
Subject: Federal Sliding Fee Discount Program

Scope of Policy: All Staff

Responsibility Compliance: Executive Director; Members of Management

POLICY:

To make available discount services to those in need.

PURPOSE:

This program is designed to provide free or discounted care to those who have no means, or limited means, to pay for their medical services (Uninsured or Underinsured). In addition to quality healthcare, clients are entitled to financial counseling by someone who can understand and offer possible solutions for those who cannot pay in full. The Accounts Receivable staff member's role is that of client advocate, that is, one who works with the client and/or guarantor to find reasonable payment alternatives.

Behavioral Health Specialists, Inc. (BHS) will offer a Federal Sliding Fee Discount Program to all who are unable to pay for their services and who do not qualify for other Sliding Fee Discount Programs being offered by BHS where less fees would be charged to the client than using the Federal Sliding Fee Discount Program. BHS will base program eligibility on a person's ability to pay and will not discriminate on the basis of age, gender, race, sexual orientation, creed, religion, disability, or national origin. The Federal Poverty Guidelines, <http://aspe.hhs.gov/poverty>, are used in creating and annually updating the sliding fee schedule (SFS) to determine eligibility.

PROCEDURE: The following guidelines are to be followed in providing the Federal Sliding Fee Discount Program.

1. **Notification:** BHS will notify clients of the Sliding Fee Discount Program by:
 - Notification of all Sliding Fee Discount Programs will be offered to each client upon admission.
 - An explanation of our Federal Sliding Fee Discount Program and our application form are available on BHS's website: www.4bhs.org
 - BHS has posted notification of Federal Sliding Fee Discount Program in the outpatient clinic waiting area.
2. All clients seeking healthcare services at BHS are assured they will be served regardless of ability to pay. **No one is refused service because of lack of financial means to pay.**
3. **Request for discount:** Requests for discounted services may be made by clients, family members, social services staff or others who are aware of existing financial hardship. The Federal Sliding Fee Discount Program will only be made available for clinic visits. Information and forms can be obtained from the Front Desk and/or the Business Office.
4. **Administration:** The Federal Sliding Fee Discount Program procedure will be administered through the Business Office. Information about the Federal Sliding Fee Discount Program policy and procedure

will be provided and assistance offered for completion of the application. Dignity and confidentiality will be respected for all who seek and/or are provided charitable services.

5. **Alternative payment sources:** All alternative payment resources must be exhausted, including all third-party payment from insurance(s), Federal and State programs.

6. **Completion of Application:** The client/responsible party must complete the Sliding Fee Discount Program application in its entirety. By signing the Federal Sliding Fee Discount Program application, persons authorize BHS access in confirming income as disclosed on the application form. Providing false information on a Federal Sliding Fee Discount Program application will result in all Federal Sliding Fee Discount Program discounts being revoked and the full balance of the account(s) restored and payable immediately.

If an application is unable to be processed due to the need for additional information, the applicant has two weeks from the date of notification to supply the necessary information without having the date on their application adjusted. If a client does not provide the requested information within the two week time period, their application will be re-dated to the date on which they supply the requested information. Any accounts turned over for collection as a result of the client's delay in providing information will not be considered for the Federal Sliding Fee Discount Program.

7. **Eligibility:** Discounts will be based on income and family size only. BHS uses the Census Bureau definitions of each when reviewing eligibility for the Federal Sliding Fee Discount Program.

a. **Family** is defined as: a group of two people or more (one of whom is the head of the household) related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

b. **Income** includes: earnings, unemployment compensation, workers' compensation, Social Security, Supplemental Security Income, public assistance, veterans' payments, survivor benefits, pension or retirement income, interest, dividends, rents, royalties, income from estates, trusts, educational assistance, alimony, child support, assistance from outside the household, and other miscellaneous sources. *Noncash benefits (such as food stamps and housing subsidies) do not count.*

8. **Income verification:** Applicants must provide one of the following: prior year W-2, two most recent pay stubs, letter from employer, or Form 4506-T (if W-2 not filed). Self-employed individuals will be required to submit detail of the most recent three months of income and expenses for the business. Adequate information must be made available to determine eligibility for the program. **Self-declaration of Income** may only be used in special circumstances. Specific examples include participants who are homeless. Clients who are unable to provide written verification must provide a signed statement of income, and why (s)he is unable to provide independent verification. This statement will be presented to Behavioral Health Specialists, Inc.'s Executive Director or his/her designee for review and final determination as to the sliding fee percentage. Self-declared clients will be responsible for 100% of their charges until management determines the appropriate category.

9. **Discounts:** Those with incomes at or below 100% of poverty will receive a full 100% discount. Those with incomes above 100% of poverty, but at or below 200% of poverty, will be charged according to the attached federal sliding fee schedule. The federal sliding fee schedule will be updated during the first quarter of every calendar year with the latest federal poverty guidelines, <http://aspe.hhs.gov/poverty>.

10. **Nominal Fee:** Clients receiving a full discount will be assessed a \$10 nominal charge per visit. However, clients will not be denied services due to an inability to pay. The nominal fee is not a threshold for receiving care and thus, is not a minimum fee or co-payment.

11. **Waiving of Charges:** In certain situations, clients may not be able to pay the nominal or discount fee. Waiving of charges may only be used in special circumstances and must be approved by Behavioral Health Specialists, Inc.'s Executive Director or their designee. Any waiving of charges should be documented in the client's file along with an explanation (e.g., ability to pay, good will, health promotion event).

12. **Applicant notification:** The Federal Sliding Fee Discount Program determination will be provided to the applicant(s) in writing, and will include the percentage of Federal Sliding Fee Discount Program write off, or, if applicable, the reason for denial. If the application is approved for less than a 100% discount or denied, the client and/or responsible party must immediately establish payment arrangements with BHS. Federal Sliding Fee Discount Program applications cover outstanding client balances incurred within 12 months after the approved date, unless their financial situation changes significantly. The applicant has the option to reapply after the 12 months have expired or anytime there has been a significant change in family income.

13. **Refusal to Pay:** If a client verbally expresses an unwillingness to pay or vacates the premises without paying for services, the client will be contacted in writing regarding their payment obligations. If the client does not make effort to pay or fails to respond within 60 days, this constitutes refusal to pay. At this point in time, BHS can explore options not limited, but including offering the client a payment plan, waiving of charges, or referring the client to collections.

14. **Record keeping:** Information related to Federal Sliding Fee Discount Program decisions will be maintained and preserved in a centralized confidential file located in the Business Office Manager's Office, in an effort to preserve the dignity of those receiving free or discounted care.

a. Applicants that have been approved for the Federal Sliding Fee Discount Program will be logged in a password protected document on Business Office Manager's personal drive, noting names of applicants, dates of coverage and percentage of coverage.

b. The Business Office Manager will maintain an additional monthly log identifying Federal Sliding Fee Discount Program recipients and dollar amounts. Denials will also be logged.

15. **Policy and procedure review:** Annually, the amount of Federal Sliding Fee Discount Program provided will be reviewed by the Executive Director and the Business Office Manager. The SFS will be updated based on the current Federal Poverty Guidelines.

16. **Budget:** Board approval for the Federal Sliding Fee Discount Program will be sought as an integral part of the annual budget.

ATTACHMENTS: APPROVAL: 12-20-2016

2016 Sliding Fee Schedule REVISED: 12-20-2016

Client Application for the Federal Sliding Fee Discount Program REVISED ON: 12-20-2016