

Policy TITLE: Financial Assistance **EFFECTIVE DATE:** 01/12/2021 APPROVER(S): **NUMBER: Applicable To:** Ochsner University Hospital & Clinic

I. **Purpose**

This policy provides guidance on Financial Assistance guidelines for the provision of free or discounted, eligible Medically Necessary services to patients who meet certain eligibility criteria and demonstrate an inability to pay in accordance with 26 U.S. Code § 501r and other applicable regulations.

II. Scope

This policy applies all patients who are residents of Louisiana or Mississippi and receive Technical Services at Ochsner University Hospital & Clinics that are Medically Necessary and who meet certain eligibility criteria.

III. **Definitions**

- A. Emergency Medical Condition As defined within the Social Security Act §1867.
- B. Elective Services- Services, which could include Medically Necessary Services, that are not considered Urgent Services.
- C. Expected Payments All claims allowed by insurers.
- D. Family Income As defined by the Census Bureau to include earnings, unemployment compensation, worker's compensation, Social Security, Supplemental Security Income, public assistance, veterans' payments, survivor benefits, pension or retirement income, interest, dividends, rents, royalties, income from estates, trusts, educational assistance, alimony, child support, assistance from outside the household, and other miscellaneous sources on a pre-tax basis. The following are excluded from calculation as Family Income by the Census Bureau:
 - 1. Noncash benefits (such as food stamps and housing subsidies);
 - 2. Capital gains or losses; and
 - Tax credits.

- E. <u>Federal Poverty Level (FPL)</u> The set minimum amount of gross income that a family needs for food, clothing, transportation, shelter and other necessities and varies by family size as set forth by the Department of Health and Human Services.
- F. <u>Financial Assistance</u> refers to healthcare services provided by Ochsner without charge or at a discount to qualifying patients.
- G. <u>Gross Charges</u> Total charges at the facility's full established rates for the provision of patient care services before deductions from revenue are applied.
- H. <u>Medically Necessary</u> Services that are reasonable or necessary for the diagnosis or treatment of an illness or injury. Medical Necessity will be determined by the examining physician.
- I. <u>Patient Portion</u> The amount of medical charges the patient is financially responsible for after insurance has been applied to the bill for the services rendered.
- J. <u>Professional Services</u> services provided by a physician or clinical professional.
- K. <u>Self-Pay Discount</u> Discount applied to amounts due from patients for uninsured services.
- L. <u>Technical Services</u> medical or technical equipment, supplies or services.
- M. <u>Underinsured</u> Patient has some form of third party assistance but still has out-of-pocket expenses that exceed his/her ability to pay.
- N. <u>Uninsured</u> Patient has no form of third party assistance to assist with financial responsibility for medical services.
- O. <u>Urgent Services</u> Services that if not performed timely would endanger life, significantly worsen the patient's condition, or result in loss of limb or irreversible loss of function.

IV. Policy Statement

A. Ochsner University Hospital & Clinics is committed to providing Financial Assistance for Medically Necessary Care to persons who are Uninsured, Underinsured, ineligible for a government program, or otherwise unable to pay, and who are determined to be eligible for Financial Assistance in accordance with this policy. Ochsner University Hospital & Clinics shall provide, without discrimination, care of Emergency Medical Conditions to individuals regardless of their eligibility for Financial Assistance or for government assistance.

V. Policy Implementation

- A. Eligibility for Financial Assistance
 - 1. The granting of Financial Assistance shall be based on an individualized determination of financial need and will not take into account age, gender, race, social or immigration status, sexual orientation, or religious affiliation.
 - 2. Patients are expected to cooperate with Ochsner University Hospital & Clinics procedures for obtaining Financial Assistance or other forms of payment, and to contribute to the costs of their care based on their individual ability to pay.

- a. Failure to comply with Ochsner University Hospital & Clinics Financial Assistance screening process, including but not limited to, Medicaid coverage determinations, will exclude patients from Financial Assistance eligibility.
- 3. Financial Assistance applies to patient liability only, including but not limited to, deductibles, co-payments, and co-insurances and is available to residents of Louisiana and Mississippi. Eligibility for Financial Assistance is determined based on the patient's Family Income, assets, and family size.
- 4. Ochsner shall provide a 100% Financial Assistance discount for eligible services to patients whose Family Income is at 200% of the FPL Guidelines or less.
- 5. Patients whose Family Income exceeds 200% of the FPL may be eligible to receive discounted rates based on their specific circumstances, such as catastrophic illness or medical indigence, at the discretion of Ochsner University Hospital & Clinics. For exceptions, documentation may be required to qualify for Financial Assistance. Exceptions include, but are not limited to:
 - a. Expensive medications and hospital/physician bills;
 - b. Terminal illness; or
 - c. Multiple hospitalizations.
- 6. Failure to comply with Ochsner University Hospital & Clinics Medicaid coverage and Financial Assistance screening process will exclude patients from Financial Assistance eligibility.
- 7. Modifications to previously awarded discounts shall be made if subsequent information indicates the information provided to Ochsner University Hospital & Clinics was inaccurate.
- 8. Patients who are determined eligible for Financial Assistance shall not be deferred for Medically Necessary care.
- B. Services Available Under this Policy
 - 1. Financial Assistance is available for all Technical Services, except for the following:
 - a. Pre-paid, fixed price services;
 - b. Transplant services;
 - c. Elective Services: and
 - d. Fees for Professional Services rendered by the providers as listed on Attachment A.
 - 2. Ochsner University Hospital & Clinics reserves the discretion to offer Financial Assistance for excluded services on a case-by-case basis.
- C. Methods by Which Patients May Apply for Financial Assistance
 - Financial Assistance requests can be made by contacting the Patient Account Customer Service department via telephone, email, fax, or written correspondence or by visiting the Patient Financial Services Department located at Ochsner Health facilities.

- 2. Financial need will be determined by an individual assessment of financial need and may:
 - a. Include an application process ("Attachment B"), in which the patient or the patient's guarantor, is required to cooperate and provide personal, financial, and other information and documentation relevant to making a determination of financial need:
 - i. The Financial Assistance application is required to provide additional information to allow for a more in-depth review of borderline approvals, hardship cases, and large balances.
 - Include the use of external publicly available data sources that provide information on a patient's or a patient's guarantor's ability to pay (e.g., credit scoring);
 - c. Use a third-party tool when there is insufficient information provided by the patient, which may be used as the sole documentation source to make a Financial Assistance determination:
 - d. Include reasonable efforts by Ochsner University Hospital & Clinics to explore appropriate alternative sources of payment and coverage from public and private payment programs and to assist patients to apply for such programs; or
 - e. Include a review of the patient's outstanding accounts receivable for prior services rendered and the patient's payment history.
- 3. Approvals for financial assistance are considered valid for 90 days and future balances within 90 days will be auto adjusted. A patient has 240 days from the date of the first post-discharge bill for an episode of care to apply for Financial Assistance for that episode of care.

D. Amounts Charged to Patients

 Patients who receive Financial Assistance may not be charged more for the same services generally billed to insured patients. The Financial Assistance discounts are separately calculated for each facility and represent the average payor yield by reviewing Medicare and commercial actual and Expected Payments (including the Patient Portion) over the prior twelve-month period as demonstrated more fully on Attachment C.

E. Presumptive Financial Assistance Eligibility

- In addition to the formal Financial Assistance application process, Uninsured
 patients may also be presumed to be eligible for Financial Assistance for charges
 on Technical and Professional Services based on evidence provided via use of a
 third-party screening tool, which may be utilized as the sole documentation source
 to make a Financial Assistance determination.
- 2. Uninsured patients or patients with Medicare Part A only will be screened prior to service and if eligible they will not be billed for technical services.
- 3. Medically Necessary charges not covered by Medicaid or indigent care programs may be presumed eligible for Financial Assistance.

4. Technical account balances with previously made payments may be considered for Financial Assistance if requested through Patient Financial Services or Patient Accounts Customer Service; however, they shall not be considered through the presumptive Financial Assistance process.

F. Billing and Collection Efforts

- 1. The Billing and Collections policy and translated copies can be obtained:
 - a. online at https://www.ochsner.org/patients-visitors/billing-and-financial-services/financial-assistance/ or
 - b. upon written request at Ochsner Health System Patient Financial Services 1514 Jefferson Highway, New Orleans, LA 70121.
- 2. Hospital will not impose against any patient extraordinary collection efforts such as wage garnishment, liens on primary residences or take other legal actions.
- G. Communication of the Financial Assistance Program to Patients and Within the Community
 - 1. Information about the Financial Assistance program can be found:
 - c. On patient billing statements,
 - d. Online via the hospital web site,
 - e. By visiting Patient Financial Services located at the hospital

VI. Enforcement

Failure to comply with this policy may result in progressive discipline up to and including termination of employment for employees or termination of contract or service for third-party personnel, students or volunteers.

VII. Attachments

Attachment A Professional Services Not Covered by Financial Assistance Policy

Attachment B Financial Assistance Application

Attachment C Amounts Generally Billed Discounts

Attachment D Facilities Covered under Financial Assistance

VIII. References

HFMA 501(c)(3) Hospital Charity Care Policy and Procedure

Census Bureau Measure of Poverty

42.U.S.C. 1395dd

26 U.S.C 501, see also 26 CFR Parts 1, 53 and 602, Additional Requirements for Charitable Hospitals; Final Rule

https://www.census.gov/topics/income-poverty.html

IX. Policy History

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Attachment A Professional Services Not Covered by Financial Assistance Policy

All Ochsner University Hospital & Clinics employed physicians are covered under the Financial Assistance Policy.

The following is a list of providers rendering care in Ochsner University Hospital & Clinics are not covered under the Financial Assistance Policy.

Gaudet, Jacques E., MD

Runnels, James H., MD Melvin, Ross R., DO Chehebar, Daniel M., DO

Eiser, John W., DO

Gautreaux, Josh D., CRNA Anzalone, Charles L., Jr., MD

Khan, Asma, M.D. Nicholas, Julie, NP

O'Neal, James W., IV, M.D. Fabre, Tracy T., CRNA Hernandez, Stephen C., MD

Taylor, Taran C., PA
Doucet, Karla M., M.D.
Hallner, Barry G., Jr., MD
Yellin, Joshua H., M.D.
Reinoso, Maria, MD
Salvatierra, Erick A., M.D.
Tadin, David M., M.D.
LeBas, Rebecca B., FNP
Lemaire, Alexandra B., PA-C

Manafi, Jason J., PA

Rodriguez-Quinones, Julio J., MD

LaCour, Keith J., M.D. Rahman, Riaz R., MD Hatch, Spencer T., DO Blem, Robert I., M.D. Louviere, Morgan M., FNP

Handy, Lena NP

Levine, Kenneth M., M.D. Schulze, Eric S., M.D. McCormic, Laurie K., M.D. DuBose, Tracie L., FNP Hebert, Tonya C., FNP Walker, Craig M., M.D. Montgomery, Andrea L., PMHNP

Saad, Marc N., M.D. Edavettal, John M., M.D. Noel, Jacque F., III, M.D.

Charles, Wronetta Ann, PMHNP

Liu, Tiffany, M.D.

Blanchet, Paulette M., M.D.
Boudreaux, Tina M., FNP
Patel, Jigar N., M.D.
Trahan, Jason R., M.D.
Dees, Ashley, FNP
Zmora, Ryan A., DO
DiLeo, Michael D., MD
Lee, Rebecca B., DO

Humble, Stephanie L., M.D. Penton, Judson L., M.D. Dauphiney, Africa B., ANP

Herrington, Christopher P., M.D.

Lodha, Ankur, M.D. Abboud, Lucien N., M.D.

Dartez, John, NP

Antoine, Laterica S., FNP
Salvaggio, Louis A., M.D.
Lopez, Alfredo A., MD
Chastant, Ryan P., M.D.
Saenz, Rodrigo E., M.D.
Tarsia, Joseph, III, M.D.
Montet, Marcus A., FNP
Burrell, Shanna, NP
George, James S., MD
Smith, Ronni, CRNA
Mampilly, George A., M.D.
Schutte, John P., M.D.
Walvekar, Rohan R., MD

Czerwinski, Kelly, NP

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O'Dell, Robin D., FNP
Vincent, Jared M., MD
Broussard, Richard K., M.D.
Leblanc, Robert D., Jr., M.D.
Ramamurthi, Deepa, MD
Graham, Stefin, CRNA
Nervez, Cecilia T., MD
Cheeran, Bose D., M.D.
Okechukwu, Vitalis C., M.D.
Viator, Timothy A., MD
Hojaili, Bernard S., M.D.

Boudreaux, Kathleen M., APRN Altamirano, John-Mario W., FNP

Nair, Pradeep K., MD

Pharo, Austin M., MD
Howes, Richard F., MD
Mogabgab, Owen N., M.D.
Jackson, Paul M., M.D.
Luke, John B., III, M.D.
Keating, Patrick L., MD
LaFleur, Naomie R., FNP
Going, Libby L., M.D.
Rastogi, Ujjwal, MD
Diggs, George W., Jr., MD
Ong-Lao, Maricar O., M.D.
Trawick, Eric P., M.D.
Sorrel, Nicholas C., MD

Fontenot, Christopher J., DO Broussard, Alan P., MD Dahr, Nahla, MD

Duhon, Nathaniel R., M.D.
Gilcrease, Samantha C., FNP
Breaux, Jason P., CRNA
Moussaoui, Asma, M.D.
Bradley, Tasia A., MD
LaFleur, Seth M., CRNA
Helaire, Christa A., FNP
Benoit, Tina M., MD
Hetzler, Laura T., MD
Linville, Whitney, DDS
Reviere, Adrienne A., DDS
Chappuis, Charles W., Jr., MD
Cunningham, Rachel B., FNP

Hebert-Briley, Tammy S., FNP

Qaisieh, Khaled, NP Sorrells, Kelly S., MD Lewis, Angela R., MD Keys, Timothy C., M.D. Andries, James C., Jr, FNP Menard-Neumann, Leah, NP Chastant, Bradley J., M.D. Long, David H., MD

Williams, Samantha L., ANP

Saul, Blake O., DO

Theodosis, Christian N., MD Buzhardt, Paul C., M.D. Guedry, Christopher J., M.D. Proctor, Brenda W., FNP Magay, Yelena A., FNP Olivier, Joseph R., CRNA Kumar, Amit, M.D. Karr, Jacob R., M.D.

Guillory, Stephanie S., ANP Al-Hariri, Adham B., MD Kedia, Ronak R., MD Oge, Linda K., M.D.

Laperouse, Patrick A., M.D.
Rubacha, Matthew, M.D.
Lebron-Berges, Alfonso J., M.D.
Leddy, Michael J., III, MD
Stout, Daniel G., MD
Ceaser, Shantell, MD
Petrolia, Chelsea R., FNP
Joseph, Jamie P., MD
Mullen, William C., M.D.
Horton, James R., M.D.
Castellano, Tara, M.D.
Castellano, Tara, M.D.
Khandker, Namir, M.D.
Hodges, Precious J., ACNP

Castellano, Tara, MD
Khandker, Namir, M.D.
Hodges, Precious J., ACNP
Degatur, Kate A., M.D.
Dooley, Madelyn H., FNP
Santiago, Kerri B., MD
Khan, Mohammad H., M.D.
Manrique-Garcia, Alvaro F., M.D.

May, Wade B., M.D. Dakin, Kim L., MD Vidal, Gabriel A., M.D.

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Fashho, Michael B., M.D. Grisby, Shaunda K., M.D. Beck, John L., M.D.

Sidhu, Gursukhman Deep S., M.D.

Dunn, Lauren E., M.D.
Morris, Lisa M., MD
Nguyen, Son V., MD
Maness, Mandy R., M.D.
Cannizzaro, Louis A., M.D.
Ayalloore, Siby G., M.D.
Heard, Michel E., Jr., M.D.

Liles, Rein T., FNP

Camilo, Osvaldo A., M.D.
Petitjean, Mark C., MD
Paris, Christopher L., MD
Bourque, Thad A., M.D.
Roy, Sudipta, MD
Owens, Laura G., M.D.
Langheinz, Kirk P., M.D.

Aubin, Andrew, M.D.
Person, Stephen M., MD
Thomas, Molly B., M.D.
Horaist, Michael F., M.D.
Bienvenu, Melanie M., M.D.

Landes, Joshua S., M.D.

Bourgeois, Traci M.D.
Darbonne, Brandi F., FNP
Richard, Tori, PMHNP

Williams, Matthew D., M.D.
Walton, Blaine T., M.D.
Bernard, Alisha, NP
Alleyn, Jaime J., MD
Batdorf, Brian J., DO
Autin, Robert L., M.D.
Mata, Jose A., MD

Phillips, Amanda R., M.D. Eschete, Dennis J., Jr., M.D.

Samii, Mark, M.D. Aggarwal, Sudhir, M.D.

Whittington, Mathew J., M.D.

Lewis, Deron J., CRNA Meaux, Tyson A., MD Beck, Christopher J., M.D. Guillory, Rachael L., M.D. Poongkunran, Mugilan, M.D. Vignes, Jonathan B., M.D.

Zeik, Alison T., PA

Vanderbrook, Richard C., Jr., M.D.

Abshire, Stephen G., M.D. Peck, Trevor H., M.D.

Financial Assistance Process & Application

The Ochsner Health System ("OHS") is committed to providing financial assistance for patients with a demonstrated financial need or hardship, who have received medically necessary healthcare services provided by OHS. Medically necessary services are services that are reasonable or necessary for the diagnosis or treatment of an illness or injury. Medical necessity will be determined by the examining physician. This application does not serve as a guarantee of financial assistance or reduction in outstanding liability.

Application must include:

- All required documents for you and your co-applicant if applicable.
- Proof of Dependents for anyone listed on application.
- Completed Ochsner Financial Assistance Application
- Signed & Dated Patient Attestation Form
- Proof of LA or MS Residency

Please include all applicable documents listed below:

A. Proof of Income (Please provide 1 of the following):

- a. Copy of tax return (Form 1040) for current tax year or
- b. Copy of three (3) most recent pay stubs.
- If unemployed, please provide letter from last employer OR copy of unemployment award letter OR letter certifying denial of unemployment benefits from applicable state department of labor
- d. If no income can be provided, please complete and sign the No Income Verification/Statement of Support (view attachment)
- e. If separated, please submit a copy of tax return (Form 1040) for current tax year.
- f. Copy of Social Security Administration monthly award letter
- g. Copy of Disability monthly award letter

B. Copy of Healthcare Insurance card/information (If applicable)

C. Proof of Residency (Please provide 1 of the following):

- a. Valid Louisiana Driver's License/Identification Card
- b. Current Utility Bill (shows name and address of applicant)
- c. Lease Agreement (shows name and address of applicant)
- d. Voter Registration

D. All other income: (Please provide 1 of the following):

- a. Spousal/Child Support (Copy of letter stating monthly award amount)
- b. Rental Property
- c. Investment Income

E. Proof of Dependents (Please provide 1 of the following):

- a. Copy of tax return (Form 1040) for current tax year
- b. School records or statements
- c. Health provider statements

<u>Please Mail Completed Info to:</u>

Ochsner Health System

Attn:

1514 Jefferson Hwy New Orleans, LA 70121

Applications can also be emailed or faxed to:

Fax- (504)-842-0322

Email- OchsnerFADocs@ochsner.org

Financial Assistance Application

MRN: ____

Income Information: Please complete the income information below. If married, please include spouse income information under the Co-Applicant fields.				
Income Sources	Applicant	Monthly Gross Income	Co-Applicant	Monthly Gross Income
Employment	\$		\$	
Social Security	\$		\$	
Disability	\$		\$	
Unemployment	\$		\$	
Rental Property	\$		\$	
Investment Income	\$		\$	
Spousal Support	\$		\$	
Child Support	\$		\$	
·		Total C	ombined Income	\$
·			·	

Applicant(s) Information **Applicant/Guarantor Information** Relationship to patient: Marital Status (*): [] Single [] Married [] Divorced [] [] Self [] Spouse [] Parent Separated First Name Middle Initial **Social Security Last Name** Number Date of Number of Current Age of Birth Dependents **Telephone Number** Dependents City Street Address ZIP State **Current Employer** Position If you are not working, how long have you been unemployed?

Co-applicant Info	ormation se include spouse inform	ation and income	
Relationship to	patient:		
[]Self []Spo	use [] Parent		
Last Name	First Name	Middle Initial	Social Security Number
Date of Birth	Number of Dependents	Age of Dependents	Current Telephone Number
Street Address State		City	ZIP
Current Employe	er		Position
If you are not working, how long have you been unemployed?			

Attachment(s)

Attestation
No Income Verification

Attestation

- I have complied with the Ochsner Medical Cost Assistance Program ("MCAP") screening process to determine if I may be eligible for alternate resources (COBRA, Social Security, Medicaid, and Victim of Crime).
- I understand that until I have complied with the MCAP eligibility process, or applicable application process, I will not be eligible for financial assistance.
- I understand that balances due to non-medically necessary services, such as purely
 elective or cosmetic services are not eligible for financial assistance. I also understand
 that balances over 240 days from the date of the first post discharge bill for an episode
 of care will not be included in this request.
- If I have included balances due to purely elective or cosmetic services, they will not be adjusted. If they are adjusted in error, they will be reinstated.
- If applicable, I have provided my most recent/current Insurance card with appropriate information to submit past, present, and future claims.
- I have provided all requested documentation from page 1 of this application. I attest that all information provided on this application, as well as all supporting documents are accurate and truthful to the best of my knowledge and ability.

Printed Name	Signature
Date of Application	Phone/Contact
Address (Street Ad	ddress, City, State, Zip)

No Income Verification/Statement of Support				
			&	
	(A _l	pplicant)		(Co-applicant) if applicable
monthly/year To the best of	ly inc my k	come. The applicant has knowledge, the applicant	listed you as their sol has no income and I	applicant has stated they do not receive any le means of support. I certify this to be true. I am either providing the with financial support as specified below
I am providin	<u>g:</u>	(Relationship to the	e applicant-for exam	ple: Shelter, Mother, Father, Other)
	•	Food and Shelter	\$	Approximate monthly total
	•	Financial Support	\$	Approximate monthly total
	•	Other	\$	Approximate monthly total
Printed Na	me (0	of supporter)		Signature (of supporter)
Date				Phone/Contact
		Ad	dress (Street Addres	s, City, State, Zip)
		****If you are not r	eceiving income fron	m any source please sign here****
I,any source	s curr	rently.	_ am not receiving ind	come or financial support from
Signature_ Applicant/0	Co-Ap	oplicant (<i>if applicable</i>)	Date	·
		<u>Pl</u>	ease Mail Complete Ochsner Hea Attn: 1514 Jefferson New Orleans, LA	llth Hwy

Attachment B - Amounts Generally Billed Discounts Financial Assistance Policy

Facility	Calculated Discount Rate
Ochsner University Hospital & Clinics	77%

Physician Charges	Calculated Discount Rate
Ochsner University Hospital & Clinics	25%



Attachment D Facilities Covered by Financial Assistance Policy

Policy Number OHS.REV.042
Date of Issue 05/01/2022
Review Dates 05/01/2022
Revision Dates 05/01/2022

Policy Owner(s) Patient Financial Services

OHS.REV.042 applies to the following hospital facilities and the associated provider-based departments of each:

Ochsner University Hospital & Clinics