



Handbook of Operating Procedures Policy 7.13	
Section: Fiscal Services and Management	Responsibility and Oversight: Chief Financial Officer
Subject: Charity Care	Origination Date: 8/1/2022 Board Approval: 8/17/2022

I. Title: Charity Care

II. Policy:

The Gulf Coast Center (GCC), is committed to providing charity care to persons who have healthcare needs and are uninsured, underinsured, or otherwise unable to pay for medically necessary care based on their individual financial situation. GCC strives to ensure that the financial capacity of individuals who need quality healthcare services does not prevent them from seeking or receiving care.

Accordingly, this procedure:

- Includes eligibility criteria for financial assistance – free and discounted (partial charity care)
- Describes the basis for calculating amounts charged to individuals served who are eligible for financial assistance under this procedure
- Describes the method by which individuals served may apply for financial assistance
- Describes how GCC will widely publicize the procedure to the community
- Limits the amounts that GCC will charge for eligible services provided to individuals qualifying for financial assistance to the amount generally billed (received) by GCC for private and public insurance (Medicaid, Medicare, etc.)

Individuals served are expected to cooperate with GCC procedures for obtaining charity care or other forms of payment or financial assistance, and to contribute to the cost of their care based on their individual ability to pay subject to the rules, regulations, and contractual requirements of the various GCC funding agencies.

To manage its resources responsibly and to allow GCC to provide the appropriate level of assistance to the greatest number of people in need, GCC establishes the following guidelines for the provision of charity care for individuals served.

Definitions

1. **Charity Care:** Healthcare services that have been or will be provided but are never expected to result in cash inflows. Charity care results from the GCC procedure to provide healthcare services free or at a discount to individuals served who meet the established criteria.
2. **Bad Debt:** Healthcare services that have been or will be provided and cash inflow is anticipated for all or a portion of the charge, but not collected. Includes the monthly Sliding Scale Fee

Schedule charges not collected for individuals above 150% of FPL. Bad Debt is not eligible for reimbursement from federal charity care programs.

3. Family: According to the Census Bureau, a group of two (2) or more people who reside together and who are related by birth, marriage, or adoption. In addition, according to Internal Revenue Service rules, if an individual served claims someone as a dependent on their income tax return, that person may be considered a dependent for purposes of the provision of financial assistance.
4. Family Income: Family Income is determined using the Census Bureau definition, which uses the following income when computing federal poverty guidelines:
 - Includes earnings, unemployment compensation, workers' compensation, Social Security, Supplemental Security Income, public assistance, veterans' payments, survivor benefits, pension or retirement income, interest, dividends, rents, royalties, income from estates, trusts, educational assistance, alimony, child support, assistance from outside the household, and other miscellaneous sources.
 - Noncash benefits (such as food stamps and housing subsidies) do not count.
 - Determined on a before-tax basis.
 - Excludes capital gains or losses; and
 - If a person lives with a family, includes the income of all family members (non- relatives, such as housemates, do not count).
5. Uninsured: A person who has no level of insurance or third-party assistance with meeting their payment obligations.
6. Underinsured: A person who has some level of insurance or third-party assistance but still has out-of-pocket expenses that exceed their financial abilities.
7. Gross charges: Total charges at GCC full established rates for the provision of services before deductions from revenue are applied.
8. Sliding Scale Fee Schedules: Financial share of individual served, calculated utilizing rules, regulations, and contractual requirements of the various GCC funding agencies, such as but not limited to Texas Health and Human Services Commission (HHSC) and Texas Correctional Office on Offenders with Medical or Mental Impairments (TCOOMMI) etc.

III. Procedures:

I. Eligible Services

A. For purposes of this procedure, "charity care" or "financial assistance" refers to healthcare services provided by GCC without charge or at a discount to qualifying individuals. The following healthcare services are eligible for charity care:

1. Behavioral health services
2. Immunizations
3. Public health services
4. Other preventative services

II. Eligibility

A. Eligibility for charity care will be considered for those individuals who are uninsured, underinsured, and who are unable to pay for their care, based upon a determination of financial need in accordance with this procedure. The granting of charity care is based on an individualized determination of financial need, and does not consider age, gender, race, social or immigrant status, sexual orientation, or religious affiliation.

B. Method by Which Individuals May Apply or be Assessed for Charity Care:

1. Financial need is determined in accordance with procedures that involve an individual assessment of financial need and may:

a. Include an application or assessment process, in which the individual or the individual's Legally Authorized Representative (LAR) are required to cooperate and supply personal financial and other information and documentation relevant to making a determination of financial need.

b. Include the use of external publicly available data sources that provide information on an individual's or LAR's ability to pay (such as credit scoring).

c. Include reasonable efforts by GCC to explore appropriate alternative sources of payment and coverage from public and private payment programs, and to assist individuals to apply for such programs.

d. Consider the individual's available assets, and all other financial resources available to the individual.

e. Include a review of the individual's outstanding accounts receivable for prior services rendered and the individual's payment history.

2. A request or assessment for charity care and a determination of financial need can be done at any point in the collection cycle but is preferred to be completed within the first 30 days of treatment. The need for financial assistance is re-evaluated annually and whenever a significant change has occurred which affects the individual's or LAR's eligibility for charity care.

a. Requests for charity care shall be processed promptly with notification to the individual or LAR in writing within 30 days of receipt of a completed application or assessment.

C. Presumptive Financial Assistance Eligibility

1. There are instances when an individual may appear eligible for charity care discounts, but there is no financial assistance form on file due to a lack of supporting documentation. Often there is adequate information provided by the individual served or through other sources, which

provide sufficient evidence to provide the individual with charity care assistance. In the event there is no evidence to support an individual's eligibility for charity care, GCC can use outside agencies in determining estimated income amounts for the basis of determining charity care eligibility and potential discount amounts. Once determined, due to the inherent nature of the presumptive circumstances, the only discount that can be granted is a 100% write-off of the account balance.

2. Presumptive eligibility may be determined based on individual life circumstances that may include:

- a. State-funded prescription programs.
- b. Homeless or received care from a homeless clinic.
- c. Participation in Women, Infants and Children programs (WIC).
- d. Food stamp eligibility.
- e. Subsidized school lunch program eligibility.
- f. Eligibility for other state or local assistance programs that are unfunded (e.g., Medicaid spend-down).
- g. Low income/subsidized housing is provided as a valid address; and
- h. Individual is deceased with no known estate.

D. Eligibility Criteria and Amounts Charged to Individuals Served

1. Services eligible under this procedure are made available to individuals on Sliding Scale Fee Schedules, in accordance with financial need, as determined in reference to Federal Poverty Levels (FPL) in effect at the time of the determination.

2. The basis for the amounts charged to individuals served who qualify for financial assistance is as follows:

- a. Individuals whose family income is at or below 150% of the FPL are eligible to receive services at a discount of 100%.
- b. Individuals whose family income is above 150% but not more than 200% of the FPL are eligible to receive services at a discount (partial charity care) at rates discounted using Sliding Scale Fee Schedules. Uncollected fees assessed are Bad Debt and ineligible for reimbursement under federal charity care programs.

c. Individuals whose family income exceeds 200% of the FPL may be eligible to receive discounted rates on a case-by-case basis based on their specific circumstances, such as catastrophic illness or medical indigence, at the discretion of GCC; however, the discounted rates shall not be greater than the amounts generally billed to private or public insurance and discounted using Sliding Scale Fee Schedules. Uncollected fees assessed are Bad Debt and ineligible for reimbursement under federal charity care programs.

III. Communication of the Charity Care Program to the Community and Individuals Served

A. Notification about charity care available from GCC includes a contact number and is disseminated by various means, which include, but are not limited to, the publication of notices in monthly statements and by posting notices in clinics, waiting areas, intake and assessment, business offices, and financial services located in GCC facilities, and other public places.

B. GCC widely publicizes a summary of this charity care procedure on the GCC website, in brochures available within service access sites and at other places within the community served by GCC.

C. Such notices and summary information are provided in accordance with the GCC Cultural Competency Plan.

IV. Relationship to Collection Procedures

A. GCC develops policies and procedures for internal and external collection practices (including actions GCC may take in the event of non-payment, including collections action and reporting to credit agencies) that take into account the extent to which the individual qualifies for charity care, an individual's good faith effort to apply for charity care from GCC, and an individual's good faith effort to comply with their payment agreements with GCC. For individuals who qualify for charity care and who are cooperating in good faith to resolve their discounted bills, GCC may offer extended payment plans, will not send unpaid bills to outside collection agencies, and will cease all collection efforts.

B. GCC will not impose extraordinary collections actions such as wage garnishments; liens on primary residences, or other legal actions for any individual without first making reasonable efforts to determine whether that individual is eligible for charity care under this financial assistance procedure. Reasonable efforts shall include:

1. Validating that the individual owes the unpaid charges and that all sources of third-party payment have been identified and billed by GCC.

2. Documentation that GCC has attempted to offer the individual the opportunity to apply or be assessed for charity care pursuant to this policy and that the individual has not complied with GCC financial assessment requirements.

3. Documentation that the individual does not qualify for financial assistance on a presumptive basis.
4. Documentation that the individual has been offered a payment plan but has not honored the terms of that plan.

V. Other Requirements

- A. Regulatory Requirements: Implementation of this procedure does not negate or supersede compliance with all other federal, state, and local laws, rules, and regulations applicable to the services outlined herein.
- B. Staff Training Requirements: Staff will adhere to parameters outlined in TAC Rule §355.8215 and Healthcare Financial Management Association guidance found in the June 2019 Statement 15, “Valuation and Financial Statement Presentation of Charity Care, Implicit Price Concessions and Bad Debts by Institutional Health Care Providers” in relation Charity Care.