	Department: Corporate Compliance	Policy No.: 303
	TITLE: CUSTOMER WAIVER OF CO-PAYS AND DEDUCTIBLES	
Effective Date: 1/1/15	Revised: 1/1/15	

CUSTOMER WAIVER OF CO-PAYS AND DEDUCTIBLES

SCOPE:

All Ascension At Home, LLC colleagues associated with the billing and coding process in any way, including all internal and external billing companies utilized by Ascension At Home, LLC. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time associates, independent contractors, clinicians, officers and directors.

PURPOSE:

To establish specific, limited circumstances under which it is permissible for a representative of Ascension At Home, LLC or its subsidiaries (the “Company”) to waive or reduce a patient’s obligation to pay co-insurance or deductible amounts owed for the provision of medical services. For purposes of this policy, all references to patients include patients who are covered by Medicare, Medicaid, other government payors, and private insurers.


POLICY:

Company colleagues and internal/external billing companies may not waive or reduce a patient’s obligation to pay co-pays and deductible amounts owed for the provision of medical services except as described below.

PROCEDURE:

Providers or suppliers of medical services may waive or reduce co-insurance or deductible amounts in the following situations:

- If we receive confirmation that the patient is indigent and requests that his balance be written-off.
- On a case-by-case basis when the cost of billing and collection of the debt would exceed, or be disproportionate to, the amount to be collected.
- “No charges” and discounts may be applied equally to all payors for a particular patient. For example, if a clinician wishes to provide a 75% discount to the patient, all payors for which the patient is covered must receive the same discount. If the clinician wants the patient to pay nothing, no insurance or government payor may be billed and the patient’s charges would be written-off to \$0. The “no charges” and discounts must be granted on a

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case-by-case basis and not across entire groups of individuals, such as clinicians' families.


- After reasonable efforts have failed to collect the co-pays or deductibles directly from the patient, a waiver may be made. This is referred to as bad debt write-offs. The billing entities must follow standard collection policies.

It is **not** acceptable to waive or reduce co-payment and deductible amounts in the following situations:

- Prior to making a reasonable effort to collect a patient's balance.
- Applying discounts to the patient's balance unequally across all payors for which the patient is covered.

Guidelines

- Decisions to waive a patient's co-payment and/or deductible should be made on a case-by-case basis and not a specific group of patients for reasons unrelated to indigence.
- Company colleagues shall not offer any waiver of co-pays or deductibles to potential patients.
- The Company shall not advertise to the general public that Medicare or private insurance is accepted as payment in full.
- The Company shall not advertise to the general public that patients will incur no out-of-pocket expenses.
- The Company shall not advertise the availability of waivers or reduce co-pays and deductibles in any way, except to advise individual patients or clinicians of the limited availability of such waivers upon inquiry.
- The Company shall not charge Medicare beneficiaries higher amounts than those charged to other persons for similar services.
- If a clinician requests the Company's billing entities to waive or reduce a patient's co-payment or deductible, the clinician must request that the entire bill be reduced by the same percentage for all payors.
- A billing entity can only waive a patient's co-payment or deductible due to financial hardship if:
 1. The patient's net income for the previous year is equal to or less than the state defined hardship level, as evidenced by the Applicant's most recent tax return or other documentation; and
 2. The patient has no current source of income in an amount equal to or greater than the state defined hardship level on an annualized basis.

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- Billing entities must follow their standard collection procedures for all patient accounts. The patient’s balance may be waived or reduced when they reach bad debt status. Also, the cost of collecting patient balances may be written-off if the balance would exceed the amount collected.

Any waiver or reduction of co-insurance or deductible amounts that do not strictly comply with the above standards are subject to potential criminal and civil sanctions and are strictly prohibited by this policy.