

CHEROKEE REGIONAL MEDICAL CENTER
Cherokee, Iowa

Department: Business Office

FINANCIAL ASSISTANCE POLICY

POLICY: Cherokee Regional Medical Center shall fulfill their charitable missions by providing health care services to all individuals without regard to their ability to pay. CRMC shall provide fair financial assistance to low income underinsured or uninsured patients. CRMC shall use consistent and fair collection practices for all patients. This policy is in effect for dates of service on or after January 1, 2016.

PROCEDURE: Cherokee Regional Medical Center is committed to meeting the needs of everyone in their communities, including those who cannot pay for their care. Similarly, patients who are able to pay have an obligation to pay and providers have a duty to seek payment from these individuals.

1. Financial Assistance Guidelines. Financial assistance will be available for only medically necessary health care services, as defined by Medicaid Guidelines, provided to persons who meet the financial and documentation criteria defined in this policy. Financial Assistance for hospital patients shall be based on the following guidelines:
 - 1.1 Full charity care shall be provided to underinsured and uninsured patients earning 200% or less of the Federal Poverty Income Guideline (FPIG).

An individual who is presumed eligible under these criteria will continue to remain eligible for six months following the date of the initial approval, unless facility personnel have reason to believe the patient no longer meets the criteria.
 - 1.2 CRMC reserves the right to limit eligibility to a shorter period and/or may require periodic reviews to confirm continuing eligibility.
 - 1.3 CRMC reserves the right, on a case by case basis and at the discretion of the CFO or CFO designee, to extend eligibility for financial assistance to patients whose Household Income exceeds 200% of the FPIG.
 - 1.4 Presumptive Eligibility. Patients who qualify and are receiving benefits from the following programs may be presume eligible for 100% financial assistance:
 - 1.4.1 The U.S. Department of Agriculture Food and Nutrition Service *Food Stamp Program*.
 - 1.4.2 *Family Investment Program*, under Iowa code Chapter 239B.
 - 1.4.3 Limited eligibility – illegal undocumented persons 3-day emergency window. The Iowa Department of Human Services allows for up to three days of Medicaid benefits to pay for the cost of emergency services for undocumented persons who do not meet citizenship, alien status, or social security number requirements. The emergency services must be provided in a facility such as a hospital, clinic, or office that can provide the required care after the emergency medical condition has occurred. Presumptive eligibility for this category will be considered valid 6 months from the date of the emergent event.
 - 1.4.4 County and state relief programs. Some Iowa counties offer a financial assistance program designed to provide emergency short term assistance to persons lacking the resources to meet their basic needs for food, shelter, fuel,

utilities, clothing, medical, dental, hospital care and burial. The state also offers programs providing energy assistance to applicants who qualify (i.e., LIHEAP State of Iowa Energy Assistance). Accepted programs also include WIC nutrition assistance.

1.4.5 Other programs may be added at the discretion of the facility.

Patients who meet presumptive eligibility criteria under this Section 1.6 may be granted financial assistance without completing the financial assistance application. Documentation supporting the patient's qualification for or participation in a program must be obtained and kept on file. Documentation may include a copy of a government issued card or other documentation listing eligibility or qualifications, or print screen of a web page listing the patient's eligibility. Unless otherwise noted, an individual who is presumed eligible under these presumptive criteria will continue to remain eligible for the six months following the date of the initial approval, unless facility personnel have reason to believe the patient no longer meets the presumptive criteria.

1.5 The Federal Poverty Income Guidelines will be updated annually from updates published by the United States Department of Health and Human Services.

1.6 In determining whether a patient meets the eligibility criteria for financial assistance, CRMC will consider the extent to which the patient's household has assets other than income that could be used to meet his or her financial obligation. CRMC will also take into account any liabilities that are the responsibility of the patient's household.

Unlike income, assets and liabilities have a lot of variability. Assets will include such things as cash, savings and checking accounts, certificates of deposit, stocks and bonds, individual retirement accounts (IRAs), trust funds, real estate and motor vehicles. This list is not intended to be inclusive.

1.7 Household income will be considered in determining whether a patient is eligible for assistance. Household income includes but is not limited to the following: traditional married couples, children over the age of 19 and who live in the household more than 6 months out of 12 and couples living together. (Married or couples living together requires that the parties present as a couple and share expenses, whether same sex or male/female.)

1.10 Waivers or discounts of Medicare or Medicaid copays or deductibles may be granted based on financial need as provided in Section 3 of this policy.

1.11 Medical Indigency. Financial assistance may be provided to patients who are determined to be medically indigent. "Medically indigent" means patients who are unable to pay some or all of their medical bills because their medical bills exceed a certain percentage of their family or household income or assets (for example, due to catastrophic costs or conditions), even though they have income or assets that otherwise exceed the generally applicable eligibility requirements for free or discounted care under the Financial Assistance Guidelines.

1.11.1 The patient shall apply for financial assistance in accordance with this policy. The patient shall supply documentation to support his/her

medically indigent status. Examples of documentation that may be used include but are not limited to, copies of patient medical bills, information related to patient's drug costs, or other evidence of healthcare costs for which the patient is responsible.

2. Hospital Patient Financial Assistance Calculation.

- 2.1 Amounts charged for hospital emergency or other medically necessary hospital care that is provided to individuals eligible for assistance under this policy may not be more than the amounts generally billed to individuals who have insurance covering such care. Amounts billed to those who qualify for financial assistance will be based on CRMC current Medicare cost to charge ratio. Hospitals may not use gross charges to calculate such amounts.

3. Discounts for Government Sponsored Program Patients (Medicare or Medicaid).


- 3.1 CRMC may waive or reduce Medicare or Medicaid coinsurance or deductibles only based on financial need if the following requirements are met:
- 3.1.1 The waiver or discount is not advertised. (It is proper to advise patients on an individual basis that waivers of copays or deductibles in the event of financial need are possible and the patient may apply for such benefits at the time or immediately before treatment is provided.)
 - 3.1.2 The discount is not routinely offered, but only to those patients in financial need who wish to apply.
 - 3.1.3 The waiver or discount satisfies one of the following:
 - 3.1.3.1 The waiver or discount is made following an individualized good faith assessment of financial need.
 - 3.1.3.2 The waiver or discount is made after reasonable efforts have failed to collect the copayment, deductibles or full payment directly from the patient; or
 - 3.1.3.3 The waiver or discount is in a settlement of a disputed claim resulting from services provided to the beneficiary.
- 3.2 Written records documenting the reasons for each waiver or discount shall be considered cost report supporting documents and therefore shall be retained as such in accordance with Policy HW-Admin, Record Retention.

4. Communicating Availability of Charity Care and Financial Assistance.

- 4.1 Facility Responsibilities. CRMC will have a means of widely communicating the availability of charity care and financial assistance to all patients and within the community served. Examples of mechanisms that CRMC may use to do this include:
- 4.1.1 Placing signage, information, or brochures in appropriate areas of the facility (E.G., the emergency department and registration and check-out/cashier areas)

- stating that the provider/physician practice offers charity care and describing how to obtain more information about financial assistance.
- 4.1.2 Placing a note on the health care bill and statements regarding how to request information about financial assistance.
 - 4.1.3 Placing a notice on the opening page of the hospital website.
 - 4.1.4 Placing a notice which summarizes the hospital's policy concerning charity care and financial assistance in a media outlet of general circulation in the community at least two times/year.
 - 4.1.5 Designating departments or individuals who can explain the provider's charity care policy.
 - 4.1.6 Staff who interact with patients will be instructed to direct questions regarding the charity care policy to the proper provider representative.
 - 4.2 After receiving the patient's request for financial assistance and any financial information or other documentation needed to determine eligibility for financial assistance, the patient will be notified of the patient's eligibility determination within a reasonable period of time.
5. Patient Responsibilities Regarding Financial Assistance. If applicable, prior to being considered for financial assistance, the patient/family must cooperate with the provider to furnish information and documentation to apply for other existing financial resources that may be available to pay for the patient's health care, such as Medicaid, Medicare, third party liability, etc.
- 5.1 To be considered for charity care or financial assistance the patient/family must furnish the provider with a completed application provided by the provider or, if requested, documentation to support the presumptive eligibility criteria described in Section 1.3.
 - 5.2 In the event the patient does not initially qualify for charity care or financial assistance after providing the requested information and documentation, the patient may re-apply if there is a change in their income, assets, or family responsibilities.
6. Collection Guidelines. CRMC collection efforts shall not include wage garnishments or other legal process seizures without the prior approval of the CFO and/or designee. Personal property (other than cash or cash equivalents) attachment or seizure will not occur. The entry of a judgment automatically attaches to real estate; however, no seizure of the patient's primary residence will occur.

***See Exhibit A, attached to this policy, for a listing of providers who provide medically necessary care within the hospital and whether their services are covered by the Financial Assistance Policy.*



 Board Chair or Designee

12/28/15

 Date

Distribution: Business Office

EXHIBIT A

CHEROKEE REGIONAL
 MEDICAL CENTER

	Provider	Privileges	NPI	FAP
1	Abu-Erreisch, Nasser, MD	Consulting	1205811940	N
2	Ali, Syed, MD	Consulting	1679544704	N
3	Antonopoulos, Kosta, DPM	Courtesy	1043521644	N
4	Armstrong, John, MD	Courtesy	1487948824	N
5	Arteaga, Roque, MD	Consulting	1164545505	N
6	Avalos, Jack, MD	Consulting	1689651655	Y
7	Awan, Iftexhar, MD	ER Locum	1114912268	Y
8	Barry, Charlie, CRNA	Affiliate	1689949356	Y
9	Beiermann, Chase, PA-C	Affiliate	1205362282	N
10	Berglin, Carmel PA-C	Affiliate	1619971959	N
11	Breiner, Julie, MD	Consulting	1417919671	N
12	Chow, Min Hwa, MD	Consulting	1407801053	N
13	Christ, David, MD	Courtesy	1922072297	N
14	Chua, David, MD	Consulting	1023268646	N
15	Crampton, Randy, DPM	Courtesy	1184612491	N
16	Cunningham, Crystal, MD	Locum	1922294628	Y
17	DeRoo, Brenda, ARNP	Affiliate	1447220355	Y
18	Dierking, Jason, MD	Courtesy	1477675940	N
19	Ducommun, Lisa, ARNP	Affiliate	1023105616	Y
20	Eastman, Paul, MD	Courtesy	1295732139	N
21	Ellerman, Justin, MD	ER Locum	1447697743	Y
22	Erlandson, Jerold, MD	Consulting	1558571497	N
23	Espelund, Joshua, MD	Consulting	1225158819	N
24	Fenzl, Mark, DO	ER Locum	1790993137	Y
25	Fleming, Alfred, MD	Consulting	1790893550	N
26	Fox, Stephen, MD	Consulting	1548221328	N
27	Friessen, Nichole, PA	Affiliate	1619971959	N
28	Grauer, Linda, CRNA	Affiliate	1154322402	Y
29	Gupta, Jitendrakumar, MD	Consulting	1285710764	N
30	Gupta, Sandeep, MD	Consulting	1194990945	N
31	Hagen, Traci, ARNP	Affiliate	1811442957	Y
32	Haraschak, Michael, MD	Locum	1962449280	Y
33	Harrer, Seth, MD	Courtesy	1194036525	N
34	Harrison, Patricia, MD	Active	1558342121	Y
35	Hartman, Herbert III, MD	Consulting	1699980565	N
36	Hurd, Marvin, MD	Consulting	1619968815	N
37	Hurtig, Kim, CRNA	Affiliate	1972692663	N
38	Ivey, Troy, DO	Locum	1194719088	Y
39	Jorgensen, Daniel, MD	Courtesy	1588634794	N
40	Joson, Tannia, MD	Consulting	1598077125	N
41	Kahanic, Stephen, MD	Consulting	1962474155	N
42	Kanuri, Swapna, MD	Consulting	1548435803	N
43	Keady, Samantha, DO	ER Locum	1649623711	Y

	Provider	Privileges	NPI	FAP
44	Khalil, Michael, MD	Locum	1124080015	Y
45	Kharbanda, Anmol, MD	Consulting	1265608343	N
46	Kruger, Doyle, ARNP	Affiliate	1588820633	Y
47	Kuwahara, Raymond, MD	Consulting	1376512244	N
48	Leo, Anthony, MD	Locum	1609925981	Y
49	Li, Anson, MD	Locum	1326064015	Y
50	Lugman, Ashar, MD	Consulting	1275742090	N
51	Majerus, Deborah, MD	Consulting	1790759512	N
52	Meis, Ryan, MD	Courtesy	1053314385	N
53	Mogensen-Kruger, Rebecca, ARNP	Affiliate	1194108662	Y
54	Morgan, Matt, DO	Locum	1447275722	Y
55	Nelson, Daniel, MD	Consulting	1922204239	N
56	Netten, John, DO	ER Locum	1356637896	Y
57	Obamwonyi, Andrew, MD	ER Locum	1184607384	Y
58	Oelke, Sara, DPM	Consulting	1184763500	N
59	Parker, Wesley, MD	Active	1790780476	Y
60	Paustian, David, DO	Locum	1841289311	Y
61	Peacock, Jon, MD	Consulting	1275507071	N
62	Pham, Thong, MD	Consulting	1538188057	N
63	Powers, Jeffrey, MD	Courtesy	1801992888	Y
64	Quesenberry, James, MD	Consulting	1669434783	N
65	Randall, Rachele, PA	Affiliate	1215363197	N
66	Rao, Radha, MD	Consulting	1699746016	N
67	Rice, Timothy, DO	Active	1841295532	Y
68	Rupp, Karen, ARNP-C	Affiliate	1811992597	Y
69	Saunders, David, MD	Locum	1750365433	Y
70	Scheer, Gabriel, CRNA	Affiliate	1902241474	Y
71	Sharaf, Mahmoud, MD	Consulting	1356677447	N
72	Sims, Ronald, MD	Interpretation	1639138837	N
73	Singh, Inder, MD	ER Locum	1235260696	Y
74	Steussy, Bryan, MD	Consulting	1932411154	N
75	Sykes, Jeffery, MD	Consulting	1649244682	N
76	Tallerico, Valerie, DPM	Courtesy	1043521644	N
77	Taylor, Joy, MD	Consulting	1093763567	N
78	Taylor, Timothy, DO	ER Locum	1285604728	Y
79	Tentinger, Abby, ARNP	Affiliate	1730521584	Y
80	Vandelune, Chris, DO	Active	1871598557	Y
81	Veit, Stephen, MD	Active	1710988159	N
82	Walks, Norma, MD	Locum	1043410418	Y
83	Wender, Donald, MD	Consulting	1861463275	N
84	Winterton, Seth, MD	Active	1093195331	Y
85	Wisco, Robert, MD	Consulting	1699778928	N
86	Worthington, Mackenzie	ER Locum	1467893461	Y
87	Zajac, Edward, MD	Consulting	1265406060	N