

St. John's Riverside Hospital

Policy and Procedure Manual

Subject:	Financial and Charity Care Program
Effective:	JANUARY 1, 2007
Revised dates:	4/1/2008; 2/15/10; 3/15/10, 10/12/12, 7/22/14,1/16, 10/16, 3/18, 3/19, 3/20, 3/21, 3/22, 1/23, 3/24, 10/24, 12/25, 01/26, 08/26

MISSION STATEMENT

St. John's Riverside Hospital ("SJRH" or the "Hospital") is dedicated to providing comprehensive medical and nursing care in a compassionate, professional, respectful, and ethical manner to every patient, regardless of ability to pay. To accomplish this mission, SJRH makes available to all of its patients a medical care financial assistance program (the "Charity Care Program").

The Charity Care Program is designed to provide financial assistance for patients who are unable to pay for all, or a portion of their medical expenses incurred at the Hospital and who meet the eligibility guidelines established under the program.

The Charity Care Program applies to our three Pavilions, Emergency Room Services, our offsite clinics and all other hospital-based, medically necessary services. Services such as cosmetic surgery are not covered. However, urgent or emergency services shall be provided irrespective of a patient's eligibility under the program. Immigration status shall not be considered when determining eligibility for financial assistance. Patients cannot be denied admission or denied emergency or medically necessary treatment or services because of an unpaid medical bill. Patients may apply for financial assistance at any point, starting from the date of service and throughout the collection process. Any patient eligible for financial assistance shall not be charged more than the Amount Generally Billed ("AGB") for emergency or other medically necessary care.

PROCEDURE

A. Notification Requirements

1. The Hospital will post signage advising patients about the availability of the Financial Assistance programs in all our locations, including but not limited to Inpatient Admissions, Outpatient services, the Emergency Room Registration areas, and the Cashiering locations.
2. Signage will be posted in both English and Spanish.
3. Information about the Health Solution program will also appear on patient bills and statements.
4. A Financial Assistance Summary will be made available on the Hospital's website "www.riversidehealth.org" and at all registration and cashiering locations. It will also be printed in English and Spanish (See Appendices A1 and A2)

5. Notification of Financial Assistance will be made in writing at intake, registration and upon discharge process.
6. Admissions, Registration, Billing and Collection staff will also advise and explain to patients about the availability of the Financial Assistance program to Self-Pay patients, and those patients who may inquire about the program, or who express difficulty with paying a bill.
7. For additional information including questions on how to apply for Financial Assistance or to request copies of the Financial Assistance Policy, contact our Financial Counselor at 914-964-7799 or 914-964-7535. FA counselors are located in our Park Care Pavilion, 2 Park Ave, Yonkers, NY 10701.
8. Translation services will be available to assist patients requiring communication in another language.
9. The Hospital Financial Aid policy follows EMTALA guidelines.

B. Covered Services and Exclusions

Note: Patients cannot be denied admission or treatment / services because of an unpaid medical bill.

1. The following services are covered under the Financial Assistance Program, and will be provided regardless of a patient's eligibility under this program:
 - i. Emergency care services.
 - ii. Medically necessary non-emergent inpatient, ambulatory surgery, and outpatient services (including clinics).
2. The following services are excluded from the Health Solution program:
 - i. Cosmetic procedures.
 - ii. Physician services.
3. Patients may not apply for financial assistance with bills from any service that is not provided by the Hospital and/or people directly in the Hospital's employment. For example, if a patient is treated by a physician working at the Hospital but who is not a salaried employee of the Hospital, the physician may bill separately for the physician services.

C. Geographic Areas Served under the Financial Assistance Program

1. For Emergency care services: All New York State residents.
2. For Medically necessary non-emergent inpatient, ambulatory surgery, and outpatient services (including clinics), the Hospital's Primary Service Area (PSA) includes all patients residing in the following counties: Westchester, Orange, Putnam, Rockland, Bronx, Manhattan (New York), Brooklyn (Kings) and Queens.
3. The Hospital may at its discretion and in consideration of exceptional circumstances extend financial assistance for medically necessary non-emergent services to patients outside of its primary service area.

D. Eligibility Requirements

The Hospital's Charity Care Program uses income and family size as the primary factors to determine eligibility for reduced rates. The income, family size, Federal Poverty Levels (FPL) levels and discounted sliding scale amounts referred to in this section are shown in Appendix B. The Hospital's sliding scale discount schedule is based on a percentage of the Medicaid rate. Discounts will be applied using the 12-month look back methodology.

1. Patients will not be required to pay a hospital bill while their application for financial assistance is being considered and can request to apply for financial assistance at any point, including during the collection process.
2. The Hospital may require that patients first apply for Medicaid, Essential plan, or other public insurance programs (provided their immigration status does not make the patient ineligible for any of these programs).
3. Uninsured individuals with documented income and family size levels that fall at or below 200% FPL will be entitled to 100% DISCOUNT specified under the State's Nominal Payment Guidelines (as shown below):
4. In the event the total charges for the services rendered were less than either the Nominal Payment Guidelines amount, or the percentage discount of the AGB (amount generally billed) rate, then the patient will only be liable for the lower amount. When applying a percentage of the AGB rate to establish the discount, it will be for the specific service(s) rendered.
5. Uninsured individuals whose documented income and family size fall between 201-300% of the FPL guidelines will be entitled to discounted fees based on a sliding scale for covered services based with the lowest income paying the lowest amount, and then increasing in equal increments up to a maximum of 90% of the rate for the service rendered.
6. Uninsured individuals whose documented income and family size fall between 301-400% of the FPL guidelines will be entitled to discounted fees based on a sliding scale for covered services based with the lowest income paying the lowest amount, and then increasing in equal increments up to a maximum of 80% of the rate for the service rendered.
7. Individuals who qualify for financial assistance under the Health Solution program may receive additional discounted fees due to extraordinary circumstances, which will be reviewed and approved by the Manager, Financial Assistance Unit.
8. Underinsured is defined as patients whose paid medical expenses have exceeded 10% of their income in the last 12 months.
9. Individuals whose income and family size levels exceed 400% FPL and those with insurance may apply and qualify for financial assistance under certain circumstances which will be reviewed on a case-by-case

basis and approved by the Manager, Financial Assistance Unit. Some of these circumstances may include (but are not necessarily limited to):

- i. Insured individuals who are unable to meet the financial obligations under their policies (i.e., deductibles, copayments, co-insurance, etc.). Patients must provide documentation that 10% of their gross income has been paid toward medical bills within the last 12 months.
 - ii. Individuals unable to meet their financial obligations due to the extraordinarily high costs of service.
 - iii. Conditions that are documented by the Hospital's medical staff that warrant special consideration.
10. No deposit is required prior to service but can be discussed after service has been rendered.
 11. Installment plans are available to patients who are unable to pay the reduced rate all at one time. Monthly payments cannot exceed 5% of gross monthly income.
 12. Recurring patients (i.e., those receiving service on three or more consecutive days) may have their sliding fee reduced when medical necessity documentation is received and reviewed.
 13. All Self-Pay patient balances are subject to an additional 9.63% New York State Surcharge being added to the amount due.
 14. Individuals not qualifying for financial assistance may receive a discount of 15% on balanced owed.

Credit card pre-authorization:

- a. Hospital shall not require credit card pre-authorization or require the patient to have a credit card on file prior to rendering emergency or necessary medical services.
- b. Hospital may ask patients to voluntarily choose to have a credit card on file but may not require patient to do so.

Credit card risk notification:

- a. **Each** time a credit card is used to pay for services, patients must be notified of the risk of paying for medical services with a credit card, including:
 - i. Medical bills paid with credit card are no longer considered medical debt.
 - ii. By paying with credit card, patients are forgoing federal and state protections around medical debt.
 - iii. Protections that patients must acknowledge forgoing include:
 1. Prohibitions against wage garnishment and property liens.
 2. Prohibition against reporting medical debt to credit bureaus
 3. Limitations on interest rates
 - iv. Patients must affirmatively acknowledge forgoing these protections by paying with a credit card.

Limitation of Charges

The Hospital utilizes the MEDICAID method to calculate the amount generally billed. The Hospital AGB is to be determined from an aggregate of Medicaid charges within a 12-month period. The financial aid rates and AGB are to be audited by Biannually. Bi-annual audits of random cases by the credit and collection supervisor. Utilizing a minimum of 5% of the Hospital submitted applications.

FAP eligible individual charges must be:

1. Less than the amounts generally billed (AGB) for all emergency or other medically necessary care provided.
2. Less than the gross charges for other medical care covered by the FAP.

E. Application Screening Process and Documentation Requirements

1. Patients without insurance and earning up to 400% FPL, and “underinsured” patients earning up to 400% FPL are eligible to apply for financial assistance.
2. Use of the Uniform Financial Assistance Application is required for all hospitals (regardless of participation in indigent care).
3. All interested individuals may apply for financial assistance under the Health Solution program by completing the application (see Appendices C1 and C2, for the English and Spanish versions,

respectively). Applications are available at all Registration and Admitting areas, and from the Patient Accounts department's Financial Assistance Unit.

4. Applications can be submitted at any time up to the completion of the collection process.
5. The Hospital Financial Counselor will accept FAP applications submitted during a longer "application period" that ends on the 240th day from the date of the Hospital's first post-discharge billing statement.
6. All patients will be screened for third party insurance. If there is no insurance coverage, the Financial Counselor will determine if the patient is potentially eligible for Medicaid or Family Health Plus.
7. Applicants may be requested to apply for coverage under Medicaid, or other applicable governmental or grant program. The Financial Assistance Unit will assist with the Medicaid application process.
6. Patients are required to document their income by presenting supporting documentation, such as:
 - i. Documents to prove income (from a responsible individual, if applicable)
 - ii. Two current pay stubs or letter from employer on company letterhead
 - iii. Letter from the Department of Labor regarding unemployment
 - iv. Social Security award letter or statement
 - v. Other documentation may be required to verify income: self-employment, annuities, unemployment income Worker's Compensation, Veteran's Benefits, military pay, interest, dividends, royalties, other income (e.g., from rents, other family member contributions, etc.)
 - vi. Decisions are based on annual income only. Assets are not considered.
7. Patients are required to document their identity and family size by presenting supporting documentation, such as:
 - i. Birth certificates
 - ii. Baptismal (or other religious) certificates
 - iii. Marriage Certificates
 - iv. Official school records
 - v. Naturalization certificate
 - vi. Passport
 - vii. Death Certificates (where a change in family size status may be indicated, or to document certain funeral expenses)
8. Patients are required to document their residency (home address) by presenting supporting documentation such as:
 - i. ID card with address
 - ii. Postmarked envelopes, postcard, or magazine label with name and date
 - iii. Driver's license issued within the last six months
 - iv. Utility bill or correspondence from a government agency which contains the name and street address

- v. Letter, lease, rent receipt with home address from landlord
- vi. Property tax records or mortgage statement

F. Determinations and Appeals Processes

1. Patient applications for financial assistance will be denied if:
 - i. False information was provided by the patient or his/her representative.
 - ii. Patient or responsible party refuses to cooperate with the terms of the financial assistance program.
 - iii. Patient or responsible party refuses to apply or cooperate with processing a government insurance program application.
2. Financial Counselors will review all applications and supporting documentation for completeness and will contact patients about missing or incomplete applications. Completed applications meeting the required guidelines will be approved.
3. All determinations must be made within 30 days from receipt of a completed application.
4. Approval letters will be sent to patients along with a financial assistance Identification card. Approval will be valid for one year, and recertification under the program must be completed annually.
5. For all approvals, unique identifiers will be entered into the Meditech Patient Accounts system that will automatically apply the appropriate discount to the patient's account.
6. For all denials, letters shall be sent to the patient advising them of the decision, the reason for denial, and information on how the Patient may appeal the decision, including the amount of the financial assistance, if any, awarded.
7. Patients will be advised that they may appeal all decisions (denials and amount of discount approved) by sending a letter to the Manager of the Financial Assistance Unit requesting appeal and reconsideration.
8. The Manager of the Financial Assistance Unit will resolve appeals for reconsideration of denials within 10 business days of receipt and advise the patient in writing of the reconsideration determination.
9. Patients whose appeals are not overturned will be advised that an additional appeal letter may be sent to a committee comprised of the Manager of the Financial Assistance Unit, Director of Revenue Cycle, and the Chief Financial Officer.
10. This committee will issue its final determination status to the patient regarding the application for financial assistance.
11. Patients will be advised that they may appeal any decision (denial or approved amount) by sending a letter to the information in item #12 below.

12. Please send appeals to:

**St. John's Riverside Hospital
Financial Assistance Unit Appeal
2 Park Avenue
Yonkers, New York 10703
Attention: Manager Financial Assistant Unit**

- 13. If upon your appeal you still disagree with our conclusion, you may contact New York State Department of Health Complaint Hotline at 1-800-804-5447.**

G. Collection Practices

- 1. Patients may apply for financial assistance at any point, including during the collections process.**
- 2. Patients eligible for financial assistance will have their open accounts adjusted to the amount due based on the level of assistance they receive, so that bills and statements will reflect the discounted amount due. Patients will then be expected to pay the adjusted amount due.**
- 3. Patients who are unable to pay the adjusted amount due will be offered payment plans.**
- 4. Payment plans will not require a patient to pay more than 5% of their gross monthly income towards monthly installment payments.**
- 5. The Hospital will not collect from a patient who is determined to be eligible for Medicaid, or who is eligible for Medicaid at the time services were rendered.**
- 6. If a patient or responsible party defaults on its payment obligations or fails to meet the terms of any financial agreement, the account in question will be considered delinquent, and after 180 days may be referred to a collection agency based on the hospital's collection policy.**
- 7. The Hospital will not send an account to collection if the patient has submitted a completed application for financial aid, including required supporting documentation, while the Hospital determines the patient's eligibility for such aid, or during the process where the patient has appealed an eligibility determination.**
- 8. The Hospital will review all accounts determined to be referred to outside collection to ensure that its financial assistance policy and procedures were followed.**
- 9. The Hospital will provide written notification and a notice on the patient's bill not less than 30 days prior to referring the account to outside collection.**
- 10. The Hospital will send each of its collection agencies a copy of its financial assistance policy and procedures and will instruct the**

agency to follow these procedures when instructing the patient how to apply for such aid.

11. Collection agencies must obtain the Hospital's written consent prior to commencing a legal action on a patient's account. The Hospital will not initiate lawsuits against patients with incomes below 400% Federal Poverty Level.
12. The Hospital will not permit the forced sale or foreclosure of a patient's primary residence to collect an outstanding medical bill.
13. The Hospital will not engage in extraordinary collection actions before it makes a reasonable effort to determine whether a patient is eligible for financial assistance under this Policy. Collection activity will proceed based on a separate Billing and Collection Policy

H. Emergency Care Policy

1. The Hospital policy is to provide emergency care to stabilize patients, regardless of their ability to pay. Following medical evaluation, non-emergent patients requiring charity care consideration should be reviewed and approved before additional services are provided.
2. The Hospital is committed to upholding the multiple federal and state laws that preclude Hospital staff to provide care for medical conditions to individual on the basis of race, sex, age, religion, national origin, immigration status, marital status, sexual orientation, disabilities, military service, or any other classification protected by federal, state or local laws.

I. Administrative and Reporting Requirements

1. The Hospital will report to the Department of Health the number of people that have applied for financial assistance annually, including their age, gender, race, ethnicity, and insurance status (aggregated data).
2. The Hospital will review this policy and procedures on a regular basis to ensure its consistency with the current regulations.
3. Statistics regarding patient applications, approvals and extent of financial assistance provided under this program will be maintained and reported to Administration.
4. Data will be provided to complete Exhibit 50 of the New York State Cost Report regarding Hospital Charity Care Reporting.
5. The Hospital will provide training to Billing and Collection and Admitting and Registration staff that will need to be most familiar with the financial assistance and charity care program.
6. The Hospital will also provide system-wide general awareness information about the Financial Assistance Program.
7. Community Health Needs Assessment (CHNA) will be complete every three years.

The Hospital staff will uphold the confidentiality and individual dignity of each patient. The Hospital shall comply with all other Federal, State, and local laws, rules, and regulations that may apply to activities conducted pursuant to this.

Addendum 1 - The following Physician services are excluded from the Health Solution program:
Hospital Based Groups:

- **Anesthesiology North Shore** – LIJ Anesthesiology 480 Bedford Road, Suite 4202 Chappaqua, NY 10514 // Phone – 914-666-8866 Fax - 914-666-6777
- **Emergency Medicine** - Dobbs Ferry Emergency Medicine 35 S. Washington Ave. Dobbs Ferry 10514 // Phone – 914-559-1022 Fax - 914-559-1191
- **Pathology** - Orange Pathology Associates Business Mailing address: P.O. Box 911 Ramsey, NJ 07466 // Phone – 201-661-7280 Fax - 201-661-7297
- **Radiology** - White Plains Radiology 122 Maple Avenue White Plains, NY 10601 // Phone - 914-681-1219 Fax - 914-681-2906
- **Hospitalist** - Symphony Medical Group - 967 North Broadway Yonkers, NY 10701 // Phone - 914-798-8956 Fax - 914-798-8955
- **Intensivist** - Rajendra Rampersaud, MD - 970 North Broadway Yonkers, NY 10701 // Phone - 914-965-3366
- **Intensivist** - Richard Wu, MD - 970 North Broadway Yonkers, NY 10701 // Phone – 914-968- 1611

ST. Johns Medical Group:

- **Internal Medicine: Boyce Thompson 1088 North Broadway, Yonkers NY 10701**
 - o Ana Androne, MD
 - o Klaudia Nowakiwskyj, MD
- **Internal Medicine: 128 Ashford Avenue, Dobbs Ferry NY 10522**
 - o Louis Androne, MD
 - o Ashok Chopra, MD
 - o Robert DeMatteo, MD
- **Family Medicine: Boyce Thompson 1088 North Broadway, Yonkers NY 10701**
 - o Thomas Apuzzo, MD
 - o Kiranprit Kaur, MD
- **Family Medicine: 128 Ashford Avenue, Dobbs Ferry NY 10522**
 - o Stere Carniciu, MD
- **Nephrology / Gastroenterology: Boyce Thompson 1088 North Broadway, Yonkers NY 10701**
 - o Michael DiGiorno, DO
 - o Mark Kozicky, MD
 - o Christopher DiGiorno, DO
 - o Maria Lufrano, DO
 - o Orest Kozicky
- **Nephrology / Gastroenterology: 141 South Central Park Avenue Suite 301, Hartsdale NY 10530**
 - o Marlene Galizi, MD
 - o Ghassan P Sayegh, DO
- **Interventional Pain management – 1022 North Broadway, Yonkers NY 10701**
 - o Stephen Erosa, DO
- **Podiatry – 1088 North Broadway, Yonkers NY 10701**
 - o Dean Spellman, DPM
- **Podiatry – 128 Ashford Avenue, Dobbs Ferry NY 10522**

- Lester Dennis, DPM
- **Podiatry –**
 - Mario Voloshin, DPM
- **Endocrinology – Boyce Thompson 1088 North Broadway, Yonkers NY 10701**
 - Lawrence Neshiwat, MD