



## Financial Assistance Policy

Approved by:	Date Last Approved:	Date of Issue:	Version: 2019-1
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Printed copies are for reference only. Please refer to the electronic copy for the latest version.

### Regulatory Requirement/References:

This Policy is in compliance with Internal Revenue Code Section 501(r) and related Treasury Regulations.

## Financial Assistance Policy

Select Specialty Hospital Hampton Roads' policy is to provide Medically Necessary Care to patients without regard to race, creed, or ability to pay. Patients who do not have the means to pay for services provided at Select Specialty Hospital Hampton Roads may request financial assistance, which will be awarded subject to the terms and conditions set forth below.

### I. Background

- A. Select Specialty Hospital Hampton Roads is a long term acute care hospital that is operated and managed in a manner that is generally consistent with the requirements of The Riverside Health System under section 501(c)(3) of the Internal Revenue Code and charitable institutions under state law.
- B. Select Specialty Hospital Hampton Roads is committed to providing Medically Necessary Care. "Medically Necessary Care" is provided to patients without regard to race, creed, or ability to pay.
- C. The principal beneficiaries of the Financial Assistance Policy are intended to be uninsured patients who reside within 50 miles of Select Specialty Hospital Hampton Roads and whose Annual Family Income does not exceed 200% of the Federal Poverty Income Guidelines (the FPG) published from time to time by the U.S. Department of Health and Human Services and in effect at the date of service for awards of financial assistance under this Policy. Patients experiencing financial or personal hardship or special medical circumstances also may qualify for assistance. Under no circumstances will a patient eligible for financial assistance under this Policy be charged more than amounts generally billed for such care.

- D. Patients are expected to cooperate with Select Specialty Hospital Hampton Roads' procedures for obtaining Financial Assistance or other forms of payment, and to contribute to the costs of their care based on their individual ability to pay.

## II. Definitions

"Annual Family Income" is determined using the Census Bureau definition, which uses the following income when computing federal poverty guidelines:

- Includes earnings, unemployment compensation, workers' compensation, Social Security, Supplemental Security Income, public assistance, veterans' payments, survivor benefits, pension or retirement income, interest, dividends, rents, royalties, income from estates, trusts, educational assistance, alimony, child support, assistance from outside the household, and other miscellaneous sources.
- Noncash benefits (such as food stamps and housing subsidies) do not count.
- Income is determined on a before-tax basis.
- If a person lives with their immediate family, includes the income of all family members.

"Application" means the process of applying under this Policy, including either (a) by completing the Select Specialty Hospital Hampton Roads financial assistance application in person, online, or over the phone with a representative, or (b) by mailing or delivering a completed paper copy of the Application to Select Specialty Hospital Hampton Roads.

"CBO" means Central Billing and Collections Office.

"Family" shall mean the patient, patient's spouse (regardless of where the spouse lives) and all of the patient's natural or adoptive children under the age of eighteen who live with the patient. If the patient is under the age of eighteen, the family shall include the patient, the patient's natural or adoptive parent(s) (regardless of where the parents live), and all of the parent(s)' natural or adoptive children under the age of eighteen who live in the home.

"FPG" shall mean the Federal Poverty Income Guidelines that are published from time to time by the U.S. Department of Health and Human Services and in effect at the date of service.

"Insured Patients" are individuals who have any governmental or private health insurance.

"Medically Necessary Care" shall mean those services, as defined by Medicare, that are reasonable and necessary to diagnose and provide preventive, palliative, curative or restorative treatment for physical or mental conditions in accordance with professionally recognized standards of health care generally accepted at the time services are provided. Medically necessary care does not include outpatient

prescription medications.

"Policy" shall mean this Financial Assistance Policy as currently in effect.

"Uninsured Patients" are individuals: (i) who do not have governmental or private health insurance; (ii) whose insurance benefits have been exhausted; or (iii) whose insurance benefits do not cover the Medically Necessary Care the patient is seeking.

### **III. Relationship to Other Policies**

- A. Policy Relating to Emergency Medical Services - Emergency services are not provided at Select Specialty Hospital Hampton Roads.
- B. Prescription Drug Coverage - Patients in need of assistance with the costs of their prescription medications may qualify for one of the patient assistance programs offered by pharmaceutical companies.

### **IV. Eligibility Criteria for Financial Assistance**

Patients seeking care at Select Specialty Hospital Hampton Roads who meet the qualifications below are eligible for the assistance described in Section VII under this Policy.

- A. Income Based Financial Assistance -
  - 1. Patients who are Uninsured Patients and whose Annual Family Income does not exceed 400% of the FPG,
  - 2. Who are seeking Medically Necessary Care for inpatient hospital services, and
  - 3. Meet at least one of the following...
    - a. Are a U.S. citizen; or
    - b. Carry a U.S. Permanent Resident Card (USCIS Form I-551); or
    - c. Live in the Select Specialty Hospital Hampton Roads service area (defined by a 50 mile radius around the facility).
- B. Additional Ways to Qualify for Assistance - A patient who does not otherwise qualify for financial assistance under this Policy but is unable to pay for the cost of Medically Necessary Care may seek assistance in the following circumstances:
  - 1. Exceptional Circumstances - Patients who relay that they are undergoing an extreme personal or financial hardship (including a terminal illness or other catastrophic medical condition).
  - 2. Special Medical Circumstances - Patients who are seeking treatment that can only be provided by Select Specialty Hospital Hampton Roads medical staff or who would benefit from continued medical services from Select Specialty Hospital Hampton Roads for continuity of care.

Requests for assistance due to Exceptional Circumstances or Special Medical Circumstances will be evaluated on a case-by -case basis with a determination made by the CBO Manager.

- C. Medicaid Screening - Uninsured Patients seeking care at Select Specialty Hospital Hampton Roads may be contacted by a representative to determine whether they may qualify for Medicaid. Uninsured Patients must cooperate with the Medicaid eligibility process to be eligible for financial assistance under this Policy.

## V. Method of Applying

### A. Income Based Financial Assistance

- 1. Any patient seeking income-based financial assistance at any time in the scheduling or billing process may complete the financial assistance application and will be asked to provide information on Annual Family Income for the three-month and twelve-month period immediately preceding the date of eligibility review. Third party income verification services may be used as evidence of Annual Family Income. The financial assistance application may be found in our Admissions areas of our facility at 500 J. Clyde Morris Blvd, Newport News, VA 23601; online at <https://hamptonroads.selectspecialtyhospitals.com/patients-and-families/admissions/financial-assistance-for-virginia-hospitals/>; or by calling our admissions department at 757-534-9764. Assistance in completing the financial assistance application may also be obtained by contacting our Central Business Office at 888.868.1103.

You may obtain a copy of our Financial Assistance Policy, Plain Language Summary, and Application Form free of charge. Copies of our Financial Assistance Policy, Application Form and Plain Language Summary are available in English, Spanish and Vietnamese.

- 2. If there is a discrepancy between two sources of information, a Select Specialty Hospital Hampton Roads representative may request additional information to support Annual Family Income. Items that may be required to process the financial application include:
  - i. Bank statements
  - ii. Income tax returns
  - iii. Check stubs
  - iv. Other forms of information to determine financial assistance liability
- 3. If the individual subsequently submits a complete financial assistance application and/or is determined to be eligible for financial assistance, a refund will be provided if the individual has paid for the care that exceeds the amount he or she is determined to be personally responsible for paying, unless such amount is less than \$5.

B. Exceptional Circumstances

Select Specialty Hospital Hampton Roads personnel will initiate an Application for any patient identified as having incurred or being at risk to incur a high balance or as reporting an extreme personal or financial hardship. Select Specialty Hospital Hampton Roads personnel will gather information on financial circumstances and personal hardships from the patient. Determinations are made by the CBO Manager under the direction of the CFO or designee. The patient will be notified of the final determination.

C. Special Medical Circumstances

Select Specialty Hospital Hampton Roads Personnel will initiate an Application for any patient identified during the scheduling or admission process as having potential special medical circumstances and a representative will solicit a recommendation from the physician who is or would be providing the treatment or care as to whether the patient needs treatment that can only be provided by Select Specialty Hospital Hampton Roads medical staff, or would benefit from continued medical services from Select Specialty Hospital Hampton Roads for continuity of care. Determinations on special medical circumstances are made by the treating physician. The patient will be notified in writing if they do not qualify for financial assistance as due to special medical circumstances.

D. Incomplete or Missing Applications

Patients will be notified of information missing from the Application and given a reasonable opportunity to supply it.

**VI. Eligibility Determination Process**

A. Financial Interview

A Select Specialty Hospital Hampton Roads representative will attempt to contact by telephone all Uninsured Patients for financial assistance at the time of scheduling for a financial interview. The representative will ask for information, including family size, sources of family income and any other financial or extenuating circumstances that support eligibility under this Policy and will aid in completion of an Application. At the time of the appointment or upon admission, patients will be asked to visit the Select Specialty Hospital Hampton Roads representative and sign the Application.

B. Applications Received

Any Application, whether completed in person, online, delivered or mailed in, will be forwarded to a Select Specialty Hospital Hampton Roads representative for evaluation and processing.

C. Determination of Eligibility

A Select Specialty Hospital Hampton Roads representative will evaluate and process all Financial Assistance Applications. The patient will be notified by letter of the eligibility determination. Patients who qualify for less than 100% financial assistance will receive an estimate of the amount due and will be requested to set up payment arrangements.

## **VII. Basis for Calculating Amounts Charged to Patients, Scope, and Duration of Financial Assistance**

Patients eligible for awards of income-based financial assistance under the Policy will receive assistance according to the following income criteria:

- If you are uninsured and your annual family income is up to 200% of the FPG, you will receive free care or 100% write off of patient liability after insurance has paid.
- If you are uninsured and your annual family income is above 200% but less than 400% of the FPG, a write off of 75% of eligible billed charges may be available. You may also be eligible to receive discounted rates on a case-by-case basis based upon the specific circumstances, such as catastrophic illness or medical indigence, at the discretion of the CBO.

Failure to comply with Select Specialty Hospital Hampton Roads' Medicaid Coverage and Financial Assistance screening process will exclude patients from Financial Assistance eligibility.

Modifications to previously awarded discounts shall be made if subsequent information indicates the information provided to Select Specialty Hospital Hampton Roads was inaccurate.

As used herein, the "amount generally billed" has the meaning set forth in IRC §501(r)(5) and any regulations or other guidance issued by the United States Department of Treasury or the Internal Revenue Service defining that term. See Appendix A for a detailed explanation of how the "amount generally billed" is calculated. Appendix A is updated annually and is also available online at <https://hamptonroads.selectspecialtyhospitals.com/>, in our admissions areas, and upon request by asking a Select Specialty Hospital Hampton Roads representative.

Once Select Specialty Hospital Hampton Roads has determined that a patient is eligible for income-based financial assistance, that determination is valid for ninety (90) days from the date of eligibility review. After ninety (90) days, the patient may complete a new Application to seek additional financial assistance.

## **VIII. Determination of Eligibility for Financial Assistance Prior to Action for Non-Payment**

- A. Billing and Reasonable Efforts to Determine Eligibility of Financial Assistance

Select Specialty Hospital Hampton Roads seeks to determine whether a patient is eligible for assistance under this Policy prior to or at the time of admission or service. If a patient has not been determined eligible for financial assistance prior to discharge or service, Select Specialty Hospital Hampton Roads will bill for care. If the patient is insured, Select Specialty Hospital Hampton Roads will bill the patient's insurer on record for the charges incurred. Upon adjudication from the patient's insurer, any remaining patient liability will be billed directly to the patient. If the patient is uninsured, Select Specialty Hospital Hampton Roads will bill the patient directly for the charges incurred. Patients will receive a series of up to four billing statements over a 120 day period beginning after the patient has been discharged delivered to the address on record for the patient. Only patients with an unpaid balance will receive a billing statement. Billing statements include a plain language summary of this Policy and how to apply for financial assistance. Reasonable efforts to determine eligibility include: notification to the patient of the Policy upon admission and in written and oral communications with the patient regarding the patient's bill, an effort to notify the individual by telephone about the Policy and the process for applying for assistance at least 30 days before taking action to initiate any lawsuit, and a written response to any financial assistance application for assistance under this Policy submitted within 240 days of the first billing statement with respect to the unpaid balance or, if later, the date on which a collection agency working on behalf of Select Specialty Hospital Hampton Roads returns the unpaid balance to the Hospital.

#### B. Collection Actions for Unpaid Balances

If a patient has an outstanding balance after up to four billing statements have been sent during a 120 day period, the patient's balance will be referred to a collection agency representing Select Specialty Hospital Hampton Roads which will pursue payment. Collection agencies representing Select Specialty Hospital Hampton Roads have the ability to pursue collection for up to 18 months from the point when the balance was sent to the collection agency. A patient may apply for financial assistance under this Policy even after the patient's unpaid balance has been referred to a collection agency. After at least 120 days have passed from the first post-discharge billing statement showing charges that remain unpaid, and on a case-by-case basis, Select Specialty Hospital Hampton Roads may pursue collection through a lawsuit when a patient has an unpaid balance and will not cooperate with requests for information or payment from Select Specialty Hospital Hampton Roads or a collection agency working on its behalf.

In no case will Medically Necessary Care be delayed or denied to a patient before reasonable efforts have been made to determine whether the patient may qualify for financial assistance. At Select Specialty Hospital Hampton Roads, an uninsured patient who seeks to schedule new services and has not been presumed eligible for financial assistance will be contacted by a representative who will notify the patient of the Policy and help the patient initiate an Application for financial assistance if requested.

C. Review and Approval

Select Specialty Hospital Hampton Roads' representative has the authority to review and determine whether reasonable efforts have been made to evaluate whether a Patient is eligible for assistance under the Policy such that extraordinary collection actions may begin for an unpaid balance.

**IX. Physicians not covered under the Select Specialty Hospital Hampton Roads Financial Assistance Policy**

Certain services are performed by physicians who are not covered by the Select Specialty Hospital Hampton Roads financial assistance policy. These services may be covered by the Riverside Health System financial assistance policy available online at [https://www.riversideonline.com/patients\\_guests/financial-assistance.cfm](https://www.riversideonline.com/patients_guests/financial-assistance.cfm).

Physicians working at Select Specialty Hospital Hampton Roads who are *not* covered under this Policy are identified in the **Appendix B, Provider List**. The list is updated quarterly and is also available online at <https://hamptonroads.selectspecialtyhospitals.com/patients-and-families/admissions/financial-assistance-for-virginia-hospitals/>, in our admissions areas, and upon request by asking a Select Specialty Hospital Hampton Roads representative.