tony A Findley MD
	Adam J Fisch MD
	Charles K Fischer MD
	Kathleen A Flannagan MD
	Ryan P Flannagan MD
	Gene R Flick MD
	Kimberly F Foster MD
	Edward P Fox MD
	Jason T Franklin DO
	Robert M Franklin MD
	Jon D Frazier MD
	Bradley T Fulkerson DMD
	Anthony L Funke MD
	Prasad V Gade MD
	John T Gallagher MD
	Meredith I Gamblin MD
	Boyd B Gasque MD
	William L Gentry MD
	Matthew G Gentry MD
	Kara E Geoghegan MD
	Christine R Gest MD
	George S Gilliam MD
	Gardar T Gislason MD
	Gardar T Gislason MD
	Eric A Goebel MD
	James E Goris MD
	Eric D Gourieux MD
	Johnathan R Grant DO
	Aaron T Gries MD
	John O Grimm MD
	Sudheer Gurram MD
	Guido P Gutter MD
	Lotfi Hadad MD

	Jon M Hall MD
	Timothy S Hamby MD
	Zachary C Hamby MD
	Walter C Hancock DPM
	Scott W Hardigree MD
	James L Hargett MD
	Ellen M Harpole MD
	Craig E Haseman MD
	Thomas S Hastetter MD
	Gregory L Hayden MD
	David M Hayes MD
	David L Hayhurst DDS
	James M Heinrich MD
	Melanie J Helms MD
	Jeffrey B Hemmerlein MD
	Glenn A Henning DPM
	Glenn A Henning DPM
	Jeffrey A Hiester DDS
	Jeffrey W Hilburn MD
	Michael R Hodges MD
	Lance R Hoover MD
	Marshall G Howell MD
	Geoffrey L Hulse MD
	Mohammad I Hussain MD
	David G Hyndman OD
	Roberto C Iglesias MD
	Roberto C Iglesias MD
	Anthony T Inzerello MD
	Michael S Irish MD
	Eric S Jackson MD
	Melinda B Jackson MD
	Umesh C Jairath MD
	Umesh C Jairath MD
	Kamran R Janjua MD
	Maritza O Jenkins DMD
	Andrea L Jester MD
	Andrea L Jester MD
	David W Johnson MD
	Glenn T Johnson MD
	Alan H Johnson MD
	Marlon D Jordan MD
	David A Josephson MD
	Rupal S Juran MD
	Francis J Kadiyamkuttiyil MD
	Anthony D Kaiser MD
	Tyler J Kelly DPM

	Kari L Kernek MD
	Mansoor A Khan MD
	Mansoor A Khan MD
	Ahmed S Khan MD
	Yuri Y Khibkin MD
	David H Kim MD
	David H King MD
	Dawn L Kirkwood MD
	Philip J Kline MD
	Peter A Knoll MD
	Katherine T Kobza MD
	Jane A Koch DPM
	Phillip W Kolb DDS
	Duane H Kuhlenschmidt MD
	Chandrashekar Kumbar MD
	Shannon S Lamb MD
	Raymond L Lamey MD
	Randy A Lance MD
	Matthew T Langenberg MD
	Jeana J Lee MD
	Susan E Leinenbach MD
	Thomas C Logan MD
	Mark B Logan MD
	Douglas J Lowery MD
	Jason D Lowrey MD
	Lori A Lynch MD
	Michael J Malchioni MD
	Bachar Malek MD
	David I Malitz MD
	Clovis E Manley MD
	Roosbeh Mansour MD
	Ross E Marburger MD
	Donald C Mardis MD
	Angela H Martin MD
	Angela H Martin MD
	William R Martin MD
	Kevin W McConnell MD
	Kevin W McConnell MD
	Gregory S McCord MD
	James D McDaniel MD
	Michael K McFadden MD
	Cynthia K McGarvey MD
	Jason M Meckler MD
	Aziz-Ullah Mehrzad MD
	Farukh S Mian MD
	Charles A Milem MD

	Michael J Miller MD
	Derek L Mitchell MD
	Kuimil K Mohan MD
	Gary R Moore MD
	Edward N Moore MD
	John P Morgan MD
	Paul W Morrison MD
	Shahid I Mufti MD
	Shahid I Mufti MD
	Richard A Murrell MD
	John M Myers MD
	John W Nay MD
	James M Neahring MD
	Joshua S Neucks MD
	Glenn H Norton DMD
	Debra M O'Donnell MD
	Richard R Orr MD
	Young S Paik MD
	Ryan C Palmer DO
	Francis X Pamela MD
	Kenneth R Parker MD
	Reinaldo F Pastora MD
	Dharmesh M Patel MD
	Donald E Patterson MD
	Kristi K Peck MD
	Scott M Peifer DDS
	Maruthi S Penumetsa MD
	Paul E Perry MD
	David N Phillips OD
	Andrew W Piering MD
	Joseph L Polio MD
	Vajravel M Prasad MD
	Sally G Primus MD
	Aaron J Pugh DO
	Aaron J Pugh DO
	Vinay M Puri MD
	Andrew J Rader DPM
	Norman D Radtke MD
	Robert W Ransdell MD
	Srinivasan D Rao MD
	Nathan J Reed MD
	John M Reid MD
	Allan L Reid DMD
	John A Reid DMD
	Charlotte A Reisinger DPM
	Melissa A Reisinger MD

	David R Reynolds DPM
	Gary D Riddle MD
	Gary D Riddle MD
	Daryle S Riegle MD
	Richard C Rink MD
	Steven F Rodgers DDS
	Steven A Rupert DO
	Michael B Rusche MD
	Andrew T Saltzman MD
	Faisal A Sami MD
	Prince D Samuel MD
	Mahendra R Sanapati MD
	Wagih A Satar MD
	Robert N Sauer MD
	Thomas E Schultheis MD
	Caitlin V Schultheis MD
	David E Schultz MD
	Samer I Schuman MD
	Brian W Schymik MD
	Constantine G Scordalakes MD
	Jeffrey W Selby MD
	Darin R Serletic DPM
	Michael A Sermersheim MD
	Himanshu N Shah MD
	Curtis E Shinabarger MD
	Mark E Shockley MD
	Robert C Shumate DMD
	Dwight A Silvera MD
	Sheldon D Simon DPM
	Moges Sisay MD
	Richard P Sloan MD
	Deane L Smith MD
	Christopher L Sneed MD
	Michael C Snyder MD
	Walter L Sobczyk MD
	Drew N Sommerville MD
	Robert S Starrett MD
	Jonathan A Staser MD
	Jonathan A Staser MD
	James M Stearns MD
	Anthony W Stephens MD
	Phillip L Stiver MD
	Theodore J Stransky MD
	Susan E Stutes MD
	Michael R Sutton MD
	Tommy Symreng MD

	Satyam Tatineni MD
	Satyam Tatineni MD
	Matthew J Taylor MD
	Terry B Thacker MD
	Killol J Thakore MD
	Andrew W Tharp MD
	Erik B Throop MD
	Michael L Titzer MD
	Ali Torab Parhiz MD
	Hoang S Tran MD
	Randolph T Travis DMD
	Bhargav A Trivedi MD
	Neil A Troffkin MD
	Stephen H Troyer DDS
	Vivien O Tucker MD
	William J Tuley MD
	Steven R Turner MD
	Gail H Vance MD
	William M Vassy MD
	Lee S Wagmeister MD
	David T Wahle MD
	Thomas M Waits MD
	Allen L Walker MD
	James D Waller MD
	Xiaoli Wang MD
	Roderick L Warren MD
	Chad W Weare MD
	David D Weaver MD
	David J Weaver MD
	Brett T Weinzapfel MD
	Richard A Wepsic MD
	Jonathan L Weyer MD
	Ross D Whitacre MD
	David L Whitney MD
	Danica A Wilking MD
	Nicolaus D Winters MD
	Mark E Wohlford DDS
	Jay H Woodland MD
	Lucinda T Wright MD
	Hongyu Yang MD
	David E Yates DMD
	Prasanna L Yelamanchili MD
	Venkata S Yelamanchili MD
	Stephen K Young MD
	Mubashir A Zahid MD
	Sheryl L Ziegler DO

	Jay H Woodland MD
	Lucinda T Wright MD
	Kenneth E Yagodich MD
	Hongyu Yang MD
	David E Yates DMD
	Prasanna L Yelamanchili MD
	Venkata S Yelamanchili MD
	Stephen K Young MD
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