PURPOSE

Willapa Harbor Hospital is committed to the provision of emergency health care services to all persons in need of medical attention regardless of ability to pay. In order to protect the integrity of operations and fulfill this commitment, the following criteria for the provision of Financial Assistance, consistent with the requirements of Washington Administrative Code (WAC) 246-453, are established. These criteria will assist staff in making consistent and objective decisions regarding eligibility for Financial Assistance while ensuring the maintenance of a sound financial basis.

The written policy includes: (a) eligibility criteria for Financial Assistance, (b) describes the basis for calculating amounts charged to patients eligible for Financial Assistance (c) describes the method by which patients may apply for Financial Assistance and (d) describes how the Hospital will publicize the policy with the community serviced by the Hospital.

POLICY

Financial assistance may cover all appropriate hospital-based medical services, received in the hospital inpatient or outpatient/clinic setting. Services not qualifying under financial assistance may include transportation costs, elective procedures, or separately billable professional services provided by the hospital’s medical staff. Non-residents of Washington State are eligible for Financial Assistance consistent with Washington Administrative Code 246-453, which includes emergent, non-scheduled services only.

ELIGIBILITY CRITERIA

Financial Assistance is generally secondary to all other financial resources available to the patient, including group or individual medical plans, worker’s compensation, Medicare, Medicaid or medical assistance programs, other state, Federal, or military programs, third party liability situations (e.g. auto accidents or personal injuries), or any other situation in which another person or entity may have a legal responsibility to pay for the costs of medical services.

The medically indigent patient will be granted Financial Assistance regardless of race, color, sex, religion, age, national origin, or immigration status. In the event that the responsible party’s identification as an indigent person is obvious to Hospital personnel, the Hospital is not obligated to establish the exact income level or request the documentation specified in the financial assistance application. Such individuals are determined to have presumptive eligibility (e.g., have qualified under the state Medicaid or Apple Health program.)

In those situations where, appropriate primary payment sources are not available, patients shall be considered for Financial Assistance under this Hospital policy based on the following criteria consistent with requirements of WAC 246-453-040:
FINANCIAL ASSISTANCE FOR THE UNINSURED & UNDERINSURED

A. The full amount of hospital and/or clinic charges will be determined to be Financial Assistance for a patient whose gross family income is at or below 150% of the current federal poverty guidelines (consistent with WAC code 246-453-050). These patients shall receive a 100% adjustment on their patient balance.

B. A sliding fee scale shall be used to determine the amount which shall be written off for patients with incomes between 151% and 250% of the current federal poverty level. All resources of the family as defined by the WAC 246-453-50 are considered in determining the applicability of the sliding fee scale in Attachment A. The sliding fee schedule shall take into account the potential necessity for allowing the responsible party to satisfy the maximum amount of charges for which the responsible party will be expected to provide payment over a reasonable period of time, without interest or late fees. In determining the maximum amount of charges, the Hospital calculates this by using the Amounts Generally Billed (AGB) look-back methodology. For the current year, the Hospital’s AGB percentage is listed on Attachment A. (enclosed). No individual qualifying under the Financial Assistance Policy shall be charged more than the AGB for emergency care or other medically necessary services.

CATASTROPHIC FINANCIAL ASSISTANCE
The Hospital may also write off as Financial Assistance amounts for patients with family income in excess of 250% of the federal poverty standards or at a higher percentage for those above 150% of the poverty guidelines, when circumstances indicate severe financial hardship or personal loss. This will be done only upon recommendation by the patient accounts representative or Director, Business Office with adequate justification and only upon approval by the Chief Financial Officer and the Hospital’s Board of Commissioners.

PROCESS FOR ELIGIBILITY DETERMINATION

Initial Determination
For the purpose of reaching an initial determination of eligibility, the Hospital shall rely upon information provided orally or in written form for Financial Assistance as outlined in the Financial Assistance Application form instructions. The Hospital may require the responsible party to sign a statement attesting to the accuracy of the information provided to the Hospital for purposes of the initial determination of eligibility. Pending final eligibility determination, the Hospital will not initiate collection efforts or requests deposits, provided that the responsible party is cooperative with the Hospital’s efforts to reach a determination of sponsorship status, including return of applications and adequate documentation.

The Hospital shall use an application process for determining initial interest in and qualification for Financial Assistance. Should patients not choose to apply for Financial Assistance, they shall not be considered for Financial Assistance unless other circumstances become known to the Hospital.
Requests to provide Financial Assistance/Sliding Fee Scale will be accepted from sources such as a physician, community or religious groups, social services, financial services personnel, or the patient. If the Hospital becomes aware of factors which might qualify the patient for Financial Assistance/Sliding Fee Scale under this policy, it shall advise him or her of the potential and make an initial determination that such account is to be treated as Financial Assistance/Sliding Fee Scale.

**Note that some independent providers practice at or deliver emergency or other medically necessary services for Hospital patients. Those providers are listed on Attachment B.**

**Final Determinations**

Financial Assistance forms, instructions, and written applications shall be furnished to patients when Financial Assistance is requested, when need is indicated, or when financial screening indicates potential need. Applications, whether initiated by the patient or the hospital and/or clinics should be accompanied by documentation to verify income amounts indicated on the application form.

One or more of the following types of documentation may be acceptable for purpose of verifying income:

1. W-2 withholding statements for all employment during the relevant time period;

2. Pay stubs from all employment during the relevant time period;

3. An income tax return from the most recently filed calendar year;

4. Forms approving or denying eligibility for Medicaid and/or state-funded Medical Assistance (denial for Medicaid purely on the basis of failure to apply timely will never be sufficient documentation by itself), if applicable;

5. Forms approving or denying unemployment compensation; or

6. Written statements from employers or welfare agencies. Patients will be asked to provide verification of ineligibility for Medicaid or Medical Assistance. During the initial request period, the Hospital may pursue other sources of funding, including Medicaid.
Financial Assistance for the Uninsured & Underinsured

7. In the event that the patient is not able to provide any of the documentation described above, the Hospital shall rely upon written and signed statements from the patient for making a final determination of eligibility for purposes of granting Financial Assistance.

Income shall be annualized from the date of application based upon documentation provided and upon verbal information provided by the patient. This process will be determined by the Hospital and will take into consideration seasonal employment and temporary increases and/or decreases of income. Applications will be processed within 14 days of receipt of the application to the Business Office.

Financial Assistance will be granted based on the approval guidelines as outlined in Attachment A. The initial determination shall remain valid for 180 days. After that, the Hospital may request updated information or re-verification of the patient’s qualification status.

Patients may be asked to provide verification or eligibility for Apple Health or other Medical Assistance. During the initial request period, the hospital may pursue other sources of funding, including Medicaid.

Income verification is required as outlined in the Hospital’s Financial Assistance Application form instructions.

For elective services not covered please contact the respective clinic or hospital department.

In the event of non-payment or a patient does not reasonably cooperate with the financial assistance process, the Hospital may take actions as outlined in its Patient Billing and Collection Policy; which is available by request and online.

Approvals

Financial Assistance applications will be approved once all required information is received and the income guidelines for granting Financial Assistance have been met. Applications will be processed within 14 days of receiving the application in the Business Office.

Eligibility on a completed and approved application is valid for eligible services received within the subsequent (180) days from application approval date and will be retroactive for eligible services for all dates of service that the Financial Assistance is being granted.

In the event that a responsible party pays a portion of all of the charges related to appropriate hospital-based medical care services, and is subsequently found to have met the Financial Assistance criteria at the time that services were provided, any payments in excess of the amount determined to be appropriate in accordance with WAC 246-453-020 shall be refunded to the patient within thirty days of achieving the Financial Assistance designation.
Time Frame for Final Determination and Appeals

The Hospital shall provide final determination within fourteen (14) days of receipt of all application and documentation material.

**Denial**

When a patient's application for Financial Assistance is denied, the patient will receive a written notice of denial which includes:

- The reason or reasons for the denial and the rules to support the hospital's decision.
- The date of the decision; and
- Instructions for appeal or reconsideration.

When the applicant does not provide requested information and there is not enough information available for the hospital to determine eligibility, the denial notice also includes:

- A description of the information that was requested and not provided, including the date the information was requested;
- A statement that eligibility for Financial Assistance cannot be established based on information available to the hospital; and
- That eligibility will be determined if, within thirty days from the date of the denial notice, the applicant provides all specified information previously requested but not provided.

Denials will be written and include instructions for appeal or reconsideration as follows. The patient/guarantor may appeal the determination of eligibility for Financial Assistance by providing additional verification of income and family size to the Patient Accounts Representative within (30) calendar days. After the first fourteen (14) days of this period, if no appeal has been filed, the hospital may initiate collection activities.

If the Hospital has initiated collection activities and discovers an appeal has been filed, they shall cease collection efforts until the appeal is finalized. All appeals will be reviewed by the Patient Accounts Representative and the Director, Business Office.
FINANCIAL ASSISTANCE FOR THE UNINSURED & UNDERINSURED

If this determination affirms the previous denial of Financial Assistance, written notification will be sent to the patient/guarantor and the Department of Health in accordance with state law.

DOCUMENTATION AND RECORDS

A. Confidentiality: All information relating to the application will be kept confidential. Copies of documents that support the application will be kept with the application form.

B. Documents pertaining to Financial Assistance shall be retained for six (6) years.

PROCESS FOR COMMUNICATION

Willapa Harbor Hospital’s Financial Assistance Policy shall be made publicly available through the following elements:

A. Notices Posted or prominently displayed within public areas of the hospital advising patients that financial assistance is provided.

B. Written Notice of the availability of Financial Assistance/ Sliding fee Scale will be made available to all patients. This is done at the time that the hospital requests information about pertaining to third party coverage. This written information shall also be verbally explained at this time. If for some reason, for example in an emergency situation, the patient is not notified of the existence of the Financial Assistance/ Sliding Fee Scale policy before receiving treatment, he/ she shall be notified as soon as possible thereafter.

C. Written information about the Hospital ’s Financial Assistance/ Sliding Fee Scale policy shall be made available to any person who requests the information.

D. The Hospital shall train front-line staff to answer Financial Assistance/ Sliding Fee Scale questions effectively or direct such inquiries to the appropriate department in a timely manner.
## Attachment A: Willapa Harbor Hospital Percentage of Sliding Fee Scale - 2019

<table>
<thead>
<tr>
<th>Family Size</th>
<th>Federal Poverty Level¹</th>
<th>100% - 150%</th>
<th>151% - 170%</th>
<th>171% - 190%</th>
<th>191% - 210%</th>
<th>211% - 230%</th>
<th>231% - 250%</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$ 12,490</td>
<td>$ 12,490</td>
<td>$ 17,486</td>
<td>$ 18,860</td>
<td>$ 21,358</td>
<td>$ 23,856</td>
<td>$ 26,229</td>
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<tr>
<td>3</td>
<td>$ 21,330</td>
<td>$ 21,330</td>
<td>$ 29,862</td>
<td>$ 32,208</td>
<td>$ 36,474</td>
<td>$ 40,527</td>
<td>$ 44,793</td>
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<tr>
<td>4</td>
<td>$ 25,750</td>
<td>$ 25,750</td>
<td>$ 36,050</td>
<td>$ 38,883</td>
<td>$ 43,775</td>
<td>$ 48,925</td>
<td>$ 54,075</td>
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<tr>
<td>5</td>
<td>$ 30,170</td>
<td>$ 30,170</td>
<td>$ 42,238</td>
<td>$ 45,557</td>
<td>$ 51,289</td>
<td>$ 57,323</td>
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<tr>
<td>6</td>
<td>$ 34,590</td>
<td>$ 34,590</td>
<td>$ 48,426</td>
<td>$ 52,231</td>
<td>$ 58,803</td>
<td>$ 65,721</td>
<td>$ 72,639</td>
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<tr>
<td>7</td>
<td>$ 39,010</td>
<td>$ 39,010</td>
<td>$ 54,614</td>
<td>$ 58,905</td>
<td>$ 66,317</td>
<td>$ 74,119</td>
<td>$ 81,850</td>
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<tr>
<td>8</td>
<td>$ 43,430</td>
<td>$ 43,430</td>
<td>$ 60,802</td>
<td>$ 65,579</td>
<td>$ 73,831</td>
<td>$ 74,265</td>
<td>$ 82,517</td>
</tr>
<tr>
<td>Each Addtl person</td>
<td>$ 4,420</td>
<td>$ 4,420</td>
<td>$ 6,188</td>
<td>$ 6,674</td>
<td>$ 7,514</td>
<td>$ 8,398</td>
<td>$ 9,282</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Discount</th>
<th>100%</th>
<th>100%</th>
<th>80%</th>
<th>60%</th>
<th>40%</th>
<th>25%</th>
<th>10%</th>
</tr>
</thead>
</table>

¹ 2019 Federal Poverty Guidelines as published in the Federal Register for the 48 Contiguous States and the District of Columbia. These guidelines are used for calculating charity care eligibility under the Revised Code of Washington (RCW) 70.170

Amounts Generally Billed: 75.71%
Attachment B

Independent and Non-Employed Providers who practice other medically necessary services for hospital patients not covered by the Financial Assistance Program:

- Dr. Hovanscek – Podiatrist at Pacific Family Health Center
- Mark Scoons – Audiologist
- Dr. Hill - Work in our ER and we bill for, but has private practice on campus. Willapa Family Medicine.
- VRAD-contracted radiology Group Bills privately
- Cellnetix-Pathology reference lab, private billing.