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Owner Susan Clarke:
Executive
Director, Revenue
Cycle
Area Fiscal Services

Charity Care Financial Assistance

Shirley Ryan AbilityLab ("SRALab") is committed to assisting its patients in financial need through the SRALab Charity Care Financial Assistance Program ("Program"). The provision of free or discounted care under the Program is important to SRALab's mission and values, and is consistent with SRALab's tax-exempt status and charitable purpose.

It is SRALab's policy to:

- Effectively communicate to patients regarding the Program, including the process for submitting a Financial Assistance Application ("Application");
- Proactively offer information on charity care options available to uninsured patients, consistent with SRALab policies on eligibility;
- In a fair and consistent manner, assess patients' ability to pay and establish payment arrangements that do not jeopardize the patients' health and basic living arrangements or undermine their capacity for self-sufficiency;
- Provide patients with the right to appeal and seek reconsideration of decisions denying free or discounted care; and
- In relation to uninsured patients receiving community-based primary care at a community health center or free and charitable clinic who are referred to SRALab for non-emergency, hospital-based health care services by that primary care provider:
 - When there is a reasonable basis to believe that the patient may be eligible for a public health insurance program, screen the patient and assist them with applying for the public health insurance program; and
 - When there is not a reasonable basis to believe that the patient may be eligible for a public health insurance program, offer the patient an opportunity to apply for financial assistance at the time hospital services are scheduled.

DEFINITIONS:

The following are explanations of key terms used in the Program:

A. Assets:

Assets may be considered under the Program, however, the following assets will not be included in SRAlab's evaluation: primary residence, personal property exempt from judgment under Section 12-1001 of the Illinois Code of Civil Procedure; or any amounts held in a pension or retirement plan, provided however that distributions and payments from pension or retirement plans may be included as income.

B. Financial Assistance:

A discount provided to a patient under the terms and conditions SRAlab offers to qualified patients.

C. Household Income:

Household Income means the sum of a family's annual earnings and cash benefits from all sources before taxes, less payments made for child support. Examples include, but are not limited to: gross wages, dividends, interest, workers' compensation, training stipends, regular support from family members not living in the household, government pensions, private pensions, insurance and annuity payments, and income from rents, royalties, estates and trusts.

D. Illinois Resident:

Illinois Resident means a person who lives in Illinois and intends to continue living in Illinois indefinitely. **Relocation to Illinois for the sole purpose of receiving health care benefits does not satisfy the residency requirement.** Acceptable verification of Illinois residency is listed in the Application.

E. Medically Necessary:

Medically necessary services will be determined by the following criteria:

1. The attending physician determines the services are medically necessary, regardless of the patient's ability to pay; and
2. The services would be covered services at SRAlab if the patient applying for assistance were a Medicare beneficiary with the same medical condition.

Note: Specially made prosthetic or orthotic devices may not qualify under this policy. Wheelchairs, elective procedures, and other non-medically necessary equipment and services are not covered under this policy.

F. Guarantor:

A person who is required by law to pay for a patient's health care expenses; for example, a parent of a minor child or a person who voluntarily agrees to pay the patient's health care expenses. With respect to eligibility and applying for financial assistance, this Policy uses "Patient" and "Guarantor" interchangeably.

G. Insured Patient

An Insured Patient is one who is covered under a policy of health insurance or is a beneficiary under public or private health insurance, health benefit, or other health coverage program, including high-deductible health insurance plans, workers' compensation, accident liability insurance, or other third-party liability.

H. **Uninsured Patient**

An Uninsured Patient is one who is not covered by, or a beneficiary of, one of the foregoing plans or programs.

PROGRAM OVERVIEW AND ELIGIBILITY:

SRALab will provide financial assistance by fully or partially waiving patient financial obligations for Medically Necessary services for patients who are Illinois Residents and who: (i) are presumptively eligible as described in Section II.A below; or (ii) complete the Program Application, provide necessary supporting documentation, and are found eligible based on Household Income and other criteria in accordance with this policy.

Even though an individual may qualify for financial assistance under (i) or (ii) above, they may not be eligible for SRALab services for other reasons, including but not limited to medical admission criteria for the applicable SRALab level of care or SRALab capacity issues.

SRALab communicates the availability of financial assistance by various means, including but not limited to: posting signage in admission/patient registration areas, discussing the Program with patients and/or family members as appropriate, and including information on the SRALab website and on SRALab bills.

A. **Presumptive Eligibility.** An Uninsured Patient who has demonstrated proof of Illinois residency is deemed presumptively eligible for up to a one-hundred percent (100%) discount from amounts they are personally responsible for paying for Medically Necessary services if there is demonstrated proof of one or more of the following:

1. Homelessness;
2. Deceased with no estate;
3. Mental incapacitation with no one to act on patient's behalf;
4. Medicaid eligibility, but not on date of service or for non-covered service;
5. Enrollment in one of the following assistance programs:
 - a. Women, Infants and Children Food Assistance Program (WIC);
 - b. Supplemental Nutrition Assistance Program (SNAP);
 - c. Illinois Free Lunch and Breakfast Program;
 - d. Low Income Home Energy Assistance Program (LIHEAP);
6. Enrollment in an organized community-based program providing access to medical care that assesses and documents limited low-income financial status as a criterion for membership;
7. Receipt of grant assistance for medical services;
8. As determined by an Electronic Scoring Model, described below.

For all patient accounts without insurance, SRALab will attempt to review the account (including any Program Application that may have been submitted) in an effort to identify any of these presumptive eligibility criteria prior to sending the patient a bill requesting payment. Where the Uninsured Patient/Guarantor has not returned a

complete Program Application, SRALab may use an Electronic Scoring Model, which relies on information obtained from credit reporting agencies that reflects personal and financial data on the Patient/Guarantor, to determine if the Patient/Guarantor has a high probability of eligibility for a Program Discount and may be deemed presumptively eligible for such discount based on the Model.

- B. Charity Care Based on Household Income.** Under the Program, a sliding scale discount for Medically Necessary services is available to Illinois residents who submit a Program Application and whose Household Income is at or below six hundred percent (600%) of the federal poverty level. Eligible patients will not be personally responsible for paying more than amounts generally billed to insured individuals.
1. Patients who are not eligible to participate in the Program include:
 - a. Non-Illinois residents;
 - b. Patients who are primarily covered under the Medicaid program of any state other than Illinois; and
 - c. Patients eligible for funding for the requested rehabilitation services from third-party sources, such as group health and indemnity plans, liability insurance coverage, Workers' Compensation, Division of Specialized Care for Children, and any other state or federal grants.
 2. The following considerations are used to determine whether a patient is eligible to participate in the Program:
 - a. Household Income, as a percentage of the Federal Poverty Guidelines ("FPG");
 - i. The FPG are based on income and family size and are updated yearly; additional information is available from the U.S. Department of Health & Human Services at <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>.
 - ii. Eligibility for patients who are claimed as dependents by a parent or legal guardian will be based on their parents' or legal guardians' income.
 - b. Availability of third-party funding sources, as well as other discounted programs, private charitable organizations, and other funds or financial resources;
 - c. Extenuating circumstances that may contribute to an inability to pay, such as job loss, extended major illness, or outstanding financial obligations;
 - d. Patient/Guarantor cooperation sufficient to allow eligibility determination to be made and application for government programs (e.g., Medicaid), third-party funding sources, or any other funding sources.
 3. If there is reason to believe that a Patient/Guarantor may have eligible Assets that are disproportionate to the reported income, and that those Assets would be available to pay for medical services, SRALab may require the Patient/Guarantor to

provide information about their Assets. Except where prohibited by law, SRAlab may consider those Assets in deciding whether, and to what extent, the patient may participate in the Program.

4. If it is determined a Patient/Guarantor has provided inaccurate, incomplete, or false information that resulted in a determination of eligibility for free or discounted care when accurate, complete, and true information would have led to a determination of ineligibility, they will be terminated from the Program and any previously granted financial assistance will be reversed and billed to the patient.

CHARITY CARE FINANCIAL ASSISTANCE PROGRAM DISCOUNTS

- A. **Limitation on Charges.** All patients are billed according to gross charges (the full established price for the medical care provided). However, eligible participants in the Program will not be personally responsible for paying more than amounts generally billed ("AGB") to individuals who have insurance for such care. SRAlab determines the AGB for Medically Necessary care on an annual basis using the "look-back method." The current AGB percentage and a description of the calculation may be obtained in writing and free of charge by contacting the Charity Care Coordinator at 312-238-6039.
- B. **Financial Assistance Due to Income Limitations.** Patients who are eligible for the Program based on their Household Income level will receive a discount for Medically Necessary services according to the following schedule:

Household Income as a % of FPL	Discount*
0-250%	100%
251%-400%	75%
401%-600%	64%

- C. *The discount allowed to eligible patients will be adjusted annually, as necessary, to ensure that such patients are not charged more than AGB to insured individuals. With respect to insured patients, the discount is applied to the amounts the patient is personally responsible for paying (e.g., as a high deductible, co-insurance), such that the patient is not personally responsible for paying more than AGB for the services at issue.
 1. *Charges Subject to Program Discount.*
 - a. *Only Medically Necessary Services by SRAlab Providers.* Medically Necessary hospital and physician services provided while a patient at SRAlab are subject to a Program discount. Services delivered by certain non-SRAlab providers, including ambulance transport and non-SRAlab physicians, are excluded from Program discounts. Patients can contact the Charity Care Coordinator at 312-238-6039 to find out whether services provided by a particular physician are subject to the Program discount.
 - b. *Uninsured Patients.* With respect to patients who do not have insurance or any other third-party sources of payment, the Program discount is applied to gross charges.

- c. *Insured Patients.* With respect to patients who have insurance or other third-party sources of payment, the Program discount is applied to the patient's out-of-pocket balance. If a Patient is Insured but SRALab is not an in-network provider, the Patient should be directed to seek services from an in-network provider and shall not be eligible for free or discounted care. Program Discounts are not available for out-of-network costs.
 2. *Further Discount for Excessive Medical Expenses.* In addition to the discount set forth above, a one hundred percent (100%) discount will be applied to the patient's out-of-pocket balance when the eligible patient's out-of-pocket balance exceeds twenty percent (20%) of the yearly gross Household Income during any twelve (12) month period. The twelve-month period begins on the date of service for which SRALab first determines the patient is eligible for the Program.

APPLYING FOR CHARITY CARE FINANCIAL ASSISTANCE PROGRAM DISCOUNTS

- A. **Application Process.** Program discounts are determined as early as possible in the patient's treatment process, preferably prior to the time of admission or service. As soon as financial assistance is requested, SRALab provides the Patient or Guarantor with a Program Application. The Patient or Guarantor must provide SRALab with a completed Program Application and any necessary supporting documentation (as listed in the Program Application) related to the financial position of the Patient or Guarantor. The Program Application identifies the required supporting documentation.

In addition to information provided by the patient, SRALab may rely on information obtained from credit reporting agencies that reflects personal and financial data on the Patient/ Guarantor.

SRALab will accept and promptly review all Program Applications for at least two-hundred forty (240) calendar days from the date of the patient's first billing statement. A determination of eligibility is generally effective for six (6) months. If a patient is relying on a Program discount, in order to best protect the patient's financial interests, SRALab will require the patient to wait for non-emergency services or assistive equipment until his/her Program Application is approved. If the patient's financial situation changes and the patient informs SRALab that reliance on a Program discount is no longer required, SRALab will schedule the patient for non-emergency services and/or receipt of assistive equipment.

If SRALab determines that the patient's application is incomplete, SRALab will request additional information. The patient and/or legally authorized representative must provide the requested additional information to SRALab within thirty (30) calendar days of SRALab's request.

- B. **Re-evaluation/Appeal.** A patient whose Program Application has been accepted has the responsibility to notify SRALab within thirty (30) calendar days of any changes in circumstances that may affect eligibility for, or amount of, financial assistance, or that impact the patient's ability to make payments under a payment plan. Participation in the Program may be re-evaluated every six (6) months or when there has been a material change in the patient's

financial circumstances (e.g., increased or decreased income, change in household size).

If a Program Application is denied, such determination does not prevent a reassessment of the patient's ability to pay at a later date should the patient's financial situation change. The patient may also file an appeal with the Executive Director, Revenue Cycle to request further consideration based on any extenuating facts or reasons as to why the patient should be eligible for Charity Care Financial Assistance.

Additional information regarding the Program and applying for financial assistance is available by contacting the Charity Care Coordinator at 312-238-6039 or at 355 E. Erie Street, Chicago, Illinois 60611.

PAYMENT PLANS AND COLLECTION ACTIVITY

If the patient's Program Application is denied, or if the patient is approved for less than a one hundred percent (100%) discount, SRAlab will work with the patient to establish individually developed payment terms (taking into account available income and assets, amounts owed, and any prior payments) for the remaining balance. If the patient's family income is less than 600% of FPL, the maximum collectible amount during a twelve (12) month period is twenty percent (20%) of the patient's family income.

The patient must comply with the agreed-upon payment plan. If the patient misses three (3) or more scheduled payments, then SRAlab may commence collection actions upon thirty (30) calendar days' notice to the patient.

Any collection activity will be suspended during the evaluation of a Program Application. SRAlab's collection agents/firms are required by contract to follow the Program's policies and to help identify patients who are eligible or who become eligible due to change of circumstances.

Further information regarding the collection activities SRAlab may pursue is available in SRAlab's Fair Patient Billing Policy. A copy may be obtained at <https://www.sralab.org/contact/billing> or by contacting the Charity Care Coordinator at 312-238-6039 or 355 E. Erie Street, Chicago, Illinois 60611.

NON-DISCRIMINATION IN EMERGENCY CARE

SRAlab is not an acute care provider, does not operate an emergency room, does not otherwise provide emergency medical care as part of its ordinary services, and transfers patients with acute symptoms to acute care hospitals. However, should an SRAlab patient manifest an emergency medical condition while at SRAlab, SRAlab will provide any necessary stabilizing services without discrimination as to whether the patient is eligible for financial assistance. SRAlab will not engage in any activity designed to delay or hinder the provision of necessary stabilizing treatment for emergency medical conditions, such as demanding payment before the services are provided.

The Program is important to SRAlab's Mission and Values. Where extenuating circumstances exist, exceptions to the Program, guidelines, procedures, time frames, and documentation may be waived.

Attachments

[Financial Assistance Application \(02.22\).pdf](#)

Approval Signatures

Step Description	Approver	Date
CFO	Jonathan Tingstad: SVP, Chief Financial Officer	11/2024
Legal Review	Michaëlle Carling: Assistant General Counsel	11/2024
Admin Review	Stephanie Snarskis: Manager Business Support	11/2024
	Susan Clarke: Executive Director, Revenue Cycle	11/2024

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