

OU Medicine, Inc.
Financial Assistance Policy

1.0 PURPOSE

OU Medicine, Inc. (OU Medicine) provides financial assistance for qualifying patients who receive emergency or other medically necessary care from OU Medicine. Medically necessary emergency care will not be delayed or withheld based on the patient's ability to pay. OU Medicine is committed to providing health services and understands that in some cases the patient will not be able to pay for the services received.

2.0 SCOPE

This Financial Assistance Policy (Policy or FAP) applies to all organizations and personnel within OU Medicine.

3.0 DEFINITIONS

- 3.1 "Ability to Pay Score" means a score will be provided through a product designed to identify patients that have limited or no ability to pay for services performed.
- 3.2 "Amounts Generally Billed" (AGB) means the amounts generally billed for emergency or other medically necessary care to individuals who have insurance covering such care. AGB percentage means a percentage of gross charges that a hospital uses to determine the AGB for any emergency or other medically necessary care it provides to an FAP eligible individual.
- 3.3 "Application Period" means the time period in which an individual may apply for financial assistance. The Application Period ends on the 240th day after OU Medicine mails or electronically provides the individual with the first billing statement for the care, but may be extended by OU Medicine upon extraordinary circumstances.
- 3.4 "Elective Services" means services or procedures that are non-emergent and non-medically necessary.
- 3.5 "Extraordinary Collection Action (ECA)" is defined in the OU Medicine Billing and Collection Policy.
- 3.6 "Federal Poverty Guidelines" are determined by the Department of Health and Human Services and published in the Federal Register.
- 3.7 "Medically Necessary Care" means healthcare services or supplies which meet all of the following requirements: (i) ordered by a physician and appropriate and necessary for the symptoms, diagnosis, or treatment of the medical or mental health condition; (ii) provided for the diagnosis or direct care and treatment of the medical or mental health condition; (iii) meet the standards of good medical practice within the medical and mental health community in the service area; (iv) not primarily for the convenience of the patient or a provider; and (v) the most appropriate level or supply of service that can safely be provided.
- 3.8 "Underinsured" means insured patients whose out-of-pocket medical costs would pose a financial burden to the patient due to deductibles, out-of-pocket maximum requirements, limited benefit plans, or non-contracted insurance plans.

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4.0 POLICY

As part of its mission, OU Medicine has developed a fair and consistent process for the review and completion of requests for financial assistance for patients of OU Medicine in need of financial assistance. Generally, eligibility for financial assistance is determined by comparing the patient's total household income to the Federal Poverty Guidelines as established by the Department of Health and Human Services on an annual basis. This Policy also serves to meet the requirements set forth in state and federal laws, including Internal Revenue Code section 501(r). This policy will supersede all other Financial Assistance Policies.

OU Medicine shall determine eligibility for financial assistance based on an individual determination of financial need in accordance with this Policy, and shall not take into account a patient's age, gender, race, immigrant status, sexual orientation, religious affiliation, or whether or not the patient has health coverage.

In accordance with Federal Emergency Medical Treatment and Labor Act (EMTALA) regulations, OU Medicine is prohibited from engaging in any actions that discourage individuals from seeking emergency medical care, such as demanding that emergency department patients pay before receiving treatment for emergency medical conditions or by permitting debt collection activities that interfere with the provision, of emergency medical care without discrimination.

5.0 ELIGIBILITY CRITERIA

All patients will be eligible to apply for financial assistance during the Application Period. Financial assistance is only available for emergency or other medically necessary services and does not cover Elective Services. This Policy covers services billed through OU Medicine at its facilities. Not all services provided within OU Medicine are provided by OU Medicine employees and therefore may not be covered by this Policy. Professional services rendered by non-employed physicians, which includes but is not limited to physicians in the emergency room, pathology, radiology, and anesthesiology, are not covered by this policy. These professionals will bill separately for these professional services. Physicians employed by OU Medicine are covered under this Policy. A full list of covered and non-covered providers can be found in Appendix "A" of this Policy. This list is available online at www.oumedicine.com.

OU Medicine will take into account each patient's income level, family size, assets, or other resources available to the patient or patient's family and amount of hospital charges when determining eligibility for financial assistance. This method allows for a fair and accurate way to assist patients who may need financial assistance. Full financial assistance will be granted based on the individual's ability to pay. Eligible individuals include patients who do not have insurance and patients who have insurance but are underinsured.

OU Medicine uses a financial assistance eligibility guideline that is based on the Amounts Generally Billed and the published Federal Poverty Guidelines for the current calendar year. Financial assistance eligibility guidelines will be maintained at OU Medical Center, 1200 Everett Drive, Oklahoma City, OK 73104. Financial assistance guidelines will be updated annually in accordance with the Federal Poverty Guidelines as published in the Federal Register by the U.S. Department of Health and Human Services.

6.0 MEASURES TO PUBLICIZE THE FINANCIAL ASSISTANCE PROCESS

Copies of the Financial Assistance Policy, the Plain Language Summary, and the Financial Assistance Application will be widely publicized and can be obtained in the following manner:

- 6.1 **Online** at the OU Medicine website, www.oumedicine.com.
- 6.2 **By telephone** at OU Medicine Customer Service, 1-866-656-8715.

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- 6.3 **By mail** at OU Medicine Customer Service, 711 Stanton L. Young Blvd., Suite 100, Oklahoma City, OK 73104.
- 6.4 **On posted signs, paper copies, and brochures** located in the emergency departments, admitting areas, and business offices of all OU Medicine facilities, in languages that are appropriate for the hospital's service area.
- 6.5 **In person** through financial counselor visits, as necessary, with patients at OU Medicine facilities, at registration desks, and discussions by designated staff, when appropriate.
- 6.6 **In billing statements**, a phone number for inquiries about financial assistance will be included.

7.0 METHOD FOR APPLYING OR OBTAINING FINANCIAL ASSISTANCE

- 7.1 A determination of whether a patient qualifies for financial assistance may be initiated by the patient, an OU Medicine representative, an external agency, or an interested party on behalf of the patient. A patient will be considered a financial assistance patient at the time sufficient information has been obtained to verify the patient's inability to pay for needed medical services. Patients identified as possible financial assistance cases will be offered the financial assistance packet. This packet includes a copy of the Financial Assistance Policy and associated Plain Language Summary, Billing and Collection Policy, and Financial Assistance Application. They will also be provided information on filling out the paperwork, additional documentation needed, and the required submission process.
- 7.2 Any patient who wishes to be considered for financial assistance must fully cooperate and comply with eligibility requirements for any federal and/or state program for which they may be qualified.
- 7.3 Outstanding balances that are owed by a patient as a result of a deductible, coinsurance, or where the insurance benefits have been exhausted may qualify for financial assistance support if the patient meets the eligibility requirements. Patients with insurance must cooperate with any insurance claim submission and exhaust their insurance or potential insurance coverage before becoming eligible for financial assistance.
- 7.4 In order to be evaluated for financial assistance, it is the responsibility of the patient to complete an OU Medicine Financial Assistance Application and provide supporting documents. The completed application must be submitted to OU Medicine Customer Service Center, Patient Account Service, ATTN: Research and Correspondence Dept. 10030 MacArthur Blvd. Irving, TX 75063.

Documentation may include:

- 7.4.1 Federal/state tax return from the most recent calendar year, which includes adjusted gross income, and/or supporting W-2s or 1099s.
- 7.4.2 Employer pay stubs.
- 7.4.3 Written documentation from income sources.
- 7.4.4 Copies of all bank statements for the past three months.

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Failure to provide these documents may result in a denial of financial assistance. If the patient is unable to provide the requested documentation, the patient will be required to provide a detailed explanation as to why.

- 7.5 Patients may also be screened through a third party vendor for financial assistance eligibility. Additionally, patients may qualify for financial assistance based on an Ability to Pay Score when the patient is unable to fully complete the application or provide some or all the necessary supporting documentation.
- 7.6 All patients must be individually approved for financial assistance even if another family member was previously approved.
- 7.7 The process of application review, approval or denial, and patient notification of decision should not take more than thirty (30) days from the date that the completed application is received with all supporting documentation, or the account is final billed whichever is later. An OU Medicine financial counselor, designated business office representative, or executive with the authority to offer financial assistance will review individual cases and make a determination of financial assistance that may be offered. All patients that request financial assistance will receive a letter stating if the patient was approved or denied for financial assistance. The letter will be mailed using the best available contact information provided by the patient. Approval of financial assistance is valid for 12 months. However, the patient is required to notify OU Medicine of any subsequent changes in income or Federal Poverty Level during that time period.

OU Medicine retains the right to require any patient to reapply if new information pertaining to any change in their income level becomes available that may change the patient's eligibility for financial assistance.

- 7.8 In the event a completed Financial Assistance Application is received during the Application Period, OU Medicine will suspend any Extraordinary Collection Actions (ECAs) while it makes a reasonable effort to determine whether a patient is eligible for financial assistance under this Policy. In the event an incomplete Financial Assistance Application is received during the Application Period, ECAs will be suspended for no more than thirty (30) days while OU Medicine provides written notice to the patient that ECAs may be initiated or resume if the Financial Assistance Application is not completed. Collection activity will resume in the following situations: (i) a partial adjustment occurs, (ii) the patient fails to cooperate with the financial assistance process, or (iii) the patient is not eligible for financial assistance.
- 7.9 OU Medicine staff will uphold the confidentiality and individual dignity of each patient. All application information and supporting documentation will be maintained in accordance with the Health Information Portability and Accountability Act and the OU Medicine Records Retention Policy.

8.0 BASIS FOR CALCULATING FINANCIAL ASSISTANCE

- 8.1 Patients eligible for OU Medicine financial assistance will be charged less than full charges (gross charges). If meeting the requirements of this Policy, patients with income from all sources up to 200% of current Federal Poverty Guidelines will qualify for 100% discount of their Hospital service.
- 8.2 Catastrophic assistance may be available for patients who do not otherwise qualify under the Financial Assistance Policy if the patient has a balance due to OU Medicine that exceeds their ability to pay.

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- 8.3 Patients that qualify will not be charged more than Amounts Generally Billed (AGB) for emergency or medically necessary care. The Prospective Method based on Medicare rates will be used to determine AGB.

9.0 FINANCIAL ASSISTANCE DENIAL

- 9.1 Financial assistance will be denied to the patient if the patient or responsible party is uncooperative, or unresponsive to reasonable efforts, to work with OU Medicine representatives, or if the patient or responsible party provides false information including information regarding their income, household size, assets, or other resources available that might show financial means to pay for care. Charges for services previously rendered will be billed to the responsible party.
- 9.2 If the patient receives a third party financial settlement associated with the care rendered by OU Medicine, the patient is expected to use the full amount of any settlement for current and future care until it is exhausted.
- 9.3 Financial assistance is not available to a patient who is a ward/custodial of a local, state or federal government agency as a result of conduct that is in violation of local, state, or federal laws.

10.0 FINANCIAL ASSISTANCE OFFERED TO DUALY ELIGIBLE PATIENTS

Medicare charity will be written off using the Medicare Bad Debt Policy and Procedures currently in place at OU Medicine.

11.0 OVERSIGHT

The OU Medicine Board of Directors, or its designee, is responsible for the oversight of this policy. Any material changes to the standards set forth in the policy must be approved by the Board prior to implementation by OU Medicine.

12.0 POLICY CROSS REFERENCE

OU Medicine Billing and Collection Policy

**OU Medicine, Inc.
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Appendix A
Provider List

The following physicians/medical groups may provide emergency and medically necessary care to patients of OU Medical System (OUMS).

Physicians/medical groups whose services ARE covered under the OUMS Financial Assistance Policy:

Included

Larry Balzer M.D.,	Family Medicine
Raymond Smith DPM,	Podiatry
M. Shane Hull D.O.,	Pulmonology
Maroun Tawk M.D.,	Pulmonology
Tarek Dernaika M.D.,	Pulmonology
Himanshu Bhardwaj M.D.,	Pulmonology
Jeremy Moad M.D.,	Pulmonology (as of 2/1/19)
Anthony Sebastian M.D.,	Transplant
Alan Hawxby M.D.,	Transplant
Harlan Wright M.D.,	Transplant
Shi-Feng Li M.D.,	Transplant
Nicole Massie PA,	Transplant
Terry Green NP,	Transplant
Mani Vijayan CNS,	Transplant

All other physician services ARE NOT covered under the OUMS Financial Assistance Policy.

Physicians/Medical Groups whose services ARE NOT covered under the OUMS Financial Assistance Policy:

Excluded

Envision Health	Emergency
Envision Health	Hospitalist
Optimum Care	Hospitalist
OU Physicians	All specialties

Others any physicians/medical groups not explicitly identified above as included will not be covered by this Financial Assistance Policy.
See list below

These physicians/medical groups may have their own financial assistance policies. Patients will need to contact the physician/medical group billing office directly to determine availability of financial assistance.

The list is current as of 7/1/2019 and will be updated as the list of covered providers' changes.

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Donald Adams	Janki Amin	Charles Anene	Cristina Arriens
Sarah Ayres	Royce Bargas	Gordon Bean	Ernest Beckham
Hillary Bennett	Michael Bernell	George Bohle	Larry Bookman
Donald Boss	Leonard Bowen	Murlin Braly	Ahmed Buksh
Courtney Caplin	Armando Carro	Craig Carson	Eliza Chakravarty
Misty Chaser	Zahid Cheema	Ahmed Cheema	Neeraj Chepuri
Asim Chohan	Daniel Clinkenbeard	Jeremy Cole	Rickie Conrady
Robert Couch	Deanne Daggett	Sami Dahr	Shantharam Darbe
Tarek Dernaika	Kerri Derrevere	Paula Deupree	Glen Diaz
German Digoy	Michelle Diu	Tresa Dorman	Robert Dyer
William Edmonds	Timothy Eldridge	Richard Falk	Muhammad Farooq
Aurelio Feliciano	James Fields	Jeffrey Floyd	Blake Forcina
Paul Garabelli	Kevin Gerold	Robert Glade	Michael Glass
Darren Goff	Robert Gordon	Robert Gourley	Christopher Green
Amitabh Gupta	Darin Haivala	Heather Hales	Mark Halterman
Laura Hanahan	Thomas Hennebry	Richard Herlihy	William High
Peter Hildebrand	Gary Hill	Carey Hill	Kristen Hodges
Charles Hogan	Vanessa Hoy	Jared Jackson	Judith Ann James
Dominique Jean	Michael Johnson	Elizabeth Joseph	Annmarie Joseph-Reynolds
Shaonda Junious	William Kakish	Paul Kammerlocher	Shannon Kaneaster
DeNae Kirkpatrick	Wayne Kishimoto	Pramoda Koduru	Glenn Koester
Ana Kumar	Hrair Kurkjian	Sallie Lau	Robert Leonard
Amanda Levine	Brian Levy	Maria Lopez-Davila	Bruce Mackey
Aneesa Majid	Bradley Margo	John Martin	Donald McGinnis
Tami McMichael	Itay Melamed	Sikandar Mesiya	Stephen Mihalsky
Alan Miyake	Robert Molloy	Jewel Montgomery	Michelle Mora
Angela Kristina Morgan	Michael Murphy	Stanley Musick	Tiffany Newman
Lydia Nightingale	Elizabeth Nolan	Barry Northcutt	Salman Nusrat
Erik Nuveen	Gregory Parker	Joseph Parkhurst	Deanna Parsons
Vijay Prabhu	Venkataraman Rajaram	Morgan Ramey	Paula Rawls
Tania Reyna	Robert Reynolds	Tirzah Rice	Michael Roberts
David Roberts	Clorinda Robles	John Rutledge	Jolene Rychtik
Suneet Sahgal	Kamal Sawan	Greg Schaublin	Brock Schnebel
Stuart Schrader	Christopher Seat	Andrea Seat	Basheer Shakir
Kamal Shanbour	Saqib Sheikh	Rakesh Shrivastava	Matthew Shtrahman
Bushra Siddique	John Siegle	Scott Sigler	Phillip Silberberg
Jessi Siler	Mellissa Simko	Rochelle Skitt	Roy Skousen
Rachel Sloan	Stephen Smedlund	Kimberly Smith	Crystal Sparling
Frederick Stafford	Lon Steinberg	Curt Steinhart	Anna Stone
Lenny Stubbs	Ilka Theruvath	Blair Thomas	Roger Thompson
Nagib Toubia	Abbas Toughanipour	Nicole Tran	Lucas Trigler
Monica Tubbesing	Jonathan Vanhooser	Timothy Vavricka	Shreekumar Vinekar
Tonya Washburn	Walter Waugh	Ivan Wayne	Timothy Weaver
Melissa Wheeler	Theresa White	Rachel Witmer	Elena Woodson
Carlan Yates	Ashley Yates	Glenna Young	Ali Zaza
Nassim Zecavati	Gregory Zeiders		