

USC NORRIS CANCER HOSPITAL
 KECK HOSPITAL OF USC
 OPERATING POLICIES

MANUAL:	Patient Access	POLICY #:	PA 1-1400		
SUBJECT:	Financial Assistance and Discount Policy	EFFECTIVE DATE:	03/26/2015		
		REVISED DATE:	01/11/2022		
		AUTHORIZED APPROVAL:			
PERSONNEL COVERED:	All	PAGE:	1	OF	9

PURPOSE

To strive to be the trusted leader in quality health care that is personalized, compassionate and innovative for the patients we serve. Keck Medicine of USC, which encompasses Keck Hospital of USC, USC Norris Cancer Hospital, and USC Verdugo Hills Hospital (VHH), is dedicated to research and clinical excellence and focused on improving the health care for the community we serve. We stand committed to help meet the needs of low-income uninsured, underinsured or patients with High Medical Costs as an important element of our commitment to our community. This policy defines the means by which Keck Medicine of USC demonstrates its long-standing commitment to achieving its mission and values while remaining compliant with all EMTALA policies and regulations. Keck and Norris hospitals do not have Emergency Departments and will appraise emergencies in accordance with hospital policies, including the Rapid Response Team and EMTALA Policies.

The Financial Assistance and Discount Policy (Policy) sets forth Keck Medicine of USC’s parameters regarding financial assistance and/or discounts for qualified patients. Further, it is written in a form to direct and guide staff and communicate and administer the Policy for all patients who seek assistance in meeting their financial obligation for care. Keck Medicine of USC will not deny emergency or other medically necessary care based on the ability to pay. The facility will not engage in actions that discourage individuals from seeking emergency medical care, such as by demanding that emergency department patients pay before receiving treatment for emergency medical conditions or by permitting debt collection activities that interfere with the provision, without discrimination, of emergency medical care. Keck Medicine of USC does not offer Financial Assistance to patients that reside out the United States.

Hospital services do not include those services provided by The Keck School of Medicine of USC, USC Care or any independent physician, each of which bills separately for care provided. Keck Medicine of USC does not control the financial assistance programs of any physician billing. If you are approved for financial assistance under Keck Medicine of USC’s Policy, please provide our approval letter to the physician(s) billing office for financial assistance consideration. This Financial Assistance policy does not cover any charges that are considered unrelated business income to the hospital.

POLICY

Keck Medicine of USC will make every reasonable effort to identify and assist eligible patients in meeting their financial obligation to pay for hospital services. Financial assistance is

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designed to aid patients with demonstrated financial need and is not intended to supplement or circumvent third party coverage, including Medicare and/or Medicaid. Before a patient may be eligible under the Policy, all available resources must first be applied for, including, but not limited to, private health insurance (including coverage through California Health Benefit Exchange). Financial assistance information for Keck Medicine of USC is widely publicized, both to the community at large and to Keck Medicine of USC’s patient population. Review can be facilitated through the use of interpreters (language, vision, and hearing) or written materials as requested by the individual. Keck Medicine of USC will respect the dignity and privacy of any patient who requires assistance in meeting their financial obligation as described in the procedural sections below.

PROCEDURE

1. COMMUNICATION AND PATIENT/ACCOUNT IDENTIFICATION

a. Keck Medicine of USC widely publicizes its Policy through the following means:

- i. Keck Medicine of USC makes the Policy, the financial assistance application, and a plain language summary of the Policy available on its Website;
- ii. Keck Medicine of USC makes paper copies of the Policy, the financial assistance application, and a plain language summary available to patients or members of the community on request and without charge, both by mail and in the admissions areas of Keck Medicine of USC and in Patient Accounting Customer Service. Keck Medicine of USC has determined the percentage or number of LEP (limited English proficiency) individuals in the hospital facilities’ community. Keck Medicine of USC will provide these policies in English and Spanish languages based on Los Angeles Service Planning Area 4 which is the community served by Keck Medicine of USC.
- iii. Keck Medicine of USC notifies and informs members of the community served by Keck Medicine of USC of the Policy through the posting on Keck Medicine of USC’s Web site and through conspicuous posting in all locations with high patient volumes including, but not limited to, patient arrival locations, and check out areas, the billing office, and ancillary service locations. The Web site and the public postings inform patients where more information may be obtained.
- iv. Keck Medicine of USC notifies and informs individuals who receive care from Keck Medicine of USC about the Policy by doing the following:

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- (1) Offering a copy of the plain language summary to patients as part of the intake or discharge process and providing written information about financial assistance to all self-pay patients. This material includes a statement about how patients may obtain additional information;
- (2) Including a conspicuous written notice on billing statements that (a) notifies recipients about the availability of discounted payment or charity care under the Policy, (b) includes the telephone number of Patient Financial Services department, which can provide additional information about the Policy and the application process, and also includes the direct Web site address where copies of the Policy, the financial assistance application, and the plain language summary of the Policy may be obtained; and (c) includes a statement that if a patient applies, or has a pending application, for another health coverage program at the same time that he or she applies for financial assistance from Keck Medicine of USC, neither application shall preclude eligibility for the other.
- (3) Posting conspicuous public displays that notify patients of the Policy in public areas of Keck Medicine of USC, including the admissions areas and that also inform patients where they may obtain additional information.

(Cal. Health & Safety Code § 127420(b); 26 U.S.C. § 501(r)—(4)(a)(5)).

- b. Written materials regarding the Policy are available in English and Spanish. Language interpretive services are provided whenever necessary to facilitate the patient's understanding and participation in payment options for financial assistance.
- c. Once a completed application is received, a financial assistance determination will be made as soon as reasonably possible. Keck Medicine of USC personnel will make all reasonable efforts to obtain information from patients about whether private or public health insurance may fully or partially cover the expense of their care. Keck Medicine of USC staff will assess the patient's eligibility for all available payer linkage options.
- d. Patients' accounts for hospital services that may be appropriate for financial assistance include the following:
 - i. Uninsured patients with no or limited means to pay.

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- ii. Insured patients who are unable to pay patient liabilities, e.g., deductibles, co-insurance, or co-pays, as required by third party coverage, including Medicare deductible or coinsurance and Medi-Cal Share of Cost.
- iii. Patients with High Medical Costs as defined in definitions.
- e. Patients that qualify will not be billed more than AGB (amounts generally billed) for emergency or medically necessary care. The Prospective Method will be used to determine AGB.
- f. Amounts Generally Billed (AGB) Prospective Method: Amounts generally billed (AGB) is based on the billing and coding process Keck Medicine of USC uses for Medicare fee-for-service for emergency or medically necessary services. Total expected payment from Medicare is divided by total expected billed charges for such claims, and that number is subtracted from 1 to calculate the AGB percentage. The Keck Medicine of USC AGB reduction to gross charges is adjusted with any changes to charges.

2. FINANCIAL ASSISTANCE APPLICATION PROCESS

- a. Keck Medicine of USC personnel will assist any eligible patient unable to pay for services, who cooperatively provides information about his/her ability to pay. Failure to fully cooperate or complete the application entirely or provide requirement documentation will result in the application being denied under the Policy.
- b. The financial assistance determination may be based on the patient providing individual or household income and family size information in the form of federal tax returns for the most recent year and, if employed, the two most recent pay stubs.
 - i. The following additional information may be required:
 - (1) Information on all assets, both liquid and non-liquid, but shall not include statements on retirement or deferred-compensation plans;
 - (2) Waivers or releases authorizing Keck Medicine of USC to obtain account information from financial or commercial institutions that hold monetary assets to verify their value;
 - (3) Family size (includes legally qualified dependents) used to determine the appropriate benchmark.

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ii. If it is determined that the family income is above 400% of the Federal Poverty Level (FPL), Keck Medicine of USC may still consider the patient eligible for financial assistance but the following information may be required:

- (1) Individual or family net worth, including assets, both liquid and non-liquid, liabilities and claims against assets;
- (2) Employment status will be considered in the context of whether the likelihood of future earnings will be sufficient to meet the cost of paying for healthcare services within a reasonable period of time;
- (3) Unusual expenses or liabilities;
- (4) Additional information as required for special circumstances.

c. Eligibility for financial assistance may be determined at any time Keck Medicine of USC is in receipt of qualifying information. This includes pre-qualification prior to services being rendered. However, patients shall be encouraged to provide the information within 30 days of the request in order to partner with Keck Medicine of USC during the billing cycle. The full collections cycle is for a 180-day period. During that time, Keck Medicine of USC shall use monthly statements and out-bound calls to reach the patient regarding his or her obligation to provide the qualifying information and to continue to extend the offer of financial assistance under the Policy.

d. A patient's failure to engage in the collections cycle or submit a completed financial assistance application and required documents will result in the account(s) being placed with an external bad debt agency after 181 days in the billing cycle. This will include formal collections processes to collect on the balances due. We will not initiate Extraordinary Collection Actions (ECA) until or after day 240 after the initial post discharge billing statement.

3. FINANCIAL ASSISTANCE DETERMINATION AND ELIGIBILITY

- a. To qualify for financial assistance coverage for either the entire hospital bill or a portion of the hospital bill, all of the following criteria must be met:
 - i. The patient must be a Self-Pay Patient or have documented annual out-of-pocket medical expenses that exceed 10% of the patient's current family income or 10% of the patient's family income over the prior 12 months, whichever is lower;
 - ii. The services are emergencies and/or medically necessary, not cosmetic;

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- iii. The patient’s family income does not exceed 400% of the FPL. (Cal. Health & Safety Code § 127400(c);
- iv. The individual must be a US resident and not an international patient who has traveled to the United States for the sole purpose of medical tourism.
- b. The first \$10,000.00 of a patient’s monetary assets and 50% of a patient’s monetary assets over the first \$10,000.00 shall not be considered in determining eligibility for financial assistance.
- c. Financial assistance will be granted on a sliding scale basis, according to the Policy. The following eligibility requirements will be reviewed and updated annually. Keck Medicine of USC’s sliding scale:

FPL sliding Scale	100%	133%	150%	200%	201%-215%	216%-230%	231%-245%	246%-260%	261%-275%	276%-290%	291%-305%	306%-320%	321%-335%	336%-349%	>350%	400%
Discount%	100%	100%	100%	100%	90%	80%	70%	60%	50%	40%	30%	20%	10%	5%	5%	5%
Required Payment %	0%	0%	0%	0%	10%	20%	30%	40%	50%	60%	70%	80%	90%	95%	95%	95%

- i. Both Self-Pay Patients and Patients with High Medical Costs are eligible to apply for the Discounted Payment Program.
 - (1) Self-Pay Patients: For Self-Pay Patients whose family income is between 201 percent and 400 percent, inclusive, of the FPL, Keck Medicine of USC shall limit the expected payment for services provided by Keck Medicine of USC to the amount of payment Keck Medicine of USC would expect in good faith to receive for providing services under Medicare (“government-sponsored program rate”). If Keck Medicine of USC provides a service for which there is no established payment by Medicare, then Keck Medicine of USC shall establish an appropriate discounted payment amount.
 - (2) Patients with High Medical Costs: For Patients with High Medical Costs whose documented income is between 201 percent and 400 percent, inclusive, of the Federal Poverty Level, Keck Medicine of USC shall limit the expected payment for services provided by Keck Medicine of USC to the lesser of (i) the balance after any insurance payments are applied or (ii) the applicable government-sponsored program rate based on Medicare rates.
- ii. For an income level that is 200% of FPL or less, the entire hospital bill will be forgiven.

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- d. Patients who are determined to be Homeless or who qualify under Presumptive FA Eligibility (as defined below) and not participating in another financial assistance program will be granted 100% financial assistance.
- e. All uninsured patients will be offered Keck Medicine of USC's Established Cash Price for services rendered. If the patient's income is over 400% of the FPL, the patient will not automatically qualify for any additional write-off of the hospital bill. However, other considerations for eligibility may be made if the patient is unable to pay the Established Cash Price and at the discretion of the Associate Administrator of Revenue Cycle. These considerations include:
 - i. Presence of extenuating circumstances such as catastrophic medical events or other special situations. Any or all such cases require specific management approval. Net worth information included on the Patient Financial Assessment Statement will be used to evaluate these special situations;
 - ii. The presence of an applicable recent bankruptcy of the patient or third party providing coverage for the patient.
- f. In determining the total amount an uninsured patient would be held responsible for if they only qualified for partial financial assistance, the Established Cash Price, not the total gross charges, will be used.
- g. Circumstances where applications may not be required:
 - i. Patients who have previously been identified as eligible for financial assistance may be granted financial assistance without repeating the full financial evaluation process for a period of six months.
- h. A determination of eligibility will be made based on all requested documentation.
- i. Should it be determined that the patient has paid more than required, a refund will be issued.
- j. Patients requesting to appeal financial assistance determinations may submit their requests to the Associate Administrator of Revenue Cycle.

4. ACCOUNT MANAGEMENT/NOTIFICATION REQUIREMENT

- a. Keck Medicine of USC posts the availability of this Policy at all locations with high patient volume, including admission and registration areas, outpatient settings and the Patient Account office.

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- b. Keck Medicine of USC will provide patients with written notice containing information about availability of the Policy including information about eligibility, as well as contact information for additional information. This written notice also will be provided to patients who receive outpatient care and who may be billed for that care but were not admitted as an inpatient.
- c. Keck Medicine of USC billing statements communicate the availability of government-sponsored programs for any patient who has not provided proof of coverage at the time of billing. Keck Medicine of USC shall provide the following information with a patient's bill:
 - i. A statement of charges for services provided by Keck Medicine of USC;
 - ii. A request that the patient inform Keck Medicine of USC if the patient has health insurance coverage, including Medicare, Healthy Families, Medi-Cal or other coverage;
 - iii. A statement indicating how patients may obtain applications for government-sponsored coverage and that Keck Medicine of USC will provide these applications; and
 - iv. The Keck Medicine of USC telephone number from which a patient may obtain information about Keck Medicine of USC's Policy, and how to apply for financial assistance.
- d. Each patient billing statement will include a prominent statement indicating the availability of financial assistance. The bill will also indicate the dates of hospital services and if a third party has been billed.
- e. Patient bills will include information about a Keck Medicine of USC contact, including an address and telephone number patients may call when they have questions about their bill. Patient billing questions will be responded to promptly by telephone or in writing.
- f. If the patient fails to engage in the collections cycle, and formal collections are required, Keck Medicine of USC will follow all fair debt and collections practices according to this Policy and will act in a manner that treats patients with dignity, respect and compassion. Prior to formal collections, Keck Medicine of USC will provide written notice containing:
 - i. Nonprofit credit counseling services that may be available in the area;

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- ii. A plain language summary of the patient’s rights pursuant to California Health and Safety Code Section 127430(a).
- iii. Patients will be sent a notice of the following information: (1) date of service; (2) name of entity to whom debt is being assigned; (3) how to get an itemized bill; (4) and an application for financial assistance.
- g. Accounts being evaluated for financial assistance will not be turned over to an internal or external collection agency until the conclusion of the financial assistance evaluation, which will occur in the event of the patient’s failure to produce requested information or otherwise cooperate in pursuing financial assistance.
- h. All collection activity will be based upon written procedures adhered to by both Keck Medicine of USC collection staff and external collection agencies. A copy of the Billing and Collection Policy can be obtained from Patient Accounting Department or on our website www.keckmedicine.org in multiple languages. We shall maintain an agreement with the external collection agency, requiring the agency to adhere to Keck Medicine of USC’s standards and scope of practices with respect to debt collection, and to comply with Keck Medicine of USC’s program of reasonable payment plans. The external collection agency will also assist the patient with the financial assistance program and application process. Any patient who qualifies under the financial assistance program will be removed from the external collection agency processing and any negative credit reporting will be deleted. Formal debt collections will be pursued in a consistent manner with state and federal collections laws.
- i. Financial Assistance determination will be made only by approved Hospital personnel. In the event of a dispute, a patient or guarantor may seek review from the Associate Administrator of Revenue Cycle in writing by providing additional information to support the dispute at:

Keck Medicine of USC
 Attention: Associate Administrator of Revenue Cycle
 1000 S Fremont Ave., Unit 16, Building A13
 Alhambra, CA 91803
- j. Please send Financial Assistance Application and Required Documents to:

Keck Hospital of USC, USC Norris Cancer Hospital and USC Verdugo Hills Hospital:

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- Contact the Financial Assistance Coordinator- 855-532-5729 (contact number for all facilities)
- Secure Fax for all Facilities: 323-865-5672
- Mail: Keck Medicine of USC
Financial Assistance Coordinator
1000 S Fremont Ave., Unit 16, Building A13
Alhambra, CA 91803

5. PAYMENT PLANS FOR FINANCIALLY QUALIFIED PATIENTS WILL BE PROVIDED WITHOUT INTEREST CHARGES

- a. A patient who qualifies for discounted payment shall cooperate in establishing an extended payment plan. Keck Medicine of USC and the patient shall negotiate the terms of the payment plan and Keck Medicine of USC shall take into consideration the patient's family income and Essential Living Expenses. If Keck Medicine of USC and the patient cannot agree on an extended payment plan, then Keck Medicine of USC shall create a reasonable payment plan based on amounts owed over time. A payment plan grid is established below and any deviation must be approved by the Associate Administrator of Revenue Cycle.

	Total Amount Owed and Months to Pay Based on Need		
Total Amount Owed	\$1 to \$500	\$501 to \$3,000	\$3001+
May Be Approved by Staff	6 Months	12 Months	24 Months
Must Be Approved by Manager	12 Months	24 Months	36 Months

- b. A payment plan will only be considered to be in default if a scheduled payment is not received for 90 days.
- c. An attempt will be made to contact the patient both by phone and in writing before the payment plan is declared in default.
- d. Defaulted payment plan accounts will be transferred to a formal collections process.

REFERENCE(S)

- Internal Revenue Code of 1986, Section 501(r).

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ATTACHMENTS

- Definitions
- Assistance for LEP (Limited English Proficient) Patients

Effective/Revision Dates for Policy # PA 1-1400		
Effective:	03/26/2015	Governing Board
Revised:	06/30/2016	Governing Board
Revised:	07/25/2017	Policy Committee
Revised:	06/25/2019	Policy Committee
Reviewed	02/09/2021	Policy Committee
Revised:	01/11/2022	Policy Committee
	00/00/0000	
Keywords:	Charity, poverty	

DEFINITIONS

Charity Care	That portion of care provided by a hospital to a patient for which a third party payer is not responsible and the patient is unable to pay, and for which the hospital has no expectation of payment.
Discounted Payment	Limited, expected payment for emergency and medically necessary services to a discounted rate for financially qualified patients whose income is between 201 and 400%, inclusive, of the Federal Poverty Level.
Extraordinary Collection Action	Any action against an Individual(s) responsible for a bill related to obtaining payment of a Self-Pay Account that requires a legal or judicial process or reporting adverse information about the Responsible Individual(s) to consumer credit reporting agencies/credit bureaus. ECAs do not include transferring of a Self-Pay Account to another party for purposes of collection without the use of legal or judicial process or the reporting of adverse information to credit agencies/bureaus.
Essential Living Expenses	Expenses for any of the following: rent or house payment and maintenance; food and household supplies; utilities and telephone; clothing; medical and dental payments; insurance; school or childcare; child and spousal support; transportation and auto expenses, including insurance, gas and repairs; installment payments; laundry and cleaning; and other extraordinary expenses
Established Cash Price	The expected payment amount after the application of a discount from its full charges for services offered to patients who have no insurance or qualify under the hospital's discount payment policy.
Federal Poverty Level	The most recent poverty guidelines periodically adopted by the federal Department of Health and Human Services for determining financial eligibility for participation in various programs based upon family size as applicable to California.
Homeless	A person is Homeless if he/she lives: <ol style="list-style-type: none">1. In a place not meant for human habitation such as: streets, cars, abandoned buildings, parks;2. In emergency shelters;3. In transitional or supportive housing (for people coming from the street or a shelter) and;4. In any of the above places, but is in a hospital/institution short-term (30 days or less);5. In a private dwelling, but will be evicted within a week;

6. In an institution, but will be discharged within a week and the discharging institution does not provide housing as part of discharge planning;
7. Without a secure living environment because the patient is a victim of domestic violence;
8. Without any possible residence having been identified and with no resources nor support networks to assist with obtaining housing.

Source: www.HUD.gov offices

http://www.dmh.co.la.ca.us/Hah/documents/COUNTRYS_3_%20Homelessness_%20Eligibility_%20Doc_Guide.pdf#search=%22defining%20homelessness%22

Income

Includes, but is not limited to, wages, salaries, Social Security payments, public assistance, unemployment and workers' compensation, veterans' benefits, child support, alimony, pensions, regular insurance and annuity payments, income from estates and trusts, assets drawn down as withdrawals from a bank, sale of property or liquid assets and one-time insurance or compensation payments.

Medically Necessary Services

A medically necessary service or treatment is one that is absolutely necessary to treat or diagnose a patient and could materially adversely affect the patient's condition, illness or injury if it were omitted, and is not considered an elective or cosmetic surgery or treatment.

Patient

For the purpose of this Policy, Patient refers to the individual seeking services or the individual responsible financially for services. Keck Medicine of USC defines the guarantor as the patient unless mentally incapacitated or a minor.

Patient with High Medical Costs

Patient who meets *all* of the following requirements:

1. A patient with third party coverage (i.e., not a Self-Pay Patient);
2. A patient whose family income does not exceed 400 percent of the Federal Poverty Level; and
3. A patient whose annual out-of-pocket costs incurred by the individual at Keck Medicine of USC exceed 10 percent of the patient's current family income in the prior 12 months; *or* whose annual out-of-pocket medical expenses exceed 10 percent of the patient's current family income, whichever is lower, if the patient provides documentation of the patient's medical expenses paid by the patient or the patient's family in the prior 12 months.

Presumptive FA Eligibility

Keck Medicine of USC recognizes that a portion of the uninsured or underinsured patient population may not engage in the traditional financial assistance (FA) application process. If the required information is not provided by the patient, Keck Medicine of USC utilizes an automated, predictive scoring tool to qualify patients for Charity Care. The PARO™ tool predicts the likelihood of a patient to qualify for Charity Care based on publicly available data sources. PARO provides estimates of the patient's likely socio-economic standing, as well as, the patient's household income and size.

Self-Pay Patient

A patient who meets the following criteria:

1. No third party insurance;
2. No Medi-Cal or other government-sponsored program; and
3. No coverage under Workers Compensation, automobile insurance, or other insurance as determined and documented by Keck Medicine of USC.

ASSISTANCE FOR LEP (LIMITED ENGLISH PROFICIENT) PATIENTS:

ATTENTION: If you need help in your language, please call 855-532-5729 where patients may obtain more information or visit the hospital admitting office where patients may obtain more information. The office is open 8am-5pm Monday through Friday and located at front of our hospitals. Aids and services for people with disabilities, like documents in braille, large print, audio, and other accessible electronic formats are also available. These services are free.