

Community Health Needs Assessment

- Define the community served
- Assess significant health needs of that community
 - Expanded scope
 - Consider collaborations



Written Financial Assistance Policy

- Must State
 - All eligibility criteria for financial assistance (free and discounted)
 - Non-FAP discounts (ex: prompt pay) need not be in FAP
 - Only discounts offered under FAP are listed on Form 990, treated as community benefit
 - Whether and how hospitals uses third party sources to verify income and information
 - List of other providers in hospital, whether covered by FAP

Written Financial Assistance Policy

- Must State
 - Limit charges for emergency and medically necessary to AGB and identify AGB method
 - How to apply for financial assistance and sources of information
 - List of collection activities
 - How to obtain copies of policies
 - Emergency medical care p
 - Ex: EMTALA compliance



Plain Language Summary

- Written statement
- Notify individual that hospital offers financial assistance
- Include:
 - Direct website and physical location to obtain FAP and application
 - Contact information to provide assistance with application
 - How to apply for financial assistance



Communication & Transparency

- “Widely publicized” FAP (including FAP, application, and plain language summary)
 - Offer plain language summary (PLS) at intake/discharge
 - Website
 - Paper – in public hospital locations, by mail
 - Public display – conspicuous, attention getting size and place
 - Community outreach – to those most likely to

Limitations on Patient Charges



- FAP-eligible patients
 - Cannot be charged more than AGB for emergency and/or medically necessary care (applies to patient responsibility, not amount charged to any insurance coverage)
- AGB
 - Amount generally billed, as a percentage of gross charges
 - Options:

Billing and Collection Po

- Extraordinary Collection Activities
 1. Actions that require legal/judicial process
 2. Selling debt to third party
 3. Reporting adverse information to credit agencies
 4. Deferring/denying/requiring pre-payment due to prior nonpayment
- ECA does not include
 - Writing off as bad debt
 - Calling or billing patient
 - Lien on recovery from third party causing patient injury
 - Charging interest
 - Filing claim in bankruptcy proceeding



Billing and Collection Policy

~ 240 Days

- Period to apply for financial assistance

30 Days

ECA initiation notice

120 Days

- Notification period re FAP

- Make “reasonable effort” to inform patient

- May not use ECAs

- Washington State law is different – no specific end of application period
- If receive FAP after ECA begun, must pause ECAs, assess application

Next Steps



- Wide operational touch points
 - Intake/discharge, ED, finance, financial assistance, billing, collections legal, operations, community outreach, public relations, etc.
 - Significant operational details
- Review policies and the on-the-ground practices of staff implementing the

Next Steps



- WSHA's planned work
 - Workgroup of Washington hospitals to develop
 - Model applications
 - Policies
 - Communication strategies per state and federal law
 - Checklists

Contact Information

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Comments and Questions?
