

St. Vincent Health
Carmel Ambulatory Surgery Center, LLC

FINANCIAL ASSISTANCE POLICY
10/01/18

POLICY/PRINCIPLES

It is the policy of Carmel Ambulatory Surgery Center, LLC (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 Carmel Ambulatory Surgery Center, LLC.

- **“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***, ****
		0 to 138%	to 250%	to 300%	to 350%	to 400%	> 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 Carmel Hospital, Financial Counselor: 317-582-7154

Customer Service Toll Free Phone Number: 866-435-2078

Mailing Address:

St. Vincent Health, Customer Service Dept.

10330 North Meridian Street, Suite 200,

Indianapolis, IN 46290

Exhibit A

Carmel Ambulatory Surgery Center

LIST OF PROVIDERS COVERED BY THE FINANCIAL ASSISTANCE POLICY

10/01/18

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. Vincent Medical Group Physicians	John Abrams MD
All St. Vincent Employed Physicians	Robert Addleman MD
Brendan Frank MD	Steven Ahlfeld MD
Christine Kelley MD	Andrew Alden MD
	Hayma Al-Ghawi MD
	Stanton Angermeier MD
	Rickinder Bains MD
	Aaron Balanoff MD
	Erik Barrett MD
	James Bastnagel MD
	Jeffrey Beach MD
	Kevin Beadle MD
	Homer Beltz MD
	Debra Bergman MD
	Feriyi Bhaijee MD
	Matthew Bojrab MD
	Shelly Bowers MD
	John Bozic MD
	Sally Bradley MD
	Chad Brink MD
	Seth Bruggers MD
	Matthew Bruns MD
	Jeffrey Buttrum MD
	Brenda Cacucci MD
	Juan Cardenas MD
	Antonio Carrelli MD
	Dion Chavis MD
	Burke Chegar MD

	Richard Chitwood MD
	James Christenson MD
	Maret Cline MD
	Angela Collie MD
	Brian Compton MD
	Jeffrey Cooke MD
	Elizabeth Cottongim MD
	James Cox MD
	David Crook MD
	Terrence Cudahy MD
	Kara Czarkowski MD
	Robert Czarkowski MD
	Ann Daniel MD
	Deborah Del Rosario MD
	Becki Denman MD
	David Diaz MD
	Darin Dill MD
	Elaine Dupler MD
	James Dupler MD
	Weldon Egan MD
	C. Layton Elliott MD
	Christopher Evanson MD
	Lawrence Falender MD
	Joseph Fata MD
	William Finkelmeier MD
	Andrew Fleming MD
	Stephen Fraser MD
	Erica Gibllin MD
	Anjali Godambe MD
	Elizabeth Grasee MD
	Jane Gunsenhouse MD
	Scott Hackett MD
	James Hardacker MD
	Robert Hastings MD
	Chad Hazelrigg MD
	David Held MD
	Robin Helmuth MD
	Scott Himmelstein MD
	John Hockema MD
	Scott Hoffman MD
	Stewart Hults MD

	Sajjad Hussain MD
	Eric Inman MD
	Margaret Inman MD
	John Irons MD
	Randy Irwin MD
	Leah Jamison MD
	Frank Johnson MD
	Mark Kahn MD
	Michael Kellams MD
	David Kelley MD
	Gerald Kirk MD
	Christopher Kirkup MD
	Kevin Kirtley MD
	Paul Kittaka MD
	Stephen Klapper MD
	Thomas Klootwyk MD
	Peter Kunz MD
	Earl Lanter MD
	Timothy Lein MD
	Justin Malenkos MD
	Phyllis Marlar MD
	Brent Marsden MD
	Anita Martin MD
	Brandon Martinez MD
	Ryan McCarthy MD
	Jean McGrady MD
	Melissa McHenry MD
	Christopher Mernitz MD
	Alex Meyers MD
	Michael Miller MD
	Norman Mindrebo MD
	Douglas Moore MD
	Jeffrey Mossler MD
	Michelle Neff MD
	John Oscherwitz MD
	Michael Pannunzio MD
	Patrick Park MD
	Nikhil Patel MD
	Jody Petts MD
	Scott Pittman MD
	David Porter MD

	Daniel Price MD
	Francis Price MD
	Mark Rafalko MD
	Arthur Rettig MD
	Lance Rettig MD
	Ashley Robey MD
	Michael Rothbaum MD
	Richard Rust MD
	Peter Sallay MD
	Andrew Satz MD
	Donald Schilson MD
	Andrew Schubeck MD
	Shoib Shafique MD
	George Sheng MD
	Kevin Sheridan MD
	Jonathan Smerek MD
	Jaime Steele MD
	Stephen Stitle MD
	Carol Stoops MD
	Craig Stoops MD
	James Teter MD
	Michael Tomlin MD
	Thomas Warren MD
	Joseph Webster MD
	Edward Wills MD
	David Wilson MD
	Catherine Winslow MD
	Juan Yepes MD
	Robert Youkilis MD
	Richard Zeph MD
	Steven Zirkelbach MD
	Brian Badman MD
	John Pasicznyk MD
	Jonathan Bennett MD