

FACILITY NAME: Rockcastle Regional Hospital and Respiratory Care Center	POLICY OWNER: Business Office Manager
SUBJECT/TITLE: Financial Assistance Policy (FAP)	ORINATION DATE: 12/3/2012 REVISED: 04/02/2018
DEPARTMENT: Business Office	REVIEWED: APPROVER: CFO, CEO

POLICY

It is the policy of Rockcastle Regional Hospital and Respiratory Care center to provide medically necessary health care to all patients, without regard to the patient’s financial ability to pay.

PRINCIPLES

Rockcastle Regional Hospital and Respiratory Care center, as a tax-exempt organization, is called to meet the needs of patients who seek care, regardless of their financial abilities to pay for services provided. All patients will be treated equitably, with dignity, respect, and compassion.

In addition, as a designated charitable (i.e., tax-exempt) organization under Internal Revenue code (IRC) Section 501 (c)(3). Pursuant to IRC Section 501(r), in order to remain tax-exempt, each tax-exempt hospital is required to adopt and widely publicize its financial assistance policy.

The purpose of this Policy is to outline the circumstances under which Rockcastle Regional Hospital and Respiratory Care Center will provide free or discounted care to patients who are unable to pay for services, and to address how Rockcastle Regional Hospital will calculate amounts charged to patients.

DEFINITIONS

Medical Necessity – Any procedure reasonably determined to prevent, diagnose, correct, cure, alleviate, or avert the worsening of conditions that endanger life, cause suffering or pain, result in illness or infirmity, threaten to cause or aggravate a handicap, or cause physical deformity or malfunction, if there is no other equally effective, more conservative or less costly course of treatment available.

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ELIGIBILITY CRITERIA

Medical Necessity

- **EMTALA**

Any patient seeking urgent or emergent care, within the meaning of section 1867 of the Social Security Act (42 U.S.C. 1395dd) at Rockcastle Regional Hospital, shall be treated without discrimination and without regard to a patient's ability to pay for care. Rockcastle Regional Hospital shall operate in accordance with all federal and state requirements for the provision of urgent or emergent health care services, including screening, treatment and transfer requirements under the federal Emergency Medical Treatment and Active Labor Act (EMTALA). Rockcastle Regional Hospital should consult and be guided by their emergency services policy, EMTALA regulations and applicable Medicare/Medicaid Conditions of Participation in determining what constitutes an urgent or emergent condition and the processes to be followed with respect to each.

- **Other Medically Necessary Services**

In addition to services provided pursuant to EMTALA, Rockcastle Regional Hospital will extend free or discount care to eligible individuals for all other medically necessary services.

- **Financial Ability**

Financial assistance is available for medically necessary services at a discount rate of 100% of gross charges (free care). The 100% discount (free care) will be extended to those self-pay patients whose family income is equal to or less than 150% of the Federal Poverty Level. Lesser discounts are not available for those that exceed 150% of the Federal Poverty Level.

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• Basic Requirements

- *Must be self-pay.
- *If have minor children in the home, must be referred to the Medicaid Office.
- *Cannot exceed income guidelines as stated in the FAP application. Household members **are** taken into consideration.
- *Cannot exceed Countable Resources as stated in the FAP application.
- *Services cannot be related to an auto accident.
- *Must supply proof of income to determine eligibility. Proof of income examples:
 - a.) Check stubs for the last 30 days.
 - b.) Social Security award letters or copy of bank deposit showing SS deposit.
 - c.) Written verification of wages from employer for the last 30 days.
 - d.) Written verification from public assistance summarizing benefits.
 - e.) Workers Compensation checks/award letters.
 - f.) Unemployment checks/award letters.
 - g.) W-2's
 - h.) If self-employed a financial statement of gross income less business expenses.
 - i.) Copy of 1040 federal income tax return.

LIMITATION ON CHARGES

Charges/Self-Pay Discount

Rockcastle Regional Hospital and Respiratory Care Center limits the amount charged for any emergency or other medically necessary care it provides to all self-pay patients to no more than the amounts generally billed to individuals with insurance covering that care (AGB). The limited amount charged is the average of our contracted insurance payer reimbursement, which is equal to 76% reimbursement. Therefore, all self-pay patients will not be charged more than 76% of gross charges. Patients applying for FAP will receive the initial self-pay discount, and if qualifying for FAP will receive a total discount of 100% (free care). Please see attached exhibit for a listing of providers that are excluded from the Rockcastle Regional Financial Assistance

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Policy. Unless identified by the exhibit as an excluded provider, all providers are included in the Rockcastle Regional Financial Assistance program.

PROCEDURES

Hospital Methodology

An established financial assistance methodology, applied consistently, shall be adopted by Rockcastle Regional Hospital and Respiratory Care Center. The methodology shall consider patient and spouse income if applicable, family size, available resources and the likelihood of future earnings sufficient to pay for health care services.

- Hospital shall utilize the *Rockcastle Regional Hospital and Respiratory Care Center Financial Assistance Application Form*.

See attached Exhibit: *Rockcastle Regional Hospital and Respiratory Care Center Financial Assistance Application Form*

To allow the Hospital to properly evaluate financial assistance eligibility, all documents provided by patients to the Hospital Facility shall be written in or translated into English.

- This Hospital shall utilize the Rockcastle Regional Hospital and Respiratory Care Center's Financial Assistance determination checklist as defined in *Section II. Hospital Indigent Care Criteria of the Rockcastle Regional Hospital and Respiratory Care Center Financial Assistance Application Form*.

Method for Applying for Financial Assistance

- Upon registration, and after all EMTALA requirements are met, self-pay patients may request the *Rockcastle Regional Hospital and Respiratory Care Center Financial Assistance Application Form (FAP)*, which outlines eligibility conditions that must be met. A cover letter is included, which summarizes the financial assistance

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program, and includes contact information.

- A free copy of the *Rockcastle Regional Hospital and Respiratory Care Center Financial Assistance Application Form* and cover letter, are provided with each registration of self-pay patients. An additional free copy can be obtained by stopping by the cashier desk of the Hospital, or by calling our billing department at (606) 256-2195 ext. 7701. The patient will never be charged for additional copies.
- Immediate financial counseling assistance from staff is available Monday through Friday 8:00 am to 4:00 pm, either in person or via a phone call made to our Billing Department at (606) 256-2195 ext. 7701.
- All available financial resources shall be evaluated before determining financial assistance eligibility. The hospital shall consider financial resources not only of the Hospital Facility patient, but also that of other persons having legal responsibility to provide for the patient (e.g., patient's spouse). The patient shall be required to provide information and verification of ineligibility of benefits available from insurance (i.e., individual and/or group coverage), Medicare, Medicaid, workers' compensation, third-party liability (e.g., automobile accidents or personal injuries) and other programs.

Approval or Denial for Financial Assistance

Hospital Facility patients that present a complete application with all required documentation, as outlined in the application, Monday through Friday 8:00 am to 4:00 pm, or mail application to Rockcastle Regional PO Box 1310, Mt. Vernon, KY 40456 will be reviewed and a determination made within 10 business days. All patients will be given an approval or denial notification. If denied financial assistance, the patient shall be informed in writing with a brief explanation given for the determination. All denials must be credible and determined with the highest integrity; the Hospital Facility needs to be comfortable with their reasons for determining that patients are not eligible for financial assistance.

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ACTIONS THAT MAY BE TAKEN IN THE EVENT OF NONPAYMENT

Rockcastle Regional Hospital and Respiratory Care Center prohibits the use of “extraordinary collection actions” on patients qualifying for financial assistance per Federal Regulation 501 (r)(6).

Financial Assistance Counselors are available during business hours to assist patients in completing the FAP application form. Completed applications with accompanying documentation will be reviewed, and a determination made within ten business days. Patients will be notified in writing of the approval or denial by the Financial Assistant Counselor. A monthly statement will cease on all approved cases, and the account balance will be written off. A monthly statement will continue on all denied cases.

The Financial Assistance Counselor will attempt to contact patients with incomplete applications, or missing income verification on day 15, 30, 45, 60, and day 90. Monthly statements are sent every 30 days, until such time the account reaches the age of 120 days from the first billing statement. By this time, all reasonable attempts to contact the patient will have exhausted. Patients with an incomplete application, denied application, or cases of “no response,” will be sent a “final notice” letter. The letter will inform patients that their account will be sent to an outside collection agency, if they do not respond within ten business days. If no response or payment, the account will be outsourced to GLA Collection Agency (A-K), or Credit Solutions (L-Z), depending on the alphabetic sequence of the patient’s last name.

Rockcastle Regional Hospital and Respiratory Care Center will continue to accept FAP applications from patients for an additional 120 days from the first billing statement. The total period of time the hospital will accept and process an FAP application is 240 days from the date of the first billing statement. If the FAP application is approved, the patient will be refunded for any personal payments made on his or her account. If the account has been outsourced to an outside collection agency, the account will be recalled.

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WIDELY PUBLIZING THE FINANCIAL ASSISTANCE POLICY (FAP)

- FAP is posted on the hospital facility’s web site at www.rockcastleregional.org.
- FAP is posted conspicuously at all registration access points. A copy shall be supplied to the requesting individual free of charge.
- A statement advertising FAP prints on every patient statement.
- FAP is mentioned when discussing an individual’s bill over the telephone.

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Excluded Provider Listing

Practitioner	Specialty
Arvin, Jon A.	Family Medicine
Brabon, David	Plastic Surgery
Gomez, Eduardo	Diagnostic Radiology
Gordon, John Michael	Gynecology
Hammond, Bethanie	Diagnostic Radiology
Alfaris, Mohamed	Emergency Medicine
Cowan, Brandon	Emergency Medicine
Crawford, Jacky	Emergency Medicine
Deskins, Jason	Emergency Medicine
Douglas, David	Emergency Medicine
Hamilton, Michael	Emergency Medicine
Kim, Joseph	Emergency Medicine
Marcum, Charles	Emergency Medicine
Morgan, John	Emergency Medicine
Onwukeme, Chima	Emergency Medicine
Poirier, Jean-Bernard	Emergency Medicine
Schroeder, David	Emergency Medicine
Williams, Bernard	Emergency Medicine
Wilson, Edward	Emergency Medicine
Anaya, Paul	UK Gill Heart_ Cardio
Anstead, Michael I.	UK Peds Pulmonology
Aslam, Azhar	Lexington Cardio
Ayach, Taha	UK Nephrology
Aycinena, Juan-Carlos	UK Nephrology
Begg, Nicole	Adolescent Medicine/Psychology
Beineke, Daniel	Radiology (coverage)

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Benrajab, Karim	UK Gastroenterology
Bhalla, Vikas	UK Cardiology
Booth, David C.	UK Gill Heart_ Cardio
Buch, Ketan P.	Pulmonology
Cain, Lee	Optometry
Chaaban, Said	UK Pulmonology
Chadwell, Jennifer	Dentistry
Chambers, Mara	Markey
Chishti, Aftab	Pediatric Nephrology
Clark, Jason A	Pathology
Coburn, Ernest	Diagnostic Radiology
Cooper, Chad	Podiatry
Crager, James	Lexington Cardio
Cumbermack, Kristopher	UK Peds Cardio
Darrat, Yousef	UK Gill Heart_ Cardio
Dave, Kinjal	UK Pulmonary
Escalante, David A.	Endocrinology
Flomenhoft, Deborah	Gastroenterology
Graham, Alan	General Surgery
Guduru, Zain	UK Neurology
Gupta, Vedant	Uk Cardiology
Hamdy, Abeer	UK Peds Cardiology
Hayman, Joshua	UK Peds Cardiology
Hesselson, Aaron	UK Cardiology
Hessler, Amy	Neurology
Howard III, Thomas W.	Rheumatology
Huffman, James G.	Ophthalmology
Huffman, Mark D.	Ophthalmology
Ireland, Mary L. Loyd	UK Orthopedics
Ismail, Bahaaeldeen	UK Gastroenterology

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Jenkins, Kirk	UK Rheumatology
Jones, Heather	Podiatry
Jones, Michael R.	Lexington Cardio
Kanthawar, Ashok	Gastroenterology
Kiessling, Stefan	Peds Nephrology
Knecht, Christian	General Surgery
Kotter, John	UK Gill Heart_ Cardio
Krestik, Paul K.	Podiatry
Larkey, Chelsen	Professional Counselor
Latterman, Christian	UK Orthopedics
Lefebvre, Melissa	UK Peds Cardiology
Lenert, Aleksander	Rheumatology
Leung, Steve W.	UK Gill Heart_ Cardio
Livas, Iraklis	Allergy/Immunology
Lozano, Richard	Pathology
Mahan, Angela L.	UK Cardiothoracic
Mahuwala, Zabeen	UK Neurology
Makhoul, Majd	UK Peds Cardio
Marshall, Ann P.	Pathology
Maskey, Ashish P.	UK Pulmonology
McClure, Rick	UK Gill Heart_ Cardio
Messerli, Adrian	UK Gill Heart
Mohan, Shaun	UK Peds Cardiology
Mullett, Timothy	UK Cardiothoracic
Neyra-Lozano, Javier A.	UK Nephrology
Pandey, Subodh	UK Pulmonology
Picklesimer, Fred L.	Pathology
Ramachandran, Preeti	Peds Cardiology
Robertson, William	Neurology
Rogers, Anthony	Cardiothoracic

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Rzasa, Callie	UK Peds Cardiology
Sadhir, Mandakini	Adolescent Med
Schaeffer, Cameron	Pediatric Urology
Schneider, Douglas	UK Peds Cardio
Settembre, Elizabeth	Pathology
Smith, Mikel D.	UK Gill Heart_Cardio
Smyth, Susan S.	UK Gill Heart_Cardio
Sorrell, Vincent	UK Gill Heart_Cardio
Stephanie Stockburger, MD	Adolescent Med
Thind, Ravneet	Oncology
Vranicar, Mark	Pediatric Cardiology
Westerfield, Byron	Sleep Medicine
Whayne, Thomas F.	UK Gill Heart_Cardio
Wheeler, Greg R.	UK Neurosurgery
Yalkut, Denis	Urology
Yozwiak, John	UK Adol Med Psychology
Ziada, Ali M.	UK Peds Urology
Abrams, Dee A.	PA-C UK Gill Heart
Clevinger, Nicole	APRN Lexington Cardiology
Cowherd, Mary J.	PA-C UK Gill Heart
Fitzpatrick, Melissa	APRN - UK Pulmonology
Green, Nancy L.	APRN - Gynecology
Grubbs, Susan	APRN - UK Nephrology
Lindsay-Rahman, Rana	APRN UK Gill Heart
Little, Caroline	PA-C Lexington Cardiology
Manning, William "Dan"	PA-C Lexington Cardiology
McLaughlin, Kimberly	PA-C UK Nephrology
McRae, David	PA-C UK Gill Heart
Moore, Barry	PA-C UK Gastro
Moore, Katherine	PA-C UK Cardiology

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Pagan, Bridget	PA-C UK Gill Heart_ Cardio
Phillips, Mary	APRN Markey Cancer
Pierson, Rose Y.	APRN Allergy
Prather, Barbara	APRN Brodhead Family Care
Puntney, Hannah L.	APRN UK Peds Urology
Tincher, Kathy	RN Extender Lexington Cardio
Alhajeri, Abdunasser	UK Radiology Telemed
Applegate, Kimberly Elaine	UK Radiology Telemed
Ayoob, Andres	UK Radiology Telemed
Beaman, Francesca	UK Radiology Telemed
Blomquist, Gustav	UK Radiology Telemed
Brooks, Michael	UK Radiology Telemed
Dawkins, Adrian	UK Radiology Telemed
Dillon, Johanne	UK Radiology Telemed
El Khouli, Riham	UK Radiology Telemed
Escott, Edward	UK Radiology Telemed
Gabriel, Gaby	UK Radiology Telemed
Ganesh, Halemane	UK Radiology Telemed
Gibbs, Richard	UK Radiology Telemed
Hobbs, Stephen	UK Radiology Telemed
Kim, June	UK Radiology Telemed
Krohmer, Steven	UK Radiology Telemed
Lee, James	UK Radiology Telemed
Lowry, Conor	UK Radiology Telemed
Lukins, Douglas	UK Radiology Telemed
Merhar, Gary	UK Radiology Telemed
Montgomery, Justin	UK Radiology Telemed
Nair, Rashmi	UK Radiology Telemed
Nickels, David	UK Radiology Telemed
Oates, M Elizaberth	UK Radiology Telemed

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Obeng, Kwaku	UK Radiology Telemed
Owen, Joseph Wilson	UK Radiology Telemed
Owen, Wendi	UK Radiology Telemed
Pawley, Barbara	UK Radiology Telemed
Pereira Rodriguez, Miguel	UK Radiology Telemed
Raissi, Driss	UK Radiology Telemed
Raslau, Falvius	UK Radiology Telemed
Spicer, Paul	UK Radiology Telemed
Stevens, Scott	UK Radiology Telemed
Szabunio, Margaret	UK Radiology Telemed
True, Jennifer	UK Radiology Telemed
Van Wyk, Charl	UK Radiology Telemed
Wang, Xiaoqin	UK Radiology Telemed
Winkler, Michael	UK Radiology Telemed
Zagurovskaya, Marianna	UK Radiology Telemed