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Owner Tami Miller: AVP,  
AR & Cash  
Management  
Area Corporate  
Revenue Cycle  
Applicability The Guthrie Clinic  
- All Locations

## Financial Assistance FY25

### SCOPE:

Patient Financial/Business Services Finance Social Services

### I. PURPOSE

As part of its mission as a nonprofit charitable health organization described in Section 501c(3) of the Internal Revenue Code, The Guthrie Clinic, which includes Guthrie Medical Group, Robert Packer Hospital, Corning Hospital, Cortland Medical Center, Troy Community Hospital, Robert Packer Hospital at Towanda Campus, Guthrie Home Health, Guthrie Lourdes Hospital, Guthrie Lourdes Retail Pharmacy, Guthrie Lourdes Medical Group and Guthrie Hospice (collectively "The Guthrie Clinic") is committed to serving the medical needs in their service area, regardless of race, religion, color, sex, national origin, immigration status, sexual orientation or gender identity, disability, or age. In addition, The Guthrie Clinic is committed to minimizing the financial barriers to access medically necessary health care services for patients in its primary service area.

### II. POLICY

This Financial Assistance Policy ("FAP") will outline the financial assistance policies and practices for The Guthrie Clinic. In accordance with this FAP, and consistent with its nonprofit, charitable mission, The Guthrie Clinic shall provide emergency and other medically necessary health care services, at no charge or reduced charge, to certain low-income, uninsured and under-insured patients who apply and qualify for such financial assistance, in accordance with the eligibility criteria and the procedures set forth herein, as adopted by the Board of Directors.

Patients cannot be denied medically necessary treatment or services because of an unpaid medical

bill. The Guthrie Clinic will provide, without discrimination, care for emergency medical conditions to individuals regardless of their financial assistance eligibility or inability to pay. It is the policy of The Guthrie Clinic to comply with the standards of the Federal Emergency Medical Treatment and Active Labor Transport Act of 1986 ("EMTALA") and the EMTALA regulations in providing a medical screening examination and such further treatment as may be necessary to stabilize an emergency medical condition for any individual coming to the emergency department seeking treatment. Additionally, The Guthrie Clinic will not engage in any actions that discourage individuals from seeking emergency medical care, such as by demanding the emergency department patients pay before receiving treatment for emergency medical conditions or by permitting debt collection activities in the emergency department or other areas where such activities could interfere with the provision of emergency care on a non-discriminatory basis. Guthrie also provides language assistance at 570-887-2600.

Financial Assistance is available to both new and established patients.

Covered Services: This policy covers all of the medical services offered by the hospital and clinics, including school based clinics. This includes: Inpatient services; Emergency room visits; and Other outpatient visits, such as to clinics operated by the hospital. Patients may not apply for financial assistance with bills from any service that is not provided by the hospital and/or people directly in the hospital's employ. For example, if a patient is treated by a physician working at the hospital but who is not a salaried employee of the hospital, the physician may bill the patient separately for the physician's services. The following are not covered\* under this FAP:

- Patient convenience items and personal charges (e.g., telephone)\*;
- Non-medically necessary services\*; such as eyewear/contact lenses, plastic/cosmetic surgery, vasectomy, orthodontics, routine dental services including dentures, bariatrics surgery, oral surgery and
- Long Term Care Skilled Nursing Facility and Personal Care Home
- Twin Tier services (Durable Medical Equipment and Guthrie Clinic Pharmacy)

\*The exclusion list does not apply to Guthrie Lourdes Hospital.

In addition, not all services provided within The Guthrie Clinic hospital facilities are provided by Guthrie employees and therefore may not be covered under this FAP. Please refer to Appendix A for a list of providers that provide emergency or other medically necessary health care services within The Guthrie Clinic hospital facilities. This appendix specifies which providers are covered under this FAP and which are not. The provider listing will be reviewed quarterly and updated, if necessary.

### III. DEFINITIONS

For the purpose of this FAP, the terms below are defined as follows:

*Amounts Generally Billed ("AGB")*: Pursuant to Internal Revenue Code Section 501(r)(5), in the case of emergency or other medically necessary care, FAP-eligible patients will not be charged more than an individual who has insurance covering such care.

*AGB Percentage:* A percentage of gross charges that a hospital facility uses to determine the AGB for any emergency or other medically necessary care it provides to an individual who is eligible for assistance under the FAP.

*Application Period:* Patients may apply for financial assistance at any point, starting from the date of service and throughout the collections process.

*Collection entity:* means any individual, partnership, corporation, trust, estate, co-operative, association, government or government subdivision, agency or other entity that either purchases medical debt or collects medical debt on behalf of another entity.

*Eligibility Criteria:* The criteria set forth in this FAP (and supported by procedure) is used to determine whether or not a patient qualifies for financial assistance.

*Emergency medical conditions:* Defined within the meaning of section 1867 of the Social Security Act (42 U.S.C. 1395dd).

*Emergency Dental Services:* means a dental condition requiring immediate treatment to control hemorrhage, relieve acute pain, eliminate acute infection, pulpal death or loss of teeth

*Emergency Medical Condition:* means a medical or behavioral -condition, the onset of which is sudden, that manifests itself by symptoms of sufficient severity, including severe pain, that a prudent layperson, who possesses an average knowledge of medicine and health, could reasonably expect the absence of immediate medical attention to result in: 1) placing the person's health in serious jeopardy; or 2) serious impairment to bodily functions; or 3) serious dysfunction of any bodily organ or part, or 4) serious disfigurement.

*Emergency Services:* means health care services and items, including psychiatric stabilization and medical detoxification from drugs or alcohol, furnished in the emergency department of a hospital, or a specialized psychiatric emergency room.

*Extraordinary Collection Actions ("ECAs"):* All legal or judicial processes, including, but not limited to, garnishing wages, placing liens on property and reporting to credit agencies. ECAs include sale of an individual's debt to another party, lawsuits, liens on residences, arrests, body attachments, or other similar collection processes. Guthrie allows only letters, text messages, emails, eGuthrie messages and phone calls as part of it's collection actions. Legal actions, such as wage garnishment, liens and/or credit reporting are not permitted or invoked.

*Financial Assistance:* Official help given to a person or organization in the form of money, loans, reduction in taxes, etc. In accordance with this FAP, financial assistance provides a patient with free or discounted emergency or other medically necessary health care if they meet the established criteria and are determined to be eligible.

*Family:* Using the Census Bureau definition, a group of two or more people who reside together and who are related by birth, marriage, or adoption. Family also includes dependents. Dependents must receive at least fifty (50%) percent of their support from the responsible party to be included in the family size

calculation.

*FAP-eligible*: Individuals who are eligible for full or partial financial assistance under this policy.

*Federal Poverty Level ("FPL")*: A measure of income level issued annually by the Department of Health and Human Services. Federal poverty levels are used to determine eligibility for financial assistance. <https://aspe.hhs.gov/poverty-guidelines>

*Household (family) Income*: For purposes of the financial assistance program, household income includes all sources of income for all family members over the age of 18 (income from minors is not included). This includes employments income, unearned income, self-employment income and in-kind income. Please refer to Attachment I of the Financial Assistance Application for additional information describing sources of income.

*Gross Charges*: The hospital facility's full, established price for medical care that is consistently and uniformly charged to patients before applying any contractual allowances, discounts or deductions.

*Medical debt*: means any obligation or alleged obligation of a consumer to pay any amount whatsoever related to the receipt of health care services, products, or devices provided by a hospital licensed under article twenty-eight of the public health law, a health care professional authorized under title eight of the education law, or an ambulance service certified under article thirty of the public health law.

*Medical debt reporting*: prohibited in contracts with collection entities. A hospital licensed under NYS article twenty-eight shall not furnish any portion of a medical debt to a consumer reporting agency.

*Medically Necessary Services*: means health care and services that are necessary to prevent, diagnose, manage or treat conditions in the person that cause acute suffering, endanger life, result in illness or infirmity, interfere with such person's capacity for normal activity or threaten some significant handicap. Social Services Law Section 365-A

*Plain Language Summary ("PLS")*: A written statement which notifies an individual that The Guthrie Clinic offers financial assistance under this FAP and provides additional information in a clear, concise and easy to understand manner.

*Under-insured*: Patients without insurance and earning up to 400% FPL, and "underinsured" patients earning up to 400% FPL are eligible to apply for financial assistance. An individual with out-of-pocket medical costs accumulated in the past 12 months that amount to more than 10% of the individual's gross income is considered Under-insured and eligible for financial assistance regardless of federal poverty level limits. Is defined as patients whose paid medical expenses have exceeded 10% of their income in the last 12 months. Income is assessed as the gross monthly income of the household, before expenses. - Paid medical expenses refer to any out-of-pocket costs for emergency or medically necessary care (i.e. deductibles, copays, coinsurance, deposits, etc.), but do not include the cost of health insurance premiums. If care totaling more than 10% of a patient's income was received at the hospital at which the patient is applying for financial assistance, hospitals may use a patient's account to determine eligibility. Otherwise, patients must provide proof of paid bills or other documentation to indicate that medical expenses were paid.

*Uninsured*: The patient has no level of insurance or third party assistance to assist with meeting their

payment obligations.

## **IV. FINANCIAL ASSISTANCE ELIGIBILITY CRITERIA**

Eligibility for financial assistance will be considered for those individuals who are uninsured, under-insured, ineligible for any government health care benefit program, and who are unable to pay for their care, based upon determination of financial need in accordance with this FAP. Individuals must meet all of the criteria described below in order to be eligible for financial assistance.

Eligibility will not be based on race, color, religion, national origin, immigration status, gender, sexual orientation or gender identity, disability, or age.

### **Temporary Charity Eligibility**

Retroactive to March 1, 2020, patients that are diagnosed with COVID-19 that are or become uninsured and retroactively meet Charity and Financial Assistance Program guidelines will be considered eligible and all policy conditions will apply. The Nationally Declared Emergency period will be determined by the Department of Health and Human Services. The Public Health Emergency ended May 11, 2023, which also ends this section.

### **Income Eligibility Criteria**

Patients with household income less than or equal to 200% of the Federal Poverty Level ("FPL") are eligible for 100% financial assistance coverage upon receipt of a completed financial assistance application.

Patients with household income greater than 200% but less than or equal to 400% of FPL are eligible for discounted care upon receive of a completed financial assistance application.

Uninsured patients will automatically receive a 20%\* discount at time of bill which does not require any criteria to be met except an uninsured status and no application is required. This policies exclusions apply to the Uninsured Discount. \*Guthrie Lourdes uninsured discount is 50% at time of bill.

### **Residency Eligibility Criteria**

For emergent and medically necessary health care services, a patient has to be a resident in The Guthrie Clinic Service area, which consists of the following counties: Broome, Bradford, Sullivan, Susquehanna, Tioga, and Wyoming in Pennsylvania and Chemung, Cortland, Schuyler, Steuben, Tioga, and Tompkins, in New York. However, on a case-by-case basis, residents from outside The Guthrie Clinic service area will be considered and follow the same guidelines as this policy.

### **Other Eligibility Criteria**

Patients who have access to a Health Savings Account ("HSA") must utilize and exhaust their benefits for medical services which can be applied to open balances. The Guthrie Clinic reserves the right to review the patient or guarantor's HSA account balance in order to make financial assistance determination.

Patients who have access to other medical care coverage (e.g., primary and secondary insurance coverage) must utilize and exhaust their benefits. The financial assistance program is available to assist these patients with co-insurance, deductibles and co-payments for services received as long as providing such assistance complies with third party payor contracts, applicable laws, and eligibility requirements.

If the Guthrie Clinic has a reasonable basis for believing that an applicant may be eligible for Medicaid or other affordable public insurance (provided their immigration status does not make the patient ineligible for any of these programs) that may require the patient to cooperate in applying for such coverage. Applicants are not required to provide proof of Medicaid denial from his/her home state as a condition of applying for financial assistance. Financial assistance applications will be processed concurrently with any application for public funds. The Guthrie Clinic can accept an attestation or other evidence to support financial assistance application, if all information is not provided. Guthrie's policies and procedures shall prohibit collections from a patient who is determined to be eligible for medical assistance pursuant to title XIX of the federal social security act at the time services were rendered and for which services a Medicaid payment is available.

## V. BASIS FOR CALCULATING AMOUNTS CHARGED TO PATIENTS

To calculate a patient's financial assistance under this policy for qualifying individuals annual household income is to be divided by the applicable 100% FPL below for the patient's family size to arrive at income as a percentage of the FPL. A percentage of the qualifying patients' charges are to be written off as indicated by the ranges below. The financial assistance allowance calculation will be applied to the eligible remaining balance representing the patient's payment responsibility.

Income as % of FPL	% of Charges to be Written off Under the FAP
0-200%	100% discount; waive all patient emergency and medically necessary out of pocket charges
201-300%	Uninsured patients: Sliding scale up to 10% of the amount that would have been paid for the service(s) by Medicaid.  Under-insured patients: Up to a maximum of 10% of the amount that would have been paid pursuant to such patient's insurance cost sharing
301-400%	Uninsured patients: Sliding scale up to 20% of the amount that would have been paid for the service(s) by Medicaid

Under-insured patients: Up to a maximum of 20% of the amount that would have been paid pursuant to such patient's insurance cost sharing
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For patients who have obtained an IRS exemption from Medicare and Social Security taxes that do not for religious reasons pursue Medicaid or other coverage would be eligible to be responsible for payment at the Medicare service rate. To qualify for this special discount, a patient must provide documentation for valid IRS – 4029 exemption form.

***For historic purposes this section remains but is not part of the discount program unless individual is over 400% of FPL, effective 10/20/24:*** In accordance with IRS §501(r)(5) The Guthrie Clinic utilizes the Look-Back Method to calculate the AGB. The AGB % is calculated annually and is calculated by dividing the sum of the amount of all its claims for emergency or other medically necessary care that have been allowed by various health insurers over a 12-month period, by the gross charges associated with those claims. The applicable AGB % is applied to gross charges to determine the AGB. In calculating its AGB %, The Guthrie Clinic utilized the following methods:

Robert Packer Hospital – Look-Back Method based on claims allowed by Medicare and all Private Health Insurers

Robert Packer Hospital at Towanda Campus – Look-Back Method based on claims allowed by Medicare and all Private Health Insurers

Corning Hospital – Look-Back Method based on claims allowed by Medicare and all Private Health Insurers

Cortland Medical Center – Look-Back Method based on claims allowed by Medicare and all Private Health Insurers

Troy Community Hospital – Look-Back Method based on claims allowed by Medicare and all Private Health Insurers

Guthrie Lourdes Hospital (Our Lady of Lourdes) - Look-Back Method based on claims allowed by Medicare and all Private Health Insurers

Non-hospital entities covered under this Financial Assistance Policy – will follow the determination of the hospital AGB, where the majority of services were rendered or will utilize the sliding scale in the instances where a hospital balance does not exist and an AGB does not apply.

The calculated AGB percentages as well as an accompanying description of the calculations are available upon request and free of charge by calling the Financial Counselor at (570) 887-2051.

Any individual determined to be eligible for financial assistance under this FAP will not be charged more than AGB for any emergency or other medically necessary health care services. Any FAP-eligible individual will always be charged the lesser of AGB or any discount available under this policy. Any monthly payments will not be set at greater than 5% of the patient's total gross monthly income.

<b>The Guthrie Clinic</b>	
<b>Amounts Generally Billed % of Gross</b>	
<b>AGB Calculation Schedule per Prior Y</b>	
<b>FAP Effective Year</b>	<b>July 1, 2023</b>
<b>AGB Calculation Period</b>	<b>April 1, 2022 - March 31, 2023</b>
<b>Methodology</b>	<b><u>Medicare + Commercial</u></b>
	<b><u>Total</u></b>
Robert Packer Hospital	27.9%
Corning Hospital	24.2%
Troy Community Hospital	37.2%
RPH at Towanda Campus	29.0%
Cortland Reg. Med. Center	30.9%
<b>Consolidated Hospital Billing (HB)</b>	<b>27.7%</b>
Guthrie Medical Group	35.8%



The Guthrie Clinic	
Amounts Generally Billed % of Gross Charges by Entity	
AGB Calculation Schedule per Prior Year Financials	
<b>FAP Effective Year</b>	<b>July 1, 2024</b>
<b>AGB Calculation Period</b>	<b>April 1, 2023 - March 31, 2024</b>
<b>Methodology</b>	<b>Medicare + Commercial</b>
	<b>Total</b>
Robert Packer Hospital	27.5%
Corning Hospital	23.1%
Troy Community Hospital	36.4%
RPH at Towanda Campus	28.2%
Cortland Reg. Med. Center	29.0%
<b>Consolidated Hospital Billing (HB)</b>	<b>26.8%</b>
<b>Guthrie Medical Group</b>	<b>34.3%</b>

Lourdes Hospital blended AGB rate is 28.3%

## VI. APPLYING FOR FINANCIAL ASSISTANCE

The Guthrie Clinic Financial Counselors are available to assist patients that wish to apply for health insurance, such as Medicaid, or financial assistance as well as to set up payment arrangements. Financial Counselors will work with patients to ensure the patient has a complete understanding of all federal, state and hospital insurance and financial assistance programs and processes. Financial Counselors will assist with applying for financial assistance and provide advice on how to proceed throughout the process.

Applicants who falsify information on their FAP Application will no longer be eligible for financial assistance and will be held responsible for all charges incurred while enrolled in the program retroactive to the first day that charges were incurred under the FAP.

### ***Application Process***

Requests for assistance under the FAP may be received from:

- The patient or guarantor;
- Physicians or other caregivers;
- Admitting and registration desks of The Guthrie Clinic hospitals and clinics;
- Administration;
- Social Workers; or
- Other approved programs that provide for primary care of indigent patients.

In order to be considered for financial assistance, patients who believe they are eligible (or a member of the patient's family) must complete a Financial Assistance Application ("Application") and provide all required supporting documentation to verify eligibility.

Please refer to Attachment I of the Application for additional information regarding the documents required to be submitted with the Application.

## ***Where to Obtain an Application***

Through intake and upon discharge, financial assistance information is provided. Patients who wish to apply for the financial assistance offered under this FAP can obtain an Application on our website: <https://www.guthrie.org/patients-visitors/pay-my-bill/financial-assistance>

Applications may be requested by calling the Financial Counselor at (570) 887-2051.

Paper copies of the Application are also available at the Financial Counseling Office located at:

The Guthrie Clinic

Patient Financial Services Department

One Guthrie Square

Sayre, PA 18840

Financial Representatives are on-site to assist you Monday - Friday from 8:00 AM – 5:00 PM.

All completed Applications may be mailed to:

Attention: Financial Counselors

The Guthrie Clinic

Patient Financial Services Department

One Guthrie Square

Sayre, PA 18840

Financial Assistance Applications shall be reviewed by a Patient Financial Services representative within ten (10) working days of receipt to determine if additional documentation is required.

## VII. PRESUMPTIVE ELIGIBILITY

Under certain circumstances, The Guthrie Clinic may use presumptive eligibility to determine if an individual is eligible for financial assistance. Guthrie may utilize analytical software or an analytical service vendor to support presumptive Financial Assistance processing. Patients may also be considered presumptively eligible for 100% financial assistance:

- balances after insurance or uninsured patients using a school based program, such as dental
- if they have current eligibility under a Medicaid type program and have outstanding balances prior to that coverage
- patient indicates they are homeless
- patient is mentally incapacitated with no one to act on patient's behalf or is not willing to assist the patient
- patient has a mental health admission that is not covered by an insurance plan due to a carve out exclusion or no insurance coverage
- patient is incarcerated with charges prior to incarceration and not to be paid by the detention facility
- patient is deceased with no estate and no family able or willing to assist in applying for the FAP program

Once determined, due to the inherent nature of the presumptive circumstances, the patient may be eligible for up to 100% write-off of the account balance.

If the patient is presumptively determined to be eligible for less than the most generous assistance available, The Guthrie Clinic will provide the individual with a PLS which will assist in notifying the individual regarding the basis for the presumptive eligibility determination and provide information on how the patient can apply for more generous assistance available under the FAP. The Guthrie Clinic will also give the individual a reasonable period of time to apply for more generous assistance.

Guthrie may utilize a presumptive tool to predict likelihood of financial assistance eligibility on account balances in order to identify patients that may qualify for presumptive eligibility. In the absence of additional information from the patient, it may result in a determination for patients who may qualify for financial assistance in accordance to this policy.

Guthrie Lourdes Retail Pharmacy will utilize information presented during intake as well as existing information supplied by patient and tools, such as FPL, income, number of individuals in household. Patient's pharmacy insurance will be billed, and financial assistance will applied to covered prescription balances including copays. If prescription benefits do not exist, a cash discount is applied. Discounts are 100%, 75% and 71%.

## VIII. BILLING PROCEDURES

The Patient Financial/Business Services staff shall administer financial assistance and shall evaluate each Application in accordance with the eligibility criteria and procedures set forth herein, and in accordance with all applicable legal requirements, including, without limitation, those established by the

Emergency Medical Treatment and Active Labor Act, Section 501(c)(3) of the Internal Revenue Code, the Pennsylvania Institutions of Purely Public Charity Act (Act 55), Pennsylvania Act 77 of 2001 (the Tobacco Settlement Fund Act), the Health Insurance Portability and Accountability Act of 1996, NYDOH Section 2807-k(9-1), known as the Financial Aid Law (FAL), Internal Revenue Code Section 501(r) as mandated by the Affordable Care Act, Public Health Law and New York General Business Law (349G and 519-A) and the rules pertaining to billing and reimbursement under all applicable Federal health programs. Such criteria and procedures shall be uniformly and objectively applied. The Guthrie Clinic retains the right in its sole discretion to determine a person's inability to pay.

The patient Financial Services representative will explore with the patient or patient's family whether the patient qualifies for any other available assistance programs, such as COBRA, Medicaid or Medicare. The patient or family is encouraged to assist The Guthrie Clinic in trying to obtain other coverage and/or allow enrollment in other programs to occur that may coverage patient's balances.

When a patient has indicated or demonstrated an inability to pay for emergency or other medically necessary health care services, the Patient Financial Services representative will assist the patient or family in completing a Financial Assistance Application. Identification of patients who are potentially eligible for financial assistance can take place at any time.

## **Procedures for Processing Applications**

The Guthrie Clinic shall ensure that the confidentiality of all information provided to Patient Financial Services in connection with the processing of an application under the FAP. All information received shall be maintained in accordance with all applicable Guthrie Clinic policies and procedures, as well as applicable state and federal laws governing such information.

Patient Financial Services shall maintain a record, paper or electronic, documenting all review and approval of assistance under the FAP, including copies of all application and worksheet forms.

Upon completion of the application and submission of appropriate documentation, the Patient Financial Service representative will complete the FAP Worksheet and thereafter forwarded for approval.

If an individual is determined to be eligible for financial assistance, Patient Financial Services will review gross charges and apply the financial assistance discount to open balances and for 365 day in the future. A financial assistance Application must be completed after the expiration date for any subsequent care provided.

Financial assistance approvals for amounts less than \$50,000 will be processed by the Director, Financial Clearance. Amounts of \$50,000 will be reviewed and approved by the AVP, Corporate AR Management.

Financial assistance approvals shall be made in accordance with the applicable program guidelines and documented as required.

## **Process for Incomplete Applications**

In the event an immediate determination of FAP-eligibility cannot be made, the Financial Representatives

will request additional information from the applicant. The Guthrie Clinic will provide the applicant with both verbal and written notice which describes the additional information/documentation required to make a FAP-eligibility determination and provide the patient with a reasonable amount of time (30 days) to provide the requested documentation.

## **Process for Completed Applications**

Once a completed Application is received, The Guthrie Clinic will:

- Suspend transfer of debt to a collection agency
- Make and document a FAP-eligibility determination in a timely manner; and
- Notify the responsible party or individual in writing of the determination and basis for determination.

An individual deemed eligible for financial assistance will be notified in writing of a favorable determination. In accordance with IRC §501(r) The Guthrie Clinic will also:

- Provide a billing statement indicating the amount the FAP-eligible individual owes, how that amount was determined and how information pertaining to discount obtained, if applicable;
- Refund any excess payments made by the individual; and
- Work with third parties acting on The Guthrie Clinic's behalf to take all reasonable available measures to assist patient in a reduction of medical debt

## **Notification of Eligibility Determination**

The Guthrie Clinic will accept and process all Applications for financial assistance.

The applicant should be provided a written decision within thirty (30) days of receipt of a completed application.

The responsible party may request reconsideration of a financial assistance determination by providing additional information (such as an explanation of extenuating circumstances) within thirty (30) days of receiving the initial decision. Patients may appeal The Guthrie Clinic's financial assistance decisions if they are denied financial aid or deemed a decision to be unfavorable. Patients have thirty (30) days to complete appeals applications and will be notified of decisions via mail within thirty (30) days of the submission of the appeals application. Based on the information provided, patients may be evaluated for further reductions or extended interest free payment plans.

## **Monitoring and Reporting**

Patient Financial Services will retain all financial records relating to an application for seven years.

A financial assistance log which periodically reports on the amount and number of patients by county, approval,denied volumes including their age, gender, race, ethnicity, and insurance status (aggregated data) by The Guthrie Clinic entity will be maintained.

The cost of financial assistance will be reported annually to The Guthrie Clinic Board of Directors and included in our annual financial reports.

Annually management will re-evaluate the Financial Assistance Program and make any necessary changes.

## IX. WIDELY PUBLICIZING

The FAP, Application and PLS are all available on-line at the following website: <https://www.guthrie.org/patients-visitors/pay-my-bill/financial-assistance>

Paper copies of the FAP, Application and the PLS are available upon request without charge by mail and are available within various areas throughout The Guthrie Clinic facilities. This includes, but is not limited to, emergency rooms, admission areas, patient registration check-in areas within each hospital facility.

All patients of The Guthrie Clinic, which includes Guthrie Medical Group, Robert Packer Hospital, Corning Hospital, Cortland Medical Center, Troy Community Hospital, Robert Packer Hospital at Towanda Campus, Guthrie Home Health, Guthrie Lourdes Hospital, Guthrie Lourdes Retail Pharmacy, Guthrie Lourdes Medical Group and Guthrie Hospice (collectively "The Guthrie Clinic") will be offered a copy of the PLS as part of the intake and discharge process. In the event of an emergent situation, the patient will be offered the PLS during the registration process, after the patient receives the required medical attention. The PLS will be made available at all Guthrie Medical Group office location annually during intake and as requested.

Signs or displays informing patients about the availability of financial assistance will be conspicuously posted in public locations including emergency rooms, admission areas, patient registration check-in areas within each hospital facility and Guthrie Medical Group location.

The Guthrie Clinic makes reasonable efforts to inform members of the community about the availability of financial assistance by speaking to community members about the availability of financial assistance at various community events held throughout the year.

The Guthrie Clinic's FAP, Application and PLS are available in English and in the primary language of populations with limited proficiency in English that constitutes the lesser of 1,000 individuals or 5% of the community served within the organization's primary service area.

Additionally, billing statements will include information about the availability of financial assistance, as well as contact information for individuals who believe they may qualify.

## BILLING & COLLECTION POLICY

### A. PURPOSE:

To ensure that all billing, credit and collection practices comply with all Federal and State laws, regulations guidelines and policies.

### B. POLICY:

It is the policy of The Guthrie Clinic to be compliant and accurate with billing and collection activities. The goal of meeting all the criteria in this policy can be accomplished by following the procedures set forth in this document.

### C. PROCEDURES:

1. Once a patient's claim is processed by their insurance, The Guthrie Clinic will send the patient a bill indicating the patient responsibility. Additionally, if a patient has no third party insurance coverage (uninsured patient) they will receive a bill indicating their patient responsibility. This will be the patients first post discharge billing statement.
2. After the patient receives their first post discharge billing statement, The Guthrie Clinic will send six (6) statements (6 billing statements in total) at 30 days intervals. The 7<sup>th</sup> billing statement for Uninsured Patients will receive a discount amount equal to the AGB applicable to the entity where services were provided. The 6th billing statement will inform the patient in writing that the account will be sent to an outside collection agency, if payment is not received within 30 days. The written notice will also include a copy of the PLS. If payment has not been received after 6 billing statements or 180 days from first post-service bill, patient accounts will be sent to a collection agency who will attempt collection of outstanding amount.
3. Although bills will continue to be generated and mailed when individuals are applying for financial assistance until after a FAP-eligibility determination is made.
4. Collection activity will be suspended when a completed application FAP-eligibility is received. If the patient is eligible for discounted care under the FAP, payment terms will be established based on disposable income, by Patient Financial Services. Monthly payments cannot exceed more than 5% of family gross income and will be expected to be paid in a twelve-month period and in no instance shall payment terms extend beyond twenty four months for the self-pay balance due. Arrangements for final self-pay balances should be made within ten (10) days after receiving written decision.
5. Guthrie Clinic does not charge Interest on any outstanding medical debt.

## **COMPLIANCE WITH INTERNAL REVENUE CODE §501(r)(6)**

In accordance with IRC §501(r)(6), The Guthrie Clinic does not engage in any ECAs. The Guthrie Clinic will demonstrate a reasonable effort to determine whether an individual is eligible for financial assistance. The Guthrie Clinic will send a minimum of six (6) statements as well as a written notice of collection action before forwarding outstanding medical debt to a collection agency.

The Guthrie Clinic, or any third parties acting on its behalf, may initiate the following

- Notification by mail of delinquent balance due
- Generate phone calls, letters, emails, eGuthrie messages and text messages requesting payment or payment arrangements for delinquent balance due and
- Assist patients in applying for financial assistance

The Guthrie Clinic may authorize third parties to initiate collection on delinquent patient accounts after 180 days from the first post-service bill. They will ensure reasonable efforts have been taken to determine whether or not an individual is eligible for financial assistance under the Financial Assistance policy and will take the following actions at least 30 days prior to initiating any contact:

- A. The patient will be provided with written notice which:
  1. Indicates that financial assistance is available for eligible patients;
  2. Identifies that The Guthrie Clinic intends to initiate to obtain payment for the care; and
  3. States a deadline after which such collection activities may be initiated.
- B. The patient has received a copy of the PLS with this written notification; and
- C. Reasonable efforts have been made to orally notify the individual about the FAP and how the individual may obtain assistance with the financial assistance Application process.

The Guthrie Clinic, and third party vendors acting on their behalf, will accept and process all Applications for financial assistance available under this policy submitted during the Application Period.

Contracted collection agencies must comply with The Guthrie Clinic financial assistance and billing policies, provide information to patients on how to apply for financial assistance. **The Guthrie Clinic does not allow wage garnishment, property liens or credit reporting, which is consider a legal action. Any legal action, if taken, would be on items excluded from this policy. The Guthrie Clinic does not sell its medical debt for those eligible for financial assistance to a third-party, unless the third-party explicitly purchases the debt to relive the debt of the patient.**

## CONSUMER PROTECTIONS

### Appendix A: The Guthrie Clinic Provider Listing

The Guthrie Clinic Financial Assistance Policy applies to The Guthrie Clinic, which includes Guthrie Medical Group, Robert Packer Hospital, Corning Hospital, Cortland Medical Center, Troy Community Hospital, Robert Packer Hospital at Towanda Campus, Guthrie Home Health, Guthrie Lourdes Hospital, Guthrie Lourdes Retail Pharmacy, Guthrie Lourdes Medical Group and Guthrie Hospice (collectively "The Guthrie Clinic"). Certain physicians and other health care providers delivering services within the various Guthrie Clinic hospital facilities are not otherwise required to follow this Financial Assistance Policy.

The following is list of providers, by hospital facility, that provide emergency or other medically necessary health care services within the hospital facilities.

#### List of Providers who are not covered under this Financial Assistance Policy:

- Quest Diagnostics Laboratory
- Guthrie Lourdes (Our Lady of Lourdes) Hospital
  - Team Health
  - Sound Health
  - Riverside Associates
  - Millenium Health
  - Ob Hospitalist Group



- Robert Packer Hospital
  - Bio-Medical Application of Pennsylvania, Inc.
  - Skilled Nursing Facility
- Corning Hospital
  - Healogics Wound Care & Hyperbaric Services, Inc. New York, P.C.
- Cortland Medical Center
  - US Acute Care Solutions
  - Skilled Nursing Facility
  - Home Health Agency
- Troy Community Hospital
  - Gulfstream Anesthesia Consultants, P.A.
- RPH at Towanda Campus
  - Gulfstream Anesthesia Consultants, P.A.
  - Joseph Cama, MD – Family Medicine
  - James Ferenzi, MD – Surgery/General Surgery
  - Jenny Ferris, PA-C – Guthrie Towanda Skilled Nursing Unit Only
  - Karen Hoffman, DO – Guthrie Towanda Skilled Nursing Unit Only
  - Timothy Hoffman, DO – Guthrie Towanda Skilled Nursing Unit Only

*There are currently no other physicians or other healthcare providers delivering services within the hospital facilities which are currently covered under this Financial Assistance Policy.*

## All Revision Dates

1/21/2025, 1/14/2025, 3/19/2024, 10/30/2023, 7/7/2022, 10/11/2021

## Attachments

[NYS\\_FinancialAssistanceApplication\\_241024.docx](#)

[NYS\\_FinancialAssistanceApplication\\_Instructions\\_241024.docx](#)

[PlainLanguageSummary\\_241024.docx](#)

## Approval Signatures

**Step Description**

**Approver**

**Date**

CRC Senior Leader	Lucia Saggiomo: VP, Corporate Revenue Cycle	1/21/2025
CRC Policy Committee	Carrie Root: Administrative Asst II	1/21/2025
Owner	Tami Miller: AVP, AR & Cash Management	1/15/2025

## Applicability

Guthrie Corning Hospital, Guthrie Cortland Medical Center, Guthrie Lourdes Hospital, Guthrie Medical Group, Guthrie Troy Community Hospital, Robert Packer Hospital, The Guthrie Clinic - Corporate

## History

**Edited by Miller, Tami: AVP, AR & Cash Management** on 1/15/2025, 4:42PM EST

updated exclusion list and AGB rate for Lourdes

**Last Approved by Miller, Tami: AVP, AR & Cash Management** on 1/15/2025, 4:42PM EST

**Draft saved by Miller, Tami: AVP, AR & Cash Management** on 1/15/2025, 4:53PM EST

**Edited by Miller, Tami: AVP, AR & Cash Management** on 1/15/2025, 4:53PM EST

updated 50% uninsured discount at Lourdes.

**Last Approved by Miller, Tami: AVP, AR & Cash Management** on 1/15/2025, 4:53PM EST

**Last Approved by Root, Carrie: Administrative Asst II** on 1/21/2025, 8:40AM EST

Approved per CRC policy committee 1/20/2025 CR

**Last Approved by Saggiomo, Lucia: VP, Corporate Revenue Cycle** on 1/21/2025, 10:17AM EST

**Activated** on 1/21/2025, 10:17AM EST