

St. Vincent Health
St. Vincent Anderson Regional Hospital, Inc.

FINANCIAL ASSISTANCE POLICY
02/01/18

POLICY/PRINCIPLES

It is the policy of St. Vincent Anderson Regional Hospital, Inc. (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 Anderson Regional Hospital, Inc.

- “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, 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 Anderson Regional Hospital, Financial Counselor: 765-646-8240

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

St. Vincent Anderson Regional Hospital

LIST OF PROVIDERS COVERED BY THE FINANCIAL ASSISTANCE POLICY

02/01/18

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	SADIA ABBASI MD
All St. Vincent Employed Physicians	KASHIF ABDUL-RAHMAN MD
Madison County Emergency Physicians	MUHAMMAD AFZAL MD
MICHAEL MENG MD	VIVEK AGRAWAL MD
	USMAN AHMAD MD
	BIANCA S AINHORN MD
	OYEKUNLE AKINOLA MD
	CARYN C ANDERSON MD
	SUSAN M ANDERSON MD
	DIANNA L ANDREWS MD
	STANTON M ANGERMEIER MD
	JOHN W ARBUCKLE MD
	PETER D ARFKEN MD
	ANWAR T ASHRAF MD
	JOSEPH C BAER MD
	EDWARD R BARTLEY MD
	TERESA D BEAM MD
	HOMER F BELTZ MD
	ERIC E BELTZ MD
	JONATHAN C BENNETT MD
	SHERI E BENNETT NP
	RICHARD M BENNETT MD
	PARIN M BHAYANI MD
	JEFFREY MORTON BLAKE MD
	LARRY L BLANKENSHIP MD
	TED BLOCH MD
	SRIDHAR R BOLLA MD

	AMANDA D BOYS CNM
	MARGARET A BRENGLE MD
	THOMAS P BRIGHT MD
	REBECCA L BUSHONG MD
	JAMES DAVID CALLAHAN MD
	BRIAN E CAMILLERI DO
	COLT A CANSLER PA
	MICHELLE LEE CARLOS NP
	KARISSA CARPENTER PA-C
	LORI ANN CARR NP
	KILE CARTER MD
	VIRGILIO N CHAN MD
	DION D CHAVIS MD
	YUMEI CHEN MD
	LI M CHEN MD
	CHAD A CHICKONOSKI RT
	KATHY SANDS CLARK MD
	MARC L COHEN MD
	JULIA J COMPTON MD
	MICHAEL S CONLEY MD
	NICHOLAS J COOK MD
	FRANCES M COSGROVE MD
	RAN DAI MD
	TIMOTHY LLOYD DAVIS MD PHD
	STEVEN J DELEE DO
	JOANN CHRISTINA DINGER NP
	JOSHUA D DOWELL MD
	JACK M DREW MD
	THOMAS C DUGAN MD
	LAURA O DUGAN MD
	MARTHA J DWENGER MD
	OLEH DZERA MD
	MICHAEL S EATON MD
	ERIC D ELLIOTT MD
	SALAH A ELSAHARTY MD
	JANALYN P FERGUSON MD
	JOHN F FIEDERLEIN MD
	WILLIAM C FISCHER MD
	MARKUS FITZEK MD

	VINCENT J. L. FLANDERS MD
	EDGARDO M FLORES ANTICONA MD
	STEVEN A FRITSCH MD
	DIANE E FUNK NP
	STEVEN R GATEWOOD MD
	JONATHAN P GENTILE MD
	JOSEPH C GEORGE MD
	MOLLY C GERETY CRNA
	PETER G GIANARIS MD
	STANLEY SCOT GIVENS MD
	KELLY M. GLOVER MD
	MAHESH C GOEL MD
	PHILLIP E GOSHERT MD
	VALERI N GOUTSOULIAK MD
	BRIAN DONALD GRANER MD
	DAVID W GRAYBILL MD
	SCOTT A GREEN MD
	SARAH ANN GREEN CRNA
	JOSHUA BEN GREENE MD
	DAVID J GULLIVER MD
	THOMAS HABIMANA CRNA
	THOMAS F HAGMAN MD
	FYEZA S HAIDER MD
	WILLIAM L HALL MD
	DAVID W HALL MD
	RICHARD L HALLETT MD
	WARREN KENT HANSEN MD
	JENILE J HARPER-ABELL NP
	WALTER G. HARRY MD
	ROBIN A HELMUTH MD
	TYLER SHEA HENSLEY CRNA
	STEVEN A HERBST MD
	CAROLYN R HERMAN MD
	STEVEN D. HILL MD
	MICHAEL J HODKIN MD
	CHARLES C HOO MD
	BRIAN D HORNBACK MD
	KELLY K HORST MD
	CHARLES HOWE MD

	JAIMIE M HOWELL MD
	AMANDA C HUDDLESTON CRNA
	MELISSA A HUEBNER MD
	VINCE S HUME DO
	ANTHONY CHRISTOPHER ILLING MD
	NICHOLAS ROBERT JASPER MD
	THEODORE BAUER JENNERMANN MD
	JOSEPH G. JERMAN MD
	PREETHAM JETTY MD
	JARED W JONES MD
	MATTHEW M JONES MD
	REGI JOSEPH MD
	SUNIL JAYANT JUTHANI MD
	SWAPNA KATIPALLY MD
	PATRICK JAMIESON KAY MD
	STEVEN CHEUL KIM MD
	DANIEL L KIM MD
	SAMUEL C KIM MD
	KEVIN W KIRTLEY MD
	LAUREN ASHTON KOMPIER DPM
	WILLIAM J KOPP MD
	PAUL E KRAEMER MD
	DEEPTHI CHRISTINA KURAKULA MD
	BENJAMIN B KUZMA MD
	THEODORE P LABUS MD
	PRIMAVERA ANNDERA LADD NP
	PATRICIA E LADD MD
	CHAD C LAMB MD
	KENT T LANCASTER MD
	LOUIS DONALD LATORRE MD
	MARK EGAN LAWLOR MD
	CARLO R LAZZARO MD
	CHRISTOPHER A LEAGRE MD
	MARK G LEFEAVE RN
	CHARLES A LERNER MD
	CHING LI MD
	ROBERT H LIEBROSS MD
	LAWRENCE E LLOYD DPM
	MATTHEW J LOCKER MD

	ANN DRAYTON LOGAN MD
	NICHOLAS IKE LONG PA
	KEVIN MACADAEG MD
	CHRIS A MAGEE MD
	JON M MAIER MD
	VASILIS MAKRIS MD
	ERICA E MANDSAGER NP
	DAVID C MARES MD
	CHRISTOPHER ANGELES MARINO MD
	ANITA R MARTIN MD
	VERONICA J MARTIN MD
	DAVID L MARTIN MD
	JOHN E MARVEL MD
	DWIGHT B MCCURDY MD
	GORDON C MCLAUGHLIN MD
	JOHN R MCLIMORE MD
	CHARLOTTE JUNE MEEKER CNM
	MICHAEL AMOS MENG MD
	ERIC H MESHULAM DPM
	ALEX M MEYERS MD
	RISHI S MHAPSEKAR MD
	JOHN MARK MICHAEL MD
	RONALD S MILLER MD
	JANE S MITCHELL MD
	PABLO E MOLINA MD
	SAMUEL ALBERT MORGOS MD
	JOHN A MORTON MD
	JACK J MOSS MD
	JEFFREY A MOSSLER MD
	CHARLES C MULRY MD
	MARWAN A. MUSTAKLEM MD
	TONY K NASSER MD
	RIMAS J NEMICKAS MD
	ROD A NISI MD
	CRAIG M NOVY MD
	ONISURU T OKOTIE MD
	NASSIM F OLABI DDS
	MARK C OSBORNE MD
	TESSA CECILE PALMER NP

	ANUJ A PATEL MD
	SUSAN ANNE PATERSON CNM
	ALIXANDRIA M PELYCH PA-C
	DONALD M PEREZ MD
	LARYN A PETERSON MD
	FRANK W PEYTON MD
	JAMES MICHAEL PHELPS MD
	UNNIKISHNAN PONNAMMA KUNJAN PILLAI MD
	FRANK J PISTOIA MD
	STEPHANIE LYNN PRESTON CRNA
	NEWELL O PUGH MD
	CHARLES R PURDY MD
	TAMARA KIMBERLEE PYLAWKA MD
	JOHN GARY QUILES MD
	DAVID M RATZMAN MD
	JOANNE TRIXLER RAY MD
	KRISTINE M REA MD
	JOHN EARL REAVES MD
	TRENT ALLEN REES PA-C
	JEFFREY I REIDER MD
	KENNETH L RENKENS MD
	GREGORY T REVEAL MD
	ANDREW J RITCHISON MD
	JEFFREY LEE ROBINSON PA-C
	RACHEL ROBINSON MD
	CHRISTOPHER P ROCCO MD
	DAVID B ROSS MD
	MICHAEL PATRICK RUDOLPH DO
	RICHARD M RUST MD
	THOMAS SALSBUY MD
	AHMAD RAMI SALTAGI MD
	RAVI R SARIN MD
	RICK C SASSO MD
	ANDREW K SATZ MD
	ZOE H SAUER MD
	RYAN NATHAN SAUER MD
	DAVID M SCHEIDLER MD
	DONALD L SCHILSON MD
	AGNES J SCHRADER MD

	ESTHER SCHUBERT MD
	SCOTT L SCHULMAN DPM
	TERI L SCHULZ MD
	GLENN R SCHWENK MD
	DAVID A SCOTT MD
	PARESH SHAH MD
	HEATHER P SHEETS NP
	CHRISTINA N SHINAVER MD
	KEVIN K SIGUA MD
	PETER M SIMMONS MD
	BRIAN W SIPE MD
	MICHAEL S SKULSKI MD
	KEVIN EUGENE SMITH MD
	THOMAS K SPINDLER PA-C
	JASON K SPRUNGER MD
	DANIELLA COURTNEY STAFFORD NP
	BARRY M STALTER PA
	DAVID I STEINBERG DO
	CAROLINE STEVENS DO
	HEATHER MARIE STIDD PA-C
	LARRY L STOVER MD
	NIRMAL K SURTANI MD
	COURTNEY RENEE SWENK NP
	MINATI D SWOFFORD MD
	AHMED S. TALEB ABDELLAH MD
	ANAND TANDRA MD
	JOHN T TAYLOR MD
	FRANCESCA D TEKULA MD
	LAURI A THOMASSON NP
	SARAH M THOMPSON DPM
	EMILY R THOMPSON CRNA
	DENISE K THOMPSON MD
	THOMAS M TRANCIK MD
	ANDREW T TROBRIDGE MD
	MARSHALL L TRUSLER MD
	AMANDA RUTH TUCKER NP
	JENNIFER L TURNER PA
	HALEY N UKIRI NP
	JEFFREY C ULRICH MD

	MARC P UNDERHILL MD
	JUAN C VARGAS MD
	NYRIA C VILLARREAL MD
	JOHN T VU MD
	KHALIL G WAKIM MD
	PAUL DAVID WARRICK MD
	SCOTT M WATERMAN MD
	MARINA WEINSTEIN DO
	LORI J WELLS MD
	BRIAN J WIEGEL MD
	ROBERT S WILLIAMS MD
	JOSEPH G WILLIAMSON PA
	STEVEN J WILLING MD
	EDWARD R WILLS MD
	JOHN W WOODALL MD
	GARY A WRIGHT MD
	CAMEUAL N WRIGHT MD
	YI-SHUANG YANG MD
	ALEXANDER M YEH MD
	RAMARAO YELETI MD
	JAMES J ZHANG MD
	JESSICA ZHOU MD