

POLICY NUMBER	POLICY TITLE	EFFECTIVE DATE
3549.7	FINANCIAL ASSISTANCE POLICY	01/01/2023
POLICY TYPE	AREA	APPLIES TO
FINANCE	PATIENT FINANCIAL SERVICES	ALL HOSPITALS

PURPOSE:

In keeping with our heritage and mission as a not-for-profit charitable organization committed to providing quality health care to all those we serve in a manner that responds to the needs of our communities and honors our faith heritage, Norton Healthcare’s hospital facilities provide emergency or other medically necessary care to all of our patients, including uninsured or under-insured patients, regardless of their ability to pay for all or part of that care.

This Financial Assistance Policy (“FAP”) is intended to be an I.R.C. (Internal Revenue Code of 1986, as amended) §501(r)-compliant financial assistance policy created and utilized to:

- (A) determine a hospital patient’s eligibility for financial assistance;
- (B) set forth the method by which hospital patients may apply for financial assistance;
- (C) provide the basis for calculating amounts charged to eligible hospital patients;
- (D) affirm that this FAP is widely publicized within the hospital communities we serve;
- (E) affirm that Norton Healthcare will not engage in extraordinary collection actions prior to making reasonable efforts to determine a hospital patient’s eligibility under this FAP and;
- (F) affirm that FAP-eligible hospital patients will not be billed more than amounts generally billed to other patients who have insurance covering such care.

“Medically Necessary Care” means those services, based upon an assessment of the eligible individual’s medical needs, that are reasonable and required to identify, diagnose, treat, correct, cure, palliate or prevent a disease, illness, injury, disability, or other medical condition including pregnancy, and which are consistent with the determination of “Medical Necessity” as defined by Kentucky’s Medicaid Program. Such services must be clinically appropriate and within generally-accepted standards of good medical practice. Further, such services must be provided in the most appropriate location where, for practical purposes, they may be safely and effectively rendered. Medically Necessary Care does not include any care provided primarily for the convenience of the individual, the individual’s caregiver or healthcare provider, or for cosmetic reasons.

“Emergency Care” means those services, including examination and stabilization, provided to treat a medical condition (1) manifesting itself by acute symptoms of sufficient severity (including severe pain) such that the absence of immediate medical attention could be reasonably expected by a prudent layperson to result in (a) placing the health of the individual (or, with respect to a pregnant woman, the health of the woman or her unborn child) in serious jeopardy, (b) serious impairment to bodily functions, or (c) serious dysfunction of any bodily organ or part; or (2) with respect to a woman who is having contractions, that (a) there is inadequate time to effect a safe transfer to another hospital before delivery, or (b) that transfer may pose a threat to the health or safety of the woman or the unborn child.

SCOPE:

This FAP applies to all hospital patients with a demonstrated inability to pay (as opposed to an unwillingness to pay, which is considered bad debt) for some or all charges for any emergency or other medically necessary hospital-based services at the following locations:

Norton Audubon Hospital
Norton Brownsboro Hospital
Norton Hospital
Norton Women's and Children's Hospital¹
Norton Children's Hospital
Norton Children's Medical Center
Norton King's Daughters' Health

Norton Cancer Institute
Norton Cardiovascular Center - Springs
Norton Cardiovascular Center - Dixie
Norton Diagnostic Center - Dupont
Norton Diagnostic Center - Fern Creek
Norton Diagnostic Center - St. Matthews

FINANCIAL ASSISTANCE POLICY:

Norton Healthcare provides free care to eligible patients under this FAP.

(A) Eligibility Criteria for Financial Assistance

1. Generally, eligibility for Norton Healthcare's FAP is based on a family unit's residency, income, resources and number of dependents.
2. More specifically, the following criteria are used to determine FAP-eligibility for a patient (or that patient's guarantor):
 - a. The patient lacks healthcare insurance or there remains an unpaid balance after their healthcare insurance plan has either paid or rejected their claim² and the patient is otherwise eligible under this FAP; and
 - b. The patient does not qualify for subsidized coverage or government assistance such as Disproportionate Share Hospital ("DSH"), Children's Health Insurance Program ("CHIP"), Medicaid, Medicaid Managed Care Organization ("MCO"), or Hoosier Healthwise; and
 - c. The patient's family unit income is equal to or less than 350% of the Federal Poverty Guidelines ("FPG"); and
 - d. The patient's family unit resources / assets are equal to or less than 200% of the DSH guidelines; and
 - e. To be eligible for assistance for non-emergent Medically Necessary Care, a patient (or that patient's guarantor) must also be a resident of Kentucky, Indiana, Tennessee, Ohio or Illinois. This residency requirement does not apply to Emergency Care. A "resident" of a state is an individual whose primary place of residence as of the date of service is within the state.
3. For the purposes of determining a family unit's income and resources, the following definitions apply:
 - a. A **patient** is the individual receiving the hospital care contemplated under this FAP.
 - b. A **guarantor** is the individual who is financially responsible for the patient (if no other individual is financially responsible for the patient, the patient is also the guarantor).
 - c. A **dependent** is any individual claimed as such by the patient or guarantor on the federal income tax return.

¹ May be billed as Norton Children's Hospital - St. Matthews

² Any payment recovered by a recipient of assistance under this FAP - through appeal to their insurance carrier or through litigation, arbitration, negotiated settlement, etc. - must be promptly forwarded to Norton Healthcare and any previous assistance will be reversed by that same amount. Failure to do so may retroactively void the approved financial assistance and result in the guarantor being responsible for the entire balance without financial assistance adjustment.

- d. An **FAP-applicant** is either the patient or a guarantor.
- e. **Spouse** means an individual who is married to another individual as a result of marriage lawful where it was entered into, including a lawful same-sex marriage, regardless of whether the jurisdiction where the provider or supplier providing health care services to the individual is located, or in which the spouse lives, permits such marriages to occur or recognizes such marriages.
- f. **Marriage** means a marriage lawful where it was entered into, including a lawful same-sex marriage, regardless of whether the jurisdiction where the provider or supplier providing health care services to the individual is located, or in which the spouse lives, permits such marriages to occur or recognizes such marriages;
- g. A **relative**, when used as a noun, includes, but is not limited to, an individual's spouse.
- h. A **minor** is anyone either (a) under the age of 23 living with a parent and claimed as a dependent on that parent's federal income tax return, or (b) under the age of 18 living with a legal guardian in the same residence.
- i. A **family unit** is comprised as follows:
 - (1) An individual and his/her spouse; or
 - (2) Parents and/or stepparents, their minor children and/or minor stepchildren, all living in the same residence; or
 - (3) Unmarried couples having at least one minor child in common, along with any minor siblings of that child, all living in the same residence; or
 - (4) A minor, the minor's legal guardian, along with any of the legal guardian's family, all living in the same residence; or
 - (5) A minor, the child of that minor, and that minor's parents, all living in the same residence; or
 - (6) A minor, the child of that minor, and that child's other parent, regardless of marital status, all living in the same residence (this is considered a separate family unit from any other family unit also in that residence); or
 - (7) A minor and that minor's grandparent living in the same residence (grandparents are a separate family unit unless the minor is claimed as a dependent by the grandparents and the grandparent can prove legal guardianship); or
 - (8) Common law spouses living in the same residence including common law marriages recognized in other states or where one spouse claims the other as a dependent.
- j. A **family unit's income** is the total money received by all family unit members from any source at any point during the preceding 12 months.
- k. A **family unit's resources / assets** include both liquid (cash, bank accounts, certificates of deposit, etc.) and non-liquid assets although certain exclusions exist as follows:

- (1) A homestead, household goods and personal property including jewelry, clothing and other items of a personal nature;
 - (2) Up to \$6,000 in equity in income producing non-homestead real property (business or non-business) essential for self-support;
 - (3) Burial reserves of up to \$1,500 per individual, burial spaces including the plot, casket, vault, and items of a similar nature, and irrevocable prepaid burial plans, contracts and burial trusts.
4. Eligibility for assistance under this FAP for past services is no guarantee that future services will be eligible. A determination of eligibility under this FAP for services related to emergency or other medically necessary care is valid for no more than twelve months from the date the application is signed.
5. In the event that, under the Do Not Bill Insurance Policy, a patient elects not to have Norton Healthcare bill his or her insurance company for charges within the scope of this FAP, such charges shall not be eligible for financial assistance under this FAP.
6. In the event that a parent or guarantor elects not to add his or her baby or minor child to his or her insurance and declines to apply for Medicaid or MCO coverage for such baby or minor child, then charges associated with such baby or minor child shall not be eligible for financial assistance under this FAP.
7. Non-emergent care, even if medically necessary, shall not be eligible for financial assistance under this FAP for a patient who participates in an insurance plan that deems Norton Healthcare and its various facilities to be “out of network” or whose insurance plan does not include Norton Healthcare and its affiliates as a participating provider – unless Norton Healthcare has approved providing financial assistance for such patient based on prior negotiations with the insurer or due to other material facts and circumstances particular to such patient.
8. Norton Healthcare has determined that, absent extraordinary circumstances, bariatric program related services are medically *beneficial* but not medically *necessary*. Such services therefore shall not be eligible for financial assistance, and the patient shall be responsible for payment for such services, in full (or for any residual balance after payment of any amounts covered by private insurance or other third-party payors).

(B) Method for Applying for Financial Assistance

1. As listed in **Exhibit A**, employees of Norton Healthcare or of Norton Healthcare’s designees are available to assist patients in determining, and/or to assess patients in order to determine, their eligibility for government assistance programs or Financial Assistance. Applications for government assistance or financial assistance may be completed by the patient directly and are available as described in this FAP. This program will be administered at the expense of Norton Healthcare with no cost to the patient.
2. To apply for financial assistance under this FAP, the FAP-applicant must:
 - a. complete the Application for Financial Assistance- (see **Exhibit B1**); and
 - b. provide their last 3 months of bank statements for all checking and savings accounts.
3. Additional information may be requested from the FAP-applicant if needed in order to clarify information provided in the application and/or bank statements, such as copies of your prior year’s

tax return, pay stubs, unemployment check documentation, Social Security check documentation, rental property documentation, mortgage statements, real estate tax assessments, etc.

(C) Basis for Calculating Amounts Charged to Eligible Patients

1. **Emergency or other medically necessary care.** Norton Healthcare (including substantially related entities) does not charge FAP-eligible patients more for emergency and other medically necessary care than amounts generally billed (“AGB”) to those who have insurance covering such care. Rather, Norton Healthcare provides emergency or other medically necessary care free of charge to any patients who meet the eligibility criteria for financial assistance under this FAP. Norton Healthcare uses the look-back method and calculates an AGB percentage for each hospital facility by dividing the sum of all of the amounts of its claims for emergency and other medically necessary care that have been allowed by Medicaid (including Medicaid managed care organizations and Medicaid fee-for-service) during the preceding 12-month calendar year, by the sum of the associated gross charges for those claims. Norton Healthcare posts a current copy of the AGB calculation description and percentages on its financial assistance website.
2. **All other medical care.** A FAP-eligible patient will be charged less than gross charges for such care; provided, however, that a billing statement may include the gross charges for such care as a starting point to which various contractual allowances, discounts or deductions may be applied in order to arrive at the less-than-gross-charges amount the FAP-eligible patient is expected to pay.

Charges for non-covered services provided to FAP-eligible patients eligible for Medicaid or other indigent care programs (including charges for days exceeding a length of stay limit) can be included in Norton Healthcare’s total charity care calculation.

(D) Widely Publicizing the Financial Assistance Policy

Norton Healthcare widely publicizes this FAP, including the FAP applications and plain language summary of this FAP, to patients and those members of the community it serves who are most likely to require financial assistance, at no charge, through conspicuous public displays in its emergency rooms and admissions areas, by offering a plain language summary of the FAP as part of either the intake or discharge process, and by making these documents and information readily obtainable on its website and in paper copies upon request. If an individual expresses a preference to receive these documents and information electronically, Norton Healthcare will do so, for example, by electronic screen or monitor, email, or direct website address or URL. Where applicable, translations of these documents and information will also be made available. Each billing statement will include a conspicuous written notice that notifies and informs the recipient about the availability of financial assistance under this FAP and includes the telephone number of the office or department that can provide information about the FAP and FAP application process, and the direct website address where copies of the FAP documents may be obtained.

(E) Non-Norton Healthcare Hospital Facilities Providers

A patient may receive emergency or other medically necessary care within a hospital facility from a non-Norton Healthcare hospital facility provider. The care these providers deliver may or may not be covered by this FAP. A list of these providers and whether or not the care they deliver is covered by this FAP is available free of charge on Norton Healthcare’s website or upon request by contacting the departments as listed at **Exhibit A**.

(F) Collection Actions

Norton Healthcare will not engage in extraordinary collection actions without first making reasonable efforts to determine a hospital patient’s eligibility under this FAP. The actions Norton Healthcare may take with



respect to non-payment by a patient are described in a separate Billing and Collections Policy. This policy is available free of charge on Norton Healthcare's website or upon request.

EXHIBIT A - FINANCIAL ASSISTANCE CONTACT INFORMATION

For information or assistance, please visit our website or contact us:

Financial Assistance Website:	www.nortonhealthcare.com/FAP
Financial Assistance Counselors:	
Norton Hospital	(502) 629-2115 -or- (502) 629-8277
Norton Audubon Hospital	(502) 636-7303
Norton Brownsboro Hospital	(502) 446-8106 -or- (502) 446-8606
Norton Women's and Children's Hospital	(502) 899-6136 -or- (502) 899-6207
Norton Children's Hospital	(502) 629-8281 -or- (502) 629-8474
Norton Children's Medical Center	(502) 446-8606
Norton King's Daughters' Health	(812) 801-0676 -or- (812) 801-8974 -or- (812) 801-0482
Customer Service Team:	(502) 479-6300

Please mail, fax or email applications and documentation to:

Financial Assistance Address:	SBO Financial Assistance Dept. 14-7 PO Box 35070 Louisville, KY 40232-9972
Financial Assistance Fax:	(502) 629-8883
Financial Assistance Email:	FAP@nortonhealthcare.org



EXHIBIT B1 - APPLICATION FOR FINANCIAL ASSISTANCE

(SEE NEXT PAGE)

NORTON HEALTHCARE APPLICATION FOR FINANCIAL ASSISTANCE

ACCOUNT #: _____

PATIENT NAME: _____ DOB: ____ / ____ / ____ SSN: _____

ADDRESS: _____ HOME PHONE: _____ MOBILE PHONE: _____

CITY: _____ STATE: _____ ZIP CODE: _____ EMAIL: _____

IS PATIENT A US CITIZEN? YES NO IS PATIENT A LEGAL US RESIDENT? YES NO

PATIENT'S EMPLOYER (IF MINOR, PARENT'S INFO): _____ PHONE: _____

SPOUSE'S EMPLOYER (IF MINOR, PARENT'S INFO): _____ PHONE: _____

IF YOU HAVE HEALTH INSURANCE, PLEASE PROVIDE:

COMPANY NAME: _____ COMPANY PHONE: _____

POLICY #: _____ POLICY HOLDER: _____

WAS THIS STAY DUE TO CAR ACCIDENT? YES NO IF YES, DATE OF ACCIDENT: _____

ATTORNEY INFORMATION: _____

IS ACCOUNT RELATED TO WORKER'S COMPENSATION? YES NO INJURY DATE: _____

ATTORNEY INFORMATION: _____

LIST THE NAME, AGE AND RELATIONSHIP OF MEMBERS IN HOUSEHOLD TO THE PATIENT:

NAME	DATE OF BIRTH	RELATIONSHIP TO PATIENT
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

(IF YOU NEED ADDITIONAL SPACE, PLEASE WRITE ON THE BACK OF THIS PAGE)

INCOME (MONTHLY):

PATIENT'S GROSS INCOME (IF PATIENT IS A MINOR, MOM'S MONTHLY INCOME): \$ _____

SPOUSE'S GROSS INCOME (IF PATIENT IS A MINOR, DAD'S MONTHLY INCOME): \$ _____

IF YOU HAVE NO INCOME, WHO PAYS FOR YOUR EXPENSES? _____

K-TAP: \$ _____ UNEMPLOYMENT: \$ _____

CHILD SUPPORT / ALIMONY: \$ _____ FOOD STAMPS: \$ _____

SOCIAL SECURITY: \$ _____ PENSION: \$ _____

SSI / DISABILITY: \$ _____ OTHER INCOME: \$ _____

➤ **TOTAL MONTHLY GROSS INCOME:** \$ _____

EXPENSES (MONTHLY):

RENT / MORTGAGE: \$ _____ FOOD AND SUPPLIES: \$ _____

TELEPHONE: \$ _____ UTILITIES: \$ _____

OTHER EXPENSES: \$ _____

➤ **TOTAL MONTHLY EXPENSES:** \$ _____

