

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, P.O. Box 290489, Nashville, TN 37229-0489.

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.
Appendix A
Provider List

The following physicians/medical groups may provide emergency and medically necessary care to patients of OU Medicine.

Physicians/medical groups whose services ARE covered under the OU Medicine, Inc., Financial Assistance Policy:

Included

Larry Balzer M.D.	Family Medicine (last date of service 12-19-19)
Michael Thrower M.D.	Senior Health
Raymond Smith DPM	Podiatry
M. Shane Hull D.O.	Pulmonology
Maroun Tawk M.D.	Pulmonology
Tarek Dernaika 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
Stephen W Mihalsky, MD	Hand Surgeon

All other physician services ARE NOT covered under the OU Medicine, Inc., Financial Assistance Policy.

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

Excluded

Questcare	Emergency
Questcare	Hospitalist
HealthFirst	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 1/1/2018 and will be updated as the list of covered providers changes.

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Appendix A
Provider List

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 1/1/2018 and will be updated as the list of covered providers changes.

Donald Adams	Matthew Draelos	Richard Kirkpatrick	Cuong Nguyen
Saud Ahmed	Robert Dyer	DeNae Kirkpatrick	Courtney Nixon
Eric Anderson	William Edmonds	Wayne Kishimoto	Elizabeth Nolan
Cristina Arriens	Steven Eisenberg	Glenn Koester	Barry Northcutt
Jon Axton	Timothy Eldridge	Ana Kumar	Erik Nuveen
Sarah Ayres	Brian Ellis	Carla Kurkjian	Gregory Parker
Roy Bankhead	Richard Falk	Pablo Lam	Joseph Parkhurst
Mark Banks	James Fields	Gary Larson	Deanna Parsons
Gordon Bean	Winston Fong	Sallie Lau	Jonathan Pillow
Ernest Beckham	Blake Forcina	Hillary Lawrence	Corey Ponder
Michael Bernell	Martha Garzon	Hamilton Le	Vijay Prabhu
Ahmad Bilal	Timothy Geib	Jason Lee	Goya Raikar
Deborah Blalock	Robert Glade	Robert Leonard	Venkataraman Rajaram
Melisa Boersma	Michael Glass	Amanda Levine	Morgan Ramey
George Bohle	Robert Gordon	Brian Levy	Paula Rawls
Larry Bookman	Robert Gourley	Bruce Mackey	Tania Reyna
Christopher Bozarth	Ina Green	Ahmed Mahmoud	Robert Reynolds
Murlin Braly	Brady Hagood	Bradley Margo	Tirzah Rice
Toby Broussard	Darin Haivala	John Martin	Michael Roberts
Michelle Brunnabend	Rita Hancock	Charity Mayhew	David Roberts
Ahmed Buksh	Sanjaykumar Hapani	Donald McGinnis	Sara Rogers
Courtney Caplin	Thomas Hennebry	Tami McMichael	Johnny Roy
Nancy Carlson	Richard Herlihy	Charles McWilliams	J. Rutledge
Armando Carro	William High	Itay Melamed	Suneet Sahgal
Craig Carson	Gary Hill	Steven Meltzner	Claudia Santosa
Zahid Cheema	Carey Hill	Sikandar Mesiya	Kamal Sawan
Jeremy Cole	Kristen Hodges	Stephen Mihalsky	Eva Sawheny
Michael Confer	Michael Hogue	Philip Miner	Brock Schnebel
Rickie Conrady	Svein Holsaeter	Charles Mirabile	Joshy Shabu
Nicole Cornish	Elizabeth Hooper	Pradeep Mohan	Rakesh Shrivastava
Robert Couch	Jared Jackson	Robert Molloy	Matthew Shtrahman
Joseph Crepps	Judith Ann James	Jewel Montgomery	Bushra Siddique
Sami Dahr	Dominique Jean	Angela Kristina Morgan	John Siegle
Shantharam Darbe	Vinodh Jeevanantham	Susan Moruri	Scott Sigler
Victor Davis	Michael Johnson	Cody Motley	Mellissa Simko

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Appendix A
Provider List

Adam De la Garza	Elizabeth Joseph	Dona Murphey	Stephen Smedlund
Tarek Dernaika	William Kakish	Stanley Musick	Jennifer Smith
Paula Deupree	Paul Kammerlocher	Abdul Azim Mustapha	William Smith
Glen Diaz	Karen Kindley	Ryan Nelson	Kimberly Smith
German Digoy	Rebecca King-Rackley	John Nesiba	Lou Smith
Crystal Sparling			
Frederick Stafford			
John Stanley			
Robert Steele			
Anna Stone			
Lenny Stubbs			
John Taylor			
Stephanie Taylor			
Aikaterini Thanou			
Blair Thomas			
Roger Thompson			
Errington Thompson			
Nagib Toubia			
Lucas Trigler			
Virginia Vaughan			
Timothy Vavricka			
Shreekumar Vinekar			
Gregory Walton			
Tonya Washburn			
Walter Waugh			
Ivan Wayne			
Timothy Weaver			
Theresa White			
Benjamin Whittam			
Kristen Williams			
Elena Woodson			
Jian Xing			
Ashley Yates			
Glenna Young			
Linda Zacharias			
Ali Zaza			
Gregory Zeiders			
Joe Zuerker			