POLICY

It is the policy of Trinity Health Of New England (TH Of NE) 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 Ministry is determined on an individual basis using specific criteria and evaluated on an assessment of the patient’s and/or family’s health care needs, financial resources and obligations.

TH Of NE has a consistent approach to providing financial assistance to patients approved at the System governance level, which is implemented across all Ministries through systemwide Procedures and Guidelines followed by each 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 TH Of NE to require each Ministry to follow TH Of NE systemwide Procedures and Guidelines to implement this Policy. TH Of NE has adopted and maintains, and all 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 Ministries will follow systemwide Procedures and Guidelines that specify the patients and services eligible for financial support and not eligible for financial support. All Ministries will establish Ministry charges based on amounts generally billed as determined by the System Office. All Ministries will follow systemwide Procedures that address residency requirements and documentation required for establishing income. All Ministries will follow systemwide procedures that describe presumptive support and the required timeline for establishing financial eligibility. All 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 Ministries will follow systemwide Procedures for accounting and reporting for financial support.

II. Assisting Patients Who May Qualify for Coverage

All 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 Ministries have discretion to adopt procedures to provide patients with premium assistance in accordance with the TH Of NE systemwide Payment of Premiums Assistance Procedure.

III. Effective Communications

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

IV. Implementation of Accurate and Consistent Policies

As required by the systemwide Procedures and Guidelines all 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 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 all patients 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 Ministries also will offer a loan program for patients who qualify. All Ministries will have written procedures outlining authority for approval of external debt collection activities. All Ministries will follow systemwide Procedures that identify debt collection activities that may be pursued by the TH Of NE Ministry or by a collection agent on their behalf. A 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 Ministry may have a System Office approved arrangement with a collection agency, provided that such agreement meets criteria established by the TH Of NE System Office.
VI. Other Discounts

All Ministries will coordinate Financial Assistance to Patients with prompt 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 Ministry operates, state law shall supersede the conflicting provision and the Ministry shall act in conformance with applicable state law.

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

- Providing access to quality health care services with compassion, dignity and respect for those 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.

TH Of NE 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

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

DEFINITIONS

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

Policy means a statement of high-level direction on matters of strategic importance to Trinity Health, or a statement that further interprets Trinity Health’s governing documents. Policies may be either stand-alone 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 TH Of NE Ministry is the sole corporate member or sole shareholder.

RESPONSIBLE DEPARTMENT

Further guidance concerning this Policy may be obtained from the TH Of NE Revenue Excellence Department.

RELATED PROCEDURES AND OTHER MATERIALS

- Finance Procedure No. 1.1: Financial Assistance to Patients
- Finance Procedure No. 1.2: Calculation of Allowances for Bad Debt, Charity Care and Operational Allowances

APPROVALS

TH Of NE Board of Directors 12/13/2018

Initial Approval: June 14, 2014 Stewardship Committee of the TH Of NE Board of Directors

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