

Administration & Finance

Compassionate Billing Procedure

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Boston EMS provides emergency medical services to patients regardless of their ability to pay. The Department is sensitive to those who face financial hardship and understands that a patient's illness or injury can create large medical bills which may impact the ability to pay. Two federal laws, the Civil Monetary Penalties Law and the Anti-Kickback Statute, prohibit providers from waiving or reducing patients' cost sharing amount (which includes co-pays and deductibles). The only exemptions are related to financial hardship and uninsured patients. Through the Department's compassionate billing policy, patients who can demonstrate financial hardship will have the fee waived and those without insurance will be afforded discount options.

POLICY

Boston EMS, through its ambulance billing provider, accepts all major credit cards and will work with the responsible party to establish a payment plan whenever possible. Patients (or their representative) who claim financial hardship will be asked to complete the "Boston EMS Financial Hardship Application" as well as submit the required supporting documentation. Boston EMS will utilize the current poverty income guidelines established by the US Department of Health and Human Services (HHS) as a means of guiding whether an individual qualifies for fees to be waived. The threshold for granting a fee waiver will be 400% of the poverty guideline for the lower 48 states and the District of Columbia.

While Boston EMS will utilize the HHS Poverty Guidelines as the primary means of determining eligibility, additional circumstances may be considered such as catastrophic financial hardship due to extended illness or injury, loss of all income, or incapacitating injury or illness. Patients must provide appropriate documentation to support such circumstances. Upon application review, the patient will be contacted to finalize determination of application approval and the appropriate level of adjustment.

PATIENT CONTACT

In an effort to determine payer status, the billing company may send Requests for Information (RFI), invoices and additionally mailings to ensure the correct insurance information is collected and patients are aware of the portion of the bill they are responsible for. In addition to mail, the billing company may contact the patient by phone. All communication must be in alignment with the language and intent of this policy. The billing company shall work collaboratively with those able to pay and guide those experiencing financial hardship through the process of verifying their status.

FINANCIAL HARDSHIP PROCEDURE

1. Before any bill is considered for reduction, Boston EMS's billing vendor will ensure that all insurance benefits have been maximized.

2. If the patient is unable to pay the full bill, but does not meet the threshold for financial hardship, the vendor will arrange for the patient to make monthly interest-free payments (typically over a 6-month period) in a dollar amount that is financially affordable to the patient.
3. If a patient claims financial hardship, Boston EMS's billing vendor will offer the "Boston EMS Financial Hardship Application".
4. The patient or representative shall complete and submit the "Boston EMS Financial Hardship Application" along with proof of income and/or additional supporting documentation to the billing vendor, as outlined in the application.
 - 4.1. Acceptable forms of proof of income include (a) a current IRS W-2 form; (b) most recent income tax return; (c) copies of two (2) current pay stubs from the head of household; (d) an unemployment check stub; (e) a notarized statement of unemployment; or (f) other documentation supporting the level of income or financial hardship claim.
5. Patients shall be informed that during the application review process, they will continue to receive invoices from Boston EMS's billing vendor.
6. A representative at the billing vendor will review the application and supporting documentation. If the patient is able to show proof they qualify for financial hardship, the billing vendor is authorized to waive the fee. If the patient does not meet the federal poverty level threshold of 400%, and the billing company is uncertain they meet the qualification for extenuating circumstances associated with financial hardship, the billing company shall contact Boston EMS for guidance (patients should not be referred to Boston EMS).
7. If the billing company is able to verify financial hardship without contacting the patient, such as for patients who are eligible for Health Safety Net (HSN) offered by MassHealth, or those who have qualified for financial hardship previously in the same year, the account may be written off as Charity Care prior to billing the patient.
8. The billing company shall provide Boston EMS a monthly spreadsheet outlining all hardship requests and resolutions for review.

UNINSURED PATIENTS

For patients who do not qualify for charity care or financial assistance as defined above, Boston EMS requires the vendor to promptly bill patients for services provided using Boston EMS billed charges less the Standard Uninsured Discount: 40% reduction of billed charges. Uninsured patients will also be offered a 10% prompt payment discount if payment is made within 30 days.

UNPAID INVOICES

The Boston EMS billing company may not refer patient accounts to a collections agency. Upon exhausting all efforts to successfully bill a patient's insurance, the billing vendor will send the patient up to four invoices at thirty (30) day intervals. If there is no activity on the account within sixty (60) days after the final invoice is sent, the account is eligible to be written off as bad debt.