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Owner **Mary Miller: Vice President Finance**
Policy Chapter **Leadership**
References **Reviewed by MWPB Board of Trustees**

Patient Financial Assistance

KEY WORDS: Financial Assistance

OBJECTIVE/BACKGROUND:

Mt. Washington Pediatric Hospital ("MWPB") is committed to providing financial assistance to persons who have health care needs and are uninsured, underinsured, ineligible for a government program, or otherwise unable to pay, for medically necessary care based on their individual financial situation.

APPLICABILITY:

PROGRAM ELIGIBILITY

Consistent with its mission to deliver compassionate and high quality healthcare services and to advocate for those who do not have the means to pay for medically necessary care, MWPB strives to ensure that the financial capacity of people who need health care services does not prevent them from seeking or receiving care.

Specific exclusions to coverage under the Financial Assistance Program:

The Financial Assistance Program generally applies to all medically necessary care provided by MWPB; however, the Financial Assistance Program does not apply to any of the following:

1. Services provided by healthcare providers not affiliated with MWPB (e.g., durable medical equipment, home health services).
2. Patients whose insurance program or policy denies coverage for services by their insurance company (e.g., HMO, PPO, or Workers Compensation), are not eligible for the Financial Assistance Program.
 - a. Generally, the Financial Assistance Program is not available to cover services that are denied by a patient's insurance company; however, exceptions may be made on a

case by case basis considering medical and programmatic implications.

3. Cosmetic or other non-medically necessary services.
4. Patient convenience items.
5. Patient meals and lodging.
6. Physician charges related to the date of service **are** included in this MWPH financial assistance policy.
 - a. A list of providers covered by this policy may be obtained on the hospital's website

Patients may be ineligible for Financial Assistance for the following reasons:

1. Have insurance coverage through an HMO, PPO, Workers Compensation, Medicaid, or other insurance programs that deny access to MWPH due to insurance plan restrictions/limits.
2. Refusal to be screened for other assistance programs prior to submitting an application to the Financial Clearance Program.
3. Refusal to divulge information pertaining to a pending legal liability claim.
4. Foreign-nationals traveling to the United States seeking elective, non-emergent medical care. Patients/guarantors/guardians who become ineligible for the program will be required to pay any open balances and may be submitted to a bad debt service if the balance remains unpaid in the agreed upon time periods.

Unless they meet Presumptive Financial Assistance Eligibility criteria, patients/guarantors/guardians shall be required to submit a complete Financial Assistance Application (with all required information and documentation) and determined to be eligible for financial assistance in order to obtain financial assistance. Patients/guarantors/guardians who indicate they are unemployed and have no insurance coverage shall be required to submit a Financial Assistance Application before receiving non-emergency medical care unless they meet Presumptive Financial Assistance Eligibility criteria. If the patient qualifies for COBRA coverage, patient's financial ability to pay COBRA insurance premiums shall be reviewed by the Financial Counselor/Coordinator and recommendations shall be made to Senior Leadership. Individuals with the financial capacity to purchase health insurance shall be encouraged to do so, as a means of assuring access to health care services and for their overall personal health. Patient families with income up to 200% of Maryland State Department of Health and Mental Hygiene Medical Assistance Planning Administration Income Eligibility Limits for a Reduced Cost of Care ("MD DHMH") are eligible for free care. Those between 200% to 300% of MD DHMH are eligible for discounts on a sliding scale, as set forth in Attachment A. All patients/families are eligible to spread their self-pay balances over the period of one year through a payment plan.

Presumptive Financial Assistance

Patients may also be considered for Presumptive Financial Assistance Eligibility. There are instances when a patient may appear eligible for financial assistance, but there is no financial assistance form on file. There is adequate information provided by the patient or through other sources, which provide sufficient evidence to provide the patient with financial assistance. In the event there is no evidence to support a patient's eligibility for financial assistance, MWPH reserves the right to use outside agencies or information in determining estimated income amounts for the basis of determining financial assistance eligibility and potential reduced care rates. Once determined, due to the inherent nature of presumptive circumstances, the only

financial assistance that can be granted is a 100% write-off of the account balance. Presumptive Financial Assistance Eligibility shall only cover the patient's specific date of service. Presumptive eligibility may be determined on the basis of individual life circumstances of the patient or parent/guarantor/guardian that may include:

- a. Active Medical Assistance pharmacy coverage
- b. Homelessness
- c. Medical Assistance and Medicaid Managed Care patients for services provided beyond the coverage of these programs
- d. Medical Assistance spend down amounts
- e. Eligibility for other state or local assistance programs
- f. Patient is deceased with no known estate
- g. Patients that are determined to meet eligibility criteria established under former State Only Medical Assistance Program
- h. Non-US Citizens deemed non-compliant
- i. Non-Eligible Medical Assistance services for Medical Assistance eligible patients
- j. Unidentified patients (Doe accounts that we have exhausted all efforts to locate and/or ID)
- k. Bankruptcy, by law, as mandated by the federal courts
- l. Specific medical and/or behavioral needs of the patient/family

POLICY:

It is the policy of MWPH to provide Financial Assistance based on indigence or high medical expenses for patients/families who meet specified financial criteria and request such assistance. The purpose of the following policy statement is to describe how applications for Financial Assistance should be made, the criteria for eligibility, and the steps for processing applications.

MWPH will post notices of financial assistance availability in inpatient admissions areas, and outpatient registration areas. Notice of availability will also be sent to the patient with patient bills. Signage in key patient access areas will be made available. A Patient Billing and Financial Assistance Information Sheet will be provided before discharge, and it (along with this policy and the Financial Assistance Application) will be available to all patients upon request and without charge, both by mail and in admissions areas. This policy, the Patient Billing and Financial Assistance Information Sheet, and the Financial Assistance Application will also be conspicuously posted on the MWPH website (www.mwph.org).

Financial Assistance may be extended when a review of a patient's/family's financial circumstances has been conducted and documented. This should include a review of the patient's existing medical expenses and obligations (including any accounts having gone to bad debt except those accounts that have gone to lawsuit and a judgment has been obtained) and any projected medical expenses. Financial Assistance Applications may be offered to patients whose accounts are with a collection agency.

MWPH retains the right in its sole discretion to determine a patient's ability to pay. All patients presenting for emergency services will be treated regardless of their ability to pay. For emergent/urgent services,

applications to the Financial Clearance Program will be completed, received, and evaluated retrospectively and will not delay patients from receiving care.

PROCEDURE:

There are designated persons who will be responsible for taking Financial Assistance applications. These staff can be Patient Accounting staff, Outpatient Registration staff, or the Financial Assistance Coordinator.

1. When possible effort will be made to provide financial clearance prior to date of service. Where possible, designated staff will consult via phone or meet with patients/families who request Financial Assistance to determine if they meet preliminary criteria for assistance.
 - a. Staff will complete an eligibility check with the Medicaid program for Self Pay patients to verify whether the patient has current coverage.
 - b. A letter of final determination will be submitted to each patient that has formally requested financial assistance. Determination of Probable Eligibility will be provided within two business days following a patient's request for charity care services.
 - c. If a patient submits a Financial Assistance Application without the information or documentation required for a final determination of eligibility, a written request for the missing information or documentation will be sent to the patient. This written request will also contain the contact information (including telephone number and physical location) of the office or department that can provide information about the Financial Assistance Program and assistance with the application process.
 - d. The patient will have thirty (30) days from the date this written request is provided to submit the required information or documentation to be considered for eligibility. If no data is received within the 30 days, a letter will be sent notifying the patient that the case is now closed for lack of the required documentation. The patient may re-apply to the program and initiate a new case by submitting the missing information or documentation 30 days after the date of the written request for missing information/documentation.
 - e. For any episode of care, the Financial Assistance Application process will be open up to at least 240 days after the first post-discharge patient bill for the care is sent.
 - f. Individual notice regarding the hospital's Financial Assistance Policy shall be provided at the time of preadmission or admission to each person who seeks services in the hospital.
2. The patient/parent/guarantor/guardian is required to provide a completed Financial Assistance Application orally or in writing. In addition, the following may be required:
 - a. A copy of the most recent Federal Income Tax Return (if married and filing separately, then also a copy spouse's tax return); proof of disability income (if applicable), proof of social security income (if applicable). If parent/guarantor/guardian is unemployed, reasonable proof of unemployment such as statement from the Office of Unemployment Insurance, a statement from current source of financial support, etc .
 - b. A copy of their most recent pay stubs (if employed) or other evidence of income.

- c. A Medical Assistance Notice of Determination (if applicable).
 - d. Copy of their Mortgage or Rent bill (if applicable), or written documentation of their current living/housing situation.
If a family submits both a copy of their most recent Federal Income Tax Return and a copy of their most recent pay stubs (or other evidence of income), and only one of the two documents indicates eligibility for financial assistance, the most recent document will dictate eligibility. Oral submission of needed information will be accepted, where appropriate.
3. In addition to qualify for Financial Assistance based on income, a patient can qualify for Financial Assistance either through lack of sufficient insurance or excessive medical expenses based on the Financial Hardship criteria discussed below. Once a patient has submitted all the required information, the Financial Counselor will review and analyze the application and forward it to the Patient Financial Assistance Coordinator for final determination of eligibility based on MWPH guidelines.
- a. If the patient's application for Financial Assistance is determined to be complete and appropriate, the Financial Assistance Coordinator will:
 - i. If the patient does qualify for Financial Assistance, the Financial Assistance Coordinator will notify clinical staff who may then schedule the patient for the appropriate hospital-based service.
 - ii. If the patient does not qualify for Financial Assistance, the Financial Assistance Coordinator will notify the clinical staff of the determination and the non-emergent/urgent hospital-based services will not be scheduled pending consultation with the patient/parent/guarantor/guardian
 - 1. A decision that the patient may not be scheduled for hospital-based, non-emergent/urgent services may be reconsidered by the MWPH CFO, upon the request of a Clinical leader.
4. Once a patient is approved for Financial Assistance, Financial Assistance coverage is effective for six months following the determination and a year prior to the determination. However, MWPH may decide to extend the Financial Assistance eligibility period further into the past or the future on a case-by-case basis. If additional healthcare services are provided beyond the eligibility period, patients must reapply to the program for clearance. In addition, changes to the family's income, assets, expenses or family status are expected to be communicated to the Financial Assistance Coordinator. All Extraordinary Collections Action activities, as defined below, will be terminated once the patient is approved for financial assistance and all the patient responsible balances are paid.
5. Account balances that have not been paid may be transferred to Bad Debt (deemed uncompensated care) and referred to an outside collection agency or to the MWPH hospital's attorney for legal and/or collection activity. Collection activities taken on behalf of the hospital by a collection agency or the hospital's attorney may include the following Extraordinary Collection Actions (ECAs):
- a. Reporting adverse information about the individual to consumer credit reporting agencies or credit bureaus.

- b. Commencing a civil action against the individual.
 - c. Placing a lien on an individual's property. A lien will be placed by the Court on primary residences within Baltimore City. The hospital will not pursue foreclosure of a primary residence but may maintain its position as a secured creditor if a property is otherwise foreclosed upon.
 - d. Attaching or seizing an individual's bank account or any other personal property.
 - e. Garnishing an individual's wage.
6. ECAs may be taken on accounts that have not been disputed or are not on a payment arrangement. ECAs will occur no earlier than 120 days from submission of first post-discharge bill to the patient and will be preceded by a written notice 30 days prior to commencement of the ECA. This written notice will indicate that financial assistance is available for eligible individuals, identify the ECAs that the hospital (or its collection agency, attorney, or other authorized party) intends to obtain payment for the care, and state a deadline after which such ECAs may be initiated. It will also include a Patient Billing and Financial Assistance Information Sheet. In addition, the hospital will make reasonable efforts to orally communicate the availability of financial assistance to the patient and tell the patient how he or she may obtain assistance with the application process. A presumptive eligibility review will occur prior to any ECA being taken. Finally, no ECA will be initiated until approval has been obtained from the Director of Patient Accounting. MWPH will not engage in the following ECAs:
 - a. Selling debt to another party.
 - b. Charge interest on bills incurred by patients before a court judgement is obtained
7. If prior to receiving a service, a patient is determined to be ineligible for financial assistance for that service, all efforts to collect co-pays, deductibles or a percentage of the expected balance for the service will be made prior to the date of service or may be scheduled for collection on the date of service.
8. A letter of final determination will be submitted to each patient who has formally submitted an application. The letter will notify the patient in writing of the eligibility determination (including, if applicable, the assistance for which the individual is eligible) and the basis for the determination. If the patient is determined to be eligible for assistance other than free care, the patient will also be provided with a billing statement that indicates the estimated amount the patient owes for the care after financial assistance is applied.
9. Refund decisions are based on when the patient was determined unable to pay compared to when the patient payments were made. Refunds will be issued back to the patient for credit balances, due to patient payments, resulting from approved financial assistance on considered balance(s). Payments received for care rendered during the financial assistance eligibility window will be refunded, if the amount exceeds the patient's determined responsibility by \$5.00 or more.
10. If a patient is determined to be eligible for financial assistance, the hospital (and/or its collection agency or attorney) will take all reasonably available measures to reverse any ECAs taken against the patient to obtain payment for care rendered during the financial assistance eligibility window. Such reasonably available measures will include measures to vacate any judgment against the patient, lift levies or liens on the patient's property, and remove from the patient's credit report any adverse information that was reported to a consumer reporting

agency or credit bureau.

11. Patients who have access to other medical coverage (e.g., primary and secondary insurance coverage or a required service provider, also known as a carve-out), must utilize and exhaust their network benefits before applying for the Financial Assistance Program.
12. Where there is a compelling educational and/or humanitarian benefit, Clinical staff may request that the CFO consider exceptions to the Financial Assistance Program guidelines, on a case-by-case basis, for Financial Assistance approval.
 - a. Clinical leaders requesting Financial Clearance/Assistance on an exception basis must submit appropriate justification to the CFO in advance of the patient receiving services.
 - b. The Chief Medical Officer will notify the attending physician and the Financial Assistance staff of the CFO determination.

Financial Hardship

The amount of uninsured medical costs incurred at other hospitals will be considered in determining a patient's eligibility for the Financial Assistance Program. The following guidelines are outlined as a separate, supplemental determination of Financial Assistance, known as Financial Hardship. Financial Hardship will be offered to all patients who apply for Financial Assistance and are determined to be eligible.

Medical Financial Hardship Assistance is available for patients who otherwise do not qualify for Financial Assistance under the primary guidelines of this policy, but for whom:

1. Their medical debt incurred at other hospitals exceeds 25% of the Family Annual Household Income, which is creating Medical Financial Hardship.

For the patients who are eligible for both, the Reduced Cost Care under the primary Financial Assistance criteria and also under the Financial Hardship Assistance criteria, MWPH will grant the reduction in charges, which is balance owed that is greater than 25% of the total annual household income.

Financial Hardship is defined as facility charges incurred at other hospitals for medically necessary treatment by a family household over a twelve (12) month period that exceeds 25% of that family's annual income.

Medical Debt is defined as out of pocket expenses for the facility charges incurred at other hospitals for medically necessary treatment.

Once a patient is approved for Financial Hardship Assistance, coverage will be effective for six months after the first qualifying date of service and a year prior to the determination. However, MWPH may decide to extend the Financial Hardship eligibility period further into the past or the future on a case-by-case basis according to their spell of illness/episode of care. It will cover the patient and the eligible family members living in the household for the approved reduced cost and eligibility period for medically necessary care.

All other eligibility, ineligibility, and procedures for the primary Financial Assistance program criteria apply for the Financial Hardship Assistance criteria, unless otherwise stated above.

Appeals

- Patients whose financial assistance applications are denied have the option to appeal the decision.
- Appeals can be initiated verbally or written.
- Patients are encouraged to submit additional supporting documentation justifying why the denial should be overturned.
- Appeals are documented within the PFA Data Spreadsheet. They are then reviewed by the CFO.
- A letter of final determination will be submitted to each patient who has formally submitted an appeal.
- The Health Education and Advocacy Unit is available to assist the patient or the patient's authorized representative in filing and mediating a reconsideration request.
 - The Health Education and Advocacy Unit can be reached through the following:
 - Phone:410-528-1840
 - Fax:410-576-6571
 - email:heau@oag.state.md.us

Address:200 Saint Paul Place, 16th Floor, Baltimore, MD 21202-2021

ATTACHMENTS:

ATTACHMENT A

Sliding Scale – Reduced Cost of Care

- All discounts stated above shall be applied to the amount the patient is personally responsible for paying after insurance reimbursements.
- Amounts billed to patients who qualify for Reduced-Cost of Care on a sliding scale (or for Financial Hardship Assistance) will be less than the amounts generally billed to those with insurance (AGB), which in Maryland is the charge established by the Health Services Cost Review Commission (HSCRC). UMMS determines AGB by using the amount Medicare would allow for the care (including the amount the beneficiary would be personally responsible for paying, which is the HSCRC amount; this is known as the "prospective Medicare method".

Effective 7/1/20

POLICY OWNER:

MWPH CFO

APPROVED:

UMMS Executive Compliance Committee Approved Initial Policy: 09/18/19

UMMS Executive Compliance Committee Approved Revisions: 10/19/2020

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Attachments

[MWPH FPL and Sliding Scale Guidelines 2023.pdf](#)

[MWPH Patient Financial Assistance Policy Attachment B \(Maryland State Uniform Financial Assistance Application\)](#)

Approval Signatures

Step Description	Approver	Date
Chief Executive Officer	Mary Miller: Vice President Finance	06/2023