FINANCIAL ASSISTANCE POLICY COASTAL PLAINS INTEGRATED HEALTH

Origination Date: 9/20/2022 Effective Date: 10/1/2022 Revision Date: 8/20/2024

PURPOSE

Coastal Plains Integrated Health (CPIH) is committed to providing quality behavioral health services and strives to ensure that the financial situation of individuals who need quality healthcare services does not prevent them from seeking or receiving care.

POLICY

In accordance with our mission to enhance personal growth in our community, CPIH provides financial assistance or Charity Care to persons who are low income, uninsured, underinsured, or otherwise unable to pay for some or all of the bills related to participation in behavioral health services.

Individuals served are expected to cooperate with CPIH's procedures for obtaining Charity Care or other forms of payment or financial assistance and to contribute to the cost of their care based on their individual ability to pay subject to the rules, regulations and contractual requirements of CPIH's various funding agencies.

DEFINITIONS

For the purpose of this policy, the terms below are defined as follows:

Bad Debt: Healthcare services that have been or will be provided and cash inflow is anticipated for all or a portion of the charge. Includes the monthly Sliding Scale Fee Schedule charges not collected for individuals above 150% of Federal Poverty Levels (FPL). Bad debt is not eligible for reimbursement from federal Charity Care programs.

Charity Care: Healthcare services that have been or will be provided but are never expected to result in cash inflows. Charity care results from CPIH's policy to provide healthcare services free or at a discount to individuals who meet the established criteria.

Family: Using the Census Bureau definition, a group of two or more people who reside together and are related by birth, marriage or adoption. According to Internal Revenue Service

rules, if the individual claims someone as a dependent on their income tax return, they may be considered a dependent for the provision of financial assistance.

Family Income: Family income is determined using the Census Bureau definition, which uses the following income when computing federal poverty guidelines:

- A. Includes earnings, unemployment compensation, workers' compensation, Social Security, public assistance, veterans' payments, survivor benefits, pension or retirement income, interest, dividends, rents, royalties, income from estates trusts, education assistance, alimony, assistance from outside the household and other miscellaneous sources.
- B. A person's Supplemental Security Income will be included if the person is an adult.
- C. Noncash benefits (such as food stamps and housing subsidies) do not count
- D. Determined on a before-tax basis.
- E. Excludes capital gains or losses; and
- F. If a person lives with a Family, includes the income of all Family members (non-relatives, such as housemates, do not count).

In keeping with HHSC requirements:

- G. Child Support will not be included.
- H. Supplemental Security Income will not be included if the person is a child.

Federal Poverty Level: The applicable household income thresholds established periodically in the Federal Register by the U.S. Department of Health and Human Services under the authority of 42 U.S.C.~ 9902(2).

Sliding Scale Fee Schedules: Individual financial share calculated utilizing rules, regulations and contractual requirements of CPIH's various funding agencies (HHSC MH/IDD, TCOOMMI, etc.).

Underinsured: The individual has some level of insurance or third-party assistance but still has out of pocket expenses that exceed his or her financial abilities.

Uninsured: The individual has no level of insurance or third-party assistance to assist with meeting his or her payment obligations.

PROCEDURES

Services Eligible Under This Policy. For purposes of this policy, Charity Care or "financial assistance" refers to healthcare services provided by CPIH without charges or at a discount to qualifying individuals. The following healthcare services are eligible for charity care:

- 1. Behavioral health services
- 2. Immunizations
- 3. Public health services

4. Other preventative services

Eligibility for Charity Care. All individuals, including low-income, uninsured and underinsured, will be treated fairly and with respect before, during and after service delivery regardless of their ability to pay. The granting of financial assistance shall be based on an individualized determination of financial need and shall not consider age, gender, race, ethnicity, socioeconomic status, sexual orientation or religious affiliation.

Method by Which Clients May Apply or be Assessed for Charity Care.

- 1. Financial need is determined in accordance with procedures that involve an individual assessment of financial need; and may
 - a. Include an application or assessment process, in which the individual or guarantor are required to cooperate and supply personal financial and other information and documentation relevant to make determinations of financial need.
 - b. Include the use of external publicly available data sources that provide information on an individual's or guarantor's ability to pay (such as credit scoring).
 - c. Include reasonable efforts by CPIH to explore appropriate alternative sources of payment and coverage from public and private payment programs and to assist individuals to apply for such programs.
 - d. Consider the individual's available assets and all other financial resources available to the individual.
 - e. Include a review of the individual's outstanding accounts receivable for prior services rendered and the individual's payment history.
- 2. A request or assessment for Charity Care and a determination of financial need can be done at any point in the collection cycle but is preferred to be completed within the first 30 days of treatment. The need for financial assistance is re-evaluated annually and whenever a significant change has occurred which affects the individual's or guarantor's eligibility for Charity Care.
- 3. CPIH's values of human dignity and stewardship shall be reflected in the application, financial need determination and granting of Charity Care. Requests for Charity Care shall be processed promptly with notification to the individual or guarantor in writing within 30 days of receipt of a completed application or assessment.

Presumptive Financial Assistance Eligibility. There are instances when an individual may appear eligible for Charity Care discounts, but there is no financial assessment on file due to lack of supporting documentation. Often there is adequate information provided by the individual served or through other sources, which provide sufficient evidence to provide that individual with charity care assistance. In the event there is no evidence to support an individual's eligibility for Charity Care, CPIH can use outside agencies in determining estimated income amounts for the basis of determining Charity Care eligibility and potential discount

amounts. Once determined, due to the inherent nature of the presumptive circumstances, the only discount that can be granted is a 100% write-off of the account balance. Presumptive eligibility may be determined based on individual life circumstances that may include:

- 1. State-funded prescription programs
- 2. Homeless or received care from a homeless clinic
- 3. Participation in Women, Infants and Children programs (WIC)
- 4. Food stamp eligibility
- 5. Subsidized school lunch program eligibility
- 6. Eligibility for other state or local assistance programs that are unfunded (e.g. Medicaid spend-down)
- 7. Low income/subsidized housing is provided as a valid address; and
- 8. Individual is deceased with no known estate

Eligibility Criteria and Amounts Charged to clients. Services eligible under this Policy are made available to individuals served on Sliding Scale Fee Schedules, in accordance with financial need, as determined in reference to Federal Poverty Levels (FPL) in effect at the time of the determination. The basis for the amounts charged to individuals served who qualify for financial assistance is as follows:

- 1. Individuals whose family income is at or below 150% of the FPL are eligible to receive services at a discount of 100%.
- 2. Individuals whose family income is above 150% but not more than 200% of the FPL are eligible to receive services at a discount (partial Charity Care) at rates discounted using Sliding Scale Fee Schedules. Uncollected fees assessed are Bad Debt and ineligible for reimbursement under federal Charity Care programs.
- 3. Individuals whose family income exceeds 200% of the FPL may be eligible to receive discounted rates on a case-by-case basis based on their specific circumstances, such as catastrophic illness or medical indigence, at the discretion of CPIH; however, the discounted rates shall not be greater than the amounts generally billed to private or public insurance and discounted using Sliding Scale Fee Schedules. Uncollected fees assessed are Bad Debt and ineligible for reimbursement under federal Charity Care programs.

Community Notification. Notification about Charity Care available from CPIH, includes a contact number, and is disseminated by various means, which includes, but are not limited to, the publication of notices in monthly statements and by posting notices in clinics, waiting areas, intake and assessment, business offices and financial services that are located in CPIH facilities and other public places as elected. CPIH publicizes a summary of this Charity Care policy on our website, in brochures available in client access sites and at other places within the community served by CPIH. Such notices and summary information are provided in accordance with the National CLAS Standards.

Collection Practices. CPIH develops policies and procedures for internal and external collection practices (including actions CPIH may take in the event of non-payment, including collections action and reporting to credit agencies) that consider the extent to which the client qualifies for charity care, an individual's good faith effort to apply for charity care and an individual's good faith effort to comply with his or her payment agreements with CPIH.

For individuals who qualify for charity care and who are cooperating in good faith to resolve their discounted bills, CPIH may offer extended payment plans, will not send unpaid bills to outside collections agencies and will cease all collection efforts. CPIH will not impose extraordinary collections actions such as wage garnishments, liens on primary residences or other legal actions for any individual without first making reasonable efforts to determine whether that individual is eligible for charity care under this financial assistance policy.

Regulatory Requirements. All applicable local, state, and federal regulatory requirements were considered in the development of this policy.

Policy Authority: For claims, appeals and requests for assistance, contact the CPIH Authority Department by:

- 1. Calling 361-777-3991, Monday through Friday, 8:00 a.m. to 5:00 p.m.; or
- Mailing a written request to: CPIH Authority Department 200 Marriott Dr. Portland, TX 78374

Participating Providers: A list of CPIH providers who participate in the Financial Assistance Policy is available on our website at:

https://coastalplainsctr.org

Board Chair

Chief Executive Office

Medical Director

8/20/24 Date

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8 20/24 Date