WellSpan Health Manual of Administrative Policy
Policy #118 - WellSpan Health Financial Assistance

WellSpan Health adopts the following policy and procedure for the following specifically-named entities:

- York Hospital
- WellSpan Surgery and Rehabilitation Hospital
- The Good Samaritan Hospital of Lebanon
- WellSpan Pharmacy
- The Gettysburg Hospital
- Ephrata Community Hospital
- WellSpan Medical Group
- Apple Hill Surgical Center
- VNA Home Health and Services
- WellSpan Medical Equipment
- WellSpan Philhaven
- Good Samaritan Physician Services
- Northern Lancaster County Medical Group/Physician Specialists of Northern Lancaster County Medical Group

NOTE: Independent providers and entities providing services within WellSpan Hospitals are not required to adopt this policy and may not apply the same discounts for services provided. See Attachment C for a list of provider groups who may not offer financial assistance under this policy.

PURPOSE
Consistent with its charitable mission of “working as one to improve health through exceptional care for all, lifelong wellness and healthy communities,” WellSpan Health provides financial assistance to eligible patients who are in need. The Financial Assistance Policy will be fair, efficient and accessible to all patients and will be consistently applied across all WellSpan Health entities.

POLICY AND PROCEDURE

I. SCOPE AND GUIDING PRINCIPLES

A. WellSpan Health will provide essential care to patients regardless of their ability to pay.

B. WellSpan Health will provide discounts to patients according to the patient’s financial status.

C. WellSpan Health determines financial eligibility based upon income, disposable assets and other forms of health insurance.

D. WellSpan Health’s ability to provide discounted services to patients may vary depending on its own financial status.

E. WellSpan Health provides assistance for the Medical Assistance application process.

F. WellSpan Health provides patients the opportunity to enter into payment plans for patient balances.

G. The HealthyCare Card Program is also available to provide financial assistance to those individuals with long-term, ongoing chronic health conditions, or to those requiring financial assistance to help with the cost of pharmaceuticals. Information regarding this program can be found at www.healthycommunitynetwork.org.

H. The requirements for grants for certain populations may supersede WellSpan Health’s financial assistance policy guidelines, including grantee community partner provider organizations approved by WellSpan Health.

II. ELIGIBILITY DETERMINATION AND APPLICATION PROCESS

A. A written or verbal request for WellSpan financial assistance may be made at any time. In the event of a verbal request, a signature may not be required.

B. WellSpan Health will provide assistance to all patients whose income falls within 400 percent of the federal poverty guidelines and within the asset limits listed on Attachment A. Those patients qualifying for financial assistance will receive a discount based on the amount generally billed (AGB), which is applicable to the facility at which services were provided.

The AGB is calculated by the look-back method, in accordance with IRS Regulation 501(r). This is based on payment received from Medical Assistance and all private payors, in the most recently completed 12 months.

C. Uninsured patients are eligible to receive an uninsured discount of 20 percent on eligible services.

D. If it has been determined that a patient has been approved for Medical Assistance with an active billable category, all accounts currently delinquent (30 days unpaid) will be written off for Financial Assistance.

E. The patient must accurately complete, in writing or verbally, the WellSpan Financial Assistance Application, provide documentation and return it to the designated patient financial representative. The
patient must sign the last page of the application, unless it is determined that acquiring a signature will be a hardship.

F. All patients applying for WellSpan financial assistance must provide proof of income for all exemptions claimed on IRS Form 1040 with the completed application. Proof of income includes three (3) current pay stubs, Social Security, disability, unemployment or workers’compensation income, pension, investment income, real estate income and all other sources of income. Three (3) consecutive months bank statements (all pages) will be required for all accounts. Six (6) consecutive months bank statements (all pages) will be required for any self-employed applicants. Tax returns (all schedules) may be requested for all applicants but are required for any self-employed applicants. In the absence of these documents, patients may be required to provide other evidence of income.

G. Patients must exhaust all other insurance resources, for which they are eligible, but not limited to private insurance, cost sharing plans, Pennsylvania Medical Assistance, Veterans Affairs benefits and other state or federal programs, prior to being accepted for financial assistance, and provide documentation to this effect, for example, Medical Assistance rejection. If patients are eligible, they must apply for a qualified health plan under the Affordable Care Act (ACA), or show rejection or exemption from such plan. Failure to apply for coverage under the ACA will result in exemption from financial assistance. Additionally, patients who fail to comply with reasonable insurance requirements, such as obtaining authorizations or referrals, may not be provided financial assistance.

H. Liquid assets (cash, savings, checking accounts, PayPal accounts, CDs, HSA funds, annuities, stocks, bonds or Christmas/Vacation Club) may need to be "spent down" depending on possible level of approval before financial assistance is considered (See Liquid Asset Guidelines on Attachment A). In general, non-liquid assets (residence, automobile and other personal property), as well as retirement or life insurance funds (401(k), 403(b), IRA or Rollover IRA) need not be considered. If retirement account is being accessed or drawn from, the full value of the resource will be considered in determining eligibility.

I. Household size will be the number of individuals eligible to be claimed as dependents on the patient’s latest Federal Income Tax return.

J. Eligibility for WellSpan financial assistance could be maintained for one (1) year from date of determination. Eligibility may be backdated for accounts in active accounts receivable with open balances. Prior accounts in bad debts should be reclassified as charity if sent to collection within the current and previous fiscal year (July 1 through June 30). Financial Assistance may be discontinued if patient’s primary insurance coverage was voluntarily terminated.

K. Patients/responsible parties will be notified of the available options for financial assistance prior to an account referral to a third-party collection agency, per IRS regulation 501(r). Methods of notification include but are not limited to:
   i. Posting of legible signage
   ii. Development of a plain language summary
   iii. Distributing informational brochures at hospital and office registration areas
   iv. Distributing informational brochures throughout its communities
   v. A copy of the Financial Assistance Policy plain language summary offered during the registration/discharge process
   vi. Conspicuous notice regarding the Financial Assistance Policy printed on all account statements
   vii. Copy of the Financial Assistance Policy plain language summary provided with last billing statement (at least 30 days prior to taking third-party collection action)

L. In the event of non-payment, accounts will be referred for third-party collection action, which generally includes extraordinary collection actions.

III. ELIGIBILITY DETERMINATIONS

A. If a patient is unable to provide all required documentation for obvious reasons (e.g., homeless) WellSpan may categorize write-offs associated with the patient’s account(s) as charity consistent with internal facility procedures, and must document the rationale for the decision.

B. Where no insurance information is available, third-party information sources used for determining financial assistance eligibility, i.e. Payment Assistance Rank Ordering (PARO) or Acumen will be used. These sources provide a patient account scoring mechanism, which uses patient demographic data to estimate the financial status of patients by accessing numerous publicly available databases. These sources provide an estimate of the patient’s household income and size, thus allowing WellSpan entities to estimate the patient’s income per Federal Poverty Guidelines. This estimate, along with other information received from the database, such as
overall charity score, may be used to provide financial assistance. When third-party information is used and the discount provided is not at the highest level available, the patient/responsible party will be given an opportunity to provide additional financial information to increase the amount of financial assistance.

C. In cases where the patient is non-responsive and/or other sources of information are readily available to perform an individual assessment of financial need, i.e. existing eligibility for Medical Assistance or scoring, these sources of information can be used to support and/or validate the decision for qualifying a patient for a full or partial financial assistance write-off.

IV. ELIGIBLE SERVICES
A. WellSpan Health offers financial assistance for all medically necessary and emergency care services. Medically necessary is generally defined as the need for an item(s) or service(s) to be reasonable and necessary for the diagnosis or treatment of disease, injury or defect. All WellSpan entities' services are eligible (unless excluded below). Financial assistance may not be available to individuals who reside outside of WellSpan Health’s primary service areas.

B. Dental services are eligible under this policy – see Attachment B.

V. SERVICES NOT ELIGIBLE FOR FINANCIAL ASSISTANCE
A. Professional fees for diagnostic services, when physicians are not employed by WellSpan entities (some non-WellSpan entities may honor WellSpan's financial policy)

B. Cosmetic procedures

C. Infertility services

D. Power lift chairs and power mobility equipment (e.g., scooters, van lifts and power wheel chairs)

E. Check-up for lock up

F. Bariatric-related services

G. Genetic testing

H. Reference labs and handling fees

I. Flat rate services under arrangements

J. Services for which the patient “opted out” or for which the patient assumed financial responsibility via signed waiver

K. Services received by patients with a Non-Par insurance (exception: emergent services in Emergency department)

L. Pharmacy Prescription co-pays

M. Services denied or not covered by patient’s insurance coverage (example: not medically necessary, experimental)

N. Services resulting from criminal/illegal activity

VI. PLAIN COMMUNITY HARDSHIP AID DISCOUNT PROGRAM
A. Due to religious beliefs, Plain Community members have different qualifications for financial assistance and are not subject to requirements of this policy.

SCOPE:
This policy applies to all entities governed by WellSpan Health.

ATTACHMENTS:
Attachment A: WellSpan Financial Assistance Policy Guidelines

APPROVED BY:
Senior Leadership Team

POLICY CROSS REFERENCES
Billing and Collection Policy
Payment Plan Policy
Financial Assistance Plain Language Summary
Emergency Medical Care Policy (EMTALA)

CREATED DATE:
07/13/04

REVIEW/REVISE DATES:
10/04; 3/05; 4/06; 8/06; 3/07; 8/07; 4/7/08; 4/23/08; 7/9/08; 7/10; 8/10; 2/11; 7/11; 4/12; 6/12, 4/1/3, 3/14, 7/16, 9/16, 6/18, 2/19

SEARCH KEYWORDS:
MAP, Free Care, Uncompensated Care, Indigent Care. Financial Assistance
Attachment A

Category I: Write-off of all eligible charges for patients whose income is less than or equal to 300% of Federal Poverty Guideline (100% discount)

Category II: Patients between 301% and 350% of poverty level receive a 70% discount on services.

Category III: Patients between 351% and 400% of poverty level receive a 40% discount on services

Category IV: Patients 401% of poverty level and greater do not qualify for financial assistance. However, all uninsured patients qualify for a 20% “no insurance” discount, regardless of income.

### Poverty Guidelines 2019

<table>
<thead>
<tr>
<th># of Family Members</th>
<th>2019 Federal Poverty Guidelines</th>
<th>Up to 300% of Poverty Level (100% Reduction)</th>
<th>301% and 350% (70% Reduction)</th>
<th>351% and 400% (40% Reduction)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$12,490</td>
<td>$37,470</td>
<td>$43,715</td>
<td>$49,960</td>
</tr>
<tr>
<td>2</td>
<td>$16,910</td>
<td>$50,730</td>
<td>$59,185</td>
<td>$67,640</td>
</tr>
<tr>
<td>3</td>
<td>$21,330</td>
<td>$63,990</td>
<td>$74,655</td>
<td>$85,320</td>
</tr>
<tr>
<td>4</td>
<td>$25,750</td>
<td>$77,250</td>
<td>$90,125</td>
<td>$103,000</td>
</tr>
<tr>
<td>5</td>
<td>$30,170</td>
<td>$90,510</td>
<td>$105,595</td>
<td>$120,680</td>
</tr>
<tr>
<td>6</td>
<td>$34,590</td>
<td>$103,770</td>
<td>$121,065</td>
<td>$138,360</td>
</tr>
<tr>
<td>7</td>
<td>$39,010</td>
<td>$117,030</td>
<td>$136,535</td>
<td>$156,040</td>
</tr>
<tr>
<td>8</td>
<td>$43,430</td>
<td>$130,290</td>
<td>$152,005</td>
<td>$173,720</td>
</tr>
</tbody>
</table>

For families with more than eight members, add $4,420 for each additional member.

**Liquid Asset Guidelines**

1 individual - $25,000 asset limit
Couple - $30,000 asset limit

WellSpan will use discretion in applying these asset limits based on the patient account balance.
WellSpan York Hospital Dental Center / Hoodner Dental Center

Sliding Fee Scale for Eligible Patients

Under the WellSpan Health Financial Assistance Policy, patients of the WellSpan York Hospital Dental Center and Hoodner Dental Center will receive discounts under the following categories as outlined in the Sliding Fee Scale-Dental Services.

Category I: Patients whose income is less than or equal to 300% of Federal Poverty Guideline
Category II: Patients between 301% and 350% of Federal Poverty Guideline
Category III: Patients between 351% and 400% of Federal Poverty Guideline
Category IV: Patients 401% of poverty level and greater do not qualify for financial assistance. However, all uninsured patients qualify for a 20% “no insurance” discount, regardless of income.

<table>
<thead>
<tr>
<th>Procedure Types</th>
<th>Category I</th>
<th>Category II</th>
<th>Category III</th>
<th>Category IV</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Procedures (preventive, basic restorative, root canals, and extractions)</td>
<td>70% discount</td>
<td>40% discount</td>
<td>30% discount</td>
<td>Uninsured 20% discount available</td>
</tr>
<tr>
<td>Procedures with Lab Costs (crowns, dentures, bridges, etc.)</td>
<td>50% discount</td>
<td>40% discount</td>
<td>30% discount</td>
<td></td>
</tr>
<tr>
<td>Esthetic procedures &amp; Dental implants</td>
<td>No discounts available</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Financial Assistance Policy: Non-participating Providers**

**Apple Hill Surgical Center**
- Anesthesia Associates of York PA, Inc
- Apple Hill Eye Center
- Apple Hill Gynecology
- Apple Hill Podiatry
- Associated Foot and Ankle Specialists
- Beech Tree Podiatry
- Children's Dental Centre of York
- David J. Bene, MD
- East Berlin Foot and Ankle Center, PC
- Hamilton Health Center
- Just Kids at Gettysburg Dental Associates
- Kenneth D Dunlap Jr, DPM PC
- Keystone Eye Care Group
- Kreiger Eye Institute
- Leader Heights Eye Center
- Leader Surgical Associates
- Martin Foot and Ankle
- Memorial Surgical Specialists
- Ophthalmology Associates of York, LLP
- OSS Health
- Pediatric and General Dentistry of York
- Plastic and Reconstructive Surgery
- Plastic Surgery of York
- Premier Ankle & Foot Specialists, PC
- Seitz Oral & Maxillofacial Surgery Associates LLC
- The Fertility Center, LLC
- V Tiruchelvam MD
- White Rose Surgical Associates
- Women's Healthcare Group
- Women's Institute for Gynecology and Minimally Invasive Surg
- Wynntre Brooke Surgical Associates
- York ENT Associates
- YorkTowne Urology, PC

**WellSpan Ephrata Community Hospital**
- Allergy & Asthma Center
- Anesthesia & Pain Associates of Northern Lancaster County
- Argires Marotti Neurosurgical Associates of Lancaster
- BACA Pediatrics
- Birth Care & Family Health Services
- Campanella & Pearah Eyecare Associates
- Cardiology Care for Children
- Charles S Yeager DPM
- Children's Heart Group
- Cocalico Dental Offices
- CovenantMD
- Dermatology Physicians, Inc.
- Drs. May-Grant Associates

**WellSpan Ephrata Community Hospital (continued)**
- Ephrata Radiology Associates
- Eye Group of Lancaster County Ltd
- Geriatric Specialists
- Hypertension & Kidney Specialists
- John F Perry, MD
- Lancaster Cardiology Group
- Lancaster County Podiatry
- Lancaster Maternal Fetal Medicine
- Lancaster Orthopedic Group
- Lancaster Urology
- Lebanon Valley Midwifery & Women's Health
- Meadow Creek Family Practice
- Mount Joy Foot & Ankle Associates, PC
- Nemours duPont Pediatrics
- Neurology and Stroke Associates
- Onsite Neonatal Partners Inc
- Otolaryngology Physicians of Lancaster
- Palliative Medicine Consultants
- Penn State Hershey Neurology
- Penn State Medical Group - Cornerstone
- Pennsylvania Institute of Endocrinology, LLC
- Persila H V Mertz, MD, PC
- Peter C Smith, DPM
- Procirca - BioTronics
- Regional GI
- Simple HomeBirth Midwifery Services
- Surgical Specialist of Lancaster
- Virtual Radiologic Professionals LLC
- vRad
- Welsh Mountain Health Centers
- Wendell L Funk, MD
- Workplace Partners

**WellSpan Gettysburg Hospital**
- Adams Oral Surgery
- Adams-Hanover Urology Associates, PC
- Advanced Otolaryngology & Allergy LLC
- Allergy & Asthma Consultants
- Apple Ridge Family Medicine
- Atlantic Foot and Ankle Specialist
- Cancer Care Associates of York, Inc
- Children's Heart Group
- Complete Family Foot Care Center
- Cumberland Valley Retina Consultants
- Dermatology Associates of York
- Epiphany Psych Services
- Family First Health
- Foot and Ankle Specialist of the Mid-Atlantic, LLC
- Frederick Lorenzo, MD
WellSpan Gettysburg Hospital (continued)
Gettysburg Cancer Center
Gettysburg Diagnostic Imaging, PC
Gettysburg Family Practice
Gettysburg Lung Center, PC
Gettysburg Ophthalmology Associates, PC.
Gettysburg Pediatrics
Greater Potomac Retina
H. Fred Martin, MD
Just Kids at Gettysburg Dental Associates
Kanagasabapathy Arumugarajah, MD
KPMA, PC, d/b/a Biglerville Foot & Ankle Center
Martin Foot and Ankle
Michael T. Sullivan, MD
Mid Maryland Urologic SRVC
Mokhtar Nasir, MD
Rajesh Bajaj, MD
Ray K Drum DDS
Richards Orthopaedic Clinic and Sports Medicine LLC
Virtual Radiologic Professionals LLC
vRad
Wetzel Family Medicine

WellSpan Good Samaritan Hospital
Allergy and Asthma Center
AO Orthopedics Inc
Balaci Oral and Facial Surgery
Barbara A Klatchko, MD
Bouquet Mulligan DeMaio Eye Prof.
Children's Dentistry
David H. Stachowicz, DMD
David L. Streisfeld, MD EMG-Neurology Center
Eye Consultants of PA
Fava and Maria Eyecare Associates
John L. Salahub, DPM
Lebanon Anesthesia Associates
Lebanon Imaging Associates, PC.
Lebanon Internal Medicine Associates
Lebanon Nephrology/Endocrinology Assoc
Lebanon Pathology Associates
Lebanon Valley Foot and Ankle Center
Melnick, Moffitt and Mesaros ENT Assoc
Oral Surgery Associates
Samuel H. Sim DDS
TeamHealth
Thomas W. Clark, DPM
Tower Health/Infectious Diseases
Urology Associates of Lebanon PA
Women's Health Center of Lebanon
Yocum Associates, PC.

WellSpan Surgery and Rehabilitation
Anesthesia Associates of York PA, Inc
James J Sullivan DO
Martin Foot and Ankle
Nephrology Associates of York
OSS Health
Plastic and Reconstructive Surgery
Premier Ankle & Foot Specialists, PC
Vision Therapy Associates of York
York ENT Associates
York Rehabilitation Associates, PC

WellSpan Surgical Center - Gettysburg
Gettysburg Internal Medicine Associates, Inc.
Rajesh Bajaj, MD

WellSpan York Hospital
Advanced Eye Specialists LLC
Allergy & Asthma Consultants
Alpha Advanced CT, LLC
Anesthesia Associates of York PA, Inc
Apple Hill Eye Center
Apple Hill Gynecology
Apple Hill Podiatry
Associates in Adult Medicine
Associates in Family Medicine
Beech Tree Podiatry
Bruce D. Klaskin, DO
Cancer Care Associates of York, Inc
Cardiac Diagnostic Associates, PC
Carroll W Ehrhart, DDS
Center for Aesthetic and Reconstructive Surgery of York
Children's Center Department of Pediatrics
Children's Dental Centre of York
Children's Heart Group
Christian N Carlisle, DDS, PC
Christianne Schoedel, MD
Dallastown Medical Associates
Daniel G Laux DMD
Davenshire Medical Center
David J. Bene, MD
Delta Family Practice
Dermatology & Skin Surgery Center of York
Dermatology Associates of York
Douglas A Schmitt, DDS
East Berlin Family Care Center
East Berlin Foot and Ankle Center, PC
Family Center for Allergy and Asthma
Family First Health
Family Health Associates
Gastroenterology Associates of York, PC
Geriatric and Adult Medicine
WellSpan York Hospital (continued)

Greater York Family Dentistry
Hanover Medical Group
Internal Medicine Consultants of York
Isett-Chronister-Wise
Jacobus Medical Center
James J Sullivan DO
Jeffrey A Frey, MD
John A Di Casimirro
Jonathan E. Rhoads, Jr., MD
Julie P Nickles, DO
Leader Heights Eye Center
Leader Surgical Associates
Lung Asthma & Sleep Assoc PC
Market Street Dental PC
Market Street Family Practice
Martin Foot and Ankle
Memorial Family Medicine at Greenbrier
Memorial Pediatric Specialists
Memorial Surgical Specialists
Michael L Peck, DO, LLC
Nephrology Associates of York
Ophthalmology Associates of York, LLP
OSS Health
Palliative Medicine Consultants
Partners in Family Health
Pediatric Care of York, PC
Pediatric Gastroenterology Associates
Pediatric Surgery
Penn State Medical Group - White Rose
Periodontal and Implants Center of York
Pinchot Family Medicine
Pine Grove Internal Medicine, Inc
Plastic and Reconstructive Surgery
Plastic Surgery of York
Premier Ankle & Foot Specialists, PC
Procirca - BioTronics
Queen Street Family Practice, PC
R Hal Baker, MD
Red Lion Health Care
Robina Santaniello, MD
Russel H Etter, MD
Sarah M Lynch DMD
Scott M Cherry, MD
Security Family Medicine, LLC
Seitz Oral & Maxillofacial Surgery Associates LLC
Southern Family Medicine, LLC
Spring Garden Family Practice
Stephen M Concino, DPM
Surgical Specialists of York
Susquehanna Oral and Maxillofacial Surgery
The Fertility Center, LLC
Thomas J Corsaro, DDS

WellSpan York Hospital (continued)

Timothy G Coughlin, DDS
TLC Cancer Clinic
V Tiruchelvam MD
Veasey B Cullen, Jr, DMD
Vidyasagar Bollampalli, MD
Virtual Radiologic Professionals LLC
vRad
Walter M Krajewski, DO
Women's Healthcare Group
Women's Institute for Gynecology and Minimally Invasive Surg
Wound Specialists LLC
York County Nursing Home
York Dermatology
York Endodontics, PC
York ENT Associates
YorkTowne Urology, PC