



**SAN MATEO COUNTY HEALTH**  
**SAN MATEO**  
**MEDICAL CENTER**

# **Financial Assistance Policy**

**Last Revised March 2023**

## TABLE OF CONTENTS

FINANCIAL ASSISTANCE PROGRAMS POLICY OVERVIEW .....	5
Policy Statement .....	5
PURPOSE.....	5
FINANCIAL ASSISTANCE PROGRAMS OVERVIEW CHART.....	6
SAN MATEO COUNTY HEALTH COVERAGE PROGRAMS FOR ADULTS CHART.....	8
NOTIFICATION AND POSTING OF FINANCIAL ASSISTANCE PROGRAMS.....	9
APPLICATION PROCESS FOR OBTAINING FINANCIAL ASSISTANCE .....	9
IDENTITY .....	12
Proof of Identity.....	12
INSURANCE/HEALTH COVERAGE STATUS .....	13
Governmentally Sponsored Programs and Third-Party Payers.....	13
Information Regarding Third-Party Payers.....	13
Proof of Insurance Coverage .....	13
Additional Sources of Information Regarding Insurance/Health Coverage Status.....	13
INCOME .....	14
Income Counted .....	14
Income Not Counted .....	14
Deductions.....	14
Proof of Income .....	14
ASSETS .....	15
RESIDENCY.....	15
Proof of Residency.....	15
APPEALS PROCESS.....	16
STEP-ONE APPEAL: INDIVIDUAL ELIGIBILITY REVIEW (IER).....	16
Timeline for Step-One Appeal Application.....	16
Content of Request for Individual Eligibility Review .....	16
Individual Eligibility Review Decision-Maker.....	16
Timeline for Decision.....	17
STEP-TWO APPEAL: ELIGIBILITY AND FINANCIAL REVIEW COMMITTEE (EFRC) .....	17
Timeline for Step-Two Application.....	17
Content of Appeal.....	17
Eligibility and Financial Review Committee and Decision-Making Process .....	17
Timeline for Decision.....	17
Anytime Request for Eligibility and Financial Review .....	17

SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

Periodic Board Reports..... 18

FRAUD ..... 18

CHARITY CARE ..... 19

    DESCRIPTION ..... 19

    SCOPE OF SERVICES..... 19

    ELIGIBILITY CRITERIA ..... 19

    APPLICATION PROCESS..... 19

ACCESS AND CARE FOR EVERYONE (ACE) PROGRAM..... 20

    DESCRIPTION ..... 20

        ACE Fee Waiver Program..... 20

        ACE Non-Fee Waiver Program..... 20

        Temporary ACE Program ..... 20

        ACE Excess Income Program..... 20

    SCOPE OF SERVICES..... 20

        Pre-Authorization ..... 20

    ELIGIBILITY CRITERIA ..... 20

        Residency Requirement..... 20

        Citizenship/Immigration Criteria ..... 20

        Income Criteria ..... 21

        Insurance/Health Coverage Status..... 22

        Restricted Scope-Medi-Cal Enrollment for ACE Fee Waiver Applicants ..... 22

        Additional Populations Eligible for the ACE Program..... 22

            Including Fee Waiver, Non-Fee Waiver, Temporary and Excess Income..... 22

    INELIGIBILITY CRITERIA..... 23

        Reasons for Ineligibility or Losing Coverage..... 23

ANNUAL PARTICIPATION FEE, CO-PAYS, CHARGES..... 23

    Annual Participation Fee ..... 23

    Co-Payments..... 24

    Estate Recovery Process ..... 25

    Waiver of Co-Pays, Annual Participation Fee and Annual Out-of-Pocket Cap..... 26

    Visit Fees Waived..... 27

    Notification of Enrollment, Denial of Enrollment or Disenrollment..... 27

DISCOUNTED HEALTH CARE (DHC) PROGRAM ..... 27

    DESCRIPTION ..... 27

    SCOPE OF SERVICES..... 28

    ELIGIBILITY CRITERIA ..... 28

SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

APPLICATION PROCESS..... 28

HEALTHCARE FOR THE HOMELESS/FARMWORKER HEALTH (HCH/FH) SLIDING FEE DISCOUNT PROGRAM (SFDP)..... 29

    DESCRIPTION ..... 29

    SCOPE OF SERVICES..... 29

    ELIGIBILITY CRITERIA ..... 29

BILLING AND COLLECTION PRACTICES..... 30

    GENERAL GUIDELINES ..... 30

    SELF-PAY PATIENTS ..... 31

    SELF-PAY PROMPT-PAY DISCOUNT ..... 32

    EXTENDED PAYMENT POLICY..... 32

    WAIVING BALANCES FOR PATIENTS ELIGIBLE FOR FINANCIAL ASSISTANCE ..... 32

    COLLECTION PRACTICES..... 33

## **FINANCIAL ASSISTANCE PROGRAMS POLICY OVERVIEW**

### **POLICY STATEMENT**

It is the policy of San Mateo Medical Center (SMMC) to provide medical services to all individuals, regardless of their ability to pay, and to provide financial assistance to eligible patients who are uninsured, underinsured, ineligible for third-party assistance or have low income.

Patients presenting with an emergency medical condition will be provided with emergency medical services and care without regard to their ability to pay or their financial status. The financial screening process will begin prior to discharge, but only after a Medical Screening Examination (MSE) has occurred.

It is the intent of the SMMC policy to comply with all federal, state, and local regulations. If any regulation, current or future, conflicts with this policy, the regulation will supersede this policy. SMMC's financial assistance practices and adherence to hospital billing and collection laws, are reflective of SMMC's commitment to complying with fair billing and pricing policies as established by the California Hospital Fair Pricing Act, Health and Safety Code §127425, and the Fair Debt and Collections Act, 15 U.S.C.1692.

### **PURPOSE**

San Mateo Medical Center (SMMC) provides emergency, outpatient, and inpatient, diagnostic and therapeutic services across multiple locations. In recognition of this, SMMC must adhere to a comprehensive Financial Assistance Policy, which serves to define criteria applied to assess a patient's unique financial situation as it relates to healthcare services provided by SMMC. Further, it is within the scope of this policy, to explain roles and responsibilities, and provide basic guidance for key patient financial activities performed by those persons and parties involved in the financial matters related to clinical services rendered by SMMC. The SMMC Financial Assistance Policy has been developed to maintain fiscal viability while providing quality customer service, respect and to ensure equal and appropriate access to medical care for all patients, while assuming consistent and transparent handling of patient accounts. Such a policy is necessary to support the understanding for all parties involved in these often-complex patient financial matters. This policy directly assists patients by reducing the uncertainty of their financial responsibilities while also helping to keep SMMC financially viable so that we may continue to carry out our mission of delivering excellent patient care.

## FINANCIAL ASSISTANCE PROGRAMS OVERVIEW CHART

Applied in the Following Order	Description	General Qualifications
<b>External Government-Sponsored Programs</b>	Medi-Cal, Covered California, Improving Access, Counseling and Treatment Program (IMPACT), Every Woman Counts (EWC), Family Planning, Access, Care and Treatment (PACT), Child Health & Disability Program (CHDP), Breast and Cervical Cancer Treatment Program (BCCTP), and Medicare	Based on specific program’s guidelines and eligibility
<b>General Assistance/Other Public Assistance Programs</b>  <b>Youth Health Centers</b>	County sponsored coverage for medically indigent adults enrolled in other public assistance programs.  County sponsored coverage for medically indigent teens and young adults receiving services provided by Teen Health Centers.	County resident receiving General assistance; enrollment in a County sponsored Alcohol & Drug Program contracted by San Mateo County Behavioral Health and Recovery Services  Patients must receive sensitive services & must be ineligible for PACT or Medi-Cal Minor Consent.
<b>Access and Care for Everyone (ACE) Program</b>	County sponsored coverage for medically indigent adults who are uninsured and meet residency and income requirements.	County resident, income at or below 200% of Federal Poverty Level (FPL), Fee-Waiver – waiver of all fees, co-pays for County residents at or below 138% FPL, who are enrolled in Restricted Scope Medi-Cal or for a person receiving General Assistance – services through the County’s Alcohol & Drug programs, Health Care for the Homeless/Farmworker Health (HCH/FH) program, or services at the County’s Teen Centers.

**FINANCIAL ASSISTANCE PROGRAMS OVERVIEW CHART...Cont'd.**

Applied in the Following Order	Description	General Qualifications
<b>Charity Care Program</b>	SMMC program that complies with the charity care mandates of the California Hospital Fair Pricing Act. This program is available to assist uninsured or underinsured patients who are not eligible for other government programs.	Not limited to San Mateo County residents. Must have income at or below 138% of Federal Poverty Level (FPL). All SMMC services are covered except for prescription benefits Patients receiving charity care pay no annual fees or copayments.
<b>Discounted Health Care (DHC) Program</b>	65% discount of total charges – not to exceed the amount of payment the hospital would expect, in good faith, to receive from Medi-Cal or Medicare for low-income adults who meet eligibility requirements.	Uninsured and underinsured patients whose income is at or below 400% of the Federal Poverty Level (FPL).
<b>HCH/FH Sliding Fee Discount Program</b>	Sliding fee scale (\$0-30) for patients experiencing homelessness and farmworkers	Patients experiencing homelessness and farmworkers and their dependents whose income is under 200% FPL
<b>Self-Pay Prompt-Pay Discount</b>	For patients who do not qualify for other programs; 50% discount for payments received within 30-days of first bill date.	No income or residency requirement; required to pay deposit in advance of receiving non-emergent services.
<b>Self-Pay Extended Repayment Plan</b>	For patients who do not qualify for other programs; payment of full charges over an established repayment period; not to exceed 24 months	No income or residency requirement; required to pay deposit in advance of receiving non-emergent services.

# San Mateo County Health Coverage Programs for Adults Chart

Eligibility Criteria	MAGI Medi-Cal	ACE Fee Waiver & Limited ACE Fee Waiver	ACE	Non-MAGI Medi-Cal Share of Cost <sup>1</sup>	Temporary ACE	ACE Excess Income with Chronic Disease	DHC <sup>2</sup>	Self-Pay	Charity Care
<b>Resident of San Mateo County</b>	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No
<b>Age</b>	19 – 64	26 – 50	19 and above	All	19 – 64	19 and above	No limit	No limit	No limit
<b>Income Limit – Federal Poverty Limit (FPL)</b>	0 – 138% FPL	0 - 138% FPL	138.01% – 200% FPL	138.01% - Up	138.01% – 200% FPL	200.01% – 225% FPL	0 – 400% FPL	No limit	0 – 138% FPL
<b>Asset Limit</b>	No Asset Limit	No Asset Limit	No Asset Limit	Please refer to <a href="#">Medi-Cal General Property Limits</a>	No Asset Limit	No Asset Limit	No Asset Limit	No Asset Limit	No Asset Limit
<b>Immigration / Citizenship and Other Requirements</b>	Satisfactory immigration status qualifies for Full Scope Medi-Cal.  Non-satisfactory immigration status qualifies for Restricted Scope Medi-Cal.  Medi-Cal Expansion 19 – 25 and 50 – 64 qualifies for full scope MC regardless of immigration status.	Satisfactory immigration status not required.  Must not be eligible for full-scope MC with or without a share of cost.  Must apply for and maintain active Restricted Scope Medi-Cal coverage (only 3 months of coverage permitted without active Restricted Medi-Cal to allow time for Medi-Cal eligibility determination).	Satisfactory immigration status not required.  Must not be eligible for Medi-Cal with or without a share of the cost.	Satisfactory immigration status qualifies for Full Scope Medi-Cal.  Non-satisfactory immigration status qualifies for Restricted Scope Medi-Cal.  Medi-Cal Expansion 19 – 25 and 50 – 64 qualifies for full scope MC regardless of immigration status.	Satisfactory Immigration Status required.  Must not be eligible for Medi-Cal with or without a share of the cost.  Must not be eligible for a Covered CA Special Enrollment Period.	Satisfactory immigration status not required.  Must be experiencing a financial hardship and have a chronic condition.	Satisfactory immigration status not required.	Satisfactory immigration status not required.	Satisfactory immigration status not required.
<b>Annual Fee</b>	None	None	\$360	None	\$360	\$360	None	None	None
<b>Payment for Outpatient Visits</b>	None	None	\$15	Share of Cost <sup>1</sup>	\$15	\$15	65% discount varies <sup>2</sup> Deposit requested.	Varies - patients have 30 days from the bill date to receive a 50% discount; must pay 100% after 30 days. Deposit requested.	None
<b>Payment for Inpatient Stays &amp; Same Day Surgeries</b>	None	None	\$300 co-pay + 35% of charges	Share of Cost <sup>1</sup>	\$300 co-pay + 35% of charges	\$300 co-pay + 35% of charges	65% discount Varies <sup>2</sup> Deposit requested.	Varies - patients have 30 days from the bill date to receive a 50% discount; must pay 100% after 30 days. Deposit requested.	None
<b>Prescriptions</b>	None	None	\$7	Share of Cost <sup>1</sup>	\$7	\$7	65% discount	50% discount	Not Covered
<b>Interest Free Repayment Plan Available Based on Ability to Pay</b>	Not applicable	Not applicable	Yes	Yes	Yes	Yes	Yes	Yes	Not applicable
<b>Retroactive Coverage / Enrollment Coverage Period Restrictions?</b>	Yes Once the application is approved, coverage begins the first day of the month the application was created. Retro coverage is available up to three-months back.	Yes Once the application is approved, coverage begins the first day of the month application was created. SMMC may waive bills in the three months prior to the coverage effective date.	Yes Once the application is approved, coverage begins the first day of the month application was created. SMMC may waive bills in the three months prior to the coverage effective date.	Yes Once the application is approved, coverage begins the first day of the month application was created. Retro coverage is available up to three-months back.	*Only available after OPEN ENROLLMENT has closed. Always ends 12/31 of the current year.	Yes Once the application is approved, coverage begins the first day of the month application was created. SMMC may waive bills in the three months prior to the coverage effective date.	Yes No time limit if after January 1, 2007	Not applicable	Yes Limited to 180 days from 1st bill date
<b>How to apply?</b>	MyBenefit CalWin, SSApp or CalHEERS	OEA or Automatic enrollment with Restricted MAGI Medi-Cal enrollment	OeA	MyBenefit CalWin, CalHEERS, or SSApp	OeA	OeA-Excess Income/Chronic Disease Application	OeA or SMMC Financial Assistance Program Application	None	SMMC Financial Assistance Program Application

<sup>1</sup> A Share of Cost (SOC) is the amount of money an individual is responsible to pay towards their medical-related services, supplies, or equipment before Medi-Cal will begin to pay.

<sup>2</sup> DHC charges will not exceed the highest amount that SMMC receives for medical services from Medicare, Medi-Cal, or other government-sponsored programs.



## **NOTIFICATION AND POSTING OF FINANCIAL ASSISTANCE PROGRAMS**

Individuals who receive medical services at the San Mateo Medical Center (SMMC) shall be provided a brochure detailing their right to apply for various financial assistance programs and shall be provided with information regarding the application process. SMMC will make available a plain language summary of its financial assistance policy.

SMMC will clearly and conspicuously post information about its financial assistance programs in locations that are visible to the public, including, but not limited to all the following:

- The California Department of Health Care Access and Information
- Emergency Department registration
- Clinic and Outpatient registration
- Patient Financial Services
- Business Services
- Admitting Department
- Long-Term Care registration
- Same Day Surgery Unit registration
- SMMC website

This includes the distribution of pamphlets, letters, and public notices in visible locations where there is a high volume of patient registrations, the dissemination of information on the SMMC web site and inclusion of statements on patients' bills indicating the availability of financial assistance.

All notices and postings of financial assistance programs will be made available in English and languages that are spoken by the lessor of 1,000 individuals or five (5) percent or more of people residing in San Mateo County. These languages are Spanish, Chinese and Tagalog.

## **APPLICATION PROCESS FOR OBTAINING FINANCIAL ASSISTANCE**

1. Uninsured patients will be given written notice about the availability of financial assistance and qualifying criteria for financial assistance, along with an application for financial assistance as soon as practical. The notice and application will be provided to patients at the time of service if the patient is conscious and able to receive written notice. If the patient is not able to receive notice at the time of service, the notice will be provided during the discharge process. If the patient is not admitted, the written notice will be provided when the patient leaves the facility. If the patient leaves the facility without receiving the written notice, the hospital will mail the notice to the patient within 72 hours of providing service.
2. SMMC will make every effort to determine a patient's eligibility for financial assistance as soon as possible. The financial assistance program application must be submitted within 180 days from initial issuance of a bill. Any applications received after 180 days will be considered on a case-by-case basis. Collection activity will be postponed while applications for health coverage or other sources of payment are still pending.

## SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

3. Financial assistance will be considered for any patient who indicates an inability to pay for medical services. SMMC will make available the assistance of a Revenue Cycle Team member to determine the appropriate financial assistance program and to initiate the application. Revenue Cycle Team members are charged with matching the patient with the appropriate financial assistance program based on the patient's unique financial situation. Patients must be screened for ACE eligibility before being enrolled in the Charity Care or Discounted Health Care programs.
4. A Revenue Cycle Team member will aid in the primary language of the patient or patient's guarantor. When staff does not speak the patient's preferred language, they will make use of the contracted interpreter services language line to ensure good communication.
5. SMMC will make reasonable efforts to determine whether a patient is eligible for financial assistance based on prior eligibility for financial assistance or the use of third-party data to identify financially eligible patients, or through notification and processing of applications as specified in 16 C.F.R. 1-501(r)-6(c)(2) and (3). When eligibility is determined based on prior eligibility, it will be documented by a note in Invision/OAS Gold and a new application and verifications will not be required.
6. Patients seeking financial assistance from SMMC are expected to make reasonable efforts to provide personal and financial information that is complete and accurate. Patients applying for financial assistance must consent to verification and investigation of eligibility by SMMC staff, agents, or contractors. To determine eligibility for full charity care, SMMC may request different or additional forms of documentation for verification of income, identity, or residency in cases where the genuineness and/or validity of the provided documents is reasonably questioned or where the provided documents raise further questions as to eligibility.
7. At any point that patients provide their information, they will be assessed for eligibility and assisted with the corresponding health program enrollment. Patients are encouraged to make reasonable efforts to provide their information in a timely manner to maximize the coverage benefit to the patient.
8. Patients must meet certain eligibility criteria, depending on the program, including being uninsured or underinsured and meeting residency and income requirements to qualify for financial assistance. A patient's unique circumstances may be taken into consideration when determining coverage for such services.
9. Once patients have applied for or been enrolled in a financial assistance program, they are required to report within 10 days any changes in circumstances that will affect their eligibility for the program, such as income, insurance/health coverage status and county residency.
10. At a minimum, an application for financial assistance must be renewed and updated annually and prior to an inpatient stay, same-day surgery and/or infusion therapy. This is required in order to incorporate and allow consideration of any changes to a patient's financial status. SMMC shall determine and may modify the period of eligibility for any individual entitled to receive services covered under the financial assistance programs.

## SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

11. All uninsured patients who present for financial screening with incomplete verifications will be entered into the State's CalHEERS (California Healthcare, Eligibility, Enrollment and Retention System), My Benefits CalWin, or the local eligibility and enrollment application. However, CalHEERS requires a government issued ID to proceed with the application. The local eligibility and enrollment application will retain the screening date as the date of application. Patients have 45 days from this date to provide verifications. If the necessary information is not received within the 45-day time frame, their application will expire, and they will need to reapply.
12. All applications will be made available in English and languages that are spoken by the lessor of 1,000 individuals or five (5) percent or more of people residing in San Mateo County. These languages are Spanish, Chinese and Tagalog.
13. The financial assistance policies apply to services provided by physicians or other medical providers practicing at SMMC, unless contractually obligated through a third-party billing arrangement with SMMC which permits services to be separately billed from SMMC provider services. SMMC emergency room providers are contract providers who bill the professional component of the visit separately from SMMC providers.
14. A list of providers who deliver medically necessary care at SMMC and are covered by the Financial Assistance policy can be found here – [Find a Doctor - San Mateo Medical Center \(smchealth.org\)](http://smchealth.org)
15. The Health Coverage Unit and/or a patient registration staff may enroll or assist patients to apply for the following state and local programs. In some cases, enrollment is processed at the point of service. Patients are referred to some programs based on specific diagnosis. In addition, San Mateo County Certified Enrollment Counselors (CECs), who are County Health or community-based organization staff, assist with enrollments in some of the public health coverage programs listed below such as ACE, Covered California and Medi-Cal. CECs are trained and certified on the eligibility and enrollment processes by the Department of Health Care Services, Covered California and the Health Coverage Unit.
  - a. Access and Care for Everyone (ACE)
  - b. AIDS Drug Assistance Program (ADAP)
  - c. California Children's Services (CCS)
  - d. Charity Care
  - e. Covered California
  - f. Discounted Health Care (DHC)
  - g. Every Woman Counts (EWC)
  - h. Family Planning, Access, Care and Treatment (PACT)
  - i. HCH/FH Sliding Fee Scale
  - j. Improving Access Counseling and Treatment Program (IMPACT)
  - k. Medi-Cal
    1. Modified Adjusted Gross Income (MAGI) Medi-Cal
    2. Non-MAGI
    3. Breast Cervical Cancer Treatment Program (BCCTP)
    4. Child Health & Disability Program (CHDP) Gateway
    5. Hospital Presumptive Eligibility (HPE)
    6. Medi-Cal Access Program (MCAP)

## SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

7. Medi-Cal County Inmate Program (MCIP)
  8. Medi-Cal Presumptive Eligibility for Pregnant Women
  9. Tuberculosis Medi-Cal
  10. Working Disabled Program (WDP)
  11. County Children's Health Insurance Program (CCHIP)
- l. Ryan White
  - m. Victim of Crime Program

16. Individuals who apply for financial assistance will be informed in writing regarding their eligibility status, and the basis for determination. The notice will provide information about the right to an individual eligibility review, the right to appeal a denial or discontinued coverage and their right to reapply. If the denial is for failure to provide the verifications within 45 days, the notice will also include information about which specific verifications are needed to complete the application process. The form "Step 1 Appeal: Individual Eligibility Review (IER)" will be included with the notice.

## IDENTITY

Applicants must provide proof of identity in order to apply for a health coverage program. The applicant may provide any one document from the lists below. Even if the document has expired, it is still an acceptable verification.

### Proof of Identity

Acceptable identification documents in order of priority:

- California driver's license or California DMV identification card
- U.S. passport or other U.S. federal government identification
- Other state driver's license or DMV identification card
- Photo in SMMC's eClinicalWorks (eCW)
- Foreign government identification document (consular ID card, passport, national ID card, or national voter card).

If documents listed above are not available, other acceptable documents, in order of priority include:

- Birth certificate
- Social Security card
- Medicare card
- Medi-Cal card
- Health Plan of San Mateo card
- Bank card with photo ID
- Two signed affidavits attesting to the identification of the patient photo identification from both parties who signed them.

## **INSURANCE/HEALTH COVERAGE STATUS**

### **Governmentally Sponsored Programs and Third-Party Payers**

Patients must be screened and enrolled in governmentally sponsored programs such as Medi-Cal, Medicare, Covered California, FFACT, IMPACT, EWC, etc. and/or provide all available third-party payer information prior to being enrolled in a SMMC financial assistance program. The applicant's eligibility for some of these programs, but not all, may preclude their eligibility for the SMMC financial assistance programs. Under some of these programs, the patient may be responsible for a share of cost or co-pay. Patients who are eligible for further financial assistance may be allowed to have specific co-pays waived.

Patients must make reasonable efforts to comply in a timely manner with the screening process by providing all required information regarding any other coverage and in pursuing third parties who may be liable for incurred health care expenses. Patients who do not cooperate in the application process could be found ineligible for Financial Assistance Programs.

### **Information Regarding Third-Party Payers**

Third-party insurance is a form of liability insurance purchased by an insured (first party) from an insurer (second party) for protection against the claims of another (third party). The patient is responsible for their charges, regardless of who is at fault for their injury or illness, but SMMC will bill to the third-party payor as a courtesy to the patient. Automobile insurance is one of the most common types of third-party insurance.

### **Proof of Insurance Coverage**

Insurance/health coverage status is determined by asking applicants for information and by checking available systems to confirm information. Examples of acceptable verifications of insurance coverage are as follows:

eCareNext

Medi-Cal/Medicare databases

HPSM HealthSuite

Verbal or electronic confirmation from health insurance company

Letter from employer stating status of employer-sponsored health insurance

### **Additional Sources of Information Regarding Insurance/Health Coverage Status**

Auto insurance or liability information

Notices regarding eligibility for government programs

Results of lawsuits

## INCOME

### Income Counted

Income is defined as total or gross cash receipts, wages and salaries, before taxes and from all sources. It also includes regular payments from Social Security, Unemployment Compensation, strike benefits, training stipends, alimony, military family allotments or other regular support from an absent family member or someone not living in the household, pensions, insurance or annuity payments, dividend income, interest, rents, royalties, estates, and trusts.

The following Social Security income will be counted: Survivor's, Retirement Survivor's Disability Income (RSDI), Federal Retirement, and Federal Disability.

### Income Not Counted

The following Social Security income will not be counted: Supplemental Security Income (SSI) and State Supplemental Payment (SSP).

Other income that will not be counted include child support received, workers compensation, military allowances, veteran's benefits and portion of scholarships, awards, fellowships used for education purposes, state disability insurance (SDI) and public assistance payments.

### Deductions

Income may be offset with the following deductions: education expenses; business expenses of reservists, performing artists and fee-basis government officials; health savings account contributions; moving expenses; deductible part of self-employment tax; self-employed, simple and qualified deduction; self-employed health insurance deduction; penalty on early withdrawal of savings; alimony paid; IRA deduction; student loan interest; tuition and fees; and domestic production activities.

### Proof of Income

Income verification documentation must be dated within the last 90 days, except for tax returns, award letters or other proof of irregular income which can exceed the 90 days. Applicant must provide proof of all forms of income for each household member.

- Unemployment – employer's records; EDD records; UIB check; layoff notice; training program records; training stipends; union records.
- Earnings – pay stubs; employer's wage record; state and/or federal income tax return; EDD records; employee W-2 form; farm business records; an employer statement, preferably on the employer's letterhead, or name of company stated on letter, including name of person employed, signature of employer, date of letter, pay frequency and gross amount.
- Affidavit - Person receiving income can write an affidavit if there is no alternative manner to document income. This letter should include: claimant's name and signature; date of letter; how much employee is paid; date, frequency and source of payment; declarations that (1) the information provided is true and correct (2) there is no other form of income documentation available, and (3) the employee understands the county/state may verify the information provided.

## SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

- Self-Employment – recent tax returns/business records; receipts for goods and services; last year’s federal income tax return including Schedule C; last three months net profit and loss statement; beneficiary’s statement when expenses cannot be verified; signed statement from business associates; statement from institutions where checks are deposited/cashed.
- Unearned Income – Social Security Administration (SSA) award letter, official correspondence from SSA, bank statement showing SSA deposit; alimony; government and private pension checks; insurance/annuities checks, correspondence; bank statements verifying interest income; rents; dividends; royalties; estates and trusts; military or other regular support from an absent family member or someone not living in the household.
- Other proof of income – other third-party documents verifying income of applicant can be provided

## ASSETS

None of the Financial Assistance programs covered by this policy has an asset limit.

## RESIDENCY

Only the ACE program has a San Mateo County residency requirement. San Mateo County residency may be self-declared.

When San Mateo County residency is questionable, the verifications listed below can satisfy the residency requirement.

### Proof of Residency

- Car registration
- Voter registration
- California driver’s license or ID card
- Employment record including offer letter, pay stubs, lay-off notice, employment or registration contract with an employment service, employer affidavit
- Rent or mortgage receipt
- Utilities bill
- Listing in the city directory or phone book that can be verified
- Principal property ownership document or property tax bill
- Membership record in a religious institution that reflects patient’s address
- Student identification
- School records
- Recent marriage license, divorce decree, or evidence of domestic partnership issued in the State of California
- Recent court documents showing the applicant’s current address
- Insurance documents
- Police record from a California law enforcement agency
- Documents from a homeless shelter or other public or community service agency indicating that the applicant is receiving services from the agency

## SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

- Adoption record
- Medical record
- Voided personal check with pre-printed address
- Other proof of residency – other third-party documents verifying residency of applicant can be provided

## APPEALS PROCESS

Any individual who has been disenrolled, or has been denied eligibility, or who wishes to request a waiver or reduction of co-pays, fees or any patient responsible balances, shall have the right to an appeal and to receive a written notice or statement. The written notice or statement shall include the (1) the denial and/or discontinuance reason; (2) the right to have the denial, discontinuance, or fees, co- pays and charges reviewed through the IER process based on ability to pay; and (3) a specific description of the appeals process and timelines. An individual who can demonstrate inability to pay shall be entitled to a reversal of the County's initial determination on eligibility, fees, co-pays or charges.

In addition, any individuals with income above the various Financial Assistance Program's income limit who can demonstrate that denial of eligibility would give rise to a hardship, may appeal their denial. This process allows the individual to present additional information to support eligibility according to the SMMC Financial Assistance Policy.

## STEP-ONE APPEAL: INDIVIDUAL ELIGIBILITY REVIEW (IER)

### Timeline for Step-One Appeal Application

Individuals may appeal a disenrollment or denial decision for any SMMC Financial Assistance Program upon receipt of a written notice indicating the disenrollment or denial. For the ACE Fee Waiver program, individuals may appeal a disenrollment or denial decision within 90 days of the receipt of the Restricted Medi-Cal Notice of Action from the Human Services Agency indicating the disenrollment or denial. Individuals who wish to request a waiver or reduction of fees, co-pays or charges may do so within 90 days of receipt of a bill for the fees, co-pays or charges. Notice of the right to appeal shall accompany such bills. Individuals are to complete a Request for Individual Eligibility Review (IER) form and submit the form to the SMMC Revenue Cycle team member.

### Content of Request for Individual Eligibility Review

In completing the Request for the IER form, individuals must provide specific information supporting their appeal. The specific information needs to support a case that the individual has special circumstances demonstrating an inability to pay which justifies a reversal of the initial decision made by SMMC to deny or disenroll, or of SMMC's decision to assess charges. Such information may include unusual and extraordinary expenses over and above the actual cost of necessities of life.

### Individual Eligibility Review Decision-Maker

The IER shall be decided by the designated SMMC Revenue Cycle team member, who has not been solely responsible for the preliminary determination. This individual shall consider all special facts and circumstances supporting the applicant's claim of eligibility or claim of inability to pay, including the actual costs of necessities of life in San Mateo County.



### **Timeline for Decision**

The SMMC Revenue Cycle team member shall make a written decision to affirm or reverse the initial County determination within 30 days after receipt of all requested documents. If the decision is to reverse the initial County determination, then the applicant shall receive a specific notice of the decision and information relating to the rights and benefits associated with the decision. If the decision is to affirm the initial County determination, then the written decision shall provide the reason for the decision and include a description of the applicant's Step-Two Appeal rights, including a form to complete the appeal. If there is no decision within 30 days, the applicant has the right to an immediate review by the Eligibility and Financial Review Committee.

## **STEP-TWO APPEAL: ELIGIBILITY AND FINANCIAL REVIEW COMMITTEE (EFRC)**

### **Timeline for Step-Two Application**

Individuals may appeal the decision of the IER to the EFRC within 60 days of the receipt of the decision letter. Individuals may initiate an appeal by completing a pre-provided appeal form and submitting it to the SMMC Revenue Cycle team member.

### **Content of Appeal**

Upon notice of appeal, the original Request for Individual Eligibility Review form and all documentation, in addition to the new appeal form will be forwarded to the EFRC for consideration. Individuals are free to supplement this form with any other information that supports their position, including inability to pay information.

### **Eligibility and Financial Review Committee and Decision-Making Process**

The EFRC shall consist of three individuals: the County Health Chief or his/her designee (other than the IER decision-maker), the San Mateo Medical Center Chief Financial Officer or his/her designee and a public member to be chosen by the County Manager and County Health Chief. The applicant has the right to appear before the EFRC, to present testimony including the sworn testimony of witnesses, and to bring an attorney. An electronic record of the proceedings will be obtained at the applicant's request. The EFRC shall consider all written materials and testimony provided and will also enlist additional expertise, as needed, to consider the appeal request.

### **Timeline for Decision**

The EFRC shall provide the decision in writing to affirm or reverse the IER determination within 30 days after receipt of requested documents. If the decision is to reverse the initial County determination, then the applicant shall receive specific notice of the decision and information relating to the rights and benefits associated with the decision. If the decision is to affirm the IER determination, then the written notice shall provide the reason for the decision.

### **Anytime Request for Eligibility and Financial Review**

Any individual may request an eligibility and financial review at any time if their circumstances change. If the SMMC Revenue Cycle team member receives such a request, it shall be processed under the same timelines and rules specified above.

## Periodic Board Reports

Periodically, program, eligibility and appeal data shall be submitted to the Board of Supervisors for review and consideration.

## FRAUD

San Mateo County Health has established a process to conduct follow up on clients who are suspected of providing false information to make themselves eligible for the financial assistance programs. County Health staff are instructed to report via e-mail any suspected client fraud to the Health Coverage Unit (HCU) Fraud Referral Coordinator who will conduct additional follow up on the case. The HCU Fraud Referral Coordinator will check all available systems to confirm the client's residency, income and other client eligibility information. In addition, the client will also be contacted and required to provide documentation to confirm his/her eligibility for the financial assistance programs. If the client fails to provide the requested documentation, the client will be disenrolled from the financial assistance program but will have the opportunity to appeal the decision.

For purposes of this Financial Assistance Policy, health care fraud is defined as "The knowing and willful executing, or attempt to execute, a scheme or deceit to defraud a health care insurance or benefit program, or to obtain by fraudulent means any benefit or payment from the program."

Clients are provided with a flyer about fraud upon enrollment in a financial assistance program. The following information is provided in the flyer.

- You are required to report any changes of income within 10 days.
- Providing false information on your application **will result in disenrollment** from your coverage program and you may be billed for past services. Examples of false information include:
  - You don't live in San Mateo County **BUT** you claim to live with a relative or other individual who lives in San Mateo County.
  - You report no income **BUT** you actually work.
  - You only report one job **BUT** you have other jobs that you did not report on the application.
  - You claim you are single or separated **BUT** you are actually married and living with your spouse.
  - You currently have an active VISA issued for less than one year.
- Willful misrepresentation of information to obtain health coverage is **grounds to report to appropriate agencies**.
- If you previously reported inaccurate information on your application, please correct it by contacting the Health Coverage Unit at **650-616-2002** or e-mail [Info-HCU@smcgov.org](mailto:Info-HCU@smcgov.org).

## CHARITY CARE

### DESCRIPTION

The Charity Care program is SMMC's program to provide access to care for patients who are unable to pay for themselves and meet certain financial criteria. It is designed to provide a consistent and uniform evaluation of the patient/guarantor ability to pay the outstanding medical balances. The Charity Care program is consistent with the changes to the California Hospital Fair Pricing Act and other applicable state and federal laws.

### SCOPE OF SERVICES

The scope of services eligible for Charity Care includes all SMMC services except for prescription benefits. The specific visits approved for Charity Care will be covered without charge to the patient.

### ELIGIBILITY CRITERIA

Charity Care will be offered to uninsured patients with income levels not exceeding 138% of the FPL. Patients will only be offered charity care if they are ineligible for the ACE program, other governmental programs and from other payers, including those having third party liability.

### APPLICATION PROCESS

Patients must complete an application for Charity Care and provide required [income](#) and [identity](#) verifications. The application must be submitted within 180 days from initial issuance of a bill. Any applications received after 180 days will be considered on a case-by-case basis. A Revenue Cycle team member evaluates the patient for Charity Care eligibility and makes an eligibility determination.

Part of this evaluation process is determining if the patient may qualify for the ACE program. If the patient qualifies for ACE, the Charity Care application will be denied. The patient will then be referred to the Health Coverage Unit to be enrolled in the ACE Program. If the patient does not meet the eligibility requirements for ACE, the Patient Access Supervisor will evaluate if the patient meets the criteria for the Charity Care program.

The Patient Access Supervisor notifies the patient of the decision by mail and phone and updates the patient's account accordingly. If the patient is denied Charity Care, the letter mailed to the patient will include an appeal form. If the patient is ineligible for Charity Care, the patient is then evaluated for the Discounted Health Care program.

## **ACCESS AND CARE FOR EVERYONE (ACE) PROGRAM**

### **DESCRIPTION**

The ACE program is a County-sponsored program that subsidizes health care to medically indigent adults and fulfills the County's obligation under Section 17000 of the California Welfare and Institutions Code. The ACE program includes the following categories:

#### **ACE Fee Waiver Program**

The application enrollment fee, co-pays and charges will be waived for patients who qualify for this program. ACE Fee Waiver applicants are also required to apply and maintain enrollment in Restricted Scope Medi-Cal.

#### **ACE Non-Fee Waiver Program**

Patients who qualify for the ACE Non-Fee Waiver program must pay an annual participation fee and co-payments for selected services.

#### **Temporary ACE Program**

The Temporary ACE program is for County residents who meet income and citizenship and/or satisfactory immigration status requirements for subsidized coverage through Covered California but did not enroll in this coverage during the designated Covered California Open Enrollment period.

Temporary ACE program coverage will end no later than December 31<sup>st</sup> of the year in which a participant is enrolled. Instead, participants will be encouraged to pursue enrollment in a Covered California plan during open enrollment to achieve a coverage effective date of January 1st of the following year. San Mateo County Certified Enrollment Counselors will offer clients assistance to successfully secure such coverage.

Patients who qualify for the Temporary ACE program must pay an annual participation fee and co-payments for selected services.

#### **ACE Excess Income Program**

The ACE Excess Income program was established to assist applicants with incomes over the ACE Non-Fee Waiver program limits but because of a chronic medical condition and financial hardship, may be eligible for this program.

Patients who qualify for the ACE Excess Income program must pay an annual participation fee and co-payments for selected services.

### **SCOPE OF SERVICES**

The ACE program scope of services is similar to that under Medi-Cal except that inpatient and outpatient care, pharmaceuticals and supplies are provided at San Mateo Medical Center or at an approved outside contracted provider site. For more detailed information about ACE scope of services, please refer to the [San Mateo County ACE Participant Handbook](#).

## SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

The ACE program does not cover cosmetic surgery, pregnancy-related services, family planning, impotence/infertility, mental health services other than limited outpatient mental health services provided within primary care settings, substance use services, emergency medical transport, emergency care and treatment at other facilities, unauthorized care or services received at other facilities, long term care, experimental or investigational treatments or therapies, non-emergent dental, and certain prescriptions such as vitamins, some pain medications and tranquilizers, etc.

Certain state programs, such as Family PACT (Family Planning), Every Woman Counts (EWC) and IMPACT (Prostate Cancer services), provide specific coverage and have the same income eligibility criteria as the ACE program. If the patient meets the specific program eligibility criteria, these programs will be used to cover the specific services rather than covering these services by the ACE program.

The ACE program will not cover outpatient procedures or admissions deemed a non-covered benefit. The patient may elect to have the procedure but will be billed in full for services provided. An advance deposit will be required.

### **Pre-Authorization**

Pre-authorization is required for outside specialty care, scheduled admissions, ambulatory surgeries, and certain outpatient procedures. Without pre-authorization, the patient may be liable for payment.

## **ELIGIBILITY CRITERIA**

Applicants must be uninsured residents of San Mateo County and meet certain specified income criteria. They must declare under penalty of perjury that they meet the requirements for eligibility as defined below.

### **Residency Requirement**

Applicants must be residents of San Mateo County. Residency is based on an applicant's actual place of residence and demonstrable intent to reside in the County. San Mateo County residency may be self-declared.

### **Citizenship/Immigration Criteria**

The ACE program does not require citizenship and/or lawfully present status for any of its program categories except for Temporary ACE. The Temporary ACE program does require citizenship and/or lawfully present status.

### **Income Criteria**

The current ACE Federal Poverty Level (FPL) guidelines are posted on the County Health SMMC webpage and are updated annually.

#### **ACE Fee Waiver**

Income must be equal to or less than 138% FPL.

#### **ACE Non-Fee Waiver**

Income must be equal to or less than 200% FPL.

**Temporary ACE**

Income must be equal to or less than 200% FPL.

**ACE Excess Income**

Income must be equal to or less than 225% FPL (must also have a chronic medical condition for which regular, recurring medical treatment is required AND have a financial hardship).

**Insurance/Health Coverage Status**

To qualify for the ACE program, applicants must be uninsured (Restricted Scope Medi-Cal enrollment is acceptable). Applicants who are recipients of third-party liability payment funding are not eligible for the ACE program. Third-party liability payment would include Medicare, full-scope Medi-Cal, Covered California, private insurance, or any other state, federal, public or private health care coverage or reimbursement or compensation for medical expenses through a third-party source, including, for example, from the proceeds of a lawsuit.

Applicants may be denied for ACE coverage if they refuse to apply for state or federal programs for which they may be eligible. Amongst others, this includes Restricted Medi-Cal with a Share of Cost.

**Restricted Scope-Medi-Cal Enrollment for ACE Fee Waiver Applicants**

To be eligible and enrolled in the ACE Fee Waiver program, applicants must apply for enrollment in Restricted Scope Medi-Cal, and if eligible, maintain continuous enrollment. The enrollment in Restricted Scope Medi-Cal will automatically enroll the client in the ACE Fee Waiver program provided that the client is a San Mateo County resident, his or her household income is at or below 138% of the Federal Poverty Level and he or she does not have other health insurance coverage.

**Additional Populations Eligible for the ACE Program**

**Including Fee Waiver, Non-Fee Waiver, Temporary and Excess Income**

County residents who meet the applicable ACE income criteria and who are ineligible for Full Scope Medi-Cal, Covered California or other public or private health coverage are eligible for the ACE program if they fall into one of the following categories:

- Persons receiving General Assistance in San Mateo County
- Persons receiving services through the County’s Alcohol and Other Drug programs
- Persons who are receiving services through the County’s Healthcare for the Homeless/Farmworker Health (HCH/FH) program
- Persons under 19 years of age who are receiving services at a San Mateo County Youth Health Center and who are also ineligible for Family PACT and Full Scope Medi-Cal Minor Consent
- Persons receiving Behavioral Health and Recovery Services in San Mateo County

These eligible populations shall receive a notice explaining that they are eligible for ACE program services, but they are not required to pay the ACE program’s annual participation fee, co-pays, charges, or estate recovery.

## **INELIGIBILITY CRITERIA**

### **Reasons for Ineligibility or Losing Coverage**

- Denied Medi-Cal, Covered California or other benefits due to lack of reasonable cooperation
- Failed to apply for Medi-Cal, Covered California or any other third-party coverage when requested to do so (including Restricted Medi-Cal with a Share of Cost)
- No longer a County resident
- No longer meets income eligibility criteria
- Failed to provide requested information
- Failed to cooperate with an ACE audit
- Provided materially incorrect or false eligibility information –
  - In such cases, the patient may be terminated immediately from the ACE program and billed retroactively for all ACE program services during the period of time in which the information was incorrect or false.
- Have an active visa issued for less than a one-year period.

## **ANNUAL PARTICIPATION FEE, CO-PAYS, CHARGES**

### **Annual Participation Fee**

Each client enrolled in the ACE Non-Fee Waiver program and the Temporary ACE program is charged an annual participation fee of \$360. However, the payment of the annual fee shall not be a condition precedent to medical services. In accordance with Welfare and Institutions Code section 16804.1(a), no patient shall be denied medical services for non-payment of the annual fee. There will be no cancellation fee.

Clients who are able and willing to pay the entire \$360 annual participation fee at the time of enrollment will receive two “ACE Bucks”. Each ACE Buck can be redeemed in lieu of one outpatient visit copayment at SMMC during the client’s program year.

Clients who are unable to pay the entire \$360 annual participation fee at the time of enrollment will be offered the opportunity to pay this amount in installments over the course of the program year. The Chief of San Mateo County Health or his or her designee shall have the authority to develop and implement installment payment plans for the annual ACE participation fee.

The annual ACE participation fee may be fully or partially waived where the client can show that payment of the fee would constitute a hardship. The Chief of the San Mateo County Health has developed and implemented a process for consideration of requests to waive, as a hardship, a client’s ACE program annual participation fee. This process is made available to all ACE program applicants, and includes, among other factors deemed appropriate by the Chief of San Mateo County Health, a consideration of the client’s income and expenses, as well as the presence of chronic conditions for which regular, recurring medical treatment is needed.

**Co-Payments**

ACE Non-Fee Waiver, Temporary ACE and ACE Excess Income clients are responsible for co-payments for selected services payable at the time of service. Co-payments for services are established to align with the cost-sharing required through a Covered California plan for individuals with incomes between 139% and 200% FPL. In addition, since Temporary ACE patients are eligible for cost-sharing credits to increase the actuarial value of a plan, the cost-sharing for this group is aligned with that of the applicable level Covered California plan.

The co-pay amounts for such services shall be described in the ACE program brochure provided to each eligible client, and are subject to change from time to time, as determined by the San Mateo County Board of Supervisors.

Cost-sharing for the major types of services are as follows:

Primary Care MD Visit	\$15
Emergency Dental Visit	\$15 \$20 if copay is not paid at time of visit
Emergency Oral Surgery provided by a physician in a clinic	\$100
Specialty Care MD Visit	\$15
Other Practitioner Visit	\$15
Laboratory For lab-only visit. Does not apply if the lab service is part of an inpatient stay, outpatient visit, emergency room visit or ambulatory surgery.	\$15
Behavioral Health Visit	\$15 (within primary care)
Outpatient Drug Therapy Services	\$15
X-ray	\$25
Imaging (CT, PET, MRI)	\$50 - CT \$150 - MRI
Rx (generic/ brand/ non-preferred/specialty)	\$7
Urgent Care/ ER	\$40 - Urgent Care \$75 - ER
Outpatient Surgery	\$150
Ambulatory Surgical Center Services (Same Day Surgery)	\$300
Outpatient Ancillary Procedures	\$150
Inpatient Hospitalization	\$300
Short Term Skilled Nursing Care	\$300
Durable Medical Equipment	Actual cost - items that cost less than \$10 \$10 - items that cost \$100 or less \$20 - items that cost more than \$100 \$150 - CPAP/BIPAP machines



SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

Orthotic and Prosthetic Devices	Actual cost - items that cost less than \$10 \$10 - items that cost \$100 or less \$20 - items that cost more than \$100
Medical Supplies	Actual cost - items that cost less than \$10 \$10 - items that cost \$100 or less \$20 - items that cost more than \$100
Home Health Care Services	\$5 - each home health visit Medical supplies, equipment, or appliances associated with home health visits are included.
Vision	\$15 - Pair of eyeglasses \$15 - Set of contact lenses Coverage limit: \$150 every two years
Acupuncture	\$15
Chiropractic Services	\$15
Occupational, Speech and Physical Therapy	\$15
Podiatry Services	\$15
Audiology (Hearing)	\$15
Respiratory Therapy	\$15
Out-of-pocket maximum	\$1,000

**Estate Recovery Process**

The ACE Estate Recovery process requires that County Health seek repayment for inpatient stays and same day surgeries from the estates of certain deceased ACE participants. Repayment only applies to benefits received by these participants on or after their 55<sup>th</sup> birthday and who own assets at the time of death. If a deceased participant owns nothing when they die, nothing will be owed.

For ACE participants who died **on or after January 1, 2017:** (See Changes to Estate Recovery effective January 1, 2017 due to Legislation SB 833)

- Repayment will be limited only to estate assets subject to probate that were owned by the deceased participant at the time of death.
- Repayment will be limited to payments made, including for nursing facility services, home and community-based services, and related hospital and prescription drug services received when the participant was an inpatient in a nursing facility or received home and community-based services.

For ACE participants who died prior to January 1, 2017:

- Repayment will be sought from all assets owned by the deceased participant at the time of death.

## SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

This ACE Estate Recovery process is based on the [Medi-Cal Estate Recovery Program](#) and it has been modified to apply to the ACE program.

- In addition to your co-payment and subject to restrictions of SB 833 above, for inpatient hospital stays and same-day surgeries, the County will pursue estate recovery from your estate for the balance of the cost of the hospital stays or same-day surgeries.
  - This balance will be billed to your estate at a discounted rate.
  - This means that the County will file a claim on your estate when you pass away to cover those costs.
- While patients who qualify for Fee Waiver will not be charged the co-pay, they are not exempt from Estate Recovery.
- Regardless of what is owed, the County will never collect more than the assets owned by the participant at the time of his/her death.
- Patients may be required to complete documentation that authorizes estate recovery action by the County.
- If you want to avoid estate recovery, you may arrange a payment plan with the San Mateo Medical Center's Billing for the balance of these costs.
  - For more information, call San Mateo Medical Center Billing at 650-573-2525.

### **Waiver of Co-Pays, Annual Participation Fee and Annual Out-of-Pocket Cap**

The ACE program's annual participation fee, co-pays and charges will be waived for the following San Mateo County residents:

1. Clients with income at or below 138% of the Federal Poverty Level and who enroll in the Restricted Scope Medi-Cal Program
2. Clients who fall into the category of [Additional Populations Eligible for the ACE Program](#) who meet income, county residency and insurance/health coverage requirements for the Fee Waiver Program
3. Clients who were approved to have their Participation fee waived via the Appeals process as set forth in the Appeals section. This waiver shall only fully or partially exempt the patient from paying the annual participation fee and shall not affect the obligation to make co-payments.

The eligibility for this waiver must be reassessed annually, at a minimum. This is required in order to incorporate any changes to a patient's financial status. The County shall determine and may modify the period of eligibility for any individual entitled to receive services covered under financial assistance programs.

All ACE program participants shall receive an ACE program brochure and Participant Handbook explaining the annual participation fee, co-pays and estate recovery program.

ACE participants, regardless of whether they qualify for a waiver of copayments or annual fees, shall be responsible only for payments up to a maximum of 6.3 percent of their income per calendar year of program participation fees or copayments. After an ACE participant incurs out-of-pocket expenses totaling 6.3 percent of their income in a calendar year for program participation fees, copayments or charges, the individual shall not be liable for any additional program participation fees, copayments or charges in that same calendar year.

## SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

Notwithstanding the foregoing, the County shall retain the right to pursue estate recovery on inpatient and same-day surgery charges that exceed an ACE participant's annual out-of-pocket liability of 6.3 percent (6.3%) of their annual income.

### **Visit Fees Waived**

Applicants found eligible for the ACE program qualify for having their SMMC balances waived from visits that took place in the three complete months prior to the date of application, provided that they also met the ACE eligibility criteria for that time period.

The Medi-Cal application date will be honored and considered as the SMMC's Financial Assistance Program's application date. If the Medi-Cal application is denied, that applicant may be evaluated for eligibility for SMMC's Financial Assistance Programs. If eligible, the Medi-Cal application date will be used to determine the effective date of eligibility for the SMMC's Financial Assistance Program. Since the ACE program does not allow for retroactive effective dates prior to the first date of the month of application, patient visits will be waived retroactively as far back as three months prior to the month of the Medi-Cal application date.

## **NOTIFICATION OF ENROLLMENT, DENIAL OF ENROLLMENT OR DISENROLLMENT**

Patients will receive a program brochure informing them of the ACE program's annual participation fee, co-payments, payment requirements for inpatient stays and same day surgeries, scope of services and San Mateo County Clinic site locations.

Patients will be informed of a denial of enrollment in the ACE program within 45 days of submission of a complete application for enrollment. Patients shall be informed of disenrollment in the ACE program in person or by mail at least 15 days prior to disenrollment unless it is due to fraud or misrepresentation which will result in immediate disenrollment. Denial of enrollment or disenrollment can be due to failure to meet or prove eligibility requirements, change of circumstances, or the patient's request for disenrollment. Disenrollment in the Restricted Scope Medi-Cal program will also constitute the notification of disenrollment for the ACE Fee Waiver program.

## **DISCOUNTED HEALTH CARE (DHC) PROGRAM**

### **DESCRIPTION**

This program offers a discount to patients who lack or have inadequate insurance and meet certain low- and moderate-income requirements. Patients who do not qualify for the County's ACE program or other financial assistance may be assessed for the Discounted Health Care (DHC) program consistent with the California Hospital Fair Pricing Act and other applicable state and federal laws.

## **SCOPE OF SERVICES**

The DHC program will provide a discount to patients who meet the program eligibility criteria. A patient may receive a discount on the amount due on any patient bill generated by San Mateo Medical Center. This discount rate may be adjusted annually.

The County Board of Supervisors sets the discount rate for the DHC program but, pursuant to State law, it will not exceed the highest amount of payment that SMMC would receive for providing the medical services in question from Medicare or Medi-Cal. The discounted rate is currently 65% of total charges.

## **ELIGIBILITY CRITERIA**

The DHC Program offers a discount to SMMC patients who meet these criteria:

1. Household income is at or below 400% of the Federal Poverty Level
2. Uninsured and underinsured patients.
  - a. An underinsured patient is one who has a third-party insurance with a deductible, co-insurance, or out of pocket medical expense.
3. Visit must not have occurred prior to January 1, 2007.

## **APPLICATION PROCESS**

- a. The DHC program will be considered for any patient who applies.
- b. There is no limit to the time, either prior to or after receiving medical care, in which a determination for the DHC program can be made. Whenever possible, patients should apply for the program prior to the first day of service.
- c. The DHC discount may be applied to accounts which had previously been turned over to a collection agency. Staff or patients may initiate the evaluation of these accounts.
- d. The DHC discount only applies to services billed by SMMC. Patients may seek financial assistance directly from contracted providers for bills not generated by SMMC.
- e. In order for an application to be processed for the DHC program, patients must provide proof of income and identity.

## **HEALTHCARE FOR THE HOMELESS/FARMWORKER HEALTH (HCH/FH) SLIDING FEE DISCOUNT PROGRAM (SFDP)**

### **DESCRIPTION**

The SFDP program offers patients who are experiencing homelessness (PEH) and farmworkers and their dependents whose incomes are below 200% FPL. This policy represents the Healthcare for the Homeless/Farmworker Health (HCH/FH) federal requirement to ensure that all PEH and farmworkers and their dependents can access San Mateo Medical Center services regardless of ability to pay.

## SCOPE OF SERVICES

The SFDP program will provide a discounted rate for all services provided by San Mateo Medical Center. A schedule of discounts will be adjusted annually to align with the Federal Poverty Level (FPL) and will be reviewed and approved annually by the HCH/FH Board. The discounted rate is \$0 for patients with household incomes at or below 100% FPL, and ranges between \$20-30 for patients whose household incomes are between 101-200% FPL.

### San Mateo County Health Care for the Homeless Farmworker Health (HCH/FH) Program

(HRSA 330 Program/FQHC)

### Sliding Fee Discount Schedule

Effective March 9, 2023

#### Monthly Income Thresholds by Family Size for Sliding Fee Discount Policy

Poverty Level*	0-100%	101-138%	139-175%	176-200%	>200%
<b>Family Size</b>					
<b>1</b>	\$1,215	\$1,677	\$2,126	\$2,430	\$2,431
<b>2</b>	\$1,643	\$2,268	\$2,876	\$3,287	\$3,288
<b>3</b>	\$2,072	\$2,859	\$3,625	\$4,143	\$4,144
<b>4</b>	\$2,500	\$3,450	\$4,375	\$5,000	\$5,001
<b>5</b>	\$2,928	\$4,041	\$5,125	\$5,857	\$5,858
<b>6</b>	\$3,357	\$4,632	\$5,874	\$6,713	\$6,714
<b>7</b>	\$3,785	\$5,223	\$6,624	\$7,570	\$7,571
<b>8</b>	\$4,213	\$5,814	\$7,373	\$8,427	\$8,428
<b>For each additional person add:</b>	\$428	\$591	\$749	\$857	\$857
<b>Patient Cost</b>	<b>No Charge</b>	<b>\$20</b>	<b>\$25</b>	<b>\$30</b>	<b>No sliding fee discount*</b>

\*Based on 2023 HHS Poverty Guidelines (<https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>)

\*\*Reduced payments may be available through other state or locally funded discount programs

## ELIGIBILITY CRITERIA

The SFDP program offers a discount to SMMC patients experiencing homelessness and farmworkers and their dependents who can demonstrate that their household income is at or below 200% FPL. If a patient cannot provide documentation/proof of income, they must provide a signed self-declaration of their income.

The SFDP program is a last resort program and clients should only be enrolled if they refuse or are ineligible to participate in Medi-Cal or other FAP program.

## **BILLING AND COLLECTION PRACTICES**

The SMMC's Patient Financial Services (PFS) department is responsible for billing and collection of services rendered at the hospital and clinics. SMMC may employ contracted billing vendors and collection agencies. The PFS department and billing vendors will adhere to SMMC's values and mission as a "safety net" institution and is committed to providing emergency services and medical treatment to patients regardless of their ability to pay. SMMC will conduct all billing and collections activities in compliance with applicable provisions of law, including without limitation California Health and Safety Code section 127400, Assembly Bill No's. 774 (AB774), 1020 (AB1020), 532 (AB532), Senate Bill 1276 (SB1276) and the Fair Debt and Collections Act. Unless otherwise specified, this policy does not apply to physicians or other medical providers, including emergency room physicians, anesthesiologists, radiologists, hospitalists, pathologists, etc., whose services are not included in a hospital bill generated and submitted by SMMC.

## **GENERAL GUIDELINES**

1. SMMC will make every effort to confirm valid insurance coverage information and to assist patients with financial assistance. SMMC may bill the patient or guarantor for their balance due after the insurance pays, or for total charges if applicable.
2. SMMC is required to provide an estimate of charges prior to services being rendered and a written notice of financial assistance options. Financial assistance information may be provided at the time of service, during discharge, or within 72 hours post hospital or clinic visit.
3. SMMC will send a statement of charges and balance due within 10 business days of the date of service. The total charges billed may not include all charges associated with a visit as in the case of emergency room services. SMMC may employ contracted physicians and allied professionals who may bill separately. Patients are notified in advance of receiving services when a separate billing may occur.
4. Patients treated at SMMC with a group health plan or health insurance coverage is considered out-of-network. Out-of-network plans usually do not cover the entire out-of-network cost, leaving the patient with higher costs than if they had been seen by an in-network provider. Billing patients for this high cost for out of network services is considered "balance billing". An unexpected balance bill is called a surprise bill and prohibited by state law. SMMC does not balance bill patients and will waive these fees as applicable.
5. SMMC will adhere to applicable laws by ensuring patients with high-cost medical bills, including deductibles, and co-insurance amounts are afforded an opportunity to be assessed for financial assistance, discounts, and payment plans.

## SELF-PAY PATIENTS

1. Uninsured patients will receive a Good Faith Estimate (GFE) prior to a scheduled non-emergent visit, during the registration process, or within 72 hours post admit and upon request. The GFE will provide the patient the expected cost for services provided and will not exceed a \$400.00 variance. Final charges exceeding a \$400.00 variance will be adjusted and the patient will not be held responsible.
2. An uninsured patient may be required to pay a deposit before receiving non-emergency or elective services. If the patient has not been screened for financial assistance, the deposit is \$25 for outpatient clinic visits and related ancillary services and \$550 for inpatient stays and surgeries. If the patient has been deemed ineligible for other coverage, thereby coded as a self-pay patient, the deposit is \$100 for outpatient clinic visits and related ancillary services and \$750 for inpatient stays and surgeries. If the patient is later found to be eligible for a health program or becomes active on an insurance plan, the patient deposit will be refunded.
3. Patients who have been coded self-pay will receive a notice that includes the following:
  - a. A statement of charges for services received at SMMC
  - b. A request that the patient inform SMMC if he/she has health insurance coverage
  - c. A statement that if the patient does not have health insurance coverage, he/she may apply for a health insurance coverage plan or a financial assistance program as outlined in this policy
  - d. A statement indicating how a patient may apply for a financial assistance program and that the hospital will provide the application. If the patient does not indicate coverage by a third-party payer or requests a discounted price or charity care, then the hospital shall provide an application for financial assistance programs to the patient. This application shall be provided prior to discharge if the patient has been admitted or to patients receiving emergency or outpatient care.
  - e. Information about the SMMC's Financial Assistance Programs, including a statement that if a patient lacks or has inadequate health insurance, and meets certain low to moderate income requirements, the patient may qualify for the ACE, DHC or Charity Care programs and the contact information for the Health Coverage Unit for information about these programs
  - f. The Health Consumer Alliance (HCA) offers free in-person and phone assistance at (888) 804-3536 to help people who are struggling to get or maintain health coverage, resolve problems with their health plans and hospital bills, and provide information about Covered California and Medi-Cal presumptive eligibility. The internet address for Health Consumer Alliance is <https://healthconsumer.org>. Patients may also contact Legal Aid for assistance at (650) 558-0915 or visit <https://www.legalaidsmc.org>.
  - g. The internet address for the hospital's list of shoppable services
4. Patient accounts will be updated to reflect the current responsible payer including any newly determined financial assistance or health insurance. Patients will receive a new statement reflecting any revised patient liability amount.

## **SELF-PAY PROMPT-PAY DISCOUNT**

SMMC extends a 50% discount off full charges to self-pay patients who remit payment within 30 days of the first bill date. This discount ensures SMMC is adequately reimbursed for the cost of care provided to the patient. The patient is responsible for full charges if the discounted amount is not received timely.

The Self-Pay Prompt-Pay discount applies to any patient who is responsible for some portion of billed charges. This includes the share-of-cost responsibility while covered under the Medi-Cal program only in those months in which patients did not meet their share of cost. It does not apply to co-payments, co-insurance, deductibles, or participation fees.

If a self-pay patient applies for other coverage and is subsequently denied, the patient will be recoded from a “pending” status to self-pay, retroactive to the initial application date. The Self-Pay Prompt-Pay discount will apply if the patient pays 50% of charges within 30 days of the first bill date after being recoded to self-pay.

## **EXTENDED PAYMENT POLICY**

SMMC provides an extended, non-discounted, interest-free payment plan to patients who are responsible for their entire bill and cannot elect to take the Self-Pay Prompt-Pay discount. The extended payment plan can be applied to all or a portion of billed charges that are determined to be the patient’s responsibility. Extended payment plans are interest-free and will be made available by the SMMC to all patients based on their ability to pay.

The extended payment plan is utilized when the patient is unable to make a full payment within the normal billing cycle timeframe for a self-pay patient. An SMMC account representative will determine the number of months and amount of installment payments. The extended amount of time granted is based on the total amount to be repaid and the patient’s current financial status. All extended payment plans must have the prior approval of a PFS supervisor or manager.

Patients defaulting on an extended payment plan may be referred to SMMC’s contracted collection agency for follow-up.

## **WAIVING BALANCES FOR PATIENTS ELIGIBLE FOR FINANCIAL ASSISTANCE**

SMMC is committed to serving our patients and may waive account balances when the following criteria are met.

Applicants found eligible for the ACE program qualify for having their SMMC balances waived from visits that took place in the three complete months prior to the date of application, provided that they also met the ACE eligibility criteria for that time period. This is similar to the Medi-Cal policy of allowing for retroactive coverage for up to three complete months prior to the month of application.



## SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

The Medi-Cal application date will be honored and considered as the SMMC's Financial Assistance Program's application date. If the Medi-Cal application is denied, that applicant may be evaluated for eligibility for SMMC's Financial Assistance Programs. If eligible, the Medi-Cal application date will be used to determine the effective date of eligibility for the SMMC's financial assistance program. Since the ACE program does not allow for retroactive effective dates prior to the first date of the month of application, patient visits will be waived retroactively as far back as three months prior to the month of the Medi-Cal application date.

### **COLLECTION PRACTICES**

SMMC is a safety net hospital whose mission requires that healthcare be provided for individuals regardless of their insurance status or ability to pay. The mission of SMMC is to focus and emphasize a devotion to providing the best possible healthcare for those who may be experiencing adverse circumstances. These circumstances mostly revolve around problems with financial payments, insurance plans, or health conditions. SMMC will make every effort to work with patients, guarantors, and insurance plans to resolve outstanding balances before referring an account to a collection agency. Similarly, patients and SMMC will make every reasonable effort to provide and obtain valid insurance information to ensure proper billing.

SMMC will not refer matters to collection when payment plans are in negotiation or established. However, patients who have committed to an established payment plan and default on the agreement may be sent to collections. Collection agencies may pursue a property lien for unpaid debts but may not use liens on primary residences as a means of collecting unpaid hospital bills.

SMMC will not refer patients to collections who are actively pursuing financial assistance or pending an eligibility determination for a governmental program. Additionally, SMMC will retract any collection account upon notice of verified insurance information. Patient accounts that are in dispute or which have been turned over to a collection agency sooner than 180 days shall be removed from collections and returned to SMMC's Patient Financial Services office.

SMMC shall reimburse patients any amount paid in excess of the amount due, including interest.

1. SMMC will send three (3) or more statements to patients and will allow a minimal of 180-day billing cycle prior to assigning an unpaid balance amount to a collection agency.
  - a. Prior to forwarding a bill for collections or selling the bill to another entity, SMMC will provide patients with a written notice called a goodbye final letter that includes the following information:
    - i. The date(s) of service of the bill that is being assigned to collections or sold;
    - ii. The name of the entity to which the bill is being assigned or sold;
    - iii. A statement informing the patient how to obtain an itemized hospital bill from the hospital;
    - iv. The name and plan type of the health coverage for the patient on record with the hospital at the time of services or a statement that the hospital does not have that information;
    - v. An application for the hospital's charity care and financial assistance;

SAN MATEO COUNTY HEALTH: FINANCIAL ASSISTANCE POLICY

- vi. The date or dates the patient was originally sent a notice about applying for financial assistance, the date or dates the patient was sent a financial assistance application, and, if applicable, the date a decision on the application was made.
2. SMMC will only send patient accounts to a collection agency when the collection agency agrees to adhere to all state and federal laws pertaining to fair collection of debt, as well as those pertaining to charity and discount care. That includes the SMMC Financial Assistance Policy, the California Hospital Fair Pricing Act, the Rosenthal Fair Debt Collection Practices Act, the federal Fair Debt Collection Practices Act, and the tax regulations at 26 C.F.R. §§ 1.501(r)-1, *et seq.*

SMMC Policy Review & Approval Grid	
Origination Date:	Last Review Date: 2022-06
Reviewed and approved by:	Date:
Manager, Patient Access	06/22, 09/22*
Manager, Patient Financial Services	06/22, 09/22*
Manager, HCU	06/22, 09/22*
Deputy Chief Health	06/22
Revenue Cycle Governance Council	06/22
Chief Financial Officer	06/22, 09/22*FINAL
Date & Submission By: 2022-06, Kathy Van Kirk-Manager HCU	
NOTE(s): * <i>Minor Edit/Republished 09/22</i>	