			
Manual:	Administration Corporate Policy and Procedure	Origination Date:	04/01/2005
		Approval Date	02/20/2025
Title:	Financial Assistance Policy	Next Periodic Review:	02/20/2025
		Owner:	Kenneth Miller
Duncan Regional Hospital, Inc., d/b/a DRH Health policies apply to Duncan Regional Hospital, Jefferson County Hospital, DRH Health Clinics, DRH Home Care, and DRH Hospice			

POLICY:

It is DRH Health’s policy to provide emergency or other non-elective medically necessary care to all patients living in our service area without regard to the patient's financial ability to pay for services.

In addition, DRH Health is designated as a charitable organization under Internal Revenue Code Section 501(c)(3). Pursuant to IRC Section 501(r), DRH Health must adopt and publicize its financial assistance policy to remain tax-exempt.

This policy outlines the circumstances under which DRH Health will provide discounted care to patients who are unable to pay for emergency or other non-elective medically necessary services and how DRH Health will calculate amounts charged to those patients.

Non-elective medically necessary services are defined as a medical condition that without immediate attention:


- Places the health of the individual in serious jeopardy, as defined by a physician
- Causes serious impairment to bodily functions or serious dysfunction to a bodily organ, as defined by a physician

Patient types assumed to be covered by this definition include, but are not limited to:

- Emergency Department Outpatients
- Emergency Department Admissions
- Inpatient/Outpatient follow-up related to the previous Emergency visit
- Care management of chronic severe illnesses (e.g., Diabetes Mellitus, COPD, etc.)

PROCEDURE:

Upon registration, and after all EMTALA requirements are met, hospital patients without Medicare, Medicaid, third-party insurance, other local health care financial assistance, or adequate health insurance shall receive financial counseling assistance from DRH Health staff, including a packet of information that addresses the financial assistance policy and procedures and an application for financial assistance (if requested).

			
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How to Apply for Financial Assistance

Any patient may apply for financial assistance by submitting an application and providing supporting documentation. A Financial Assistance Application may be obtained in one of the following ways:

- By telephone: 580-251-8918
- On our website at: www.drhhealth.org/billing-finance
- In person: Patient Accounts Management Department/Central Business Office - 2621 Whisenant Drive; Duncan, OK 73533
- Via mail free of charge: Central Business Office: Duncan Regional Hospital, P.O. Box 2000, Duncan, OK 73534-2000


Patients requesting financial assistance will be required to complete the Financial Assistance Application Form to establish eligibility (see attached Exhibit). In certain situations, DRH Health may initiate the application process. Requests for financial assistance will be honored up to 240 days after the date the first post-discharge billing statement is sent to the individual either by mail or electronic bill presentment.

It is the patient/guarantor's responsibility to provide, to the best of their knowledge, accurate, honest, and complete information regarding their application and billing information. The patient/guarantor shall be required to provide information and verify ineligibility for benefits available from insurance, Medicare, Medicaid, Worker's Compensation, third-party liability (e.g., auto accident or personal injury) and other programs.

All available financial resources shall be evaluated before determining eligibility for financial assistance. DRH Health will consider financial resources not only for the patient and other household members, but also for other persons with legal responsibility to provide for the patient. The financial assistance assessment methodology shall consider the income of the patient/guarantor/household, assets, family size, and current available resources sufficient to pay for health care services (See Eligibility Criteria/Basis for Calculating Amounts Charged to Patients below).

Income from the patient/guarantor/household include:

- Employment income (gross)
- Self-Employment Income (gross)

			
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- Pension, Retirement, Social Security Income
- Unemployment, Disability Income
- Child Support, Alimony
- Available assets include:
 - Cash
 - Checking Account(s)
 - Savings Account(s)
 - Stocks and bonds


Bad Debt Procedure

After an account is reviewed and the balance is deemed patient responsibility, a statement is sent to the patient within 20 days. The statement includes insurance and patient payments credited to the account if applicable. A follow-up statement is sent thirty days after the initial statement is sent to the patient. If there has been no payment on the account after the fifth statement, a call is placed to the patient to attempt to collect the debt. If the debt is not collected, the account is reviewed for presumptive eligibility (see presumptive policy below). Accounts with patient balances and no payment activity for 150 days accounts are submitted to the Chief Financial Officer (CFO) to review and take to the Board for approval. The accounts are sent to an outside collection agency upon approval from the Board. After 90 days of collections efforts, all unsatisfied accounts are returned from an outside collection agency who conclude all internal and external collection efforts by mail and telephone are exhausted, and it has been established that there is no likelihood in the future for payment for commercial payers the bad debt is moved to uncollectible bad debt in the practice management system. If the payer is Medicare, the account is reviewed and adjusted off to the appropriate adjustment code (AMCRBD).

Presumptive Eligibility:

Individuals who are uninsured may be considered eligible for the most generous financial assistance in the absence of a completed Financial Assistance Application (FAA) if:

- Individual is homeless;
- Individual is deceased and has no known estate able to pay hospital debts;

			
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- Individual is incarcerated for a felony (verified on OSCN.net website);
- Individuals who have received Medicaid benefits are considered indigent based on the Medicaid screening process. Because of this qualification, these patients are presumed to qualify for financial assistance under the DRH Health Financial Assistance Policy. Service dates for up to one year prior to the Medicaid qualification and six months past the Medicaid eligibility date will be considered for Financial Assistance.
- Individuals with self-pay balances that are greater than or equal to \$1000 and five or more statements have been sent and no payment activity for 150 days.


A credit report may be generated to identify additional expenses, obligations, and income to assist in developing a complete understanding of the individual's financial circumstances. A third-party scoring tool may be used to justify eligibility for financial assistance. If household size is not indicated on the credit report or third-party scoring tool, DRH Health will use the demographic information provided by the patient/guarantor at the time of admission. Financial assistance adjustments will be applied to dates of service for emergency or other non-elective medically necessary services for up to one year prior to the presumptive eligibility and will extend an additional six months into the future.

For any individual presumed to be eligible for financial assistance in accordance with this policy, the same actions described in the section and throughout this policy would apply as if the individual had submitted a completed Financial Assistance Application. If DRH determines that a patient qualifies for presumptive eligibility, and the discount is less than 100%, the patient will be notified by U.S. Mail that they have the opportunity to apply for more generous financial assistance.

Approved Financial Assistance:

Patients/Guarantors will be notified by U. S. mail when DRH Health determines the amount of financial assistance discount eligibility related to emergency or other non-elective medically necessary services provided by DRH Health. This Financial Assistance Policy does not apply to any healthcare provider not employed by DRH Health, all of whom are listed below. Patients/guarantors may contact these providers to inquire about any financial assistance they may offer.” If, however, this list is not comprehensive, then the list should be revised to include all non-employed providers (individuals or practice groups) of emergency or other medically necessary care in the facility. Note that this list needs to be updated at least once every three months to comply with the 501(r) regulations.

1. Centurion Health Partners (Emergency department providers)
2. RadPartners (radiologists)

			
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3. HCC Duncan Inc (hospitalists)
4. Duncan Anesthesia Associates (nurse anesthetists)
5. Judith M. Gilbreth, M.D.
6. F. James McGouran, M.D.
7. Ron Miller, M.D.
8. Cancer Centers of Southwest Oklahoma (oncologists)

Financial assistance adjustments will be applied to dates of service for emergency or other non-elective medically necessary services for up to one year prior to the application approval and will extend an additional six months into the future. After that, a new verification of financial status shall be required to continue financial assistance discounts. Accounts will be adjusted at the time the Financial Assistance is approved.


Emergency

Any individual, regardless of ability to pay, who comes to a DRH Health facility, including Duncan Regional Hospital, Jefferson County Hospital, as well as any Jefferson County clinic or Solutions Physician Practice Management LLC clinic, for a potential emergency medical condition or emergency services, will receive an appropriate medical screening examination regardless of an individual's ability to pay, consistent with the DRH Health Emergency Medical Treatment and Labor Act (EMTALA) Policy.

DRH will not engage in any actions that discourage individuals from seeking emergency medical care, such as demanding that emergency department patients pay before receiving treatment for emergency medical conditions or permitting debt collection activities that interfere with the provision, without discrimination, of emergency medical care.

Denied Financial Assistance:

If financial assistance is denied, patients/guarantors will be notified by U. S. mail, along with a brief explanation of the reason for the determination.

			
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Eligibility Criteria/Basis for Calculating Amounts Charged to Eligible Patients:

Charges for emergency or other non-elective medically necessary care provided to patients eligible for financial assistance under the policy will be limited to not more than the amounts generally billed (AGB) to individuals with insurance. DRH Health uses the look-back method as defined by Internal Revenue Code Section 501(r) and is calculated as follows:

1. The AGB percentage is calculated by including claims from the prior 12-month fiscal period.
2. Payments from Medicare fee-for-service and all private health insurers (including coinsurance, deductibles, and copays) are used to determine the percentage.
3. The AGB percentage is determined by dividing the total allowed payments for claims billed to Medicare, Medicaid, and private payers by the total billed charges for the fiscal period.

Charges, as defined in this policy, are considered the amount the patient is personally responsible for paying after all deductions, discounts, and insurance reimbursements have been applied. Patients with family income less than or equal to 200 percent of the Federal Poverty Level (FPL) will receive a 100 percent discount. Patients with family income ranging from 201 to 400 percent of FPL are eligible for a sliding scale discount. Discounts under this policy will be applied according to the following sliding scale:

Annual Household Income Amount of Discount for Uninsured/Underinsured:

Annual Household Income	Amount of Discount
Up to 200% of FPL	100%
201-250% of FPL	75%



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251 -300 % of FPL	70%
301 -350% of FPL	65%
351-400% of FPL	50 %

Actions under Billing and Collection Policy in the Event of Non-Payment:


DRH Health will not engage in extraordinary collection actions (ECA) for up to 120 days after the date of the patient's first statement. During that time, DRH Health will make reasonable efforts to determine whether an individual who has an unpaid amount from DRH Health is eligible for financial assistance.

Extraordinary collection actions include:

- Reporting a patient's delinquent debt to a credit bureau
- Placing a lien on a patient's accident related claim
- Garnishing a patient's wages, but only after establishing that an individual is able but unwilling to pay.

DRH Health will publicize the availability of financial assistance (see next section). Also, notices will be printed on statements to the patient/guarantor, directing the patient/guarantor to contact the DRH Central Business Office to discuss financial arrangements and the availability of financial assistance.


Also, the patient/guarantor will be sent a written notice 30 days after the initial statement that extraordinary collection efforts (ECA) may be initiated if a complete financial assistance application is not submitted, the bill is not paid, or an arrangement to pay the bill has not been agreed to by both patient and provider within 150 days after the first billing statement. Although DRH Health may undertake ECAs after this 150-day period, if we have not yet determined whether an individual is FAP-eligible, we will still accept and process a FAP application for an additional 90 days. The total period during which DRH Health must accept and process the FAP application is 240 days from the date of the first billing statement. If DRH Health receives an FAP application during the application period, we will suspend any ECAs we have started until we have processed the application and made a determination of eligibility. If the individual is FAP-eligible, we will reverse the ECAs. While debts may be referred to third parties to assist with collection actions at any time, including during the initial 120-day notification period, they will not be sold to third parties during the notification period unless and

			
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until an eligibility determination has been made.

Publicizing the Availability of Financial Assistance:

- DRH Health will post complete and current versions of the following on the DRH Health website:
 - Financial Assistance Policy (FAP)
 - Financial Assistance Application Form (FAA)
 - Plain Language Summary of the Financial Assistance Policy (PLS)
 - Contact information for DRH Financial Counselors
- Signs will be posted in English to advise patients of the availability of financial assistance. Signage will be displayed in all points of admission and will contain the following:
 - DRH Health website address where the FAP, FAA, and PLS may be accessed <http://duncanregional.com/billing-finance>
 - Telephone number and physical location that individuals may call or visit to obtain copies of the FAP, FAA and PLS or to obtain more information:
 - Patient Accounts Management Department/Central Business Office at Duncan Regional Hospital; (580)251-8918;
 - Signage, the FAP, FAA and PLS will be in other languages in instances where the lesser of 1,000 individuals or 5% or more of the local population speaks said foreign language.
- Paper copies of this information will be available upon request at all points of admission.
- A notice will be included on billing statements that notifies and informs recipients about the availability of financial assistance for eligible individuals under DRH's FAP and includes the telephone number of the Financial Counselor who can provide information about the FAP and application process and the website address where copies of the FAP, FAA and PLS may be obtained.

			
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- DRH Health will distribute Financial Assistance information at Community Health Fairs.