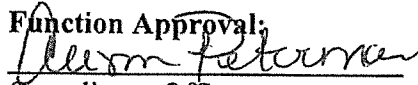
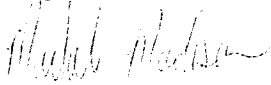
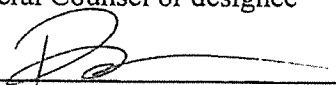


**SOUTH GEORGIA HEALTH SYSTEM
SYSTEM POLICIES AND PROCEDURES**

| | | |
|---|--|--|
| TITLE: Financial Assistance Policy | FACILITIES: | SYSTEM POLICY NUMBER: 3.006 |
| APPROVALS: | <input checked="" type="checkbox"/> SGMC <input checked="" type="checkbox"/> SGMC Berrien Campus <input checked="" type="checkbox"/> SGMC Lanier Campus <input checked="" type="checkbox"/> SGMC Smith Northview Campus <input type="checkbox"/> SGMC Lakeland Villa <input checked="" type="checkbox"/> SGMC Physician Network | FUNCTION: <input type="checkbox"/> 1.000 Administrative/Operations <input type="checkbox"/> 2.000 Clinical Services <input checked="" type="checkbox"/> 3.000 Compliance <input type="checkbox"/> 4.000 Environment of Care <input type="checkbox"/> 5.000 HIPAA <input type="checkbox"/> 6.000 Finance <input type="checkbox"/> 7.000 Human Resources |
| Function Approval:  Compliance Officer | | |
| Legal:  General Counsel or designee  Chief Executive Officer | | |

PURPOSE

The purpose of this Financial Assistance Policy (this "Policy") is to set forth the eligibility criteria and process regarding financial assistance to qualifying patients for emergency and other medically necessary care. As further described below, this Policy:

1. Includes the eligibility criteria for financial assistance and sets forth the circumstances in which a patient will qualify for free or discounted care
2. Describes the method by which SGHS determines the Amount Generally Billed to individuals who have insurance
3. Describes the method by which patients may apply for financial assistance
4. Describes the actions SGHS takes in the event of non-payment
5. States the location of a list of all SGHS providers who deliver emergency or medically necessary care and who are subject to this Policy
6. Describes how SGHS will widely publicize this Policy within the community it serves

APPLICATION

This Policy is applicable to all emergency and other medically necessary care provided by SGHS, as defined herein.

DEFINITIONS

Amount Generally Billed or *AGB* means the amount derived from applying a “look-back” method (as defined in 26 C.F.R. § 1.501(r), as amended from time to time), namely, the amount determined for emergency or medically necessary care by multiplying the Gross Charges for that care by the AGB Percentage.

AGB Percentage means the amount that SGHS will calculate at least annually by dividing (a) the sum of the amounts of all claims that have been allowed for emergency and other medically necessary care by Medicare fee-for-service and all private insurers that pay claims to SGHS during a prior twelve- (12-)month period by (b) the sum of the associated Gross Charges for those claims. For these purposes, SGHS will include in the amount “allowed” the amount to be paid or reimbursed by Medicare or the private insurer and the amount (if any) the Medicare beneficiary is personally responsible for paying (in the form of co-payments, coinsurance and deductibles) regardless of whether or when the full amount allowed is actually paid and disregarding any discounts applied to the individual’s portion (under this Policy or otherwise). The AGB Percentage in effect at any particular time may be obtained by contacting Patient Financial Services at 229-333-1040 or 877-225-2071.

Extraordinary Collection Action means any action described in 26 C.F.R. § 1.501(r)-6(b)(1).

Federal Poverty Guidelines means the current Federal Poverty Income Guidelines as published in the *Federal Register* from time to time by the U.S. Department of Health and Human Services.

Gross Charges means SGHS’ full, established price for medical care that it consistently and uniformly charges patients before applying any contractual allowances, discounts or deductions.

Household Income means the gross income of all persons included in the household.

Plain Language Summary means the plain language summary document SGHS has created in compliance with 26 C.F.R. § 1.501(r)-1(b)(24).

Presumptive Eligibility means a process used as a courtesy to the patient to determine whether patients qualify for free or discounted care before they submit a financial assistance application.

SGHS means South Georgia Health System, a trade name used by the Hospital Authority of Valdosta and Lowndes County, Georgia (“The Authority”) for the hospitals, nursing home, clinics and health care facilities and services owned and operated by The Authority.

SGHS Facility means, for purposes of this Policy, SGMC, SGMC Berrien Campus, and SGMC Lanier Campus.

POLICY

SGHS is committed to providing free or discounted emergency and other medically necessary care to qualifying patients in accordance with the eligibility criteria and determination processes set forth in this Policy.

This Policy does not affect or limit SGHS' dedication and obligation under EMTALA to treat patients with emergency medical conditions. Further, SGHS adheres to all applicable federal, state and local laws and contractual obligations which may be associated with the subject matter contained in this Policy.

It is the policy of SGHS to provide without discrimination, Indigent Care or Charity Care financial assistance for emergency and/or other medically necessary care to those who qualify for such assistance under this Policy.

SGHS may provide self-pay discounts to certain uninsured individuals who do not have healthcare insurance. Patients who qualify for self-pay discounts are not treated as qualifying for financial assistance and therefore are not subject to the AGB limitations or other requirements applicable to patients who qualify for financial assistance programs.

Presumptive Financial Assistance

SGHS may presume, based on an individual's life circumstances, that the individual is presumptively eligible for financial assistance. Instances where patients may be presumptively eligible include, but may not be limited to, the following:

- When the patient is awarded Medicaid coverage but coverage is not retroactive to the date of service;
- When the patient had Medicaid coverage the month preceding and the month post services;
- The patient is indigent based on residency validation;
- The patient's services are covered under a grant that has exhausted funding;
- The patient exceeds the maximum allowed Medicaid covered days; or
- The patient is deceased with no known estate.

Presumed eligibility for financial assistance is by encounter only and cannot be used for future balances.

Financial Assistance Qualifications

Eligibility at SGHS for financial assistance relating to emergency or medically necessary care is based on patient cooperation and Federal Poverty Guidelines and percentages thereof. Patients whose Household Income is less than or equal to 125% of the Federal Poverty Guidelines will not be responsible for any charges on their account. Total self-pay charges for these accounts will be written off to Indigent Care.

Patients whose Household Income is between 126%-300% of the Federal Poverty Guidelines will not be responsible for any charges on their account. Total self-pay charges for these accounts will be written off to Charity Care.

Patients whose Household Income is between 301%-400% of the Federal Poverty Guidelines *may* be eligible for financial assistance. If these patients apply and meet the qualifications for financial assistance, they will only be charged the current AGB percentage in effect for their account(s).

Current Federal Poverty Guidelines can be found online at <https://www.healthcare.gov/glossary/federal-poverty-level-fpl/>.

Patient Cooperation

In addition to meeting the Household Income requirements, in order to be eligible for financial assistance under this Policy, a patient must also do the following:

- Complete the SGHS Financial Assistance Application Form;
- Supply all documentation requested by SGHS in accordance with this Policy and the Financial Assistance Application Form;
- Apply for all public assistance programs requested by SGHS, including, but not limited to, Medicaid, Social Security, disability, Victims of Crime, etc.;
- Cooperate with SGHS in determining whether or not the patient is eligible for financial assistance under this Policy; and
- Have no access to third-party funds to pay for the service(s).

Applicants must conduct themselves in a courteous, cooperative manner. Failure to do so can result in termination from the financial assistance program.

Not Applicable to Insurance

Financial assistance under this Policy will never apply to the payment responsibility of an insurance company or a health benefits plan regardless of whether the insurance company or health plan has made payment to the patient or to SGHS.

Basis for Calculating Amount Charged To Patients

SGHS will not charge patients eligible for financial assistance under this Policy for emergency or medically necessary care more than the Gross Charges for such care multiplied by the AGB Percentage. The amount charged shall not be greater than the Amount Generally Billed for emergency or other medically necessary care. Individuals may request the AGB Percentage in effect at any particular time by contacting Patient Financial Services at 229-333-1040 or 877-225-2071. AGB Percentage information will be provided free of charge.

PROCEDURE

Eligibility

Any patient/guarantor whose total household income is less than 400% of the Federal Poverty Level ("FPL") is eligible to apply for financial assistance.

Automated Financial Assistance

SGHS *may* electronically assess the Federal Poverty Level ranking through presumptive automated third-party software. Any patient qualifying for Indigent or Charity Care will be automatically written off and will not need to apply for financial assistance. If the system is unable to determine a Federal Poverty Level, the patient may apply through the manual application process.

If, through its automated or other presumptive process, SGHS determines that a patient is not eligible for a full write-off, SGHS will:

- Notify the patient regarding the basis for the presumptive determination;
- Notify the patient of the way to apply for more generous financial assistance;
- Allow the patient a reasonable amount of time to apply for more generous assistance; and
- If a financial assistance application is completed, determine if the patient is eligible for more generous financial assistance.

Method by Which Patients May Apply For Financial Assistance

Patients or their guarantors may apply for financial assistance within two-hundred forty (240) days from date of service by completing the SGHS Financial Assistance Application Form and providing all documentation requested by SGHS in accordance with this Policy and the Financial Assistance Application Form.

SGHS may require the patient to provide various types of information, including, without limitation, any of the following (as applicable):

- Proof of Identity – Provide the original or certified copy of any state or federal ID
- Proof of Income – SGHS accepts any of the following to show income:
 - Three (3) months of the most recent paycheck stubs or employer statement verifying gross wages;
 - IRS W-2 issued during the past year;
 - Most recent IRS Form 1040 document;
 - Three (3) months of the most recent bank statements for each checking, savings, money market or other bank or investment account;
 - Written statements for the most recent three (3) months for all other income (e.g., unemployment compensation, disability, retirement, student loans,

award letter from Social Security Office, current profit and loss report for all self-employed applicants, alimony documentation, child support documentation, worker's compensation etc.);

- Unemployment compensation denial letter;
 - Food stamps letter;
 - Verification of homelessness or a letter from a shelter on company letterhead; and
 - Other documents showing how the patient is being supported.
- Proof of Number of Dependents (Household Members) – the following may be required as proof of number of dependents in the household:
 - Most recent Income Tax Return; and
 - Other documentation reasonably acceptable to a Financial Counselor.

Partial Financial Assistance Eligibility

To be eligible for partial assistance, the uninsured/underinsured patient must have their total Household Income fall between 301%-400% of the Federal Poverty Guidelines, must have applied for any other potential coverage, and must agree to comply with SGHS payment plan requirements for balances after the AGB adjustment is applied.

Patients must apply for any and all federal or state assistance programs they may qualify for prior to using SGHS's financial assistance program.

Ineligibility

Financial assistance does not apply to the following:

- Cosmetic/plastic surgery or procedures;
- Experimental procedures and treatments;
- Accounts where the patient has requested that their insurance not be billed;
- Non covered services;
- Patients who have refused to apply for an individual or group market health plan when legally entitled to do so; and
- Charges covered by third-party liability (i.e.: automobile insurance, workers compensation, liability insurance) unless proof of denial of coverage is provided.

Financial Assistance Eligibility Determinations

The SGHS Patient Financial Services Department will render a decision regarding whether an individual qualifies for financial assistance within ten (10) business days of receipt of a complete financial assistance application.

Applicants with incomplete applications and those lacking supporting data will be notified in writing of the additional information and/or documentation required and will be given thirty (30) days to resubmit their application. Failure to provide the required information within the thirty (30) days will result in denial of the application.

Approved financial assistance will be effective for twelve (12) months from the date of application and retroactively for all patient balances incurred prior to the approval.

SGHS reserves the right to evaluate special circumstances and extend financial assistance outside of the above listed criteria.

Financial Assistance Reconsiderations

In the event any patient believes his or her application for financial assistance was not properly considered in accordance with this Policy, or if he or she otherwise disagrees with the application of this Policy to his or her case, a patient may submit one written request for reconsideration. Applications will only be reconsidered if new or additional information is provided.

If any patient information provided is found to be inaccurate, false or misleading, any financial assistance that may have been approved will be rescinded, the patient will be responsible for all charges incurred, and the patient may risk discontinuation of services, legal action, and the requirement to pay in advance for any future services.

SGHS will make reasonably available financial counselors to provide assistance with the financial assistance application process at Patient Financial Services located at 402 Woodrow Wilson Drive, Valdosta, GA 31602; (T): 229-333-1040. The Financial Assistance Application Form is also available at <https://www.sgmc.org/patients-visitors/financial-assistance/>.

Actions SGHS May Take In The Event Of Non-Payment

It is SGHS policy to pursue collection of patient balances from patients who have the ability to pay for services.

Collection efforts will be applied consistently and fairly for all patients. All collection efforts will comply with applicable laws and with the SGHS mission and values. For patients who qualify for financial assistance and who are cooperating in good faith to resolve their outstanding bills, SGHS may offer payment plans and will not refer those unpaid bills to outside collection agencies.

At all times, the confidentiality and individual dignity of each patient shall be upheld, and actions shall only be taken in compliance with all applicable laws for handling protected health information.

Collection Agencies

SGHS may engage third-party debt collection agencies only after all reasonable collection and payment options have been exhausted. Third-party debt collection agencies may be used, for

example, in situations in which patients have not made proper payments, have been unwilling to provide reasonably requested financial and other information to support a request for financial assistance, or have been otherwise uncooperative in making payments.

SGHS reserves the right to undertake all Extraordinary Collection Action permitted under applicable law.

Provider List

A complete list of physicians who provide emergency or medically necessary care at SGHS Facilities and whether or not they are covered by this Policy can be found at <https://www.sgmc.org/patients-visitors/financial-assistance/>. Such provider list is incorporated in this Policy by reference. For providers not covered by this Policy, patients should contact the provider's office to determine their policies regarding financial assistance.

Actions SGHS Takes To Widely Publicize Its Financial Assistance

SGHS makes this Policy, the Financial Assistance Application form and a Plain Language Summary of this Policy widely available to the public on its website at <https://www.sgmc.org/patients-visitors/financial-assistance/> in both English and Spanish and will provide individuals seeking access to such documents with the direct website address.

In addition, SGHS makes paper copies of this Policy, the Financial Assistance Application Form and a Plain Language Summary of this Policy available upon request and without charge in SGHS admissions and registration areas and in the SGHS Emergency Room. Individuals may also receive a copy of these documents through the mail by contacting Patient Financial Services at 229-333-1040 or 877-225-2071. A paper copy of the Plain Language Summary of this Policy will be offered to patients as part of the intake or discharge process.

SGHS will notify and inform members of the community it serves about this Policy in a manner reasonably calculated to reach those members who are most likely to require financial assistance from SGHS. Patients may also apply via SGMC MyChart.

All billing statements will include information on how to obtain a copy of this Policy, the Financial Assistance Application Form and the Plain Language Summary, along with the contact information for the SGHS Department that can provide more information about this Policy and aid with the application process.

Finally, SGHS will set up conspicuous public displays in the SGHS Emergency Room and admissions areas that notify and inform patients about this Policy.

RESPONSIBILITY

The individual(s) and department(s) primarily responsible for the content of this Policy:
Compliance and Revenue Cycle Department.

POLICY HISTORY

Original Adoption Date: May 16, 2018

Review/Revision History:

Revised: May 7, 2019

Review/Revision History:

Revised October 1, 2019

Revised August 4, 2020

Revised September 1, 2020

Revised, July 21, 2021

Revised, November 16, 2022

15639197 (1) (34746_125954) (SGMC - Financial Assistance Policy) (002) - 1/10/2023 10:08:22 AM