

## **Exhibit C3**

### **Greenwich Hospital Alternative Payment Arrangement Policy**

#### **I. PURPOSE:**

The purpose of this policy is to establish a policy for providing alternative payment arrangements to qualified patients who are determined, under the Hospital's eligibility criteria, to lack the ability to pay for care under customary terms and conditions.

Greenwich Hospital (the "Hospital") is guided by a mission that includes the provision of high quality care to all patients, including those who cannot pay for all or part of the essential care they receive at the Hospital. The Hospital is committed to treating all patients with compassion, from the bedside to the billing office, and including through payment and collection efforts. Furthermore, the Hospital is committed to advocating for expanding access to health care coverage.

The Hospital will maintain financial aid policies that are consistent with its mission and values and take into account an individual's ability to pay for medically necessary health care services.

#### **II. POLICY:**

##### **A. General Statement of Need – Free Care distinguished from Charity Care Defined.**

Recognizing its charitable mission, it is the policy of the Hospital to provide a reasonable amount of its services to eligible patients that do not have the ability to pay for care at full charges.

Free care generally involves cooperative efforts among the Hospital and the patient and / or the patient's family pursuant to which free or reduced bills are established for the patient's services.

Charity care is applied to an account when the patient and spouse (or both parents, if the patient is a dependent) are unemployed AND do not own property. Screening for employment and property ownership is done at the end of the usual billing cycle but before the account would be assigned to a collection agency. Currently only accounts with a balance of \$1,000 or greater are screened. Accounts under \$1,000 are treated in the same manner if the patient applies for Free Care Funds.

## **B. Notice.**

The Hospital will provide notice and information to patients about the availability of free care under the clinic sliding scale discounting program in a number of ways, including by describing and / or referencing this policy on the Hospital's one page summary description of free bed funds and other free or reduced care policies (also referred to as the "Notice of Availability of Funds" document).

The Hospital will provide notice and information in a manner that complies with the requirements of law and is designed to make information easily available and accessible to patients.

The Hospital may develop a more detailed policy and procedure specifically describing the manner in which notices and information will be provided.

## **C. Eligibility for Alternative Payment Arrangements:**

1. Generally. Extended payment arrangements may be established with the patient whether or not they qualify for the clinic sliding scale payment discounting program or any other free care or charity care program. Eligibility is determined on a case by case basis and made based on medical or financial hardship.

2. Types of Arrangements. The arrangements may include extended payment terms with reduced or no interest charges.

3. Failure to Comply. If the patient does not honor the payment arrangement based on the eligibility guidelines, the patient account may be referred to a collection agency.

4. Other Programs. Additional financial assistance programs are provided by the Hospital. These programs include payments alternatives and are described in the Hospital's other policies.

5. Specific Requirements. The Hospital, at its discretion, may enter into an agreement for payment of a patient's bill through monthly payments not to exceed twenty-four (24) months. Under this plan, patients with account balances greater than One Hundred Dollars (\$100) that are determined to be the patient's responsibility (after applicability of other programs has been determined) may satisfy their accounts through interest-free monthly payments.

6. Exceptions. Any exceptions to the extended payment policy requires pre-approval from the Senior Vice President of the Hospital and will be coordinated with the Hospital's management oversight committee.



## EXHIBIT C2

### GREENWICH HOSPITAL

#### Financial Assistance/Charity Care Policy: Clinic Sliding Scale - Discounting Program

Comment [wsg1]:

#### I. PURPOSE:

The purpose of this policy is to establish a policy for providing financial assistance under a sliding scale discounting program to uninsured clinic patients who are determined, under the Hospital's eligibility criteria, to lack the ability to pay for care at full charges.

Greenwich Hospital (the "Hospital") is guided by a mission which includes the provision of high quality care to all patients, including those who cannot pay for all or part of the essential care they receive at the Hospital. The Hospital is committed to treating all patients with compassion, from the bedside to the billing office, and including through payment and collection efforts. Furthermore, the Hospital is committed to advocating for expanding access to health care coverage.

The Hospital will maintain financial aid policies that are consistent with its mission and values and take into account an individual's ability to pay for medically necessary health care services.

In addition to free care provided under this clinic sliding scale discounting program, free care is also provided to uninsured and insured patients in accordance with the Hospital's Policy for Free Care Funds. See the Hospital's separate policy regarding Free Care Funds. The Hospital also provides relief and assistance to other patients pursuant to policies regarding the waiver or reduction of (a) co-payments, (b) deductibles and / or (c) Medicaid spend-down requirements on a case-by-case basis determined on grounds of medical and financial hardship.

## II. POLICY:

### A. General Statement of Need – Free Care distinguished from Charity Care Defined.

Recognizing its charitable mission, it is the policy of the Hospital to provide a reasonable amount of its services to eligible patients that do not have the ability to pay for care at full charges.

**Free care generally involves cooperative efforts among the Hospital and the patient and / or the patient’s family pursuant to which free or reduced bills are established for the patient’s services.**

Charity care is applied to an account when the patient and spouse (or both parents, if the patient is a dependent) are unemployed AND do not own property. Screening for employment and property ownership is done at the end of the usual billing cycle but before the account would be assigned to a collection agency. The only accounts currently screened are those with a balance of \$1,000 or greater. Accounts under \$1,000 are treated in the same manner if the patient applies for Free Care Funds.

### B. Notice.

The Hospital will provide notice and information to patients about the availability of free care under the clinic sliding scale discounting program in a number of ways, including by describing and / or referencing this policy on the Hospital’s one page summary description of free care funds and other free or reduced care policies (also referred to as the “Notice of Availability of Funds” document).

The Hospital will provide notice and information in a manner that complies with the requirements of law and is designed to make information easily available and accessible to patients.

The Hospital may develop a more detailed policy and procedure specifically describing the manner in which notices and information will be provided.

### C. Eligibility for Clinic sliding Scale Program:

1. Generally. As noted above, the Hospital provides care through the clinic sliding scale discounting programs to uninsured patients that do not have the ability to pay for medically necessary services at full charges.

2. Other Programs. Additional financial assistance programs are provided by the Hospital. These programs include payment alternatives and are described in the Hospital's other policies.

3. Specific Eligibility Guidelines. Patients must fulfill the following eligibility guidelines:

- a. **Family Income At or below Four Hundred (400%) percent (the "Clinic Test Amount Percentage") of the federal poverty income level.**

Patients will be considered eligible for the clinic sliding scale discount program if (a) the patient's family income level does not exceed the Clinic Test Amount Percentage of the federal poverty income level and (b) the Hospital, having considered the patient's resources, has determined that the patient lacks the ability to pay all or some portion of the bill.

The Hospital will establish appropriate documentation requirements to verify eligibility.

Generally, the patient can apply for consideration under the clinic sliding scale program at any time.

Subject to a change in the patient's financial circumstances, eligibility will be granted for one year, unless otherwise determined by the Hospital, at which time the patient may reapply for clinic sliding scale status.

For patients that qualify for the clinic sliding scale program and whose annual family income is at or below the Clinic Test Amount Percentage of the federal poverty income level, the patient's bill for services will reflect full charges and then be discounted to an amount reflecting such family income as indicated in the table attached as **Schedule 1** (the "Clinic Table"). This "cost to charge" percentage will be reviewed and set by the Hospital on an annual basis. The discounted amount will be considered free / charity care. The balance remains the patient's financial responsibility.

**b. Family Income Over the Clinic Test Amount Percentage of the federal poverty level.**

For patients whose annual family income is greater than the Clinic Test Amount Percentage of the federal poverty income level, the patient will not be eligible for the sliding scale discount program, but will be eligible to apply for Free Care Funds, and if denied will be billed for services at gross charges, minus any applicable discount, and the charges billed will remain the patient's financial responsibility.

**D. Free Care / Charity Care Determination.**

As noted above, free care generally involves cooperative efforts among the Hospital and the patient and / or the patient's family or representatives pursuant to which free or reduced bills are established for the patient's services.

Charity care is applied to an account when the patient and spouse (or both parents, if the patient is a dependent) are unemployed AND do not own property. Screening for employment and property ownership is done at the end of the usual billing cycle but before the account would be assigned to a collection agency. Currently, only accounts with a balance of \$1,000 or greater are screened. Accounts under \$1,000 are treated in the same manner if the patient applies for Free Care Funds.

**E. Extended Payment Guidelines.**

The Hospital has other programs that include alternative payment arrangements. See the Hospital's Alternative Payment Arrangement Policy.

**F. Accounting for Charity Care and Free Care.**

Only that portion of a patient account that meets the clinic sliding scale program criteria is recognized as free care. Free care and charity care amounts are a reduction in charges made by the Hospital because of the patient's inability to pay for services at charges.

03/14/08



# Exhibit D1

## **GREENWICH HOSPITAL**

### **ADMINISTRATIVE POLICY**

### **FOR CREDIT AND COLLECTIONS**

#### **I. Purpose**

A goal of Greenwich Hospital (“GH” or the “Hospital”) is to provide the highest quality of medical care to its patients at the lowest cost. In order to do so, an efficient and equitable system must be established that will maximize the collection of patient account receivable balances in order to provide the cash flow required to operate the institution effectively.

In accordance with the above, the following credit and collection policy is hereby established for the Hospital.

Detailed procedures may be included in a credit and collection manual as maintained by the Hospital.

#### **II. Source of Payment**

##### **A. Patient.**

The patient has the primary responsibility for the payment of the patient’s account. Except in an emergency, all patients capable of doing so will be required to sign a payment guarantee prior to admission or receipt of inpatient service.

The patient portion of the hospital bill may be satisfied through payment via one or more of the following sources:

1. Cash,
2. money order,
3. personal check,
4. bank check,
5. travelers checks
6. credit cards acceptable to the hospital
7. Money Transfer
8. ATM Debit Cards

B. Third Party Coverage.

The Hospital will extend credit on third party benefits assigned to the Hospital upon proper validation of coverage. Principal third party payers recognized in the Hospital generally, subject to Hospital approval, include the following:

1. Blue Cross
2. Managed Care Payers
3. Medicare
4. Commercial Insurance Companies (upon assignment of benefit to Hospital)
5. Workers Compensation
6. Medicaid
7. Others

The Hospital will cooperate with all third party payers to the fullest extent as per applicable agreements in order to facilitate the collection of patient bills.

C. **Elective Services: Payment of Hospital Charges For Elective Hospital Services Not Covered By Insurance**

The Hospital will require, or request payment for the difference between the estimated patient bill and the total available insurance coverage or approved social assistance. This procedure will be applied after giving consideration to the amount of the “patient portion”, employment history and other Hospital indebtedness. Consideration of these factors will result in the distinction between required and requested payments, which are defined as follows:

**Required Payment.**

Any non-emergency patient may be required to make a deposit or pay estimated charges prior to visit. Payment of past due accounts may be required prior to a new hospital service. This encompasses co-payments, co-insurance, and deductibles.

**Requested Payment.**

Patients will be informed of the estimated patient portion of the bill, and a request for a deposit or payment of charges will generally not affect the admission procedure. These payments include co-payments, co-insurance, and deductibles.

D. **Free Care Funding.**

The Hospital has various Hospital Free Care Funds to assist those patients that meet the specific criteria and are unable to pay for services rendered. Please refer to the Hospital’s Free Care Policy for additional information.

E. **Clinic Sliding Scale Discounting Program.**

The Hospital offers a Clinic Sliding Scale Discounting Program for eligible patients that do not meet the criteria for Free Bed Funds, but meet criteria to receive Hospital services at cost. Please refer to the Hospital’s Clinic Sliding Scale Discounting Program for additional information.

F. Alternative Payment Arrangements.

For patients who do not qualify for either Free Care Bed Funds or the Hospital's Clinic Sliding Scale Discounting Program, the Hospital provides financial assistance to patients through discounts and alternative payment plans. Please refer to the Hospital's Alternative Payment Arrangement Policy for additional information.

G. Patient Inquiries.

Patient inquiries related to the credit and collection policies of the hospital may be answered or addressed only by those individuals designated within patient financial and / or admitting services.

**IV. Admission Procedures.**

A. Pre-Admissions.

The Hospital will pre-admit patients whenever possible. The source(s) of funds for payment of a patient's account must generally be verified prior to admission (i.e. confirmation directly with insurance plan, employer, or by examination and photocopy of appropriate insurance data).

B. Elective Admissions.

Elective admission referrals must generally be received in the Admitting office no later than 12 (noon) the business day prior to the expected admission date. All elective admissions are subject to the payment of Hospital charges not covered by insurance.

C. Emergency Admissions.

The Hospital will admit all emergency cases without regard to the financial status of the patient. See the Hospital's other policies and procedures relating to Emergency Department Admissions and Medical Screening Examinations.

**V Billing Policy and Procedures.**

All patients/guarantors will generally receive one or more statements including, when there is any third party coverage with respect to the patient's bill. See the Hospital's other policies and procedures relating to billing including but not limited to the Hospital's policies and procedures regarding the Hospital Billing Practices Act (P.A. 03-266).

**VII Collection Policies and Procedures**

Subject to the other applicable Hospital policies and procedures, these credit and collection policies and procedures generally apply to all self-pay accounts and / or the self-pay portion of patient accounts.

Accordingly, these collection policies and procedures generally apply to all pending Welfare, non-contractual insurance and self-pay (pure self-pay and residual self-pay) accounts. All rejected third party accounts will also be classified as self-pay until such time as further insurance is verified. Final bills are generally processed after discharge and are referred to the collection section of the Hospital.

### **VIII Analysis of accounts prior to collection turnover.**

Prior to the turnover of any account into the outside collection process (collection agency or collection attorney), the Finance Department and / or a "Turnover Expeditor" (where available), will generally review a list of accounts.

The Expeditor will verify the following:

- a) All third party insurance opportunities have been pursued and / or exhausted; this will include a review of previous patient accounts for third party insurance coverage, including Medicaid coverage.
- b) Employment history and / or status.
- c) Liquid asset values if they can be obtained.
- d) No free care application is currently in process.

Accounts Balances Under \$1,000. Based on the account review, and if the account value is under \$1,000, the account may be referred to the collection agency.

Account Balances Greater than or Equal to \$1,000. If the account is \$1000 or more, and it is determined under the Hospital's eligibility criteria that the patient and spouse are not employed and do not own property, the entire account balance may be written off to Charity Care. The account may be referred to an outside collection agency if the Expeditor believes that the patient has the financial ability to pay as determined under the Hospital's eligibility criteria.

In all cases, the cycle detailed for all accounts in this procedure will be interrupted by the following occurrences:

- a. Receipt and verification of third party coverage,
- b. Payment arrangements are agreed to and followed by the patient / guarantor,
- c. Evidence that the accounts, or other legal consideration may result in an expedited referral to an agency or attorney, or
- d. If at any time the patient indicates potential eligibility or interest in initiating an application for free care or sliding scale discount services. Patient will be referred to a free care coordinator or other patient financial services representative to receive a Free Care Application in this situation.

The above guidelines are reflected in the chart attached as **Exhibit Z**.

## **IX Bad Debt.**

### **1. General Statement of Need.**

Bad Debts are amounts considered to be uncollectible for which no likelihood of recovery at anytime in the future is expected. Bad debts are differentiated from charity care, which is defined as the inability to pay versus bad debt as the unwillingness of the patient to pay.

### **2. Patient Responsibility.**

The patient is deemed responsible for the payment of provided services. Patient's responsibility also refers to all non-covered third party charges, such as insurance deductibles and copayments.

### **3. Uncollectible Debt.**

If after reasonable and customary attempts to collect a bill, the debt remains unpaid, the debt may be deemed as uncollectible. The Hospital's collection efforts may include the use of a collection agency or attorney in addition to subsequent billings, follow up letters, telephone calls, and personal contact.

### **4. Account for Bad Debt.**

Amounts determined as bad debt are recorded as expense net of recoveries and classified accordingly on the Hospital's Financial Statements.

**X. Policies Governing Collection Agencies and Collection Attorneys**

**1. Free care eligibility.**

If at any time in the collection process the collection agency, or a collection attorney, becomes aware of a potential eligibility for free care, the collection is stopped and the account is referred back to the Hospital for pursuit of free care or other financial assistance programs. Collection agencies and collection attorneys will include Summary Notice of Free Care Availability in all communications with debtors.

**2. Prior approval.**

Collection agencies and attorneys are instructed that pre-approval from the Hospital is required prior to the initiation of any legal action concerning a referred account.

**3. Property Liens.**

Collection agencies and attorneys are instructed to severely limit the placement of property liens unless they can demonstrate significant financial assets by the debtor beyond the assets in the property. Pre-approvals will not be granted unless the account balance is over \$1000 and the property(s) to be made subject to a lien are at least \$200,000 in assessed value. Even if the account meets these criteria, a property lien may not be approved if in the view of the Hospital, the placement of the lien will cause financial hardship on the debtor.

#### 4. **Wage Garnishments.**

Pre-approvals will be granted for wage garnishments if the following criteria are met and a written letter has been provided to the patient reiterating the following:

- The debtor has had an opportunity to apply for free care and has either refused or been found ineligible for free care assistance.
- The debtor does not fall under the definition of “uninsured” as set by the State of Connecticut.
- The debtor has not applied or qualified for sliding scale discounts to assist in the payment of their debt, or has qualified and has not paid.
- The debtor has not elected to make voluntary payments towards their debt.
- The placement of a wage garnishment is being approved as a last course of legal remedy.

Wage garnishments, if approved, will only apply to account balances over \$500. Additionally, any State Marshall fee for administering the wage garnishment will be absorbed by the Hospital as a cost of collection. No interest will accrue on wage garnishments.

Any wage garnishments for employees of Yale New Haven Health, Yale-New Haven Hospital, Bridgeport Hospital, or Greenwich Hospital, or their affiliates, will require special review and attempts will be made through Human Resources to develop an alternative payment arrangement.

#### 5. **Bank Executions.**

All bank executions, in addition to pre-approval, require special review by the Hospital for verification that the execution will not cause undue financial hardship on the debtor. If this cannot be determined, no bank execution will be ordered.

#### 6. **Foreclosures and Writs of Capias.**

The Hospital will not pursue and will not initiate a writ of capias. The Hospital may ask for examinations of debtors but the Hospital itself will specifically indicate that the Hospital does not request any writ of capias. Except in unusual circumstances (e.g. where there is evidence of an ability to pay, multiple homes or properties, or the existence of significant assets), the Hospital will not pursue foreclosures for property liens.

**7. Interest and Court Costs.**

Interest will be allowed to accrue on accounts after legal court judgment is received. Interest will accrue at the current statutory rate. The Hospital will not allow interest to accrue greater than 50% of the account balance. If the principal is paid in full, the Hospital will waive payment of interest. Court costs will be assumed by the Hospital as a cost of collections and not charged to the debtor.

**8. Collection Agency and Collection Attorney Reporting.**

Monthly performance reports will be prepared by each collection agency and sent to the Hospital each month. Quarterly discussions will be held with each agency to discuss collection activities, pending legal proceedings, and problematic collection accounts. Performance reports will include the following information:

- Number and value of accounts in current inventory.
- Number and value of accounts received monthly from GH.
- Number and value of accounts returned as uncollectible from law firm.
- Recoveries, net of costs and fees
- Court costs and fees due from GH.
- Number of property liens approved and placed.
- Number of wage executions approved and placed.
- Number of bank executions approved and placed.

## **XI. Administrative Write-offs**

Due to the availability of specialized and tertiary / other level services at the Hospital, requests will be made from time to time by Hospital medical staff members and/or outside special interest groups for the Hospital to care for an adult or child from the United States or from a foreign country who require these services. When these cases are identified, the following criteria and other applicable factors will be considered in the decision to provide care with no consideration as to full payment:

- The clinical need of the patient, to include his/her prognosis.
- The adequacy of follow up care available in the patient's home country or city.
- The degree to which the Hospital's resources are especially suited for the care of the patient.
- The estimated costs of care.
- The availability of other specific funding to offset total costs of care.
- The willingness of physicians on the Hospital's medical staff to waive all or a portion of their professional and technical fees to support such patients.
- The total amount of free or discounted care provided by the Hospital to such patients during the fiscal year in which the request is made.

Requests must be made to the Senior Vice President, who will coordinate a review of the case based on the above mentioned criteria and who will utilize the management oversight committee for direction and / or input and exceptions to the Financial Assistance Programs.

## **XII. Free Care Funds Committee**

### **1. Purpose**

Financial Assistance Programs for Hospital Services will be overseen by a management oversight committee (“Committee”) to review the case of any patient who may demonstrate a compelling hardship or personal circumstance which warrants financial assistance. The Committee will also review financial assistance requests from patients who are insured, but may demonstrate financial hardship causing difficulty in paying co-payments or deductibles.

### **2. Composition of Committee**

The Committee is chaired by a Senior Vice President for the Hospital. Additional committee members may include Patient Financial Services Representatives, Patient Relations Representatives, finance and medical staff liaisons as needed. The committee will meet on a monthly basis, or more frequently if necessary.

### **3. Operating Protocols**

- Patient accounts are referred to the Committee by patient financial services or patient relations representatives, or could be initiated by an appeal by the patient where free care services have been denied.
- Patients’ accounts reviewed by the Committee typically do not meet the eligibility requirements for the provision of Charity Care.
- Typical Committee requests may include:
  - Insured patients with co-payments and deductibles where medical/financial hardship creates difficulty to pay patient’s responsibility.
  - Self-pay patients with income/assets placing them above 250% of the poverty level, but where the patient’s bill is significant and presents a financial hardship.
  - Medicare and Commercial insured patients that have exhausted insurance benefits or maximum coverage amounts.
  - Medicaid enrollees with a Medicaid spend down and demonstrated financial hardship.

- Committee will typically deny financial assistance requests for the following situations:
  - Lack of medical necessity for a service requested by a patient.
  - Cosmetic surgery
  - Financial hardship caused by the intentional failure of a patient to not follow through with a) medical advice, or b) health plan requirements such as a payment of premium, notification of admission, or other requirements outlined in the patient's Subscriber Certificate.

The Committee will maintain minutes of meetings and will communicate findings to the appropriate departments as well as written communications to the affected patient.

## **IX General Policies**

Accounts identified as referrals to agencies or attorneys, and accounts directly written off will be reviewed and approved by the Patient Financial Services staff, Director of Patient Accounts, and / or the Senior Vice President, Finance.

## **X. Review of Administrative Policy for Credit and Collections.**

The Administrative Policies for Credit and Collection will be reviewed on a semi-annual basis along with affected detailed operational policies involved in credit and collection. This review will examine existing policies in light of the current economic market, comparison to other peer hospital institutions for best practices, and with respect to annual financial budgets.

**Exhibit Z**  
**Chart of Actions / Accounting**  
**Based on Patient Account Balance Amount**

	<b>Bill Account Balance Amount</b>	
<b>I</b>	<b>Less Than \$1,000</b>	<b>GH Treatment</b>
A	If Patient Not Eligible for Financial Assistance Programs, then:	
1	Accounting Treatment	Write-off as bad debt
2	Additional Collection Efforts?	Yes, pursue collection
B	If Patient Eligible for Financial Assistance Programs, then:	
1	Accounting Treatment	Write-off as Free care or Looney status if applicable
2	Additional Collection Efforts?	Follow program rules
<b>II</b>	<b>Greater than or equal to \$1,000</b>	
A	If able to verify (a) house or (b) job (i.e., ability to pay), then	
1	Accounting Treatment	Write-off as bad debt
2	Additional Collection Efforts?	Yes, pursue collection
<b>B-1</b>	If verified that patient has (a) no house and (b) no job (i.e. no ability to pay),	
1	Accounting Treatment	Write-off as free care
2	Additional Collection Efforts?	<b>No, STOP collection</b>
<b>B-2</b>	If <b>no</b> information compiled / provided (i.e. not able to verify ability to pay), then	
1	Accounting Treatment	Write-off as Bad debt <sup>1</sup>
2	Additional Collection Efforts?	Yes, pursue collection <sup>2</sup>

<sup>1</sup> Note: Accounting treatment determined to be bad debt because amounts reasonably anticipated are not material.

<sup>2</sup> Note: If information is developed through the collection efforts, further actions will depend on such information.



# Exhibit C1

## Greenwich Hospital Policy for Free Care Funds

### I. PURPOSE:

To establish the policy for the use of funds that have been donated to Greenwich Hospital (“GH” or the “Hospital”) and other funds that may from time to time be designated by the Hospital to provide free care or charity care. This policy is in addition to the Hospital’s other policies related to free care and / or charity care.

The policies and procedures described in this policy are subject to applicable laws, rules, regulations and any applicable agreements, orders, writs, decrees, indentures, trusts or other obligations to which the Hospital is a party or with which the Hospital must comply.

### II. POLICY:

#### A. General Statement of Need.

The Hospital has received charitable contributions including contributions to the Hospital’s endowment that are restricted by the donor in a manner limiting their use to the provision of free care or free beds to patients (hereinafter referred to as “Free Care / Free Bed Funds”).

Some of the donated funds contain additional restrictions (e.g., home address of patient, church, nominator, etc.). Other funds have no additional restrictions.

The Hospital may if the Hospital so chooses from time to time establish a spending policy with respect to the distribution of these Free Care Funds.

In addition, the Hospital may from time to time determine that such funds are insufficient to satisfy the need for such funds and in such case the Hospital may provide additional free care to patients from the Hospital’s operations (hereinafter referred to as “Hospital Designated Free Care Funds”).

The Free Care / Free Bed Funds and any Hospital Designated Free Care Funds are collectively referred to as “Free Care Funds.”

**B. Notice.**

The Hospital will provide notice and information to patients about Free Care Funds in a number of ways, including posting notices in appropriate locations in the Hospital; ensuring the availability of a one-page summary description of Free Bed Funds and how to apply for them (referred to as the “Hospital’s Notice of Availability of Funds” document); providing individual written notice to patients; and making available written information in other forms that may be helpful to patients.

The Hospital will provide notice and information in a manner that both (a) complies with the requirements of applicable law, including applicable Connecticut law concerning hospital bed and other funds, and (b) is designed to make information easily available and accessible to patients.

The Hospital may develop a more detailed policy and procedure specifically describing how notices and information will be provided.

**C. Eligibility for Donated Free Bed Funds with No Specified Nominator.**

The Hospital has Free Care Funds where the historic dollar value is restricted and the net appreciation and income are available to support free care and or free beds for patients unable to pay, but no specific nominator is named. If the Hospital has adopted a Hospital Endowment Spending Policy, then the allocation of these funds may be based on such Hospital’s Endowment Spending Policy.

These Free Care Funds will be available only to patients with no specified nominator after all possibilities of third party reimbursement have been exhausted. The Hospital may require that Patients applied for City and State assistance, and thereafter provide to the Hospital formal documentation showing denial of such applications.

The Hospital requests appropriate documentation to verify eligibility.

In addition, the Hospital, at its discretion and on a case by case basis, may provide Free Funds to patients with insurance, assuming they satisfy the other criteria outlined above and there are no other prohibitions on them receiving such assistance.

If the patient is insured by a governmental program (Medicare, Medicaid or Tricare) or a private insurer, the Hospital will consider requests for Free Funds for co-pays, deductibles, and/or spend-downs on a case by case basis. If granted, these amounts will be relieved at the amounts determined under the contract or program in question.

In addition, the Hospital will consider requests for Free Funds when a patient's insurance or maximum coverage benefits have been exhausted. In making these decisions, the Hospital will consider medical and financial hardship. The Hospital may also choose to provide Free Funds for only a portion of the request, if in the Hospital's judgment, providing Free Funds for the entire request would adversely affect other applicants who meet the qualifications, but are without insurance (and thus may carry a larger debt).

**D. Eligibility for Donated Free Bed Funds with Geographic or other Additional Restrictions but no Specified Nominator.**

Patients must fulfill the above referenced eligibility guidelines for "Donated Free Bed Funds with No Specified Nominator", and reside in the specific geographic location dictated by the original gift or meet the other additional eligibility restrictions contained in the original gift.

**E. Eligibility for GH Designated Free Care Funds.**

If (a) Free Care Funds with no nominator or other special restriction have been exhausted up to any approved annual endowment spending policy limit, and (b) there are patients otherwise eligible for Free Care Funds who do not meet the restrictions for eligibility for any available restricted Free Care Funds, the Hospital may determine to provide additional free care to patients from Hospital Designated Free Care Funds, to the extent that such funds have been determined to be available in light of the Hospital's current and future financial needs. Patients must nonetheless fulfill the eligibility guidelines for "Donated Free Bed Funds with No Specified Nominator" to be eligible for free care designation from Hospital Designated Free Care Funds.

The Hospital may determine to also make available additional free care funds from operations for other types of requests where the patient demonstrates a compelling hardship or personal circumstances which warrant providing financial assistance.

**F. Eligibility for Donated Funds Restricted to Use by an Outside Nominator.**

The Hospital has Free Care Funds where the historic dollar value is restricted and the net appreciation and income are available to support free beds for patients unable to pay and a nominator is named. The allocation of the available funds may be based on an endowment spending policy, if one has been established by the Hospital.

The Hospital will notify nominators at least annually of the status of Free Care Funds for which they have a nominator role. The nominator may request the use of Free Care Funds for any eligible patient who meets the guidelines for a given fund. Each nominator will receive, at least annually, a report of Free Care Funds utilized by patients (subject to applicable rules and regulations relating to the confidentiality of patient information ). Nominators may request that unused funds be held for use in a subsequent year for their previously stated purposes or, to the extent the nominator has such power, the nominator may designate any remaining funds for a particular fiscal year or other period to be used by the Hospital for general free care purposes. In addition, the Hospital may award funds in cases in which the donor has specifically provided that the Hospital has the power to award the funds if the nominator fails to do so.

**G. Accounting of Free Care Funds.**

**1. For donated Free Care Funds with no specified nominator and donated Free Care Funds with geographic or other additional restrictions but no specified nominator:**

If Free Care Funds are to be made available for a patient from such a fund, then the fund will be billed for the services and the bill will be an amount equal to the cost for such services.

**2. For Hospital Designated Free Care Funds:**

If Free Care Funds are to be made available for a patient from such a fund, then the fund will be billed for the services and the bill will be an amount equal to the charges for such services.

**3. For donated Free Bed Funds restricted to Use by an Outside Nominator:**

If Free Care Funds are to be made available for a patient from such a fund, then the fund will be billed for the services and the bill will be an amount equal to the charges for such services.

Greenwich Hospital Greenwich, Connecticut 06830		<b>ADMINISTRATIVE POLICY AND PROCEURE</b>	
Title: <b>Billing and Collection: Bad Debt</b>			Policy #: <b>A-J:2</b>
Date Issued: <b>10/09</b>	Date Reviewed/Revised:	Approved By: <b>President &amp; Chief Executive Officer</b>	Page 1 of 5
Contact: <b>Director, Patient Accounts</b>			

**PURPOSE:**

To ensure that outstanding balances on patient accounts are pursued fairly and consistently by the Hospital and its agents in a manner consistent with its charitable mission.

**DEFINITIONS:**

“*Collection agent*” means any person, either employed by or under contract to, the Hospital, who is engaged in the business of collecting payment from consumers for medical services provided by the Hospital, and includes, but is not limited to, attorneys performing debt collection activities.

“*Hospital bed fund*” or “*free bed fund*” means a special donation received by the Hospital to subsidize, in whole or in part, the cost of medical care, including inpatient or outpatient care, incurred by patients at the hospital, whose financial circumstances render them unable to pay their hospital bills.

“*Patient*” means those persons who receive care at the Hospital and the person who is financially responsible for the care of the patient.

“*Uninsured patient*” means any person who is liable for one or more hospital charges whose income is at or below two hundred fifty percent (250%) of the poverty income guidelines who: (1) has applied and been denied eligibility for any medical or health care coverage provided under the state-administered general assistance program or the Medicaid program due to failure to satisfy income or other eligibility requirements, and (2) is not eligible for coverage for hospital services under the Medicare or CHAMPUS programs, or under any Medicaid or health insurance program of any other nation, state, territory or commonwealth, or under any other governmental or privately sponsored health or accident insurance or benefit program including, but not limited to, workers' compensation and awards, settlements or judgments arising from claims, suits or proceedings involving motor vehicle accidents or alleged negligence.

**POLICY:**

It is the Hospital’s policy to treat all patients equitably with respect and compassion, from the bedside to the billing office. The Hospital will pursue patient accounts, directly and through its collection agents, fairly and consistently taking into consideration demonstrated financial need.

**PROCEDURE:**

A. General

1. In accordance with Connecticut law, before a bill is sent to a patient the Hospital will:
  - a. determine (based on information in its possession) (i) if the patient is an uninsured patient and (ii) eligibility for free bed funds; and
  - b. notify the patient in writing of this insurance determination and the reasons for the determination.

Greenwich Hospital Greenwich, Connecticut 06830		<b>ADMINISTRATIVE POLICY AND PROCEURE</b>	
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2. In accordance with Connecticut law, the Hospital will not collect more than the cost of services from an uninsured patient.
3. Each bill and all collection notices from the Hospital, or any collection agent acting on behalf of the Hospital, must include the Hospital's Summary Notice of Free Care Availability.
4. Throughout the billing and collections cycle, the Hospital will provide financial counseling to patients about their Hospital bills and respond promptly to patient's questions about their bills and to requests for financial assistance.

**B. Pre-Collections**

The Hospital will follow its pre-collection billing cycle in accordance with internal operational processes and practices.

**C. Outside Collections**

1. The Hospital will seek to maintain written contractual relationships with one or more collection agents for collection of past due accounts that will require compliance with the standards and scope of collection practices set out in this Policy.
2. At the end of the Hospital's internal (pre-collection) billing cycle, outstanding balances may be referred to an approved outside collection agent under the following guidelines:
  - (i) Hospital has billed all third-party payers that may, based on hospital's records, be responsible for paying the claim;
  - (ii) Hospital has provided patient information on how to arrange for a payment plan if the patient cannot afford to pay the entire bill at once and patient has not qualified for, arranged for, or complied with a payment plan;
  - (iii) Hospital has notified patient that it has free bed funds and other free or discounted care for which the patient may be eligible;
  - (iv)(a) No financial assistance application has been completed that establishes the patient's eligibility for hospital bed funds or other financial assistance nor is an application in process, or (b) patient has applied and qualified for partial financial assistance, but has not paid his/her responsible part then the ineligible portion of the account may be referred for collection;

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- (v) A representative of the Hospital's Finance Department or a Turnover Expeditor concludes, based on the results of an internal review and in accordance with the Hospital's eligibility criteria for its financial assistance programs, that the patient has the financial ability to pay for all or a portion of his or her bill; and
  - (vi) The referral is reviewed and approved by the Credit & Collections staff under the direction of the Manager, Credit & Collections and using criteria & procedures permitted by the Director of Patient Accts and/or the Sr. VP, Finance.
3. If at any point in the debt collection process, the Hospital, including any employee or agent of the Hospital, or a collection agent acting on behalf of the Hospital, receives information that a patient is eligible for hospital bed funds, free or reduced price hospital services, or any other program which would result in the elimination of liability for the debt or reduction in the amount of such liability, the Hospital or collection agent will promptly discontinue collection efforts and, if a collection agent, refer the account back to the Hospital for determination of eligibility. The collection effort will not resume until such determination is made.
  4. The Hospital will annually file a debt collection report with the Office of Health Care Access as required by Connecticut law.

**RESPONSIBILITY:**

Sr. VP, Finance, Director of Patient Accounts, and all Credit & Collections Department Staff

**REFERENCES:**

Conn. Gen. Statutes §19a-673 and §19a-673(a) – (d)  
Fair Debt Collection Practices Act  
Connecticut Not-For-Profit Acute Care Hospital Voluntary Guidelines for Debt Collection  
AHA – Statement of Principles and Guidelines - Hospital Billing & Collection Practices

**RELATED POLICIES:**

Administrative Policy & Procedure A-A 18 - Questions Regarding Bills for Patient Care  
Charity Care Policy

Greenwich Hospital Greenwich, Connecticut 06830		<b>ADMINISTRATIVE POLICY AND PROCEURE</b>	
Title: <b>Billing and Collection: Bad Debt</b>			Policy #: <b>A-J:2</b>
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### Exhibit A

## STANDARDS & SCOPE OF COLLECTION PRACTICES

1. Prior approval of legal action required.

Collection agents must obtain written approval from the Hospital's Director of Patient Accounts, and/or the Senior Vice President, Finance or his or her designee, prior to the initiation of any legal action concerning a referred account.

2. Property Liens & Foreclosures.

Liens on personal residences are permitted only if:

- (i) The patient has had an opportunity to apply for free bed funds and has either failed to respond, refused, or been found ineligible for such funds;
- (ii) The patient has not applied or qualified for other financial assistance under the Hospital's Charity Care Policy, including sliding scale discounts to assist in the payment of his/her debt, or has qualified, in part, but has not paid his/her responsible part;
- (iii) The patient has not attempted to make or agreed to a payment arrangement, or is not complying with payment arrangements that have been agreed to by the Hospital and patient;
- (iv) The aggregate of account balances is over \$1000 and the property(ies) to be made subject to the lien are at least \$200,000 in assessed value; and
- (v) The lien will not result in a foreclosure on a personal residence. Except in unusual circumstances (*e.g.* where there is evidence of an ability to pay, multiple homes or properties, or the existence of significant assets), the Hospital will not pursue foreclosures for property liens.

3. Wage Garnishments.

Garnishments of wages are permitted only if:

- (i) The patient is not an uninsured patient;
- (ii) The criteria in (i) – (iii) above under Property Liens are met;
- (iii) A court determines that the patient's wages are sufficient for garnishment and enters a judgment against the patient; and
- (iv) The Hospital has notified the patient in writing of the foregoing.

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(v) Wage garnishments, if approved, will only apply to account balances over \$500. Additionally, any State Marshall fee for administering the wage garnishment will be absorbed by the Hospital as a cost of collection. No interest will accrue on wage garnishments.

4. Bank Executions.

All bank executions, in addition to pre-approval, require special review by the Hospital for verification that the execution will not cause undue financial hardship on the patient. If this cannot be determined, no bank execution will be ordered.

5. Writs of Capias.

The Hospital will not pursue and will not initiate a writ of capias (*i.e.*, a petition to have a debtor arrested as a result of a debt collection activity). The Hospital may ask for examinations of patients but the Hospital itself will specifically indicate that the Hospital does not request any writ of capias.

6. Interest and Court Costs.

Interest will be allowed to accrue on accounts after legal court judgment is received. Interest will accrue at the current statutory rate. The Hospital will not allow interest to accrue greater than 50% of the account balance. If the principal is paid in full, the Hospital will waive payment of interest. Court costs will be assumed by the Hospital as a cost of collections and not charged to the patient.

7. Credit Reports.

No accounts or account activity will be directly reported to Credit Bureaus or rating agencies. Credit Bureaus may obtain information from court records.

# Greenwich Hospital

## OVERVIEW OF FINANCIAL ASSISTANCE PROGRAMS FOR HOSPITAL SERVICES

### I. PURPOSE:

Greenwich Hospital (“GH” or the “Hospital”) recognizes that many patients may be uninsured, may not have adequate insurance or may otherwise lack the financial resources to pay for quality health care services without financial assistance. Consistent with its mission, the Hospital is committed to assuring that a patient’s ability to pay will be considered carefully when settling and or seeking amounts due for health care services.

In recognition of the Hospital’s role in helping those in need of financial assistance, the Hospital has established the GH Financial Assistance Programs for Hospital Services (“the Programs”). These Programs include free care policies, clinic sliding scale discounting policies, prompt pay discount, and certain billing/collection policies each separately described in specific policies.

The objectives of the Programs are to:

- Maintain a humane environment for our patients and their families;
- Assist patients in gaining access to government insurance programs;
- Provide clear information regarding the Programs;
- Ensure easy and timely access to the Programs.
- Consistently apply the Programs to all patients;
- Apply fair and equitable business practices with respect to the collections of bills for patient services; and
- Comply with all applicable laws, rules and regulations and other binding obligations of the Hospital.

All patients will have the option to apply for government or Hospital financial assistance programs based on financial need.

## II. POLICY:

### A. General Scope.

1. The Programs apply to Hospital inpatient, outpatient and ancillary services billed by the Hospital.
2. The Programs **apply generally to:**
  - Uninsured patients (as defined by CT Public Act 03-266).
  - Patients with no insurance coverage.
  - Non-covered services (as determined by the patient's third party payer benefits) that are medically necessary.
  - Under-insured patients with significant co-payments and deductibles.
  - Charges incurred after patients' exhaustion of third party payer benefits.
3. The Programs **generally do not provide for:**
  - Routine waiver of deductibles, co-payments and co-insurance imposed by third party payers on Hospital claims.
  - Private room or private duty nurses.
  - Services that are not medically necessary, such as elective cosmetic surgery.
  - Other fees that may not be charged directly by GH (e.g., guest food trays, gourmet meals, private room charges).
4. The patient will generally be ineligible for some or all financial assistance if any of the following occur:
  - It is determined that false information materially related to financial eligibility and/or status was provided by the patient or responsible party during the application or billing and collection process.
  - The patient or responsible party fails to apply for government insurance programs, and such an application is an eligibility requirement for certain types of assistance in the Programs.
  - The patient or responsible party fails to provide information necessary to complete the eligibility process.
5. GH reserves the right to evaluate a patient's eligibility on a case-by-case basis, especially where complex medical, scientific or financial situations exist.

## **B. Access to Information.**

Patients will obtain information on eligibility for government or Hospital programs from information distributed by the Hospital.

Patients will be alerted to the Financial Assistance Programs in a number of ways, including notices in English and Spanish posted in appropriate locations in the Hospital, a summary of free care availability and information on how to apply for free care (referred to as the “Hospital’s Notice of Availability of Funds”), information distributed via mail and / or in the Hospital’s admission package, and information on the Hospital’s web site. Information will also be provided when direct inquiries are made to GH. There is also access to a translation telephone.

The Hospital will provide notice and information in a manner that (a) complies with the requirements of law, including Connecticut law concerning hospital funds, and (b) is designed to make information easily available and accessible to all patients.

All patients will have access to information regarding estimated charges for particular services or actual charges for hospital services that have been provided.

## **C. Summary of Financial Assistance Programs.**

### **1. Free Care Funds.**

The Hospital has various Free Care Funds to assist those patients who meet the specific criteria and are unable to pay for services rendered.

The Hospital may also have other funds that have been designated by GH to provide free care.

Additional information regarding these funds is contained in the Hospital’s Policy for Free Care Funds. See Exhibit C(1) attached.

The Hospital will use a free care funds application (“Application”) to assess eligibility for Free Care Funds and a Outpatient Department financial assessment application to assess eligibility for the Clinic Sliding Scale Discounting Programs.

### **2. Clinic Sliding Scale Discounting Programs.**

The Hospital offers a Clinic Sliding Scale Discounting Program for eligible patients who may meet the criteria in the Policy for Free Care Funds.

Additional information regarding this program is contained in the Hospital’s Sliding Scale Discounting Program. See Exhibit C(2) attached.

### **3. Extended Payment Plans.**

The Hospital offers alternative payment arrangements for eligible patients.

Additional information regarding this program is contained in the Hospital's Alternative Payment Arrangement Policy. See Exhibit C(3) attached.

### **4. Waiver of Co-Pays, Deductibles or Spend Down Requirements.**

The Hospital, in certain qualifying circumstances, offers waiver of co-pays, deductibles or spend down requirements.

Additional information regarding this program is contained in the Hospital's Alternative Payment Arrangement Policy. See Exhibit C(4) attached.

### **5. Financial Screening / Information.**

A patient financial counselor will generally perform a financial screening for inpatients with payment obligations not covered by insurance or other means for the purpose of (a) determining the patient's potential eligibility for financial assistance in connection with any unpaid balances and (b) encouraging patients to apply for such assistance.

## **D. Credit, Collections and Bad Debt.**

The Hospital has adopted policies and procedures relating to credit, collections and bad debt.

Additional information regarding this program is contained in the Hospital's Credit, Collections and Bad Debt Policy. See Exhibits D and D1 attached.

## **E. Free Care Funds Committee.**

### **1. Purpose.**

The Programs will be overseen by a management oversight committee ("Committee"). The Committee will, among other oversight responsibilities, review the case of any patient who may not qualify for a specific Financial Assistance Program, but nevertheless may demonstrate compelling hardship or personal circumstances which warrant financial assistance. The Committee will also review financial assistance requests from patients who are insured, but demonstrate financial hardship in paying co-payments or deductibles.

## **2. Composition of Committee.**

The Committee will be chaired by a Senior Vice President of the Hospital. Additional Committee members may include senior management, patient financial services representatives, patient relations representatives, finance and medical staff liaisons as needed. The Committee will meet at least monthly or more frequently, if necessary.

### **3. Operating Protocols.**

Patient accounts may be referred to the Committee for review by Patient Financial Services, Patient & Guest Relations Representatives, or other appropriate referral sources. In general, the Committee will review patient accounts that do not meet the standard eligibility requirements for the various Financial Assistance Programs.

Typical referrals to the Committee will include:

- Insured patients with co-payments and deductibles that present financial hardship.
- Self-pay patients with income / assets over the poverty income levels with a significant bill that presents a financial hardship.
- Insured patients who have exhausted insurance benefits or maximum coverage amounts with a significant bill that presents financial hardship.
- Medicaid enrollees with a Medicaid spend down and demonstrated financial hardship.

The Committee will typically deny financial assistance requests for the following situations:

- Financial hardship caused by the intentional failure of a patient to follow through With: a) medical advice, or b) health plan requirements such as payment of premium, notification of admission, or other requirements outlined in the patient's Subscriber Certificate.

The Committee will maintain minutes of meetings and will communicate findings to the appropriate departments as well as writing to the affected patient.

**F. Accounting and Reporting of Financial Assistance Programs.**

1. The Hospital's financial department will collect and distribute information to senior management regarding these Programs on at least an annual basis. This information may include, but is not limited to:

- Number of cases referred;
- Number of cases processed;
- Number of cases determined eligible for and referred to government insurance programs;
- Number of Free Care Applications distributed;
- Number of Free Care Applications received (complete and incomplete), accepted and rejected and reasons for rejection; and
- Average time required to process Free Care Applications from the date of receipt of the completed application.

2. A sample spreadsheet showing the reporting format for the above information will be prepared for review and approval by a financial assistance oversight committee.

3. The Finance and Audit Committee of the Board of Trustees of the Hospital will be provided at least annually with a report concerning the status of these Programs.

**GREENWICH HOSPITAL  
2010 OUTPATIENT CENTER FEE SCALE**

Family Size	Federal Poverty Level (Annual)	Clinic Eligibility		Cap. - 400% of FPL
		200% of FPL (OPCCLINA)**	200-250% (OPCCLINB)	250%-400% (OPCCLINC)
1	10,830	0-21,660	21,661-27,075	27,076-43,320
2	14,570	0-29,140	29,141-36,425	36,426-58,280
3	18,310	0-36,620	36,621-45,775	45,776-73,240
4	22,050	0-44,100	44,101-55,125	55,126-88,200
5	25,790	0-51,580	51,581-64,475	64,476-103,160
6	29,530	0-59,060	59,061-73,825	73,826-118,120

\*each addtl. Person add \$3,740

**FEES**

Outpatient Center Fee:	No Fee	\$25.00 per visit	\$25.00 per visit
Behavioral Health Fee:	No Fee	\$15.00 per visit	\$15.00 per visit
Dental Fee:	No Fee	Self Pay	Self Pay
Off-site MDs(includes ENT, Optholmology, Cardiology)	No Fee	\$25.00 per visit	\$25.00 per visit

\*\*Effective April 1, 2007, we stopped collecting any co-pays from those patients whose financial status is categorized up to 200% of the Federal Poverty Level (OPCCLINA). (No fees will be collected for any Greenwich Hospital Services, included those listed below.)

**Pharmacy Charges:**

Clinic patients without Prescription Plans are eligible for a "reduced pharmacy charge" (Prescriptions provided at a variable rate over cost using drug cost as a basis for charge.) MCR D is not currently accepted in the Outpatient Pharmacy.

**Emergency Department:**

E.D. Services will be covered at the cost of \$35.00 per visit.

Ø *Patient must present their current Outpatient Center Card.*

Ø *Outpatient Center Membership must be renewed on an Annual Basis. Please call 863-3409 to schedule an appointment.*

**Inpatient Services & Ambulatory Procedures:**

Clinic patients are eligible for a reduction on their inpatient and ambulatory services as long as they are medically necessary and are referred by a physician through the Outpatient Center. Elective procedures or services referred by private physicians cannot be reduced. The current discounted rates are:

**Ambulatory Services**

\$250.00 per procedure

**Inpatient Services**

\$750.00 per admission per patient

**Inpatient Services - Maternity**

\$750.00 per admission (mother – regular delivery)  
\$850.00 per admission (mother – c-section)

Medicare patients under Federal guidelines may be eligible for a reduction in co-payment and deductible amounts, if you meet specific qualifications.

**Contacts:**

**Outpatient Center – Clinic Registration & Renewal Fee Questions - 863-3334**  
**Credit Specialist – Payment Arrangements, Hospital Fund Applications - 863-3013**

The following are fees to be collected at the point of service for those patients categorized as OPCCLINB & OPCCLINC:

Emergency Room Visit	\$35 per visit
OB Observation	\$25
Radiology	\$20 per exam
Nutrition Consult	\$20 per visit
Geriatric Assessment	\$20 per visit
Stress Test	\$20
Sleep Study	\$20
PT/OT/ST	\$10 per visit
Gero-Psychiatry	\$10 per visit
ARC	\$10 per visit (\$750 per inpatient stay)
Radiation Therapy	\$10 per visit
Chemotherapy	\$10 per visit
Lab	No Fee
Acupuncture	Full Fee
IDAP	\$10 per visit

**Updated 10/01/09**

## **Exhibit C4**

### **Greenwich Hospital Waiver of Co-Pays / Deductibles or Spend Down Requirements Policy**

#### **I. PURPOSE:**

The purpose of this policy is to establish a policy for providing waivers of co-pays, deductibles or spend down requirements to qualified patients who are determined, under the Hospital's eligibility criteria, to lack the ability to pay for co-pays, deductibles or otherwise satisfy spend down requirements under customary terms and conditions.

Greenwich Hospital (the "Hospital") is guided by a mission that includes the provision of high quality care to all patients, including those who cannot pay for all or part of the essential care they receive at the Hospital. The Hospital is committed to treating all patients with compassion, from the bedside to the billing office, and including through payment and collection efforts. Furthermore, the Hospital is committed to advocating for expanding access to health care coverage.

The Hospital will maintain financial aid policies that are consistent with its mission and values and take into account an individual's ability to pay for medically necessary health care services.

The availability of this policy is determined on a case-by-case basis and is made based on medical and financial hardship.

#### **II. POLICY:**

##### **A. General Statement of Need – Free Care distinguished from Charity Care Defined.**

Recognizing its charitable mission, it is the policy of the Hospital to provide a reasonable amount of its services to eligible patients that do not have the ability to pay for care at full charges.

Free care generally involves cooperative efforts among the Hospital and the patient and / or the patient's family pursuant to which free or reduced bills are established for the patient's services.

Charity care is applied to an account when the patient and spouse (or both parents, if the patient is a dependent) are unemployed AND do not own property. Screening for employment and property ownership is done at the end of the usual billing cycle but before the account would be assigned to a collection agency. Currently only accounts with a balance of \$1,000 or greater are screened. Accounts under \$1,000 are treated in the same manner if the patient applies for Free Bed Funds.

**B. Notice.**

The Hospital will provide notice and information to patients about the availability of free care such as that provided under this policy in a number of ways, including by describing and / or referencing this policy on the Hospital's one page summary description of free bed funds and other free or reduced care policies (also referred to as the "Notice of Availability of Funds" document).

The Hospital will provide notice and information in a manner that complies with the requirements of law and is designed to make information easily available and accessible to patients.

The Hospital may develop a more detailed policy and procedure specifically describing the manner in which notices and information will be provided.

**C. Eligibility for Waiver of Co-Pays, Deductibles or Spend Down Requirements:**

1. Generally. The availability of this policy is determined on a case-by-case basis and is made based on medical and financial hardship.

2. Other Programs. Additional financial assistance programs are provided by the Hospital.

# Exhibit D1

## GREENWICH HOSPITAL ADMINISTRATIVE POLICY FOR CREDIT AND COLLECTIONS

### I. Purpose

A goal of Greenwich Hospital (“GH” or the “Hospital”) is to provide the highest quality of medical care to its patients at the lowest cost. In order to do so, an efficient and equitable system must be established that will maximize the collection of patient account receivable balances in order to provide the cash flow required to operate the institution effectively.

In accordance with the above, the following credit and collection policy is hereby established for the Hospital.

Detailed procedures may be included in a credit and collection manual as maintained by the Hospital.

### II. Source of Payment

#### A. Patient.

The patient has the primary responsibility for the payment of the patient’s account. Except in an emergency, all patients capable of doing so will be required to sign a payment guarantee prior to admission or receipt of inpatient service.

The patient portion of the hospital bill may be satisfied through payment via one or more of the following sources:

1. Cash,
2. money order,
3. personal check,
4. bank check,
5. travelers checks
6. credit cards acceptable to the hospital
7. Money Transfer
8. ATM Debit Cards

B. Third Party Coverage.

The Hospital will extend credit on third party benefits assigned to the Hospital upon proper validation of coverage. Principal third party payers recognized in the Hospital generally, subject to Hospital approval, include the following:

1. Blue Cross
2. Managed Care Payers
3. Medicare
4. Commercial Insurance Companies (upon assignment of benefit to Hospital)
5. Workers Compensation
6. Medicaid
7. Others

The Hospital will cooperate with all third party payers to the fullest extent as per applicable agreements in order to facilitate the collection of patient bills.

C. **Elective Services: Payment of Hospital Charges For Elective Hospital Services Not Covered By Insurance**

The Hospital will require, or request payment for the difference between the estimated patient bill and the total available insurance coverage or approved social assistance. This procedure will be applied after giving consideration to the amount of the “patient portion”, employment history and other Hospital indebtedness. Consideration of these factors will result in the distinction between required and requested payments, which are defined as follows:

**Required Payment.**

Any non-emergency patient may be required to make a deposit or pay estimated charges prior to visit. Payment of past due accounts may be required prior to a new hospital service. This encompasses co-payments, co-insurance, and deductibles.

**Requested Payment.**

Patients will be informed of the estimated patient portion of the bill, and a request for a deposit or payment of charges will generally not affect the admission procedure. These payments include co-payments, co-insurance, and deductibles.

D. **Free Care Funding.**

The Hospital has various Hospital Free Care Funds to assist those patients that meet the specific criteria and are unable to pay for services rendered. Please refer to the Hospital’s Free Care Policy for additional information.

E. **Clinic Sliding Scale Discounting Program.**

The Hospital offers a Clinic Sliding Scale Discounting Program for eligible patients that do not meet the criteria for Free Bed Funds, but meet criteria to receive Hospital services at cost. Please refer to the Hospital’s Clinic Sliding Scale Discounting Program for additional information.

F. Alternative Payment Arrangements.

For patients who do not qualify for either Free Care Bed Funds or the Hospital's Clinic Sliding Scale Discounting Program, the Hospital provides financial assistance to patients through discounts and alternative payment plans. Please refer to the Hospital's Alternative Payment Arrangement Policy for additional information.

G. Patient Inquiries.

Patient inquiries related to the credit and collection policies of the hospital may be answered or addressed only by those individuals designated within patient financial and / or admitting services.

**IV. Admission Procedures.**

A. Pre-Admissions.

The Hospital will pre-admit patients whenever possible. The source(s) of funds for payment of a patient's account must generally be verified prior to admission (i.e. confirmation directly with insurance plan, employer, or by examination and photocopy of appropriate insurance data).

B. Elective Admissions.

Elective admission referrals must generally be received in the Admitting office no later than 12 (noon) the business day prior to the expected admission date. All elective admissions are subject to the payment of Hospital charges not covered by insurance.

C. Emergency Admissions.

The Hospital will admit all emergency cases without regard to the financial status of the patient. See the Hospital's other policies and procedures relating to Emergency Department Admissions and Medical Screening Examinations.

**V Billing Policy and Procedures.**

All patients/guarantors will generally receive one or more statements including, when there is any third party coverage with respect to the patient's bill. See the Hospital's other policies and procedures relating to billing including but not limited to the Hospital's policies and procedures regarding the Hospital Billing Practices Act (P.A. 03-266).

**VII Collection Policies and Procedures**

Subject to the other applicable Hospital policies and procedures, these credit and collection policies and procedures generally apply to all self-pay accounts and / or the self-pay portion of patient accounts.

Accordingly, these collection policies and procedures generally apply to all pending Welfare, non-contractual insurance and self-pay (pure self-pay and residual self-pay) accounts. All rejected third party accounts will also be classified as self-pay until such time as further insurance is verified. Final bills are generally processed after discharge and are referred to the collection section of the Hospital.

## **VIII Analysis of accounts prior to collection turnover.**

Prior to the turnover of any account into the outside collection process (collection agency or collection attorney), the Finance Department and / or a "Turnover Expeditor" (where available), will generally review a list of accounts.

The Expeditor will verify the following:

- a) All third party insurance opportunities have been pursued and / or exhausted; this will include a review of previous patient accounts for third party insurance coverage, including Medicaid coverage.
- b) Employment history and / or status.
- c) Liquid asset values if they can be obtained.
- d) No free care application is currently in process.

Accounts Balances Under \$1,000. Based on the account review, and if the account value is under \$1,000, the account may be referred to the collection agency.

Account Balances Greater than or Equal to \$1,000. If the account is \$1000 or more, and it is determined under the Hospital's eligibility criteria that the patient and spouse are not employed and do not own property, the entire account balance may be written off to Charity Care. The account may be referred to an outside collection agency if the Expeditor believes that the patient has the financial ability to pay as determined under the Hospital's eligibility criteria.

In all cases, the cycle detailed for all accounts in this procedure will be interrupted by the following occurrences:

- a. Receipt and verification of third party coverage,
- b. Payment arrangements are agreed to and followed by the patient / guarantor,
- c. Evidence that the accounts, or other legal consideration may result in an expedited referral to an agency or attorney, or
- d. If at any time the patient indicates potential eligibility or interest in initiating an application for free care or sliding scale discount services. Patient will be referred to a free care coordinator or other patient financial services representative to receive a Free Care Application in this situation.

The above guidelines are reflected in the chart attached as **Exhibit Z**.

## **IX Bad Debt.**

### **1. General Statement of Need.**

Bad Debts are amounts considered to be uncollectible for which no likelihood of recovery at anytime in the future is expected. Bad debts are differentiated from charity care, which is defined as the inability to pay versus bad debt as the unwillingness of the patient to pay.

### **2. Patient Responsibility.**

The patient is deemed responsible for the payment of provided services. Patient's responsibility also refers to all non-covered third party charges, such as insurance deductibles and copayments.

### **3. Uncollectible Debt.**

If after reasonable and customary attempts to collect a bill, the debt remains unpaid, the debt may be deemed as uncollectible. The Hospital's collection efforts may include the use of a collection agency or attorney in addition to subsequent billings, follow up letters, telephone calls, and personal contact.

### **4. Account for Bad Debt.**

Amounts determined as bad debt are recorded as expense net of recoveries and classified accordingly on the Hospital's Financial Statements.

**X. Policies Governing Collection Agencies and Collection Attorneys**

**1. Free care eligibility.**

If at any time in the collection process the collection agency, or a collection attorney, becomes aware of a potential eligibility for free care, the collection is stopped and the account is referred back to the Hospital for pursuit of free care or other financial assistance programs. Collection agencies and collection attorneys will include Summary Notice of Free Care Availability in all communications with debtors.

**2. Prior approval.**

Collection agencies and attorneys are instructed that pre-approval from the Hospital is required prior to the initiation of any legal action concerning a referred account.

**3. Property Liens.**

Collection agencies and attorneys are instructed to severely limit the placement of property liens unless they can demonstrate significant financial assets by the debtor beyond the assets in the property. Pre-approvals will not be granted unless the account balance is over \$1000 and the property(s) to be made subject to a lien are at least \$200,000 in assessed value. Even if the account meets these criteria, a property lien may not be approved if in the view of the Hospital, the placement of the lien will cause financial hardship on the debtor.

#### 4. **Wage Garnishments.**

Pre-approvals will be granted for wage garnishments if the following criteria are met and a written letter has been provided to the patient reiterating the following:

- The debtor has had an opportunity to apply for free care and has either refused or been found ineligible for free care assistance.
- The debtor does not fall under the definition of “uninsured” as set by the State of Connecticut.
- The debtor has not applied or qualified for sliding scale discounts to assist in the payment of their debt, or has qualified and has not paid.
- The debtor has not elected to make voluntary payments towards their debt.
- The placement of a wage garnishment is being approved as a last course of legal remedy.

Wage garnishments, if approved, will only apply to account balances over \$500. Additionally, any State Marshall fee for administering the wage garnishment will be absorbed by the Hospital as a cost of collection. No interest will accrue on wage garnishments.

Any wage garnishments for employees of Yale New Haven Health, Yale-New Haven Hospital, Bridgeport Hospital, or Greenwich Hospital, or their affiliates, will require special review and attempts will be made through Human Resources to develop an alternative payment arrangement.

#### 5. **Bank Executions.**

All bank executions, in addition to pre-approval, require special review by the Hospital for verification that the execution will not cause undue financial hardship on the debtor. If this cannot be determined, no bank execution will be ordered.

#### 6. **Foreclosures and Writs of Capias.**

The Hospital will not pursue and will not initiate a writ of capias. The Hospital may ask for examinations of debtors but the Hospital itself will specifically indicate that the Hospital does not request any writ of capias. Except in unusual circumstances (e.g. where there is evidence of an ability to pay, multiple homes or properties, or the existence of significant assets), the Hospital will not pursue foreclosures for property liens.

7. **Interest and Court Costs.**

Interest will be allowed to accrue on accounts after legal court judgment is received. Interest will accrue at the current statutory rate. The Hospital will not allow interest to accrue greater than 50% of the account balance. If the principal is paid in full, the Hospital will waive payment of interest. Court costs will be assumed by the Hospital as a cost of collections and not charged to the debtor.

8. **Collection Agency and Collection Attorney Reporting.**

Monthly performance reports will be prepared by each collection agency and sent to the Hospital each month. Quarterly discussions will be held with each agency to discuss collection activities, pending legal proceedings, and problematic collection accounts. Performance reports will include the following information:

- Number and value of accounts in current inventory.
- Number and value of accounts received monthly from GH.
- Number and value of accounts returned as uncollectible from law firm.
- Recoveries, net of costs and fees
- Court costs and fees due from GH.
- Number of property liens approved and placed.
- Number of wage executions approved and placed.
- Number of bank executions approved and placed.

## **XI. Administrative Write-offs**

Due to the availability of specialized and tertiary / other level services at the Hospital, requests will be made from time to time by Hospital medical staff members and/or outside special interest groups for the Hospital to care for an adult or child from the United States or from a foreign country who require these services. When these cases are identified, the following criteria and other applicable factors will be considered in the decision to provide care with no consideration as to full payment:

- The clinical need of the patient, to include his/her prognosis.
- The adequacy of follow up care available in the patient's home country or city.
- The degree to which the Hospital's resources are especially suited for the care of the patient.
- The estimated costs of care.
- The availability of other specific funding to offset total costs of care.
- The willingness of physicians on the Hospital's medical staff to waive all or a portion of their professional and technical fees to support such patients.
- The total amount of free or discounted care provided by the Hospital to such patients during the fiscal year in which the request is made.

Requests must be made to the Senior Vice President, who will coordinate a review of the case based on the above mentioned criteria and who will utilize the management oversight committee for direction and / or input and exceptions to the Financial Assistance Programs.

## **XII. Free Care Funds Committee**

### **1. Purpose**

Financial Assistance Programs for Hospital Services will be overseen by a management oversight committee (“Committee”) to review the case of any patient who may demonstrate a compelling hardship or personal circumstance which warrants financial assistance. The Committee will also review financial assistance requests from patients who are insured, but may demonstrate financial hardship causing difficulty in paying co-payments or deductibles.

### **2. Composition of Committee**

The Committee is chaired by a Senior Vice President for the Hospital. Additional committee members may include Patient Financial Services Representatives, Patient Relations Representatives, finance and medical staff liaisons as needed. The committee will meet on a monthly basis, or more frequently if necessary.

### **3. Operating Protocols**

- Patient accounts are referred to the Committee by patient financial services or patient relations representatives, or could be initiated by an appeal by the patient where free care services have been denied.
- Patients’ accounts reviewed by the Committee typically do not meet the eligibility requirements for the provision of Charity Care.
- Typical Committee requests may include:
  - Insured patients with co-payments and deductibles where medical/financial hardship creates difficulty to pay patient’s responsibility.
  - Self-pay patients with income/assets placing them above 250% of the poverty level, but where the patient’s bill is significant and presents a financial hardship.
  - Medicare and Commercial insured patients that have exhausted insurance benefits or maximum coverage amounts.
  - Medicaid enrollees with a Medicaid spend down and demonstrated financial hardship.

- Committee will typically deny financial assistance requests for the following situations:
  - Lack of medical necessity for a service requested by a patient.
  - Cosmetic surgery
  - Financial hardship caused by the intentional failure of a patient to not follow through with a) medical advice, or b) health plan requirements such as a payment of premium, notification of admission, or other requirements outlined in the patient's Subscriber Certificate.

The Committee will maintain minutes of meetings and will communicate findings to the appropriate departments as well as written communications to the affected patient.

## **IX General Policies**

Accounts identified as referrals to agencies or attorneys, and accounts directly written off will be reviewed and approved by the Patient Financial Services staff, Director of Patient Accounts, and / or the Senior Vice President, Finance.

## **X. Review of Administrative Policy for Credit and Collections.**

The Administrative Policies for Credit and Collection will be reviewed on a semi-annual basis along with affected detailed operational policies involved in credit and collection. This review will examine existing policies in light of the current economic market, comparison to other peer hospital institutions for best practices, and with respect to annual financial budgets.

**Exhibit Z**  
**Chart of Actions / Accounting**  
**Based on Patient Account Balance Amount**

	<b>Bill Account Balance Amount</b>	
<b>I</b>	<b>Less Than \$1,000</b>	<b>GH Treatment</b>
A	If Patient Not Eligible for Financial Assistance Programs, then:	
1	Accounting Treatment	Write-off as bad debt
2	Additional Collection Efforts?	Yes, pursue collection
B	If Patient Eligible for Financial Assistance Programs, then:	
1	Accounting Treatment	Write-off as Free care or Looney status if applicable
2	Additional Collection Efforts?	Follow program rules
<b>II</b>	<b>Greater than or equal to \$1,000</b>	
A	If able to verify (a) house or (b) job (i.e., ability to pay), then	
1	Accounting Treatment	Write-off as bad debt
2	Additional Collection Efforts?	Yes, pursue collection
<b>B-1</b>	If verified that patient has (a) no house and (b) no job (i.e. no ability to pay),	
1	Accounting Treatment	Write-off as free care
2	Additional Collection Efforts?	<b>No, STOP collection</b>
<b>B-2</b>	If <b>no</b> information compiled / provided (i.e. not able to verify ability to pay), then	
1	Accounting Treatment	Write-off as Bad debt <sup>1</sup>
2	Additional Collection Efforts?	Yes, pursue collection <sup>2</sup>

<sup>1</sup> Note: Accounting treatment determined to be bad debt because amounts reasonably anticipated are not material.

<sup>2</sup> Note: If information is developed through the collection efforts, further actions will depend on such information.

