

## Clinical and Administrative Policies and Procedures

**Section:** Financial Management **Policy:** 06.10.FL

**Title:** Financial Assistance Policy

### **Purpose:**

Centerstone is a not-for profit entity established to meet the health care needs of the residents of the communities we serve. Accordingly, Centerstone provides emergency psychiatric/substance use treatment and other medically necessary care, without discrimination, regardless of the client's financial assistance eligibility. This policy will provide a systematic method for identifying and distributing financial assistance to the residents of the communities served by Centerstone.

### Scope:

This policy applies to Centerstone of Florida programs and revenue cycle department.

### **Definitions:**

**AGB:** Amounts Generally Billed

**URL:** Uniform Resource Locators – Internet address **AHCA:** Agency for Health Care Administration

**FPL:** Federal Poverty Level

**ECA:** Extraordinary collection actions

**FAP:** Functional Analytic Psychotherapy - FAP-related care

## **Policy:**

Centerstone will provide financial assistance to clients who are determined unable to pay for emergency psychiatric/substance use treatment and other medically necessary care, services due to financial hardship. Centerstone will determine client fees based on income and family size.

### **Procedure:**

Clients who have submitted complete financial information and qualified for financial assistance will not be subject to any billing and/or collection actions with no expectation of payment. Expected payments for services covered under this policy will not be over

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the amounts generally billed (AGB). When determining AGB, Centerstone utilizes the look back method. Centerstone annually calculates the look back method by multiplying gross charges by the percentage of Medicaid, Medicare, and all private insurance claims allowed over a 12-month period divided by the sum of the associated gross charges. All physicians within Centerstone are covered under this policy. We do not allow any non-staff providers to use our facility and, therefore, no provider list is required. Note: Services provided by medical hospitals (Manatee Memorial Hospital, Blake Medical Center, Lakewood Ranch Medical Center, etc.) providing care for emergency medical conditions for clients regardless of source of payment are not covered under this policy. Admissions Specialists will be available to clients during designated times to assist clients with determining their eligibility for federal, state and county financial assistance programs. Final authority for determining eligibility and whether reasonable efforts were made to determine eligibility for financial assistance lies with the Regional Finance Officer.

Measures to widely publicize the Centerstone Financial Assistance Policy and related documents to clients, family members, visitors and the general public will include, but are not limited to:

- Financial assistance-related documents include the full policy, plain language summary statement of the full policy, the application for financial assistance for completion, All financial assistance-related documents will be available in languages identified as representing the lesser of 5 percent or 1,000 individuals of the populations likely to be affected, encountered or served by Centerstone.
- All financial assistance-related documents described above will be available on Centerstone of Florida website (<a href="www.centerstone.org/locations/florida">www.centerstone.org/locations/florida</a>), and available on site and upon request, without charge, both by mail and on site.
- Clients will be advised of the availability of financial assistance in the admission and scheduling process.
- Clients will be informed of the financial assistance policy on statements after services are rendered. Information on each statement will include the URL where all financial assistance-related documents can be obtained and the telephone number to call for more information about the financial assistance policy and application process.

**Methods for applying for financial assistance:** Financial assistance-related documents and assistance with the application process can be obtained from admission specialists. In addition, a request for mailing the financial assistance related documents can be made by calling (941)-782-4318, or the documents can be printed directly from the <a href="https://www.centerstone.org/locations/florida">www.centerstone.org/locations/florida</a> website. Completed applications may be returned in person to the Administration office at 391 6<sup>th</sup> Ave W or the Hospital campus location

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at 2020 26<sup>th</sup> Ave E, by mail (PO Box 9478, Bradenton, FL 34206) or by fax (941-782-4301). See Financial Assistance Application attached.

The following documentation or information may be used to determine financial assistance eligibility:

- Signed financial assistance application acknowledging that providing false information to defraud Centerstone is a misdemeanor in the second degree (Section 817.50 F.S.)
- Income documented by one of the following: W-2 withholding forms, employer paystubs, previous year federal tax return, verification of current wages from employer(s), from public welfare agencies or other governmental agency which can attest to the patient's income status for the past 12 months.

Information needed to determine financial assistance eligibility includes the client's demographic information and income, household members' names, birthdates and social security numbers, pensions, any rental income, and income for all household members. Household members include family members who were claimed on a client's income tax from the prior year or to be claimed in the next tax-filing period. Other family members who are being directly supported by the client may be included on the application, if that inclusion speaks to the client's need for financial assistance.

# **Required proofs:**

- <u>Proof of Income:</u> copy of notices from Social Security, Unemployment Compensation, pensions, rental income or ANY income used to pay your expenses
- No Income: provide a letter of support from the individual assisting you

Applications will be reviewed within 30 days and notification of eligibility will be provided by mail or by email upon request. A client may appeal a denial by phone, by email, by fax or by letter with an explanation of their financial circumstances and documentation related to their extenuating circumstances. The final decision on an appeal will be made by the Regional Finance Officer.

If a patient submits an incomplete financial assistance application within 120 days of the first post-discharge billing statement for the care for which they are requesting financial assistance, they will be notified which necessary information is missing with a copy of the plain language summary of the Financial Assistance Policy, and any collection efforts related to charges for that care will be suspended. This includes collection efforts by Centerstone, and primary and secondary collection agencies. Clients who qualify for financial assistance will have their balance adjusted to zero, collection efforts will cease permanently, and notice will be sent to any credit bureau where adverse information had previously been reported.

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Criteria used to determine a patient's eligibility for financial assistance:

1. The following services are deemed to be not medically necessary and not eligible for financial assistance under this policy: Experimental, related to a research study.

- 2. Patient income must meet one of the following criteria:
  - a. Florida Agency for Health Care Administration (AHCA) Charity Guidelines: Family income for the 12 months preceding the determination does not exceed 300 percent of the current federal poverty guidelines, and/ or the unpaid portion of the hospital bill due from the patient exceeds 25 percent of the annual family income. The total family income cannot exceed four times the federal poverty level for a family of four regardless of the charges due from the patient. Other AHCA-eligible clients include Medicaid eligible, clients under county assistance programs, and Medicare/Medicaid eligible who have exhausted benefits or are receiving non-covered services. Refer to Client Discount Policy 06.05.FL for additional information.
  - b. Clients with Medicaid or county-run indigent health care programs in the immediately prior or subsequent six months to the date of service under review
  - c. Charges not covered under Medicaid as part of the Medicaid client's share of cost
  - d. Clients identified as deceased with no estate
  - e. Clients listed as homeless or where an inability to pay is indicated based on diagnosis, employment status and payment history and no financial screening form is available.
- 3. Uninsured client balances and client balances after insurance are eligible for financial assistance. Presumptive financial assistance decisions may be determined based on third party analytics, using a credit inquiry process, under the following circumstances:
  - a. Uninsured accounts of clients not seen by Admission specialist or without a current financial assistance application on file
  - b. The reported federal poverty level (FPL) of the client meets the criteria for financial assistance

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2023 Discount Schedule													
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Percent of Poverty	2023 Poverty	135%	150%	165%	180%	195%	210%	225%	240%	255%	270%	285%	300%
	Guidelines												
Discount Percentage			Min Co-Pay	96%	94%	89%	81%	70%	56%	39%	19%	10%	5%
family of 1	14,580	19,683	21,870	24,057	26,244	28,431	30,618	32,805	34,992	37,179	39,366	41,553	43,740
family of 2	19,720	26,622	29,580	32,538	35,496	38,454	41,412	44,370	47,328	50,286	53,244	56,202	59,160
family of 3	24,860	33,561	37,290	41,019	44,748	48,477	52,206	55,935	59,664	63,393	67,122	70,851	74,580
family of 4	30,000	40,500	45,000	49,500	54,000	58,500	63,000	67,500	72,000	76,500	81,000	85,500	90,000
family of 5	35,140	47,439	52,710	57,981	63,252	68,523	73,794	79,065	84,336	89,607	94,878	100,149	105,420
family of 6	40,280	54,378	60,420	66,462	72,504	78,546	84,588	90,630	96,672	102,714	108,756	114,798	120,840
family of 7	45,420	61,317	68,130	74,943	81,756	88,569	95,382	102,195	109,008	115,821	122,634	129,447	136,260
family of 8	50,560	68,256	75,840	83,424	91,008	98,592	106,176	113,760	121,344	128,928	136,512	144,096	151,680
family of 9	55,700	75,195	83,550	91,905	100,260	108,615	116,970	125,325	133,680	142,035	150,390	158,745	167,100
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family of 10	60,840	82,134	91,260	100,386	109,512	118,638	127,764	136,890	146,016	155,142	164,268	173,394	182,520
family of	65,980	89,073	98,970	108,867	118,764	128,661	138,558	148,455	158,352	168,249	178,146	188,043	197,940
11	05,760	02,073	70,770	100,007	110,704	120,001	130,336	140,433	130,332	100,279	170,140	100,043	177,740
family of			10.7.55		10001				.=0 -0-	101.05			
12	71,120	96,012	106,680	117,348	128,016	138,684	149,352	160,020	170,688	181,356	192,024	202,692	213,360
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# **Emergency Medical Care**

Centerstone will not postpone any emergency psychiatric/substance use treatment and other medically necessary care regarding any non-payment for prior or current debt.

### **Billing and Collections**

All clients with outstanding balances and not determined to be eligible for financial assistance will be subject to standard collection processing and may result in turnover to a collection agency. Accounts with unpaid balances and not in an established payment plan will transfer to a collection agency 120 days from the first post-discharge billing statement and after three billing statements that have contained the plain language summary of the financial assistance policy.

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Extraordinary collection actions (ECAs) will not occur on outstanding patient balances prior to making all reasonable efforts to determine if a client is eligible for financial assistance. These efforts include:

- All actions previously described in this policy
- An attempt at oral notification of the pending ECA at least 30 days prior to implementing the ECA
- A written notice, provided at least 30 days prior to implementing the ECA, indicating that financial assistance is available for eligible individuals, identifying the ECA(s) Centerstone (or collection agency) plans to take against the individual, including a plain language summary of this policy, and stating a deadline after which the ECA(s) will be taken that is at least 30 days after the date of the written notice

ECAs may include the following: Debt reported to a consumer credit reporting agency or credit bureau, legal or judicial processes to collect the debt, sale of the debt, lawsuits or liens against the client or client's property, or requiring payment on past-unpaid bills for FAP-related care before providing non-medically necessary care. Clients who qualify for financial assistance during the collection process and within six months from the date of service will have their balance adjusted to zero, collection efforts will cease permanently, and notice will be sent to any credit bureau where adverse information had previously been reported. All contracted parties involved in debt collection activities on behalf of Centerstone will be subject to all financial assistance and billing and collection standards included in this policy.

Related Policies: Client Discount Policy 06.05.FL

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# **Financial Assistance Application**

To apply for financial assistance for medical expenses incurred at Centerstone, please complete the attached application and return it to the Finance Department. It is very important to follow the instructions below in order for your application to be reviewed:

- List financial information for a full 12 months on the application.
- If the patient is a minor, list financial information for the parent or guardian.
- Applications must be signed AND witnessed to be considered for assistance.
   Notary is not required.

This application does not address Non Centerstone services. Completed applications received by the Finance Department will be reviewed to determine programs that may be able to assist. If additional information is needed, a representative will contact you.

### POTENTIAL MEDICAID PARTICIPANTS

- Are you pregnant OR have a child aged 17 or under in your custody?
- Are you between the ages of 18-21?
- Are you over 65 years of age?
- Are you receiving Social Security disability?

If you answered yes to any of these questions, you are potentially eligible for Medicaid. Visit <a href="www.myflorida.com/accessflorida">www.myflorida.com/accessflorida</a> to complete a Medicaid application.

Visit <u>www.centerstone.org/locations/florida</u> for an application or reach the Finance Department by phone at (941) 782-4318 with any questions.

Application can be faxed to (941) 782-4301 or mailed to Centerstone, PO Box 9478, Bradenton, FL 34206.

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Name:		Date of Birth:				Last 4 digits of SS #:					
Address:	Mailing	Mailing Address:				Email:					
City, State, ZIP	City	City, State, ZIP				Phone:					
Pregnant ☐ Yes ☐	No Disable	ed □Yes □ No	Marital	Status	□ M	□s□	D 🗆	w			
Household Informat living together	ion Househo	ds are defined	as spous	ses, par	ents	of minors	, min	ors and	l/or siblings un	der 21	
Household Members Please Include Patient Date of Birth		Last 4 digits of SS#	US Citiz Legal Ro		Relationship to Patient			Tax Filing Status Choose Individual, Joint, Dependent, Not Filing			
Information			Y/N		Self/Patient			Dependent, Not I limig			
Household Income	List all inco	me/no income	for hous	sehold	mem	bers liste	ed ab	ove inc	cluding patien	ıt.	
Name of household member with or without income in the past 12 months DO NOT WRITE N\A	Income Source Employer Nan Jobs, No Inco Unemploymer rental income, alimony, Social Administration	nt, Odd ensions, support,	Numb Month with Incom Incom	er of s e/No	Current Gross Monthly Income	Yea Gro Inco List inco	rly ss ome total ome for past 12	Have you applied for any program listed below in the past 12 months:  Circle all that apply			
Self/Patient									Medicaid Social Security		
									Disability County Medical Coverage		
									Workers Compensation		
			Total:						Health Insurance Marketplace	е	
If you are claiming N	o Income, tell	us who is suppo	orting you	1							
Is there health/auto in	surance to cov	er any cost of you	ır medical	I care? [	∃Yes	1				No	
							I	nsuranc	e/Policy#		
Centerstone reserves the submitted informa recovery of monies. I 817.50 providing false in the second degree needed. This applica	tion is inaccul certify that the e information t I grant Cente	rate/false or if me e information abo o defraud a hosp erstone authoriza	edical bills ove is corr oital for th	s relate rect and e purpo	to an unde se of	accident for rstand that obtaining (	or whi t in a goods	ich there ccordan s or serv	e is a subseque ce with FL Stati vices is a misde	nt ute meanor	
Client/Guarantor Sig	nature	Date	Wit	ness Sig	natur	e (Notary	not r	equired)	) Date		
The	rgen							Janu	ıary 19, 202	23	
Chief Executive Officer				Date							

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