

Policy Statement

Parkview Health is committed to making emergency and other medically necessary healthcare accessible to patients regardless of their ability to pay. Parkview Health, its facilities, and its emergency departments, will provide, without discrimination, care to individuals for emergency medical conditions, regardless of the individual's ability or inability to pay for such care, and regardless of whether the individual is eligible under Parkview Health's Financial Assistance Policy. Parkview Health facilities and emergency departments are prohibited from engaging in actions that discourage individuals from seeking emergency medical care, such as by 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. Parkview Health facilities and emergency departments shall provide care for emergency medical conditions as required by EMTALA and its implementing regulations, by providing medical screening examinations and stabilizing treatment and referring or transferring an individual to another facility when appropriate. To that end, Parkview Health facilities and emergency departments shall provide care for emergency medical conditions in accordance with Subchapter G of Chapter IV of Title 42 of the Code of Federal Regulations, or any successor regulations (Centers for Medicare & Medicaid Services, Department of Health and Human Services, Standards and Certification). The purpose of this policy is to provide detailed information to our patients, staff, physicians and the community regarding the services eligible for financial assistance, the application process, and eligibility criteria. This policy has been approved by Parkview Health's Finance Committee, pursuant to authority delegated to it by the Board of Directors of Parkview Health.

Definition of Terms

- A. Emergency Care is defined as medical conditions including psychiatric conditions that manifest as acute symptoms of sufficient severity, including severe pain such that the absence of immediate medical attention could reasonably be expected to result in placing the health of the person in serious jeopardy, serious impairment to bodily functions, or serious dysfunction of any bodily organ or part.
- B. Medically Necessary Care is defined as services rendered to a patient in order to diagnose, alleviate, correct, cure, or prevent the onset or worsening of conditions that endanger life, cause suffering or pain, cause physical deformity or malfunction, threaten to cause or aggravate a handicap, or result in overall illness or infirmity.
- C. Application Period is defined as the period that begins on the date the care is provided to an individual and ends on the later of the 240th day after the individual is provided with the first billing statement for care, or at least 30 days after Parkview Health provides the individual with a written notice that sets a deadline after which extraordinary collection actions may be initiated.
- D. Amount Generally Billed or (AGB) is defined as the amount allowed by Medicare fee-for service and all private health insurers for emergent or medically necessary care. Parkview Health uses the Look Back Method to calculate the Amount Generally Billed.
- E. The Look Back Method is defined as the calculation that looks back to the previous year's Medicare and private health insurer payments to calculate and determine the Amount Generally Billed for the current year.
- F. Gross Family Income is defined as the gross family income of those listed on the federal income tax form 1040 and by annualizing those family members' current gross income from employment and other sources as described under section D.
- G. Parkview Health Service Area is generally defined as the following counties of northeastern Indiana and northwestern Ohio. In Indiana: Adams, Allen, DeKalb, Huntington, Kosciusko, LaGrange, Noble,

Steuben, Wabash, Wells, Whitley, Fulton, Marshall, Miami, Grant, Cass counties; in Ohio: Defiance, Paulding, Van Wert, Williams, Fulton counties.

Procedure

A. Communication of Financial Assistance Policy – Measures to Widely Publicize

1. A copy of Parkview's Financial Assistance Policy, application and Plain Language Summary is available on Parkview.com, at all hospital cashier offices, or by calling the Patient Financial Services Department at 260.266.6700 or toll free 855.814.0012.
2. Brochures explaining Parkview's Financial Assistance Policy are available at all points of hospital registration.
3. Signage regarding financial assistance is located within the Emergency Department and all hospital registration areas and includes information on where to seek more information regarding the Financial Assistance Policy.
4. Patients are offered a Plain Language Summary of the Financial Assistance Policy at the time of hospital registration.
5. All billing statements notify and inform patients about the availability of financial assistance and include contact information for patients who would like more information about financial assistance.
6. A Plain Language Summary of this policy is included in all statements sent to patients, along with instructions on how to obtain an application.
7. Information regarding financial assistance is also provided to patients who express an inability to pay within Parkview Guidelines. Payment guidelines are provided in the Collection Policy. A copy of the Collection Policy is available on Parkview.com, at all hospital cashier offices, or by calling the Patient Financial Services Department at 260.266.6700 or toll free 855.814.0012.

B. Eligible Services

1. Emergency and Medically Necessary Care is eligible for consideration under the Financial Assistance Policy.
 - A. Services “not covered” by a patient’s policy may not mean the services were not medically necessary.
2. Elective services including, but not limited to, Direct Access Testing, Heart Smart CT, vascular screening, Oncology genetic counseling, Cardiology genetic counseling, Weight Loss Management Program, physician office copays, dental services and cosmetic services are not eligible under the Financial Assistance Policy.

C. Eligible Providers

1. Medical bills pertaining to Parkview Physicians Group, Parkview Home Health, Parkview Hospice, Parkview Home Infusion, and any of Parkview's affiliated hospitals are covered by the Financial Assistance Policy. Parkview affiliated hospitals include but are not limited to: Parkview Hospital Randallia, Parkview Behavioral Health, Parkview Park Center, Parkview Regional Medical Center, Parkview Orthopedic Hospital, Parkview Whitley Hospital, Parkview Huntington Hospital, Parkview Noble Hospital, Parkview LaGrange Hospital, Parkview DeKalb Hospital, Parkview Wabash Hospital, and Parkview Warsaw. Other non-Parkview providers' services are not eligible

under Parkview's Financial Assistance Policy. A list of physicians whose charges are (and are not) eligible for consideration under this Policy is available on Parkview.com or by accessing this link:

2. www.parkview.com/financialassistancecharges

D. Eligibility Criteria

1. Patients whose Gross Family Income does not exceed 200% of the Federal Poverty Guidelines (see section IV) are eligible for write-off of account balances that are eligible and applied for within the Application Period.
2. Patients whose Gross Family Income is between 201%-250% of the Federal Poverty Guidelines are eligible for partial write-offs of account balances that are eligible and applied for within the Application Period. The patient balance is reduced to the AGB to provide a discount. The AGB can be found on the Parkview website.
3. Family size is determined by the number of dependents claimed by the patient or guarantor on the previous year's federal tax return and should be included on the Financial Assistance Application. In custody cases where the guarantor claims a child on their tax return every other year, a copy of two years' taxes or one year's taxes and a copy of the custody agreement will be required to show the child is claimed as a dependent.
4. The term Gross Family Income includes, but is not limited to, the guarantor and spouse's gross income from employment, short-term disability, long-term disability, unemployment, social security, VA pensions, military allotments, pensions, and accessible income from trust accounts. Self-employment income, income from Partnerships, S Corporations, and/or LLCs, rental property income and farm income will be determined by looking at gross profit after cost of goods sold are deducted and deducting items such as fuel, utilities, business rent/mortgage and business insurance. Items including, but not limited to, deductible meals, cell phone charges and depreciation are not considered to be deductible in determining financial assistance approval.
5. The patient (guarantor if minor) must cooperate in applying for state or federal programs for which they may qualify.
6. If the patient has third party coverage or is eligible for coverage under COBRA, only the patient portion as indicated on the insurance Explanation of Benefits is eligible for consideration under the Financial Assistance Policy. Underpayments by insurance companies are not eligible for consideration under the Financial Assistance Policy. Insurance denials resulting from the patient's failure to comply with insurance company requests or failure to use in-network services are ineligible for consideration under the Financial Assistance Policy.
7. The patient must generally have an established residence in the Parkview Health Service Area to be considered for financial assistance. Visitors from another state or country outside the Parkview Health Service Area, either short term or long term, are not eligible for financial assistance.
8. Patient accounts will be considered for financial assistance if the service and application occurred within the Application Period, see definition of terms. Any personal payments made on accounts determined to be eligible for financial assistance will be refunded to the guarantor in accordance with the Parkview Collection Policy.

9. Retirement accounts as defined by the IRS, including, but not limited to, pensions, 401K, 403B, and IRAs will not be considered in determining eligibility for financial assistance, unless the patient is receiving a distribution as part of their retirement income.
10. Any patient whose income exceeds the income threshold (200% FPL) for financial assistance and who experiences a catastrophic medical event may be granted financial assistance at Parkview's sole discretion. Patients granted assistance due to a catastrophic medical event will not be billed more than the Amount Generally Billed. The Amount Generally Billed for the current year for each Parkview Health hospital facility is available on Parkview.com.

E. Presumptive Eligibility

1. Management may approve financial assistance with less than a fully completed Financial Assistance Application if other information supports the patient's eligibility for financial assistance. Presumptive Eligibility for Financial Assistance is further documented within Patient Financial Services Team policies.

F. Application Process

1. A Financial Assistance Application can be obtained at any hospital cashier area, by calling the Patient Financial Services Call Center at 260.266.6700 or toll free 855.814.0012, or on Parkview.com.
2. The patient and patient's spouse or guarantor must submit a completed, signed and dated Financial Assistance Application including all applicable attachments in order to be considered for financial assistance. The required attachments will be listed on the Financial Assistance Application. The Financial Assistance Application and attachments must be completed and returned to the address indicated no later than 30 days from the date listed on the application.

G. Approval Process

1. The Financial Assistance Application will be approved by Parkview Health's CFO or designees.
2. Financial Assistance Applications approved for Emergency and Medically Necessary Care are valid for six months after the approval date listed on the Financial Assistance Application unless the guarantor or patient's circumstances change, i.e., change in employment status. Patients must reapply in order to be considered for financial assistance for services incurred after the six-month approval period or if their circumstances have changed within the six-month time period.
3. The patient/guarantor will be notified in writing (via US Mail or electronic notification) of their approval or denial for financial assistance.
4. Parkview will rely on the Alliance FQHC charity application processes to grant Alliance patients who present to Parkview and are eligible for charity based on their application to Alliance.

H. Actions Taken in the Event of Nonpayment

1. For patients not eligible for financial assistance under the Financial Assistance Policy, accounts will be billed to the patient and managed under the Collection Policy. Payment options and actions taken in the event of non-payment are addressed in this

policy. The Collection Policy is available free of charge by calling the Patient Financial Services Department at 260.266.6700 or toll free at 855.814.0012 or on Parkview.com.

I. Basis for Calculating Amounts Charged to Patients

1. Following a determination of eligibility under this policy, a patient eligible for financial assistance will not be charged more for emergency or other medically necessary care than AGB.
2. Parkview Health uses the Look-Back Method to determine AGB. Under this method, AGB is calculated for each Parkview Health hospital facility by dividing the sum of all of its claims for emergency and other medically necessary care that have been allowed by Medicare fee-for-service and private insurers during a prior 12-month period by the sum of the associated gross charges for those claims. Parkview Health will begin applying the AGB percentage by the 120th day after the end of the 12-month period used in the calculation.
3. Members of the public may obtain the current AGB percentage for each Parkview Health hospital facility free of charge via the contact information listed below.
4. Parkview Health does not bill or expect payment of gross charges for any medical care from individuals who qualify for financial assistance under this policy.

J. Hospital Contact Information

1. For further information or questions regarding this policy, please contact:
 - a. Patient Financial Services Call Center at 260-266-6700 or toll free 855-814-0012 or
ARS Team - Patient Financial Services
Parkview Health
PO Box 5600
Fort Wayne, IN 46895
2. Cashier office between the hours of 9:00 am and 4:00 pm at any of the following locations:
 - a. Parkview Regional Medical Center and Parkview Ortho Hospital
11109 Parkview Plaza Drive (Entrance 1)
Fort Wayne, IN 46845
 - b. Parkview Hospital Randallia
2200 Randallia Drive
Fort Wayne, IN 46805
 - c. Parkview Huntington Hospital
2001 Stults Road
Huntington, IN 46750
 - d. Parkview LaGrange Hospital
207 North Townline Road
LaGrange, IN 46761
 - e. Parkview Noble Hospital
401 Sawyer Road
Kendallville, IN 46755

- f. Parkview DeKalb Hospital
1316 E. 7th Street
Auburn, IN 46706
- g. Parkview Wabash Hospital
10 John Kissinger Drive
Wabash, IN 46992
- h. Parkview Warsaw
1355 Mariners Drive
Warsaw, IN 46582
- i. Parkview Whitley Hospital
1260 E. State Road 205
Columbia City, IN 46725
- j. Parkview Park Center
909 East State Boulevard
Fort Wayne, IN 46805

K. Other Information

- 1. Parkview Health facilities and/or providers may choose to provide select services referred by Community Organizations at no cost to the patients – as a Community Benefit. These Community Organizations may include but are not limited to: Matthew 25 Health and Care & Neighborhood Health Clinic.

Reference(s)

- A. Federal Poverty Level Guidelines inflated by 250% will be used to determine financial assistance eligibility and are compared to the current year's annualized Gross Family Income. Federal Poverty guidelines are published the first quarter of each year in the Federal Register. The current Federal Poverty Guidelines are available at Parkview.com.