Policy Number AD300

Subject: AD300 - Carle Financial Assistance Program

Category / Section: Administration / Finance

Owner: Manager – Self Pay Receivables Management

Reviewer(s): Director - Patient Financial Services; VP - Revenue Cycle Operations

Effective Date: 04/10

Review Frequency: 3 years

Approval Date: 12/21/2021

Scope of Policy/Procedure (applies to entities/locations marked below)

This document applies to all entities/locations listed below:

Hospitals

- All Carle Hospitals listed below:
  - X Carle Foundation Hospital (Urbana CFH)
  - Carle Hoopeston Regional Health Center (CHRHC)
  - Carle Richland Memorial Hospital (CRMH)
  - Carle Eureka Hospital (CEH)
  - X Carle BroMenn Medical Center (CBMC)

Ambulatory/Off-Campus locations

- All Carle ambulatory/off-campus locations listed below:
  - CFH/CPG ambulatory locations (also includes Home Health, Therapy Services, Medical Supply, Danville Surgicenter, Specialty Pharmacy)
  - CHRH ambulatory locations (includes, CARMC, Cisna Park, Dan-Fairchild, Mattoon-Hurst, Milford, Roseville, Tuscola, Watseka)
  - Administration Building locations (includes Carle at the Fields)
  - CRMH Ambulatory locations (includes Bridgeport, Newton, West Salem, Olney, Specialty Services)

Other Carle Entities

- All other Carle entities listed below:
  - X Arrow Ambulance, LLC
  - Carle Retirement Centers (Windsor of Savoy & Windsor Court)
  - X Carleigh Surgeon Center, LLC
  - Health Alliance Medical Plans
  - Carle Cancer Institute Normal, LLC
  - X Carle Cancer Institute Normal, LLC
  - FCC – FirstCarolinaCare Insurance Co.
  - CHPP—Carle Health Physician Partners

Scope Exclusions (Mark this box and enter any departments or locations within a marked entity that are exempt from the policy/procedure.)

Christie Clinic LLC Providers, Life Watch, OSF Providers, Quest Diagnostics, All Other Third Party Providers

Attachments

AD300B - Carle Financial Assistance Program Limited and Non-Covered Service Listing
AD300C – CFAP Area Homeless Shelters

Purpose

A. To identify and assist those patients who are uninsured or underinsured and who are financially eligible to receive discounts for specified medical expenses through the Carle Financial Assistance Program. Carle will consider each patient’s ability to contribute to the cost of his or her care received and the financial ability of Carle to provide discounts for the care provided.

B. All care rendered by an eligible Carle entity, except for services noted in policy AD300B, may be considered through the Carle Financial Assistance Program. Eligible entities are identified above.

Definitions

A. Family/Household Size - includes those dependents listed on tax returns, divorce decree, or child support order. Defined by the IRS for tax filing purposes under section 36B (d) (1), “a taxpayer’s family consists of the individuals for whom the taxpayer claims a personal exemption deduction under section 151 for the taxable year. Taxpayers may claim a personal exemption deduction for themselves, a spouse, and each of their dependents. Section 152 provides that a taxpayer’s dependent may be a qualifying child or qualifying relative, including an unrelated individual who lives with the taxpayer. Family size is equal to the number of individuals in the taxpayer’s family."

B. Resident – a person who lives in the state of Illinois and who intends to remain living within Illinois indefinitely. Relocation for the sole purpose of receiving health care benefits does not satisfy the residency requirement.

C. Underinsured - a person without insurance benefits for services provided due to exclusions of coverage by the insurance provider. This does not apply to those circumventing insurance restriction or specification or out-of-network services.
D. Generally accepted standards of medical practice:
   1. Standards that are based on credible scientific evidence published in peer-reviewed, medical literature generally recognized by the relevant medical community;
   2. Physician Specialty Society recommendations;
   3. The views of physicians practicing in the relevant clinical area; and
   4. Any other relevant factors.

E. Uninsured patient - a person who is a patient and is not covered under a policy of health insurance and is not a beneficiary under a public or private health insurance, health benefit, or other health coverage program, including high deductible health insurance plans, workers compensation, accident liability insurance or other third party liability.

F. Experian Information Solutions, Inc. (Experian) – is a third party vendor that uses proprietary data analytics to provide unique information related to patients for the purpose of financial assistance and recovery of patient debt.

Statement of Policy

A. Any patient or responsible party may apply for the Carle Financial Assistance Program, regardless of insurance coverage. Patients may apply for the Carle Financial Assistance Program at any time, including before care is received. If approved, the patient is eligible for 12 months from the date of approval.

B. Certain identified patient populations are presumptively eligible for the Carle Financial Assistance Program. Further detailed information is contained within the AD355 - Presumptive Eligibility for Financial Assistance.

C. Carle desires that:
   1. All patients, regardless of their immigration status or residency, be aware of the Carle Financial Assistance Program and all other financial assistance available at Carle;
   2. For those patients who are eligible to be identified as early in the care, treatment and billing process as possible; and
   3. That the process is as simple as possible for the patient.

D. An application for government assistance must be completed if the patient appears to meet the eligibility criteria for such assistance. When appropriate, Carle staff or designee will use a screening checklist to assist in determining if the patient would qualify for government assistance.
   1. Failure by a patient or responsible party to complete the government program application process and/or failure to cooperate during the application process will result in an automatic denial of financial assistance.
   2. If the patient applies for government assistance, documentation of the determination from the government program is required for reprocessing of the Carle Financial Assistance Program application.
   3. Patients who have a third party payment source that will reimburse more than the government program reimbursement will be excluded from the requirement of applying for government assistance.

E. Patients who may be eligible for certain third party assistance programs must cooperate with program requirements to maintain eligibility within the Carle Financial Assistance Program.

F. Patients covered by Medicare Part A or Part B must complete a Carle Financial Assistance application which includes a request that the patient provide a federal tax return and a defined list of assets. This asset list shall include the patient’s bank account balances such as checking and savings, money market accounts and certificates of deposit.

G. The Carle Financial Assistance Program discount amount is dependent on the applicant’s household income and family size compared to the currently published Federal Poverty Level guidelines at the time of application.

*Exception: patients covered by Medicare Part A or Part B must also follow the process as outlined in section F above.

<table>
<thead>
<tr>
<th>CFAP Program Guidelines</th>
<th>Federal Poverty Level</th>
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<tbody>
<tr>
<td></td>
<td>≤ 200%</td>
</tr>
<tr>
<td>Carle Financial Assistance Program</td>
<td>100% Discount</td>
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| Illinois Uninsured Hospital Patient Discount Program | Limits patient’s Carle medical expenses to 20% of the household’s gross annual income. See policy AD346 - IL Hospital Uninsured Patient Discount Program for additional information.

1. Consideration for the Carle Financial Assistance Program may occur through the following methods:
   a. Presumptively through Financial Assistance Screening:
      • Carle will use Experian to identify those patients who may be presumptively eligible for Carle Financial Assistance Program at the 100% discount level.
b. Completing a financial assistance application and returning with required documentation. If a patient has questions regarding the application process, they can visit Carle.org/FinancialAssistance or contact Carle at (888) 71-CARLE or (217) 902-5675.

- Applications are to be fully completed, signed, and returned with required documentation to:
  Carle Financial Assistance Program
  PO Box 4024
  Champaign, IL 61824-4012

- **Resident** – Except for emergent situations outlined below, the Carle Financial Services Program is intended for Illinois residents only.
  - Residency verification documentation - if needed:
    * Any document within the income verification listing with a preprinted address
    * Valid state-issued identification card
    * Recent (last 60 days) residential utility bill
    * Valid lease agreement
    * Current vehicle registration card
    * Voter registration card
    * Mail addressed to patient at an IL address from a government office
    * Award letter from school
    * Statement from a family member that the patient resides at the same address with one of the above residency verifications.

- Income eligibility will be based on the most current published Federal Poverty Guidelines.
  - Prior year’s Federal Tax Return showing all household members and their adjusted gross income.
  - If the guarantor/patient did not file taxes, proof of prior year’s income may consist of:
    * W2 from all jobs held
    * Self-employment income and expenses
    * Unemployment compensation
    * 1099 forms for the following types of income:
      1. Social Security
      2. Social Security Disability
      3. Veteran’s pension
      4. Veteran’s disability
      5. Private disability
      6. Worker’s compensation
      7. Retirement Income
    * Child support, alimony or other spousal support
    * Other miscellaneous income sources.
  - If none of the above documents can be supplied, a written statement describing current household size and financial situation.

2. Patients who receive a determination of either an approval or denial under the Carle Financial Assistance Program may reapply after six (6) months from the date of original application signature in the event there are substantial or unforeseen material changes in their financial situation. In the case of extraordinary circumstances, an application may be submitted prior to the six (6) month limitation.

3. Applicants may appeal the application determination by sending a written appeal to the Manager Self Pay Receivables Management. Further appeals may be directed to the Director Patient Financial Services, may be escalated to either the Vice President of Revenue Cycle Operations, the SVP, Chief Revenue Cycle Officer or the Chief Financial Officer and ultimately to the Community Care Review Committee.

4. Translated copies of all Carle Financial Assistance Program materials are available in Spanish at Carle.org/FinancialAssistance or by request to Carle representatives at FinancialAssistance@Carle.com or by phone at (888) 71-CARLE.

H. The Carle Financial Assistance Program discount will apply to the residual patient balances after all other payments from sources such as Medicare, insurance companies, third party legal settlements, and/or patient funds are received and posted.

1. Patients who purposefully circumvent insurance requirements (i.e. waiting periods, preauthorization, etc.) may be held responsible for the billable services and not receive any discounts on services.
2. Patients, who knowingly provide untrue information on the application for financial assistance, will be ineligible for financial assistance. Any financial assistance granted will be reversed, and the patient will be held responsible for the billable services.

3. Non-emergent, out-of-network care including out-of-state Medicaid that would be paid by the patient’s insurance company elsewhere will not be eligible for the Carle Financial Assistance Program because the patients have the opportunity to have their healthcare needs met at a participating provider.

4. Emergent out-of-network care for those who qualify will be eligible under the Carle Financial Assistance Program policy guidelines after all other payment sources have been exhausted.

5. Emergent out-of-state Medicaid patients are not required to complete the Carle Financial Assistance Program application process. They will be approved for a one time discount as eligible under the Carle Financial Assistance Program after proof of coverage is provided and all other payment sources have been exhausted.

I. Discount will apply to any patient responsible balance retroactively, including those that have been referred to a collection agency if court costs have not yet been incurred. However, an application for government assistance may be requested as stated in C1.

1. Carle will not file collection suit liens on a primary residence.
2. Carle will not authorize body attachments for purposes of medical debt collection.

J. Carle will utilize the Centers for Medicare and Medicaid Services coverage guidelines when determining services that qualify for the Carle Financial Assistance Program.

1. Coverage will apply to health care services that a physician, exercising prudent clinical judgment, would provide to a patient for the purpose of evaluating, diagnosing or treating an illness, injury, disease or its symptoms;
2. In accordance with the generally accepted standards of medical practice;
3. Clinically appropriate, in terms of type, frequency, extent, site and duration, and considered effective for the patient’s illness, injury or disease; and
4. Not primarily for the convenience of the patient, family or physician and not more costly than an alternative service or sequence of services at least as likely to produce equivalent therapeutic or diagnostic results as to the diagnosis or treatment of that patient’s illness, injury or disease.

K. Carle Financial Assistance Program will not cover cosmetic, elective or non-medical retail services.

L. Amounts Generally Billed (AGB) to Carle Financial Assistance Program participants will be determined by Medicare fee-for-service together with all private health insurers, during a prior 12-month period.

1. AGB determined through calculations of sum of all payments plus the sum of all bad debt and charity care adjustments divided by the sum of all charges in the time frame.
2. Time frame included in method is for October 1 through September 30 of the prior calendar year.

M. Patients who have been approved for the Carle Financial Assistance Program may re-apply annually from the date of original application approval. Carle Foundation will attempt to notify patients by mail 90 days before the current termination date of eligibility in the Carle Financial Assistance Program.

Procedure

A. Patients with financial concerns should be identified by Carle personnel as soon as possible in the registration, care, treatment or billing process.

1. A referral to Social Services, other pertinent staff or directly to a government program should be completed in order to obtain a determination of eligibility for Public Assistance.
   a. Patients who fail to cooperate with the government program during the application process will automatically be denied for the Carle Financial Assistance Program.
   b. If the patient does not meet the eligibility criteria for a government program or if they have a spend-down, they may be eligible for a Carle Financial Assistance Program discount.

2. Patients are encouraged to apply for the Carle Financial Assistance Program within 90 days after discharge or provision of service. The application for the Carle Financial Assistance Program will be available on the Carle website Carle.org/FinancialAssistance, in all registration areas, the Patient Financial Services offices, Cashier areas and Social Services.

3. Upon receipt of the Carle Financial Assistance Program application by Self Pay Receivables Management staff, EPIC Prelude and Resolute systems will be noted:
   a. All collection activity will be held until the application processing is completed.
   b. Application and supporting documentation will be scanned into OnBase and the paper copies destroyed.
   c. Applicant will be notified of any missing documentation.
   d. If the missing documentation is not returned within 30 days, a notification letter will be mailed to the applicant that indicates billing will commence.

4. The completed application should include:
   a. A fully filled in application with verification of the number of family/household members;
   b. Signature of the applicant; and
c. Prior year’s tax return or other income verification for all wage earners in the family/household.
   • Parents’ income will be used to determine financial eligibility for students who are over age 18 but still claimed as dependents for their parents’ income tax purposes.

B. When the application has been processed and the determination is made, a record of each application and associated documentation will be maintained by fiscal year.
   1. Applications received prior to April 23, 2013 are maintained in paper form and warehoused.
   2. Applications received on or after April 23, 2013 are maintained electronically within OnBase.

C. All efforts will be made to send written determination to the applicant within 30 working days of receipt of the completed application. If the application is approved, the patient’s account will be adjusted as soon as possible thereafter to reflect the discount.

D. Patients who qualify for a partial discount of the balance will be required to pay the remainder due, as with other private pay accounts. Balances billed to a Carle Financial Assistance Program participant will not exceed amounts generally billed to other patients. See the AD335 - Payment Policy and AD336 - Self-Pay Billing and Collection Policy.

E. When Carle Foundation receives an application for the Financial Assistance Program that indicates treatment at any applicable Carle Foundation facility, the application, verification and determination will be applied to all other applicable Carle businesses.

F. Information related to the Carle Financial Assistance Program will be regularly reported to the Director Patient Financial Services and the Senior Vice President Revenue Cycle Operations including:
   1. Adjustments
   2. Number of paper applications received
   3. Approvals
   4. Denials
   5. Backlogs
   6. Quality assurance measures

Other Related Links
AD337 - Carle Regional Financial Assistance Program
Plain Language Summary - X0873
Non-Participating Provider List - X0271

References
• 210 ILCS 88/27 – Fair Patient Billing Act (Illinois Public Act 96-965)
• 210 ILCS 89 – Hospital Uninsured Patient Discount Act
• 79 FR 78953 - Federal Register, Department of the Treasury (IRS 501r Rules and Regulations)

Electronic Approval on File

Dennis Hesch
Executive Vice President/Chief Financial Officer
Carle Financial Assistance Program
Area Homeless Shelters/Transitional Housing

**Courage Connection:** Houses women and children (males up to age 17 with their mothers) fleeing domestic abuse and sexual assault.
- Mailing Address: 1304 E. Main
- Urbana, IL 61802
- Phone Number: (217) 384-4462, domestic violence business office
- Fax Number: (217) 384-4383
- Service Area: Champaign, Piatt, Ford and Douglas counties

**City of Urbana-Transitional Housing Program for Homeless Families:** Provides housing and support services to selected homeless families with dependent children who have been residents of Champaign County for at least three months.
- Mailing Address: 400 S. Vine St.
- Urbana, IL 61801
- Phone Number: (217) 328-8263
- Fax Number: (217) 384-2367
- Service Area: Champaign County

**Danville Rescue Mission:** Emergency and transitional shelter for single men.
- Mailing Address: 834 N. Bowman Avenue
- Danville, IL 61832
- Phone Number: (217) 446-7223

**Dayspring Women & Children’s Shelter:** Homeless Women & Children’s Shelter- small shelter.
- Mailing Address: 213 Bowmen Ave.
- Danville, IL 61832
- Phone Number: (217) 274-7424

**Jesus is the Way Prison Ministries, Inc.:** Provides follow-up assistance to just-released male inmates with employment, housing, food and spiritual needs.
- Mailing Address: 602 S. Liberty Ave.
- Rantoul, IL 61866
- Phone Number: (217) 892-4044
- Fax Number: (217) 892-5995

**Mattoon Public Action to Deliver Shelter (PADS):** Homeless shelter and food bank in Mattoon.
- Mailing Address: 2017 Broadway Ave.
- Mattoon, IL 61938
- Phone Number: (217) 234-7237

**Restoration Urban Ministries:** Offers transitional housing, food pantry, clothing, substance abuse classes, and many other programs to assist teens, men and women.
- Physical Address: 1213 Parkland Court
- Champaign, IL 61820
- Mailing Address: PO Box 3277
- Champaign, IL 61826-3277
- Phone Number: (217) 355-2662

**Safe Housing:** Temporary shelter for victims of domestic violence and sexual assault- UIUC Students Only
- Mailing Address: Safe Housing
- Family and Graduate Housing
- 1841 Orchard Place
- Urbana, IL 61801
- Phone Number: (217) 33-1216 (UIUC PD) Intake
**Salvation Army Stepping Stone Program:** Provides temporary and transitional housing for homeless men (18 and older) on a nightly basis. Men, Women & Families who comment to working the program. Can only house 2 families/individuals at a time.
- **Mailing Address:** 2212 N. Market
- **Champaign, IL 61822**
- **Phone Number:** (217) 373-7830
- **Fax Number:** (217) 373-8441

**CU at Home:** Phoenix Day Drop-In Center (Tuesday – Friday 12p-5pm); Austin’s Place- Sober Women’s Shelter (must due intake during day hours) (Tuesday – Friday 12p-4pm); Men’s Sober Shelter is open every night 8:30pm-7:30am (must due intake during day hours) (Tuesday – Friday 12p-4pm)
- **Mailing Address:** 70 E. Washington
- **Champaign, IL 61820**
- **Phone Number:** (217) 819-4569
- **Emergency Number:** (217) 888-0329

**Crosspoint at the Y—Residential Program:** Dormitory style housing for 23 homeless, self-sufficient women (18 and older); Domestic Violence Shelter & Transitional housing
- **Mailing Address:** 201 N. Hazel Street
- **Danville, IL 61832**
- **Phone Number:** (217) 709-0331
- **Fax Number:** (217) 443-6845

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**Bloomington Area Homeless Shelters/Transitional Housing**

**Home Sweet Home Ministries:** Provides case management and other supportive services to the homeless such as shelter, hot meals, access to clothing and toiletries, and job training. Our goal is to help people find independence, restore their hope and share the love of Jesus Christ with them.
- **Phone:** 309-828-7356
- **Address:** 303 E. Oakland Avenue, Bloomington, IL 61701
- **Website:** [Home Sweet Home Ministries - Humbly Serving Bloomington-Normal (hshministries.org)](http://hshministries.org)

**Neville House Shelter:** Residents staying at Neville House work closely with a trained domestic violence advocate that will assist in finding resources for housing, childcare, employment, legal representation, transportation, and enhancement of life skills. Twenty-four hour emotional and educational support is available to assist individuals and families responce to crisis and increase self-sufficiency.
- **Phone:** 309-827-7070
- **Address:** 1301 West Washington Street, Bloomington, IL 61701
- **Website:** [Neville House Shelter - Domestic Violence Crisis Assistance (mccainc.org)](http://mccainc.org)

**Salvation Army Safe Harbor Shelter:** Services offered include emergency shelter, transitional housing, casework services, and food & nutritional programs.
- **Phone:** 309-829-7399
- **Address:** 601 West Washington Street, Bloomington, IL 61701
- **Website:** [Bloomington (salvationarmy.org)](http://salvationarmy.org)

**Project Oz:** Homeless youth between the ages of 17-23. Offer survival aid, help finding and keeping a job, safety planning, GED enrollment, legal aid, medication connections, emotional support, and we'll work to connect you to housing.
- **Phone:** 309-827-0377; there is a 24-hour crisis worker who can talk to you about emergency housing by calling 2-1-1 anytime of night or day.
- **Address:** 1105 W Front St., Bloomington, IL 61701
- **Website:** [Housing and Homeless Resources | Project Oz](http://ozproject.org)

**Oxford House Bloomington:** Males only. A concept in recovery from drug and alcohol addiction. In its simplest form, an Oxford House describes a democratically run, self-supporting and drug free home. Fill out application and set up interview.
- **Phone:** 309-829-5014
- **Address:** 501 McLean, Bloomington, IL 61701
- **Website:** [Oxford House](http://oxfordhouse.org)
Oxford House West Bloomington: Women only. A concept in recovery from drug and alcohol addiction. In its simplest form, an Oxford House describes a democratically run, self-supporting and drug free home. Fill out application and set up interview.
Phone: 309-808-1632
Address: 704 W Scott Street, Bloomington, IL 61701
Website: Oxford House

YWCA Labyrinth House: A transitional living program for formerly incarcerated McLean County women. Residents live in a shared two-bedroom furnished apartment and receive on-site support from residential counselors each evening. Residents have access to economic/employment resources and a counselor/case manager. Residents are able to increase their privilege level over time and can remain for up to two years.
Phone: 309-662-0461
Address: 1201 North Hershey Road, Bloomington, IL 61704
Website: https://ywcamclean.org/what-we-do/prevention-and-empowerment-services/labyrinth/