

JSMC	Policy Title:	501R Financial Assistance Policy	
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01/01/2016	4/2017, 4/2018, 4/2019, 4/2020, 4/2021, 4/2022, 11/2022, 12/2022, 11/2023		11/2023
Manual:	Developed by:	Approved by:	Pages with attachments:
Administrative	Finance Division	Administration / JSMC Finance Committee	14

Approved By:  Date: 11/15/23

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PURPOSE:

Consistent with its mission to commitment to excellence in service and accommodation to the growing healthcare needs of our community, Jennie Stuart Medical Center is committed to providing affordable care to individuals who need emergency or medically necessary treatment and have a household income below 400% of the Federal Poverty Level (FPL) Guidelines (Appendix A).

This 501R Financial Assistance Policy applies to the following JSMC facility locations:

- Jennie Stuart Medical Center, 320 West 18th Street, Hopkinsville, KY 42240
- JSMC Wound Healing, 320 West 18th Street, Hopkinsville, KY 42240
- JSMC Radiation Oncology, 320 West 18th Street, Hopkinsville, KY 42240
- JSMC Ambulatory Surgery Campus, 8250 Eagle Way, Hopkinsville, KY 42240
- JSMC Medical Imaging Center & Express Lab, 110 Nick Terhune Blvd, Hopkinsville, KY 42240
- JSMC Dermatology, 10755 Eagle Way, Suite 202, Hopkinsville, KY 42240
- JSMC General Surgery, 1722 High Street, Hopkinsville, KY 42240
- JSMC JennieCare, 10755 Eagle Way, Suite 100, Hopkinsville, KY 42240
- JSMC Orthopedics, 10755 Eagle Way, Suite 200, Hopkinsville, KY 42240
- JSMC Urology, 1724 Kenton Street, Suite 1C, Hopkinsville, KY 42240
- JSMC Medical Oncology, 1717 High Street, Suite 1A, Hopkinsville, KY 42240
- JSMC Physical Therapy, 10755 Eagle Way, Suite 102, Hopkinsville, KY 42240
- JSMC MOHS & Skin Surgery, 1717 High Street Suite 2B, Hopkinsville, KY 42240
- JSMC ENT, 10755 Eagle Way, Suite 201, Hopkinsville, KY 42240
- JSMC General Surgery, 1722 High Street, Hopkinsville, KY 42240

- JSMC Gastroenterology, 231 Burley Ave, Hopkinsville, KY 42240
- JSMC Family Health, 227 Burley Ave, Hopkinsville, KY 42240
- JSMC OBGYN, 1621 Nashville Street, Suite 102, Russellville, KY 42276
- JSMC Neurology, 1724 Kenton Street, Suite 1A, Hopkinsville, KY 42240
- Jennie Stuart Medical Center OBGYN, 1717 High Street, Suite 4B, Hopkinsville, KY 42240
- Jennie Stuart Medical Center Family Health, 105 Keeton Drive, Hopkinsville, KY 42240
- Jennie Stuart Medical Center Family Health, 222 West 18th Street, Hopkinsville, KY 42240
- Jennie Stuart Medical Center Family Health, 120 N. Main Street, Trenton, KY 42240

Details regarding Financial Assistance available for JSMC Rural Health Clinic patients can be found in a separate policy, JSMC Rural Health Clinic Financial Assistance Policy.

In accordance with the federal Patient Protection and Affordable Care Act (PPACA) and section 501(r) of the Internal Revenue Service code, all patients who are deemed financial assistance eligible will not be charged more than the amount generally billed to insured patients for emergency or medically necessary care.

DEFINITIONS:

The following terms are meant to be interpreted as follows within this policy:

- Applicant: Refers to the individual whose signature appears on the application.
- Catastrophic Charity: Financial assistance given to patients whose medical expenses exceed one-fourth of their total household income.
- Emergency Care: Immediate care which is necessary to prevent serious jeopardy to a patient's health; serious impairment to bodily functions, and/or serious dysfunction of any organs or body parts.
- Financial Assistance: Monetary aid to individuals meeting established criteria.
- Household: Defined to mimic the state and federal definition of household for healthcare programs, household refers to all persons related by birth, marriage, or adoption who reside together, dependents, and others in the same tax household. Unrelated individuals who are not dependents living at the same address are considered separate households. The following compose the household:
 - The applicant and their spouse.
 - The applicant's unmarried partner if they are the parent of the applicant's child.
 - Anyone under 19 years of age who lives with and is taken care of by the applicant.
 - Anyone claimed as a dependent on the applicant's federal tax return.

- Anyone who claims the applicant on a federal tax return and their tax dependents.
- Income: The modified adjusted gross income (MAGI) as defined by the IRS and used by the state and federal agencies for healthcare programs. Income refers to all cash receipts before taxes with certain adjustments. Income does not include non-cash benefits such as SNAP, school lunch programs, clothing vouchers, or food/rent in lieu of wages. For most patients eligible for sliding fee discounts, income calculation is simple. A full definition of MAGI is available from the IRS. Common income sources included in MAGI:
 - Wages, salaries, and tips.
 - Social Security benefits.
 - Unemployment compensation.
 - Net self-employment or business income (generally the amount of money you take in from your business minus your business expenses).
 - Alimony.
 - Retirement and pension income.
 - Investment and rental income.Common income sources excluded from MAGI:
 - Child Support.
 - Supplemental Security Income (SSI).
 - Veteran's disability benefits.
 - Workers' compensation.Common Deductions from MAGI:
 - Alimony paid.
 - Student loan interest and tuition costs paid.
 - Individual retirement account contributions.
- Medically Necessary: Services or care rendered to a patient, both inpatient and outpatient, in order to diagnose, alleviate, correct, cure, or prevent the onset or worsening of conditions that endanger life, cause suffering or pain, cause physical deformity or malfunction, threaten to cause or aggravate a handicap, or result in overall illness or infirmity.
- Proof of Income: Must be current information and includes but is not limited to the following.
 - Most recent income tax return or W-2
 - 3 most recent months' pay stubs
 - Most recent unemployment check
 - Proof of other household income (Social Security, pension, etc....)
 - Complete bank statements showing direct deposits and transfers
 - Sufficient information on how patients are currently supporting themselves financially
- Uninsured: Patients with no insurance or third-party assistance to help resolve their financial liability to healthcare providers.
- Underinsured: Patients who have limited healthcare coverage, or coverage that leaves the patient with an out-of-pocket liability, and therefore may still require

financial assistance.

- **Urgent Care:** Services necessary to avoid the onset of illness or injury, disability, death, or serious impairment or dysfunction if not treated within 12 hours.

POLICY:

Financial Assistance is provided only when care is deemed medically necessary and after uninsured or underinsured patients have been found to meet all qualifying criteria.

Patients seeking financial assistance may be assisted with applications for other means of payment (e.g., Medicaid, other local funding programs) BEFORE approval for financial assistance. Uninsured patients who are believed to have the financial ability to purchase health insurance may be encouraged to do so to ensure healthcare accessibility and overall well-being. Jennie Stuart Medical Center is equipped with financial counselors to assist in this process.

PROCEDURE:

A. Eligibility Criteria for 501R Financial Assistance

Patients who have a household income below 400% of the Federal Poverty Level may qualify for Financial Assistance (see sliding scale, Appendix A).

Determinations for eligibility for discounted care will require patients to submit a complete financial assistance application (including all documentation required by the application) and may require appointments or discussion with Financial Counselors. Patients will remain eligible for one year from the application approval date.

When determining patient eligibility, Jennie Stuart Medical Center does not consider race, gender, age, sexual orientation, religious affiliation, social or immigrant status.

Additionally, Jennie Stuart Medical Center may refer to or rely on external sources and/or other program enrollment resources if uninsured patients lack documentation that supports eligibility. For example, Jennie Stuart Medical Center may provide discounted care when:

- Patient is homeless
- Patient is eligible for other state or local assistance programs that are unfunded
- Patient is eligible for food stamps or subsidized school lunch program
- Patient is eligible for a state-funded prescription medication program
- Patient's valid address is considered low-income or subsidized housing

- Patient receives discounted care from a community clinic and is referred to Jennie Stuart Medical Center for further treatment

B. Applying for 501R Financial Assistance

To apply for Financial Assistance, patients must submit a complete and submit application (Appendix C) and supporting documents to Jennie Stuart Medical Center Financial Counseling, P.O. Box 2400, Hopkinsville, KY 42240 either in person or by mail. Patients will be encouraged to update their income information and household size annually. Jennie Stuart Medical Center will assist the patient in determining the household size and income as necessary.

In addition to completing an application, individuals should be prepared to supply required documentation including but not limited to:

- Bank statements from all accounts
- Proof of income for applicant as well as all wage earners in household, such as W-2s, pay stubs, unemployment insurance payment stubs, or sufficient information on how patients are currently supporting themselves financially.
- Copy of most recent tax return
- Investment statements from all accounts
- Payment history of any outstanding accounts for prior services
- Information on available assets or other financial resources

External public sources may also be used to verify eligibility as well.

Financial counselors are available Monday through Friday, from 7:00am until 3:30pm in the Financial Counseling office located at Jennie Stuart Medical Center, 320 W. 18th Street, Hopkinsville, KY 42240 or by phone at 270-887-0332 or 270-887-0100 ext. 4505 to discuss the application process. Jennie Stuart Medical Center has access to translators who can assist patients who are unable to speak English.

C. Determining the 501R Financial Assistance Adjustment

The following table should be used to determine the discount percentage applied:

Federal Poverty Level	Discount Percentage
0% - 224%	100%
225% - 299%	90%
300% - 349%	80%
350% - 400%	70%

D. Emergency and Medically Necessary Care

Services eligible for financial assistance include:

- Emergent or urgent care; and,
- Services deemed medically necessary by Jennie Stuart Medical Center; and,
- Care that is non-elective and needed to prevent death or adverse effects to the patient's health.

The 501R Financial Assistance Policy may not be applied to charges for certain medical services. Services that may be excluded from Financial Assistance include, but are not to be limited to:

- Cosmetic services
- Infertility services
- Non-emergent optical services
- Non-emergent auditory services
- Retail Pharmacy services
- Tubal ligation or vasectomy, or the reversal of tubal ligation or vasectomy

E. Actions in the Event of Non-Payment

The collection actions that Jennie Stuart Medical Center may take if a financial assistance application and/or payments are not received are described in a separate billing and collections policy.

In brief, Jennie Stuart Medical Center will make certain efforts to provide uninsured patients with information about our financial assistance policy, such as including a summary of it with billing statements, before we or our collection vendors take certain actions to collect your bill (these actions may include charging of interest, some civil actions, or reporting of outstanding debt to credit bureaus).

For more information on the steps Jennie Stuart Medical Center will take to inform uninsured patients of our financial assistance policy and the collection activities we may pursue, please see Jennie Stuart Medical Center's Billing and Collections Policy here:

<http://www.jenniestuarthealth.org/Patient-Visitors/Financial-Assistance-Guidelines>.

F. Communication of 501R Financial Assistance

Jennie Stuart Medical Center's financial assistance policies, financial assistance applications, and summaries of the financial assistance policies are available to patients in English and Spanish. These documents are available free of charge at

all facility locations, by mail, and on our website:

<http://www.jenniestuarthealth.org/Patient-Visitors/Financial-Assistance-Guidelines>. These documents can be requested by contacting Jennie Stuart Medical Center Financial Counselors at 270-887-0332 or by mailing your request to Jennie Stuart Medical Center Financial Counseling, P.O. Box 2400, Hopkinsville, KY 42240.

Jennie Stuart Medical Center communicates the availability of financial assistance through means which include:

- Posting signs and making documents available within waiting rooms, registration areas, and on the JSMC website.
- Personally notifying patients during registration or appointment scheduling.
- Providing information about the policy and how to apply during verbal communication about the patient's bill.
- Ensuring designated staff are knowledgeable of the financial assistance policy and can answer patients' questions or refer patients to the program.
- Notifying local physician practices and representatives of community and social service agencies and other non-affiliated community physician offices about the availability of financial assistance at Jennie Stuart Medical Center and how interested individuals can apply.
- Sending Financial Assistance summary with billing statements.

G. Ensuring Compliance

On an annual basis, the Director of Patient Financial Services or their designee will perform an audit to include:

- a random sampling of billing statements to ensure it includes all information required.
- a visit to each physician office and registration point to ensure each point of entry has access to the updated financial assistance policy, as well as updated financial assistance applications and staff are informed on how to inform patients of each.
- an audit of the website to ensure the application and policy are still easily accessible.
- a look-back to ensure the reimbursement rates of the payers being used to calculate an average of "amounts generally billed" does not fall below that of what a patient who qualifies for financial assistance is being billed.

H. Jennie Stuart Medical Center and Providers Furnishing Care at Jennie Stuart Medical Center Locations

The financial assistance policy will only apply to and cover the emergency or

other medically necessary care delivered by Jennie Stuart Medical Center. This FAP will not apply to any services provided by health care providers who bill separately and are not owned by Jennie Stuart Medical Center. A listing of providers to whom this FAP does not apply shall be attached as an appendix to this FAP (Appendix B). Paper copies of this listing shall be available free of charge in the emergency room, registration, and financial counseling locations of JSMC, and a copy shall also be available on JSMC's website. This listing shall be updated by management on a quarterly basis.

I. Determining Amounts Generally Billed

Individuals eligible for financial assistance under this policy shall not be charged more than the amounts generally billed (AGB) to individuals who have insurance. This value shall be calculated using the "look-back" method based on actual paid claims from Medicare fee-for-service and private health insurers.

J. Catastrophic Charity Eligibility

Individuals whose household income exceeds 400% of the federal poverty guidelines and have a catastrophic illness resulting in expenses that are greater than one-fourth of their annual income, may receive a catastrophic charity adjustment.

Patients concerned about their ability to pay for services or who would like to learn more about Financial Assistance should be directed to the Financial Counseling office at (270) 887-0332 or (270) 887-0100 ext. 4505.

APPENDIX A: 2024 Federal Poverty Level Guidelines

2024 Poverty Guidelines: 48 Contiguous States (all states except Alaska and Hawaii)

Household/ Family Size	Per Year							
	100%	200%	225%	275%	300%	325%	350%	400%
1	\$15,060	\$30,120	\$33,885	\$41,415	\$45,180	\$48,945	\$52,710	\$60,240
2	\$20,440	\$40,880	\$45,990	\$56,210	\$61,320	\$66,430	\$71,540	\$81,760
3	\$25,820	\$51,640	\$58,095	\$71,005	\$77,460	\$83,915	\$90,370	\$103,280
4	\$31,200	\$62,400	\$70,200	\$85,800	\$93,600	\$101,400	\$109,200	\$124,800
5	\$36,580	\$73,160	\$82,305	\$100,595	\$109,740	\$118,885	\$128,030	\$146,320
6	\$41,960	\$83,920	\$94,410	\$115,390	\$125,880	\$136,370	\$146,860	\$167,840
7	\$47,340	\$94,680	\$106,515	\$130,185	\$142,020	\$153,855	\$165,690	\$189,360
8	\$52,720	\$105,440	\$118,620	\$144,980	\$158,160	\$171,340	\$184,520	\$210,880
9	\$58,100	\$116,200	\$130,725	\$159,775	\$174,300	\$188,825	\$203,350	\$232,400
10	\$63,480	\$126,960	\$142,830	\$174,570	\$190,440	\$206,310	\$222,180	\$253,920

APPENDIX B:

Provider Listing
DOES NOT Follow Jennie Stuart Medical Center's
501R Financial Assistance Policy

The Financial Assistance will not apply to any third party contracted professional services provided by the health care provider groups listed below, though services may be offered at Jennie Stuart Medical Center facility. The billing practices and discounts associated with Jennie Stuart Medical Center's Financial Assistance Policy DO NOT apply to these providers. Therefore, any professional fees associated with these providers may be excluded from the Financial Assistance Policy. This listing is effective as of 12/5/2022 and updated quarterly.

Provider Group Name	Services
Pennyrile Radiology, PSC	Radiology Professional Services
TeleRadiology	TeleRadiology Professional Services
APP of Kentucky ED, PLLC	Emergency Medicine Professional Services
Associated Pathology, Inc	Pathology Laboratory Services
Vanderbilt University Medical Center	Infectious Disease and Neurology Professional Services via TeleHealth
PedForAll	Neonatology and Pediatric Professional Services
Pediatric Cardiology Associates	Pediatric Cardiology Professional Services
Western Kentucky Pulmonary Clinic	Internal Medicine and Sleep Lab Professional Services
Nephrology Group of Hopkinsville	Nephrology Professional Services
Ohio Valley Nephrology Associates	Nephrology Professional Services
Calvert Ophthalmology Center, PSC	Ophthalmology Professional Services
Ophthalmology Associates	Ophthalmology Professional Services
Murray Radiation Oncology, PSC	Radiation Oncology Professional Services
Maanya, LLC dba Trigg County Medical Clinic	Internal Medicine Professional Services
West Ky Neurological Medicine, PLLC	Neurology Professional Services
Dr. Rao Velaga, MD, PSC	Cardiology Professional Services
Lambert Oral Surgery	Oral Surgery Professional Services
Fedko Emergency Physicians, LLC	Emergency Medicine Professional Services

APPENDIX C:

Download the Financial Assistance Application at

<http://www.jenniestuarthealth.org/Patient-Visitors/Financial-Assistance-Guidelines/>

APPENDIX D:

"Plan Language Summary"

In accordance of the 501 (r) charity requirements, below is considered the "Plain Language Summary" of the Jennie Stuart Medical Center Financial Assistance Policy which will accompany all billing statements and be presented to patients during all financial discussions.

Consistent with its mission to provide high quality health and wellness services for the community, Jennie Stuart Medical Center is committed to providing affordable care to individuals who are in need of emergency or medically necessary treatment and have a household income below 400% of the Federal Poverty Level (FPL) Guidelines. Individuals who qualify for financial assistance will not be charged more than the average amounts generally billed to insured patients, for emergency or medically necessary care.

Financial counselors are available Monday through Friday, from 8:00am until 4:30pm to discuss the application process at (270) 887-0100 or you can dial direct at (270) 887-0332 or (270) 887-0100 ext. 4505.

Jennie Stuart Medical Center will not pursue extraordinary collections actions against an individual without first using reasonable efforts to determine if such individual is eligible for financial assistance.

For a free copy of the entire Financial Assistance Policy and/or an Application for Financial Assistance in English or Spanish, patients can:

- Request in person at Jennie Stuart Medical Center located at 320 W 18th, Hopkinsville, KY 42240; or,
- Request a copy by mail by calling ((270) 887-0332); or,
- Mail a request to Jennie Stuart Medical Center Business Office, P.O. Box 2400, Hopkinsville, KY 42240; or,
- Access it online:
- <http://www.jenniestuarthealth.org/Patient-Visitors/Financial-Assistance-Guidelines>