

## POLICY & PROCEDURE

**Title:** Financial Assistance & Charity Care

### OVERVIEW

TGH Rehabilitation Hospital (TGRH) provides, without discrimination, necessary medical care regardless of the patient's ability to pay for services. Charity care is available to patients who qualify under this policy. Underinsured and uninsured patients who do not meet charity guidelines may qualify for discounted care. This policy addresses only the most common situations that may arise, and it is not intended to be all-inclusive.

Accordingly, this written policy:

- Includes eligibility criteria for financial assistance – free and discounted (partial charity) care
- Describes the basis for calculating discount amounts to patients eligible for financial assistance under this policy
- Describes the methods by which patients may apply for financial assistance
- Describes how TGRH will widely publicize the policy within the community served by the hospital
- Limits the amounts that TGRH will charge for medically necessary care provided to individuals eligible for financial assistance to the amount generally billed for medically necessary care.

Please note that this Financial Assistance Policy is only applicable to TGRH. Independent physicians may or may not offer financial assistance or discounts.

### ELIGIBILITY CRITERIA

After an assessment of medical necessity and financial ability, TGRH may provide free or discounted care to patients who qualify for financial assistance under this Policy. TGRH will follow standard procedures in determining eligibility for financial assistance and in collecting on delinquent patient accounts as follows:

#### **Medical Necessity**

- *EMTALA*

Any patient seeking care for an emergency medical condition [within the meaning of section 1867 of the Social Security Act (42 U.S.C. 1395dd)] at a TGRH hospital facility shall be treated without discrimination and without regard to a patient's ability to pay for care. TGRH shall operate in accordance with all federal and state requirements for the provision of emergent health care services, including screening, treatment and transfer requirements under the federal Emergency Medical Treatment and Active Labor Act (EMTALA).

- *Other Medically Necessary Services*

In addition to services provided pursuant to EMTALA, TGRH will extend free or discounted care to eligible individuals for other medically necessary services as provided herein. Medical necessity will be determined by TGRH.

## **Financial Ability - Generally**

If a patient's household income, adjusted for family size, retrospectively and prospectively for the six months from the determination is less than or equal to 200% of the current Federal Poverty Guidelines (FPG), then the patient is eligible for a 100% reduction of any unpaid balance. If the patient's household income, adjusted for size, is between 200% and 400% of the FPG, the patient shall be eligible for a discount that is annually calculated using a "look back"<sup>1</sup> method, unless the patient qualifies for catastrophic consideration pursuant to the following paragraph.

## **Financial Ability – Catastrophic**

Notwithstanding the foregoing paragraph, if a patient's household income, adjusted for family size, retrospectively and prospectively for the six months from the determination is less than or equal to 400% of the current FPG and charges from TGRH exceed 25% of the patient's annual household income, then the patient is eligible for a 100% reduction of any unpaid balance.

## **OTHER ELIGIBLE BALANCES**

Patients eligible for Medicaid or other indigent care programs (i.e. HCHCP) may be eligible for free or discounted care for non-covered services (including charges for days exceeding any length of stay limit). Denials of Medicaid, Medicaid HMO or HCHCP services will also be eligible for charity as long as the patient meets the eligibility criteria for Medicaid, HCHCP or financial criteria for free care as defined in this policy.

## **COOPERATION**

**Patients who seek financial assistance from TGRH, whether for free or discounted services, must, upon reasonable request, cooperate with TGRH's staff in determining their eligibility for financial assistance and applying for governmental assistance when in TGRH's reasonable judgment the patient is capable of cooperating.**

## **NON- ELIGIBILITY SERVICES AND BALANCES**

Financial assistance will not apply to the following services or patient responsibilities:

- Services and procedures not covered by a patient's insurance unless deemed necessary by TGRH Medical Staff to treat an emergency medical condition under EMTALA and/or Florida law
- Cosmetic procedures that are not medically necessary
- Balances payable by insurance or other third parties such as Medicare, Medicaid, automobile insurance, worker's compensation, or liability insurance
- Ventricular Assist Devices
- Transplants
- Bariatric procedures, education programs and nutritional supplements
- Elective procedures for patients residing outside Hillsborough County, Florida
- High Cost Drugs<sup>2</sup> unless necessary to treat an emergency medical condition under EMTALA

---

<sup>1</sup> Look-back method

- A realization rate is based on actual claims paid to hospital by Medicare fee-for-service, Medicare Advantage together with all private health insurers paying claims
- Calculated by multiplying gross charges by the Amounts Generally Billed (AGB) percentage
- Must calculate AGB percentages no less than annually by dividing sum of certain claims paid by sum of associated gross charges
- Must begin applying AGB percentages by 45<sup>th</sup> day after end of 12-month period used in calculation
- May calculate one average AGB percentage for all emergency and medically necessary care or multiple AGB percentages for separate categories of care

<sup>2</sup> Currently any drug is considered a "High Cost Drug" if the cost to TGRH exceed \$1,000 per unit does, which amount will be adjusted for inflation on an annual basis

## **DETERMINATION AND SCREENING PROCESS**

There are two methods for patients to qualify for Financial Assistance under this Policy: presumptive eligibility (see below) and completion of the TGRH Financial Assistance application. Patients seeking financial assistance will be requested to complete the forms and return them by mail or in person to the facility. Note that Medicare beneficiaries do not qualify for presumptive eligibility. The TGRH Financial Assistance application is updated annually to reflect changes to Federal Poverty Income Guidelines.

Patients who appear to qualify for government assistance will be offered courtesy assistance with the government assistance application process. Uninsured or underinsured patients will be asked to complete a Financial Assistance Application either at the time of registration or within 60 days of the date of service. If a patient is physically and mentally able to engage in the government assistance application process and refuses to do so, TGRH may either declare the patient “presumptively eligible” or after written notice to such patient with a 30 day opportunity to cure, deny such patient any discount to which the patient may have been entitled to under this Policy. Financial assistance counseling communication will be clear, concise and considerate of the patient and family members and offered without charge.

In addition to income and family information, the patient may be required to provide proof of employment. Some patients may also be asked to provide additional information about their assets, monthly expenses, and any other resources to pay for their care. TGRH may obtain a credit and assets check on completed and incomplete applications for financial assistance. TGRH may deny financial assistance if TGRH determines a patient has sufficient assets to pay for his or her care.

Upon a patient’s request, determination of eligibility or denial of financial assistance will be communicated to the responsible party within 30 days of receipt of all required documentation. If a patient qualifies for financial assistance, this determination will remain active for one year, unless his or her ability to pay improves during the 12-month period. Approved patients with older accounts will be considered for financial assistance on accounts going back one year from the determination date. Absent extraordinary circumstances, as determined by TGRH in its sole discretion, accounts older than one year from the determination date will not be considered for financial assistance.

The granting of financial assistance shall be based on an individualized determination of financial need and medical necessity, and shall not take into account age, gender, race, social or immigrant status, sexual orientation or religious affiliation.

## **PRESUMPTIVE ELIGIBILITY**

Patients may be eligible for a discount of the full unpaid balance in the absence of a completed Financial Assistance Application Form if the patient meets one or more of the following:

- Is homeless
- Is deceased and has no known estate able to pay medical bills
- Is currently eligible for Medicaid and/or Hillsborough County Health care Plan, but was not at date of service
- Is eligible to receive benefits from a governmental agency as the victim of a violent crime of sexual assault and the treatment is related to the violent crime or sexual assault
- Based on credit and assets check performed by TGRH, a patient likely has a family income of no more than 200% of the FPG and has insufficient assets to pay for his or her care

TGRH may deem a patient to be presumptively eligible for financial assistance at any time, based on the information then available to TGRH; provided, however, any insured patient will not be eligible for presumptive

eligibility for Financial Assistance until at least 150 days after such patient has been discharged from TGRH. In compliance with federal law, TGRH will obtain independent income and resource verification for Medicare beneficiaries.

#### **RELATIONSHIP TO COLLECTIONS AND BILLING POLICY**

TGRH maintains a separate policy outlining its billing and collection procedures. In accordance with its Billing and Collections Policy, TGRH will not engage in, nor will it authorize its collection agency to engage in, extraordinary collection actions without verifying that patients have been given the opportunity to apply for financial assistance.

#### **COMMUNICATION OF THE AVAILABILITY OF FINANCIAL ASSISTANCE WITHIN THE COMMUNITY**

Notification about financial assistance available from TGRH shall be disseminated by TGRH to the community by various means, which may include, but are not limited to, publishing this Policy on the TGRH website, placing posters around the hospital, and making brochures available at all patient registration areas.

#### **REGULATORY REQUIREMENTS**

In implementing this Policy, TGRH will comply with all other federal, state, and local laws, rules, and regulations that may apply to activities conducted pursuant to this Policy.

#### **RETROACTIVITY**

TGRH will apply this Policy on a retroactive basis for patients with outstanding account balances on the date of adoption of this Policy, as amended.

#### **AVAILABILITY OF FORMS AND POLICY**

Copies of the Financial Assistance Policy, including the application forms will be made available upon request and without charge by contacting the facility at 813.893.6000 or by submitting a written request to:

TGH Rehabilitation Hospital  
1307 Kennedy Blvd  
Tampa, Florida 33606  
Attn: Business Office

The Financial Assistance Policy can be downloaded from [www.tampageneralrehabhospital.com](http://www.tampageneralrehabhospital.com)