



EFFECTIVE DATE: December 8, 2021

POLICY TITLE:

Financial Assistance to Patients

***To be reviewed every three years by:
Board of Directors***

REVIEW BY: January 1, 2025

POLICY

It is the policy of Trinity Health and each of its Health Ministries to address the need for financial assistance and support of patients for all eligible services provided under applicable state or federal law. Eligibility for financial assistance and support from the Health Ministry is determined on an individual basis using specific criteria along with evaluation and assessment of the patient's and/or family's health care needs, financial resources and obligations.

Trinity Health has a consistent approach to providing financial assistance to patients which is approved at the System governance level and implemented across all Health Ministries through systemwide Procedures and Guidelines followed by each Health Ministry and Subsidiary. Because of the dynamic nature of the environment, the impact will be closely monitored and revisited as necessary.

It is the policy of Trinity Health to require each Health Ministry to follow Trinity Health systemwide Procedures and Guidelines to implement this Policy. Trinity Health has adopted and maintains, and all Health Ministries will follow, systemwide Procedures and Guidelines that address the following six requirements to ensure a consistent approach:

I. Qualifying Criteria for Financial Assistance

All Health Ministries will follow systemwide Procedures and Guidelines to:

- Specify the patients and services eligible and not eligible for financial support.
- Establish Health Ministry charges based on amounts generally billed as determined by the System Office.
- Address residency requirements and documentation required for establishing income.
- Describe the consideration required for patient assets, including protected assets.

- Describe presumptive support and the required timeline for establishing financial eligibility.

All Health Ministries will provide levels of financial support, including at a minimum support for Family Income at or below 200% of Federal Poverty Income Guidelines, and for Family Income between 201% and 400% of Federal Poverty Income as required by systemwide Procedures. All Health Ministries will follow systemwide Procedures for accounting and reporting for financial support.

II. Assisting Patients Who May Qualify for Coverage

All Health Ministries will make affirmative efforts to help patients apply for public and private programs for which they may qualify and that may assist them in obtaining and paying for health care services, including adoption of procedures to help patients determine if they qualify as required by systemwide Procedures. All Health Ministries have discretion to adopt procedures to provide patients with premium assistance in accordance with the Trinity Health systemwide Payment of Premiums Assistance Procedure.

III. Effective Communications

All Health Ministries will follow systemwide Procedures requiring the Health Ministry to:

- Provide financial counseling,
- Respond promptly and courteously to patients' questions,
- Utilize a billing process that is clear, concise, correct and patient friendly, and
- Make available specific information in an understandable format about what the Health Ministry charges for services.

All Health Ministries will post signs and display brochures that provide basic information about the Health Ministry's Financial Assistance Policy ("FAP") in public locations in the Health Ministry and list those public locations in the Health Ministry's FAP, and make the Health Ministry's FAP and a plain language summary and application form available to patients upon request in accordance with systemwide Procedures. All Health Ministries will post the FAP, a plain language summary, and an application form on the Health Ministries' websites.

IV. Implementation of Accurate and Consistent Policies

As required by the systemwide Procedures and Guidelines all Health Ministries will provide staff education about billing, financial assistance, collection policies and practices, and treatment of all patients with dignity and respect regardless of their insurance status or their ability to pay for services.

V. Fair Billing and Collection Practices

All Health Ministries will implement billing and collection practices for the patient payment obligations that are fair, consistent and compliant with state and federal regulations, and make available to allpatients who qualify for a short term interest free payment plan with defined payment time frames based on the outstanding account balance as required by systemwide Procedures. All Health Ministries also will offer a loan program for patients who qualify. All Health Ministries will have written procedures outlining authority for approval of external debt collection activities. All Health Ministries will follow systemwide Procedures that identify debt collection activities that may be pursued by the Trinity Health Ministry or by a collection agent on their behalf. A Health Ministry (or a collection agent on its behalf) may NOT pursue action against the debtor's person, such as arrest warrants or "body attachments." A Health Ministry may have a System Office approved arrangement with a collection agency, provided that such agreement meets criteria established by the Trinity Health System Office.

VI. Other Discounts

All Health Ministries will coordinate Financial Assistance to Patients with pre-pay, self-pay and other discounts as provided in systemwide Procedures.

Should any provision of this FAP conflict with the requirement of the law of the state in which the Health Ministry operates, state law shall supersede the conflicting provision and the Health Ministry shall act in conformance with applicable state law.

This Policy is intended to fulfill Trinity Health's and the Health Ministry's commitment to

- Providing access to quality health care services with compassion, dignity and respect forthose we serve, particularly the poor and the underserved in our communities;
- Caring for all persons, regardless of their ability to pay for services; and
- Assisting patients who cannot pay for part or all of the care that they receive.

Trinity Health is a community of persons serving together in the spirit of the Gospel as a compassionate and transforming healing presence within our communities. Aligned with our Core Values, in particular that of "Commitment To Those Who Are Poor", we provide care for persons who are in need and give special consideration to those who are most vulnerable, including those who are unable to pay and those whose limited means make it extremely difficult to meet the health care expenses incurred.

SCOPE/APPLICABILITY

This is a Board Policy and also a Trinity Health Mirror Policy. Therefore, this Policy applies to all organizations within Trinity Health, including its Health Ministries and Subsidiaries, and each Health Ministry and Subsidiary within the System that provides or bills for patient care shall adopt an identical Policy.

DEFINITIONS

Executive Leadership Team (“ELT”) means the group that is composed of the highest level of management at Trinity Health.

Health Ministry (sometimes referred to as Ministry) means a first tier (direct) subsidiary, affiliate, or operating division of Trinity Health that maintains a governing body that has day-to-day management oversight of a designated portion of Trinity Health System operations. A Health Ministry may be based on a geographic market or dedication to a service line or business. Health Ministries include Mission Health Ministries, National Health Ministries, and Regional Health Ministries.

Policy means a statement of high-level direction on matters of importance to Trinity Health, its Health Ministries and Subsidiaries or a statement that further interprets Trinity Health’s, its Health Ministries’ and Subsidiaries’ governing documents. Policies may be either stand alone, Systemwide or Mirror Policies designated by the approving body.

Procedure means a document designed to implement a policy or a description of specific required actions or processes.

Standards or Guidelines mean additional instructions and guidance which assist in implementing Procedures, including those developed by accreditation or professional organizations.

Subsidiary means a legal entity in which a Trinity Health Ministry is the sole corporate member or sole shareholder.

RESPONSIBLE DEPARTMENT

Further guidance concerning this Policy may be obtained from the Trinity Health Revenue Excellence Department.

RELATED PROCEDURES AND OTHER MATERIALS

- Finance Procedure No. RE.PFS.3 - Financial Assistance to Patients
- Finance Procedure No. RE.REIMB.10 - Calculation of Allowances for Bad Debt, Charity Care and Operational Allowances

APPROVALS

Initial Approval: June 14, 2014 Stewardship Committee of the Trinity Health Board of Directors

Subsequent Review/Revision(s): September 18, 2014; July 1, 2017; December 8, 2021