



Title: Financial Assistance Policy

Responsible Department: Revenue Cycle	Date Created: 12/01/2015
Approver(s): Keith Page (President & CEO)	Date Approved: 02/04/2016

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Policy Statement:

Anderson Hospital is an independent not for profit hospital dedicated to creating a health care setting in which quality of life and service excellence are experienced by our patients, their families and the community. Anderson Hospital provides emergency and other medically necessary care to patients without discrimination regardless of their ability to pay. In the event that third party insurance coverage is not available, and a patient does not meet the qualifications for Medicaid, a patient may be granted financial assistance based on a determination of eligibility. This policy identifies those circumstances when Anderson Hospital may provide free or discounted care based on the financial needs of the patient.

This financial assistance policy also pertains to certain Anderson Medical Group providers that bill for professional services to patients receiving care at Anderson Hospital including, but not limited to, such specialties as Surgery, Cardiology, and Orthopedics.

Services not eligible for Financial Assistance include: professional services which are related to the hospital visit and billed by non-Anderson Medical Group providers, professional services provided by Anderson Medical Group providers that do not provide services at Anderson Hospital, Maryville Imaging Services, private contract procedures (primarily Cosmetic), Phase 3 Cardiac Rehab, Hearing Aids and other Medicare non-covered services.

Professional services for certain Anderson Medical Group providers, and other providers that perform professional services at Anderson Hospital not covered under this policy are listed in the appendix of this Financial Assistance Policy.

Anderson Hospital will comply with the Patient Protection and Affordable Care Act of 2010 under Section 501(r), the Illinois Hospital Uninsured Patient Discount Act, and the Illinois Financial Assistance under the Fair Billing Act. This policy has been adopted by the governing body of Anderson Hospital in accordance with the regulations under Section 501(r). Throughout the language of this policy, the term “patient” refers to the patient and/or their guarantor.

Guidelines/Procedures:

Definitions:

- A. **Amounts Generally Billed (AGB)** – calculation of the amounts generally billed for emergency or other medically necessary care to individuals who have insurance



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covering such care. This calculation will be performed annually.

- B. **AGB Percentage** – a percentage of gross charges that Anderson Hospital uses to determine the AGB write off for any emergency or other medically necessary care it provides to an individual who is eligible for assistance under its financial assistance policy (FAP)

- C. **Application Period** – the period during which Anderson Hospital must accept and process an application for financial assistance under its FAP submitted by an individual in order to have made reasonable efforts to determine whether the individual is FAP-eligible. Anderson Hospital management may accept and process an individual’s FAP application submitted outside of the application period for extenuating circumstances. With respect to any care provided by Anderson Hospital to an individual, the application period begins on the date the care is provided and ends on the 240th day after the date that the first post-discharge billing statement for the care is provided.

- D. **Eligibility** for Anderson Hospital financial assistance is defined by the patient/guarantor’s income based on a sliding scale relative to Federal Poverty Guidelines (Refer to Guidelines/Procedures in this policy) or other criteria as follows:
 1. Patients with yearly income that falls below current federal and state poverty guidelines and are not eligible for any state or federal assistance programs which provide healthcare coverage.
 2. Uninsured patients or Underinsured patients that do not qualify for local, state or federal programs, and based on their analysis of their financial situation; it is determined that full payment of the hospital bill would cause financial hardship. This determination may require partial payment by the patient.
 3. Patients who apply for Medicaid and meet income eligibility requirements but are subsequently denied for reasons other than financial hardship.
 4. Patients whose family or friends have provided information establishing the patient’s inability to pay.
 5. Patient is deceased without an estate or other financially responsible party.
 6. Patients who are screened and/or identified for financial assistance by a Patient Access Financial Counselor or Associate, Patient Financial Services employees, or a hospital contracted agency.
 7. Patients will not be discriminated against in regards to race, creed, color, national origin, sex, sexual orientation, or the presence of any sensory, mental, or physical disability.

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- 8. Other circumstances may apply at the discretion of the Director of Revenue Systems, Patient Financial Services Director or Vice President /CFO.

- E. **Extraordinary Collection Action (ECA)** – actions taken by Anderson Hospital against an individual related to obtaining payment of a bill for care covered under the hospital facility’s FAP that require legal or judicial process, or involve reporting adverse information about an individual to consumer credit reporting agencies or credit bureaus.

- F. **FAP Application (FAP)** – information and accompanying documentation that an individual submits to apply for financial assistance under the Anderson Hospital financial assistance policy. An individual is considered to have submitted a complete FAP application if he or she provides information and documentation sufficient for Anderson Hospital to determine whether the individual is FAP-eligible. An incomplete FAP application is considered if he or she provides some, but not sufficient, information and documentation to determine FAP-eligibility. The term “FAP application” does not refer only to written submissions. Anderson Hospital may obtain information from an individual in writing or orally (or a combination of both).

- G. **FAP- Eligible** – individuals eligible for financial assistance under Anderson Hospital’s FAP for care covered by the FAP, without regard to whether an individual has applied for assistance under the FAP.

- H. **Federal Poverty Guidelines (FPG)** – The federal government establishes and publishes annual poverty guidelines in the Federal Registry. The guidelines compare the family’s yearly/monthly income with the size of the family/dependents.

- I. **Family/Dependents** – The family unit is a group of individuals related by blood, marriage, adoption or residence, whose income can be applied to the patient’s medical expenses. Children over eighteen years of age that are not a student, emancipated minors and children living under the care of individuals, not legally responsible for their support will not be considered part of the family/dependents unless those individuals are claimed as dependents on the responsible parties income tax.

- J. **Financial Assistance Policy (FAP)** –written policy that specifies all of the eligibility criteria that an individual must satisfy to receive a financial assistance discount, free care, or other level of assistance.

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- K. **Gross Charges** – Anderson Hospital’s full, established price for medical care that the hospital facility consistently and uniformly charges patients before applying any contractual allowances, discounts or deductions.

- L. **Healthcare Scoring** is a method to define and demonstrate community needs and recognizing that some patients will be unresponsive to the charity care application process. In the absence of information provided by the patient or in cases where the information provided by the patient is incomplete, or to evaluate for comparison, an assessment process utilizing a predictive model will be deployed to screen and qualify patients (pre or post service) for financial assistance. The predictive model incorporates income and household size estimates, a socio-economic need factor as well as information on homeownership. This data will be calibrated to emulate the hospital’s Financial Assistance policy and local economic factors (i.e. Federal Poverty level percentage).

- M. **Illinois Discount** – Illinois state requirements related to Uninsured patients is defined as charges discounted to 135% of cost (62.5% of charges) determined by applying ratio of cost to charges (RCC) from the most recently filed Medicare cost report to an Uninsured patient’s bill. Actual formula for discount is $[1-(RCC \times 1.35) \times \text{charges}]$, applicable only to charges exceeding \$300 in any one inpatient admission or outpatient encounter.

- N. **Insured Patients** have medical coverage for hospital services with designated copayments, co-insurance, deductibles and/or out-of-pocket patient financial responsibilities. A patient who is represented by an attorney seeking third-party liability coverage for services rendered will be considered an Insured patient until the pending litigation is finalized, and therefore is not eligible for Financial Assistance.

- O. **Medically Necessary** Services related to Illinois state requirements for Uninsured Patients are defined as those considered as medically necessary under Medicare Guidelines (with the exception of Medicare non-covered services deemed eligible for Financial Assistance approved by Administration). Services not eligible for Financial Assistance includes Private Contract procedures (primarily Cosmetic), Phase 3 Cardiac Rehab, and Hearing Aids.

- P. **Substantial Assets** related to Illinois state requirements regarding discounts for Uninsured patients is defined as a value in excess of 600% FPL in urban areas. Assets excluded for consideration are patient’s primary residence, personal property exempt

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from collections under Section 5/12-1001 of the Illinois Code of Civil Procedure and any amounts held in a pension or retirement plan.

- Q. Plain Language Summary of the FAP** – a written statement that notifies an individual that Anderson Hospital offers financial assistance under a FAP and provides the following additional information in language that is clear, concise, and easy to understand. It includes:
1. A brief description of the eligibility requirements and assistance offered under the FAP
 2. A brief summary of how to apply for assistance under the FAP
 3. The direct Website address (or URL) and physical locations where the individual can obtain copies of the FAP and FAP application form
 4. Instructions on how the individual can obtain a free copy of the FAP and FAP application by mail
 5. The contact information, including telephone number and location where an individual can go for assistance
 6. A statement of the availability of translations of the FAP, FAP application form, and plain language summary of the FAP in other languages, if applicable
 7. A statement that a FAP-eligible individual may not be charged more than AGB for emergency or other medically necessary care
- R. Presumptive FAP-eligibility determination** – determination that an individual is FAP-eligible based on information other than that provided by the individual or based on a prior FAP-eligibility determination.
- S. Presumptive Eligibility (Illinois only)** is defined as those uninsured patients presumed to be eligible for charity care discounts on the basis of individual life circumstances (Presumptive Eligibility). Illinois uninsured patients are screened for Presumptive Eligibility prior to the issuance of any bill for those health care services provided by the hospital. Such patients may be presumed eligible for 100% charity without the completion of a financial assistance application, when at least one of the following circumstances applies for the patient:
1. Medicaid eligible but not eligible on the date of service or for non-covered services;
 2. Homelessness;
 3. Deceased with no estate;
 4. Mental incapacitation with no one to act on patient’s behalf;

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5. Enrollment in the following assistance programs for low-income individuals having eligibility criteria at or below 200% of the federal poverty income guidelines:
 - a. Women, Infants and Children Nutrition Program (WIC)
 - b. Supplemental Nutrition Assistance Program (SNAP)
 - c. Illinois Free Lunch and Breakfast Program;
 - d. Low Income Home Energy Assistance Program (LIHEAP);
 - e. Enrollment in an organized community-based program providing access to medical care that assesses and documents limited low-income financial status as a criterion for membership;
 - f. Receipt of grant assistance for medical services
 - g. Temporary Assistance for Needy Families
 - h. Healthcare Score indicates presumptive eligibility has been met.

- T. **Uninsured Patients** are patients without any health insurance or any coverage for the services provided that may be screened for Medicaid eligibility and/or financial assistance.

- U. **Underinsured Patients**— individual that has medical insurance but has inadequate financial coverage to address their medical needs. This includes high deductible health plans, coinsurance, non-covered services, etc. Patients who refuse or otherwise fail to provide information regarding other coverage may not be eligible for financial assistance.

- V. **Uninsured Discount Eligibility Criteria** regarding Illinois state requirements related to Uninsured patients is defined as having family income that is no more than 600% of the Federal Poverty Level (FPL) in urban areas. (Family income in this context is defined as a family’s annual earnings and cash benefits from all sources before taxes [including distributions and payments from pensions or retirement plans] less payments made for child support.). Discounts available under Illinois law is only required for “residents”, i.e. a person who lives in Illinois and who intends to remain living in Illinois indefinitely.

Notification

- A. All patients registered for Anderson Hospital services will be offered a plain language summary as part of the intake process. The plain language summary will be a written statement that notifies an individual that Anderson Hospital offers financial assistance under its financial assistance policy.

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- B. Financial assistance policies are transparent and will be readily available to the community including eligibility criteria, and how to apply for financial assistance. Free paper copies of financial assistance policies will be available in all admission areas, as well as, posted on the Anderson Hospital website.
- C. Anderson Hospital will prominently and conspicuously post complete and current versions of financial assistance documents and other application information on the Anderson Hospital website in English and in Spanish in compliance with the Patient Protection and Affordable Care Act of 2010 under Section 501(r). The following will be posted:
 - 1. Financial Assistance Policy (FAP)
 - 2. Financial Assistance Application Form (FAA)
 - 3. Plain Language Summary (PLS)
 - 4. Information regarding how to visit a Financial Counselor in the Patient Access department during the hours of 8am – 4:30pm
 - 5. How to obtain an application from any hospital registration desk including the Emergency department
 - 6. How to apply for financial assistance after hospital services have been performed and a patient billing statement has been received by calling 1-877-444-6382
 - 7. How to apply for financial assistance if services were provided by an Anderson Medical Group provider by calling 1-866-724-6658
- D. Anderson Hospital will provide a conspicuous notice on each patient billing statement regarding availability of financial assistance. The notice will also reference the uninsured patient discount for Illinois resident’s legislation.
- E. Emergency Medical Care – Anderson Hospital will prohibit debt collection activities, such as copays, that interfere with the provision, without discrimination, of emergency medical care regardless where such activities occur. Anderson Hospital Patient Access Registrars are trained that collection activities during the registration process that can delay the provision of screening and treatment for an emergency medical condition are prohibited. The actions of requesting immediate payment before or while providing screening or stabilizing treatment for emergency medical conditions is prohibited under this policy.

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Methods of Calculating the Financial Assistance Discount

- A. Anderson Hospital has established a financial assistance policy that provides financial assistance to uninsured and underinsured individuals. Individuals whose income is at or below 200% of the Federal Poverty Guidelines will receive 100% Financial Assistance. Partial discounts are available for those with income between 200% and 600% of the current years Federal Poverty Guidelines. For uninsured individuals, these discounts are applied for eligible patients after the uninsured discount of 50% is deducted from the patient balance. See the sliding scale below.

<u>Family Income as % of FPL</u>	<u>Discount Percentage</u>
Up to 200% of the Federal Poverty Guidelines	100% (free care)
201% - 300%	90%
301% - 400%	80%
401% - 600%	70%

- B. Anderson Hospital will comply with the Illinois Hospital Uninsured Patient Discount Act, the Illinois Financial Assistance Under the Fair Billing Act, and the Patient Protection and Affordable Care Act of 2010, 501(r)(3) -(6). Discounts provided to Anderson Hospital patients that qualify under this legislation will be classified as charity adjustments.
- C. The minimum financial discount percentage (charity adjustment) is calculated in accordance with section 501(r) – 5(b) regulations. Anderson Hospital has chosen to use the look-back method in order to determine the hospitals Amounts Generally Billed (AGB). Anderson Hospital calculated the amounts generally billed (AGB) based on all claims allowed by Medicare and private health insurers over a specified 12-month period, divided by the associated gross charges for those claims. This calculation is performed annually and any changes that are made to the AGB percentage will go into effect within 120 days after the end of the 12-month period used in calculating the AGB percentage. Questions regarding Anderson Hospital’s AGB percentage can be directed to the Anderson Hospital Financial Counselor.
- D. For purposes of the section 501(r) limitation on charges, a financial assistance eligible individual is considered to be “charged” (patient liability) only the amount he or she is personally responsible for paying after all deductions and discounts have been applied and less any amounts reimbursed by insurers (i.e. deductibles, coinsurance, copays). Upon determination of financial assistance eligibility, an individual will not be charged more than amounts generally billed for emergency or other medically necessary care.

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Screening and Application Process

- A. Anderson Hospital will screen uninsured patients for presumptive eligibility as soon as possible (before or after receipt of healthcare services) and prior to the issuance of any bill for those health care services without further scrutiny by the hospital. Patient Access staff will utilize a registration questionnaire and healthcare scoring as a means of screening when a patient is uninsured. For patients meeting presumptive eligibility criteria, Patient Financial services will discount the patients financial liability 100% if any of the below conditions are met:
 - 1. No third-party coverage is available
 - 2. Patient is already eligible for assistance (i.e. Medicaid), but the services are not covered
 - 3. Medicare or Medicaid benefits have been exhausted and the patient has no further ability to pay
 - 4. Patient meets Illinois state charity care requirements

- B. In order to assess individual needs, Anderson Hospital Patient Access Financial Counselors and Associates, (or contracted agents) may provide the patient with a Financial Assistance application and review with the patient the information needed and the documentation required to complete the eligibility process.

- C. Patients are notified of the hospitals financial assistance programs throughout the billing cycle. The billing statements sent to the patient give a brief description on how to apply for financial assistance.

- D. Patients are sent billing statements each month for a period of 120 days before the account may be referred to an outside agency for further collection efforts.

- E. In the event a patient inquiries about financial assistance, they are sent a plain language summary which includes a listing of required supporting documentation.

- F. The financial assistance application contains a notation that if a patient meets the presumptive eligibility criteria, or is otherwise presumptively eligible by virtue of the patient’s family income, the patient shall not be required to complete the portions of the financial assistance application addressing the monthly expense information and estimated expense figures.

- G. Once a financial assistance application is received, all collection activities are placed on hold pending the outcome of the application determination. In the event that an

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application is received and the account has already been referred to an outside agency for further collections activities, the agency is notified and the account is placed on hold pending the determination of the application.

- H. The application is then evaluated to determine if all necessary documents for making a determination are included. If all documents are present, then the information from the patient's application is processed and a determination is made.
- I. A determination letter is provided to every patient that applies for financial assistance within 21 days of the completed application. The determination letter specifically documents the outcome of the application submitted.
- J. When an application is approved and the patient is determined to qualify for either full or partial assistance, then the patient account(s) are documented and the appropriate adjustment is added to the account(s). The applicable outside agency is notified to cease collection activities and the account(s) are processed for the appropriate discount.
- K. In the event the patient does not qualify for financial assistance, and the application is denied, a determination letter reflecting the reason for the denial is submitted to the patient. The account is then taken off of hold and collection activities will resume.
- L. In the event that a patient has not submitted all of the documents necessary for completing their application, a determination letter is submitted to the patient along with a listing of the documents necessary to complete the application.
- M. The patient is instructed to return any outstanding items within 10 days from the date of the request. However, an application will remain valid for up to 30 days in the event that a patient does return documents after the recommended 10 day period.
- N. Anderson Hospital will give individuals eight months (240 days) after the first post-discharge bill to apply for financial assistance to be considered to have made reasonable efforts to determine whether the patient is FAP eligible.

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- O. Anderson Hospital will provide a patient who has been determined to be eligible for free care with written documentation of that eligibility determination. A zero balance billing statement indicating that nothing is owed for the care is not required.
- P. If a patient submits a completed financial assistance application and is determined to be eligible, Anderson Hospital must refund any amounts the individual has paid for the care that exceeds the amount he or she is determined to be personally responsible for paying as an eligible individual. There is an exception to this general requirement to refund, under which Anderson Hospital is not required to refund excess payments of less than \$5.
- Q. Applications for account balances or estimated services exceeding \$5,000 in account balance(s) must be approved by the Director of Patient Financial Services or the Director of Revenue Systems.
- R. Applications for account balances or estimated services exceeding \$25,000 in account balance(s) must be approved by the Vice President /CFO.

Supporting Documentation

Unless an IL uninsured patient has demonstrated 100% presumptive eligibility for financial assistance in accordance with this policy, the following documents are requested to determine financial assistance eligibility:

- a. Listing of patient's available financial resources (net worth).
- b. Last two (2) statements for checking, savings, stocks, bonds, annuities, etc.
- c. Last three (3) paycheck stubs or earnings statements as proof of household income.
- d. Previous year's Federal Income Tax Return and W-2's.
- e. If an applicant does not have any of the listed documents to prove household income, he or she may call Anderson Hospital's Financial Counselor to discuss other reliable evidence that may be provided to demonstrate eligibility. Additional information may be provided via written submission, orally, or a combination of both.
- f. Other information requested by Anderson Hospital (i.e. Medicaid denial letter, Support or Public Assistance or Food Stamp Benefit Award letter, or documentation to prove Illinois residency).
- g. Internal Revenue Service Form 4506-T if applicable.

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Eligibility Determination

- A. Each application will be reviewed independently and allowances will be made for extenuating circumstances based on good faith effort and mitigating factors. Anderson Hospital reserves the right to review credit reports or any other method to validate the information submitted on the financial assistance application.
- B. The portion of the patient's unpaid and outstanding medical bills in excess of what the patient is able to pay in installments over (5) years is considered catastrophic medical costs and will be eligible for financial assistance. Any payment arrangements as a result of the catastrophic process must be made through the bank loan program.
- C. In the event that the patient does not cooperate (or is unable) with the financial assistance determination process, Anderson Hospital staff, or their agent, has the right to determine financial assistance eligibility based on the information the hospital has obtained and/or by the use of healthcare scoring and credit reporting.
- D. Uninsured or underinsured patients who qualify for financial assistance are expected to honor the payment plans for their discounted hospital bill and are expected to honor the provisions of their payment plan or to communicate to the hospital any change in their financial situation that may impact their ability to pay their discounted hospital bill.
- E. Anderson Hospital staff will ensure that the guidelines outlined in this policy are followed by any contracted agent engaged to assist in obtaining payment on outstanding bills from patients who have received financial assistance.
- F. Financial assistance may be applied to the Insured patient's copays, deductibles and/or coinsurances if the patient meets the requirements of this policy.
- G. Financial assistance approved applications will be reviewed for future patient services incurred within three (3) months of the date of the initial application without requiring the patient to complete a new application.
- H. Anderson Hospital does not accept appeals on financial assistance applications unless there has been a significant change in guarantor's income since the application was reviewed (such as a lay-off, patient has exhausted all their resources

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or a disability).

- I. If a patient would like to appeal the financial assistance application determination (i.e. the application was not approved or only partial assistance was awarded), the appeal must be sent in writing to the Financial Counselor or contracted agent who processed the application. The patient must provide documentation of change in income/circumstances along with the appeal letter. The patient has 30 days from the date of the award letter to appeal the decision.

Extraordinary Collection Actions (ECA's)

- A. Anderson Hospital or authorized party may not initiate ECA's against an individual whose financial assistance eligibility has not been determined before 120 days after the first post-discharge billing statement, provided the required notifications and reasonable efforts have been made prior to the initiation of ECA's.
- B. Written patient notices (and an accompanying plain language summary of the FAP) regarding ECAs will be mailed and state the ECAs that Anderson Hospital or other authorized party actually "intends to take". This notice does not need to be provided unless, and until one or more ECAs are initiated against an individual. The written notice will state the deadline after which the identified ECAs may be initiated, that is no earlier than 30 days after the date that the written notice is provided. Written notices or communications that are mailed will be considered "provided" on the date of mailing. A communication may also be considered provided on the date it is sent electronically or delivered by hand.
- C. Anderson Hospital or authorized party may provide any of the written notices or communications electronically (i.e. email) to any individual who indicates he or she prefers to receive the written notice or communications electronically.
- D. Oral notification about the FAP is also considered as a reasonable effort to determine FAP eligibility for those patients that Anderson Hospital or other authorized party intends to engage in ECAs. Anderson Hospital or authorized party is to make a reasonable effort to orally notify an individual about the hospital's FAP and about how the individual may obtain assistance with the FAP application process at least 30 days before the initiation of the ECAs against the individual.

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- E. Anderson Hospital or authorized party will need to document whether and how reasonable efforts were made to determine an individual’s FAP-eligibility before engaging in ECAs.
- F. If Anderson Hospital or authorized party receives a completed financial application during the application period from an individual after initiating an ECA against the individual, the application must be processed. If the individual is determined to be eligible for financial assistance, the ECA should be reversed and the collection process should be stopped (if the patient is eligible for free care), or continues anew based on the adjusted amount.
- G. If an individual is determined to be ineligible for financial assistance, no reversal of ECA’s will be necessary (suspension will be necessary only for the period of time the application is being processed).
- H. If Anderson Hospital or authorized party receives an incomplete financial assistance application, ECAs must be suspended against an individual until, either the individual completes the FAP application, or until the individual has failed to respond to requests for additional information and/or documentation within a reasonable period of time.
- I. The reasonableness of the period of time individuals are given to complete a FAP application before ECAs may resume will depend on the particular facts and circumstances including the amount of additional information and/or documentation that is being requested. Anderson Hospital or authorized party will inform the individual who has submitted an incomplete FAP application of the potential ECAs (and an accompanying plain language summary of the FAP) to ensure the individual knows who to contact for assistance in completing the application.
- J. The application period for the care of an individual will be longer than 240 days if the hospital facility provides the individual with notice about available financial assistance that is after the 240th day from the first post-discharge bill.
- K. Anderson Hospital or authorized party is permitted to initiate or resume ECAs before the end of the application period against an individual who has failed to respond to requests for additional information and/or documentation. If the individual subsequently completes the FAP application during the application period, Anderson Hospital or authorized party will again suspend any ECAs taken against the individual



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until the hospital determines whether the individual is FAP-eligible.

- L. If Anderson Hospital or authorized party aggregates an individual’s outstanding bills for multiple episodes of care before initiating one or more ECAs, the ECAs may not be initiated until 120 days after the post discharge bill was provided for the most recent episode of care.
- M. Anderson Hospital or authorized party will only suspend ECAs taken against the individual “to obtain payment for the care” at issue, not ECAs relating to past care for which Anderson Hospital has already satisfied the reasonable efforts requirements.
- N. In cases where Anderson Hospital staff or authorized party believes an individual who has submitted a completed FAP application may qualify for Medicaid, the determination for FA eligibility may be postponed until after the individuals Medicaid application has been completed and submitted, and a determination as to Medicaid eligibility has been made. However, when an individual has submitted a complete FAP application, Anderson Hospital or authorized party may not initiate or resume any ECAs to obtain payment for the care at issue until a FAP-eligibility determination has been made.
- O. Anderson Hospital or authorized party is required to report whether and how reasonable efforts were made to determine an individual’s FAP eligibility before engaging in ECA’s, and as a general matter, Anderson Hospital will maintain records to substantiate any information requested.

CHARITY CARE DISCOUNT QUALIFICATIONS UNDER ILLINOIS HOSPITAL UNINSURED PATIENT DISCOUNT ACT (Public Act 95-0965):

- A. Illinois residents applying for financial assistance should be evaluated as outlined herein. If the policy does not provide for a financial charity adjustment of at least 50%, the patient should be considered for charity discount as required by the Illinois Public Act 95-0965.
- B. Uninsured Patients are those patients who have no form of insurance or are not insured for any of the services provided. The term uninsured patients excludes patients who are covered for the services provided by Medicare, Medicaid or

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another public aid program.

- C. Uninsured patients charges will be discounted 50% (so that billed amount does not exceed 135% of cost) of medically necessary services.
- D. Patients are to provide third-party verification of income, information regarding assets and documentation of residency within thirty (30) days of request.
- E. The maximum amount collectible for medically necessary services from uninsured patients is 25% of annual family income for those Illinois resident patients who meet eligibility criteria and do not have substantial assets. For any subsequent services to be included in the maximum, the patient must inform the hospital that he/she had received prior services from that hospital which were determined to be eligible for discount.

References:

- A. Patient Protection and Affordable Care Act of 2010, 501(r)(3) -(6) effective December 29, 2015
- B. Illinois Register Hospital Financial Assistance Under the Fair Patient Billing Act (January 1, 2014)
- C. Illinois Hospital Uninsured Patient Discount Act (Public Act 95-0965)
- D. Anderson Hospital Out of Market Policy for Elective Services
- E. Federal Poverty Guidelines / Federal Poverty Level
- F. Section 5/12-1001 Illinois Code of Civil Procedure (Appendix A)
- G. Medicare Guidelines / Medical Necessity
- H. Anderson Hospital Billing and Collection Policy



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Appendix A

Anderson Medical Group Providers
Eligible for Financial Assistance under this Policy

Bicalho, Paul MD	Orthopedics
Diederich, Ryan MD	Plastic & Hand Surgery
Grebing, Brett MD	Orthopedics
Heng, Rafe M. DO	Cardiology
Jackson, Chelsea PA	Endocrinology
Lane, Charles A. MD	General Surgery
Maryville Medical Services, LLC	Highland Express Care
McKee, Robert Craig MD	Plastic/Plastic Hand Surgery
McKinzie, Laura APN	Plastic & Hand Surgery
Sandhu, Anita MD	Endocrinology
Shepperson, Kyle MD	Orthopedics
Staten, Patrice L. MD	OB/GYN
Steinmann, Gary PA	General Surgery
Wikiera, Richard DO	General Surgery
Wong, Scott A. MD	General Surgery

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Appendix B

Professional Providers that Perform Services at Anderson Hospital
Not Eligible for Financial Assistance under this Policy

Ahmad, Shafique, MD	Pediatrics
Ahmed, Makin U., MD	Pediatrics
Ahmed, Noor N., MD	Plastic Surgery
Albers, Gary M., MD	Pediatrics Pulmonary Medicine
Albright, Emily L., MD	Surgery/General Surgery
Ali, Syed S., MD	Neurology Pediatrics
Anderson, Peter J., MD	Surgery/Orthopedic Surgery
Aquino, Louis DPM	Surgery/Podiatry
Aslam, Naeem, MD	Gastroenterology
Badahman, Omer M., MD	Infectious Disease
Bard, Angela L., MD	Pediatrics
Beatty, Michael E., MD	Plastic & Hand Surgery Plastic Surgery
Bednarski, Hania B., DO	Surgery/General Surgery
Belvadi, Yashaswi, MD	Critical Care
Breda, Edgar J., DDS	Surgery/Dentistry/Oral Surgery
Bullock, Travis L., MD	Urology
Burstein, Samuel A., MD	Oncology/Hematology
Cardenas, Gabriel, Jr., DPM	Surgery/Podiatry
Chen, Wen Y., MD	Surgery/Ophthalmology



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Coats, Richard D., MD	Vascular Surgery Surgery
Crabtree, Travis D., MD	Cardiothoracic Surgery General Surgery
Dalal, Rashid A., MD	Nephrology
Dalla Riva, James J., MD	OB/GYN
Didriksen, Lizbeth H., MD	Pediatrics
Dimmitt, Walter A., MD	Cardiology
Dunn, William H., MD	Oncology/Radiation
Eberhart, Lori L., MD	Pediatrics
Eddy, Mark C., MD	Pediatrics
Eisenstein, David J., MD	Pathology
Engel, Elizabeth, MD	Pediatrics/Orthopedics
Ermis, Chad A., DO	Pain Management Physical Medicine & Rehabilitation
Fedder, Mark S., MD	Gastroenterology
Feldott-Johnson, Debra C., MD	Pediatrics
Fernandez, James A., MD	Otolaryngology
Fierstein, Jeffrey T., MD	Otolaryngology
Fleissner, Michael J., MD	Cardiology
Foner, Barbara J., MD	Critical Care Medicine Pulmonary Sleep Medicine Pulmonary Medicine



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Fraleley, Matthew A., MD	Cardiology
Frederickson, Neil W., MD	Gastroenterology
Frohnert, Paul W., MD	Radiology
Gingrich, Tina M., MD	OB/GYN
Gitersonke, Alan R., DPM	Surgery/Podiatry
Glennon Care for Kids	Pediatrician Services
Goldenberg, Etai, MD	Urology
Goran, Daniel D., MD	Dermatology
Gould, Ronald J., MD	Gastroenterology
Greco, Alfred O., MD	Oncology/Hematology
Gruen, Laura M., MD	Cardiovascular Disease
Gunapooti, Mahendra, MD	Physical Medicine & Rehabilitation
Haacke, Linda T., MD	Critical Care Medicine Pulmonary Medicine Sleep Medicine
Hegde, Bijoy I., MD	Physical Medicine & Rehabilitation
Herman, David B., MD	Pediatrics
Hesterberg, Michael R., DMD	Surgery/Dentistry/Oral Surgery
Hopkins, Timothy T., DDS	Surgery/Dentistry/Oral Surgery
Hulsen, Jennifer S., MD	Pediatrics
Hulsen, Thomas M., MD	OB/GYN



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Hurford, Dennis M., MD	OB/GYN
Hyten, Steven J., DMD	Surgery/Dentistry/Oral Surgery
Illinois Hospitalist, LLP	Hospitalist & Intensivist Services
Integrated Oncology & Integrated Services	LabCorp
Jung, Randy J., MD	Psychiatry
Kanungo, Sriraj T., MD	Nephrology
Katsikas, Demetrios A., MD	Urology
Keetch, David W., MD	Urology
Kim-judd, Jeong N., MD	Pediatrics
Kinscherff, David W., DPM	Surgery/Podiatry
Klucka, Mark T., DO	Gastroenterology
Knox, Scott D., PA-C	Surgery/Orthopedic Surgery
Kollmann, Kenneth S., DMD	Surgery/Dentistry-Pediatric
Koul, Deepak, MD	Cardiovascular Disease
Krick, Jennifer D., MD	Pediatrics
Kube, Richard A., MD	Surgery/Orthopedic Surgery
Kugler, Morris A., MD	General & Vascular Surgery General Surgery
Kurichety, Prasad R., MD	Oncology/Radiation
Landgraf, James R., MD	Pathology
Lee, II, Carl W., MD	Otolaryngology
Lee, Robert D., MD	Surgery/General/Vascular



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Levy, Nat T., MD	Critical Care Medicine Pulmonary Medicine Pulmonary Sleep Medicine
LoBianco, Salvador, MD	Critical Care
Loethen, Jennifer A., MD	Pediatrics
Loethen, Paul E., MD	General & Vascular Surgery
Mangalat, Nisha, MD	Gastroenterology
Martinez, Misha L., MD	Pediatrics
Maryville Radiology Group	Radiology Services
McGrady, Murray D., MD	Otolaryngology
McGranahan, Mark E., MD	Pediatrics
Megahy, Mohamed S., MD	Oncology/Radiation
Mehra, Suwan B., MD	OB/GYN
Midkiff, Christina L., MD	OB/GYN
Millennium Anesthesiology Consultants, LLC	Anesthesiology
Miller, Jeffrey W., DPM	Surgery/Podiatry
Moosa, Hans H., MD	Vascular Surgery
Mostello, Dorothea J., MD	OB/GYN
Mukerji, Rita, MD	Cardiology
Myles, Thomas D., MD	OB/GYN
Naseer, Riaz A., MD	Neurology Pediatrics



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Nauman, Karen J., MD	Pediatrics
Neurology Lab (Drs. Ali & Naseer)	Neurology
Nelson, Krista N., DPM	Surgery/Podiatry
Neville, Patrick M., MD	Vascular Surgery
Owens, Markel L., MD	OB/GYN
Padda, Gurpreet, MD	Pain Management Anesthesiology
Painter, Benedict F., MD	Infectious Disease
Palka, Kevin T., MD	Oncology/Hematology
Parres, Jeffrey A., MD	Urology
Penn, Tim J., MD	Surgery/Orthopedic Surgery
Prieb, Kosit, MD	Vascular Surgery Hand Surgery
Pulmonary Function & Sleep Study Interpretation	Pulmonary & Sleep Center
Purcell, Henry E., MD	Nephrology
Quick, Shona J., ANP	Gastroenterology
Rana, Jamil Z., MD	Pediatrics
Randle, Gregory C., MD	Anesthesiology/Pain Management
Rodriguez, Guillermo D., Jr., MD	Oncology/Hematology
Roykhman, Margarita, MD	OB/GYN
Russell, Sharman M., MD	OB/GYN



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Sandu, Manpreet K. MD	Oncology/Hematology
Sanford, Kimberly N., MD	OB/GYN
Satterly, Elizabeth M., MD	Pediatrics
Sawar, Amar, MD	Neurology
Scharff, Kevin M., MD	OB/GYN
Scherer, Paul J., MD	Surgery/Orthopedic Surgery
Shands, Courtney, MD	Urology
Shyken, Jaye, MD	OB/GYN
Skouby, Jarod D., MD	Pediatrics
Snook, Eric, DPM	Surgery/Podiatry
Sola, James B., MD	Surgery/Orthopedic Surgery
Spellman, Matthew J., MD	Urology
Striegel, Stephen P., MD	General & Vascular Surgery General Surgery
Swaminathan, Rajesh, MD	Critical Care
Thatch, Ursula L., MD	OB/GYN
The Heart Care Group	Cardiology
Uptown Emergency Physician Services	Emergency Dept./Express Care
Thom, William H., MD	Pain Management
Thomas, James N., DO	Department of Emergency Medicine/Level 1
Ungacta, Felix F. MD	Surgery/Orthopedic Surgery
Uppstrom, Erica L., MD	Cardiology



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Villarreal, Hugo A., MD	Gastroenterology
Visconti, John L., DO	Oncology/Hematology
Von der Lancken, Gustavo	Surgery/General Surgery
Vulin, Christopher L., MD	Urology
Wagner, Frederick W., MD	Anesthesiology
Wagner, Jean V., MD	Pediatrics
White, Brad C., MD	Urology
Whittenburg, Eric C., DPM	Surgery/Podiatry
Williams, Elizabeth R., MD	Urology
Yang, Kui, MD	Anesthesiology/Pain Management
Young, Staci R., MD	Pediatrics
Young, Tamara K., CNM	OBGYN
Zaiz, Thomas J., PA-C	Surgery/Orthopedic Surgery
Zeffren, Barry F., MD	Allergy/Immunology
Zutshi, Nancy, MD	Department of Emergency Medicine/Level 1