

**WITTENBERG LUTHERAN VILLAGE
POLICY AND PROCEDURES**

	Policy No. 33.120WLV	Date Issued	6/30/09	Page 1 of 1
Dept.	Finance			
Subject:	Charity Care Provision			

POLICY STATEMENT: Wittenberg Lutheran Village and Wittenberg Lutheran Village Endowment Corporation (collectively referred to as “Wittenberg”) are committed to providing charity care to persons who have healthcare needs and are uninsured, underinsured, ineligible for a government healthcare program, or otherwise unable to pay. Consistent with its mission to deliver compassionate, high quality, affordable healthcare services and to advocate for those who are poor and disenfranchised, Wittenberg strives to ensure that the financial capacity of people who need health care services does not prevent them from seeking or receiving care.

Charity is not considered to be a substitute for personal responsibility. Customers are expected to cooperate with Wittenberg’s procedures for obtaining charity or other forms of payment or financial assistance, and to contribute to the cost of their care based on their individual ability to pay.

I. Definitions

For the purpose of this policy, the terms below are defined as follows:

Charity Care: Healthcare services that have or will be provided for which the Customer cannot provide complete reimbursement. Charity care results from Wittenberg’s provision of healthcare services free or at a discount to individuals who meet the established criteria.

Family: Using the Census Bureau definition, a group of two or more people who reside together and who are related by birth, marriage, or adoption. According to Internal Revenue Service rules, if the Customer claims someone as a dependent on their income tax return, they may be considered a dependent for purposes of the provision of financial assistance.

Family Income: Family Income is determined using the Census Bureau definition, which uses the following income when computing federal poverty guidelines:

- 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;

- Determined on a before-tax basis;
- Excludes capital gains or losses; and
- If a person lives with a family, includes the income of all family members (Non-relatives, such as housemates, do not count).

EXCLUDED: Noncash benefits (such as food stamps and housing subsidies) are not available for payment of healthcare and residential services and therefore are NOT part of income.

Uninsured: The Customer has no level of insurance or third party assistance which is applicable to their level of care to assist with meeting his/her payment obligations.

Underinsured: The Customer has some level of insurance or third-party assistance but still has out-of-pocket expenses that exceed his/her financial abilities.

II. Procedures

A. Services Eligible Under this Policy. For purposes of this policy, “charity” refers to healthcare or residential services provided by Wittenberg without charge or at a discount to qualifying Customers in the ordinary course of its service provision.

B. Eligibility for Charity. Eligibility for charity will be considered for those individuals who are uninsured, underinsured, ineligible for any government health care benefit program, and who are unable to pay for their care, based upon a determination of financial need in accordance with this Policy.

C. Determination of Financial Need.

1. Financial need will be determined in accordance with procedures that involve an individual assessment of financial need; and may include an application process, in which the Customer or the Customer’s guarantor are required to cooperate and supply personal, financial and other information and documentation relevant to making a determination of financial need; and may
 - Include the use of external publically available data sources that provide information on a Customer’s or a Customer’s guarantor’s ability to pay (such as credit scoring);

- Include reasonable efforts by Wittenberg to explore appropriate alternative sources of payment and coverage from public and private payment programs, and to assist Customers to apply for such programs;
 - Take into account the Customer's available assets, and all other financial resources available to the Customer; and
2. It is preferred but not required that a request for charity and a determination of financial need occur prior to rendering of services. However, the determination may be done at any point in the collection cycle. The need for payment assistance shall be re-evaluated at each subsequent time of services if the last financial evaluation was completed more than a year prior, or at any time additional information relevant to the eligibility of the Customer for charity becomes known.
 3. Wittenberg's values of human dignity and stewardship shall be reflected in the application process, financial need determination and granting of charity. Requests for charity shall be processed promptly and Wittenberg shall notify the Customer or applicant in writing within 30 days of receipt of a completed application.

D. Customer Qualifications for Charity

Subject to a determination by Wittenberg that it can continue to operate on a sound financial basis, services will not be terminated solely because of a Customer's financial inability to continue to pay the stated fees or other charges payable due to reasons or circumstances beyond a Customer's control; provided, however, this policy shall not be construed to qualify or limit the right of Wittenberg to terminate services in accordance with the terms of a Customer agreement. A Customer will present facts to Wittenberg related to his/her inability to pay and if these facts, in Wittenberg's sole discretion, justify special financial consideration, Wittenberg will give careful consideration to deferring or waiving in part or in whole the any charges payable by the Customer so long as such deferral or waiver can be made without impairing Wittenberg's ability to attain standards of care while operating on a sound financial basis. Any determination with regard to the granting of financial assistance shall be within Wittenberg's sole discretion, and any decision to provide such financial assistance shall continue in effect only so long as Wittenberg, in its sole discretion, determines that it can continue to operate for the benefit of all customers on a sound financial basis.

In the event Wittenberg determines to provide a Customer with any financial assistance, Wittenberg may require the Customer to accept a change in the specific dwelling place in which services are provided.

At Wittenberg's discretion, Customers may be required to provide a financial up-date from time to time as requested.

E. Communication of the Charity Program to Customers and the Public. Notification about charity care available from Wittenberg, which shall include a contact number, shall be disseminated by Wittenberg by various means, which may include, but are not limited to, the publication of notices in Customer bills and by posting notices in admitting and registration

departments, and Wittenberg business offices that are located on facility campuses, and at other public places as Wittenberg may elect. Information shall also be included on facility websites and in the admission form. Such information shall be provided in the primary languages spoken by the population serviced by Wittenberg. Referral of Customers for charity care may be made by any member of the Wittenberg staff or affiliates, including physicians, nurses, financial counselors, social workers, case managers, chaplains, and religious sponsors. A request for charity care may be made by the Customer or a family member, close friend, or associate of the Customer, subject to applicable privacy laws.

F. Relationship to Collection Policies. Wittenberg management shall develop policies and procedures for internal and external collection practices that take into account the extent to which the Customer qualifies for charity, a Customer's good faith effort to apply for a governmental program or for charity from Wittenberg, and a Customer's good faith effort to comply with his or her payment agreements with Wittenberg. For Customers who qualify for charity care and who are cooperating in good faith to resolve their healthcare bills, Wittenberg may offer extended payment plans to eligible Customers, will not impose wage garnishments, will not send unpaid bills to outside collection agencies, and will cease all collection efforts.

G. Regulatory Requirements. In implementing this Policy, Wittenberg management and facilities shall comply with all other federal, state, and local laws, rules, and regulations that may apply to activities conducted pursuant to this Policy.

Authority Reference: Organizational Directive.