

Our Healing Ground PLLC

EFFECTIVE DATE: June 1 2019

POLICY: Prompt Pay Discount

PURPOSE: To make available discount services to reduce costs in billing for the agency and to reduce expense for clients

Eligibility: Prompt pay is offered to all clients.

How it works: The discount is offered for outstanding balances after insurances/ other payors have been billed at the noted rate for services. It is offered immediately for clients paying out of pocket or with their HSA/FSA. Prompt pay is offered to those who have the sliding fee scale payment option. It is applied after rate of services has been reduced to fit income guidelines. 10% Prompt Pay discount is offered for those clients who pay with cash or check within ten days of receiving their invoice.

When paying by credit card/ check card/ HSA/ FSA a client may receive a 7% prompt pay discount when payment is received within 10 days of receiving the invoice.

Approval:	Katrina Gregor MSW, LICSW CEO/CFO
Revised:	June 8, 2020; May 1, 2021; May 1, 2022
Reviewed By:	Katrina Gregor MSW, LICSW CEO/CFO

Our Healing Ground PLLC

EFFECTIVE DATE: June 1 2019

POLICY: Sliding Fee Discount Policy

PURPOSE: To make available discount services to those in need.

According to the National Association of Social Workers: 1.13 Payment for Services

(a) When setting fees, social workers should ensure that the fees are fair, reasonable, and commensurate with the services performed. Consideration should be given to clients' ability to pay.

(b) Social workers should avoid accepting goods or services from clients as payment for professional services. Bartering arrangements, particularly involving services, create the potential for conflicts of interest, exploitation, and inappropriate boundaries in social workers' relationships with clients. Social workers should explore and may participate in bartering only in very limited circumstances when it can be demonstrated that such arrangements are an accepted practice among professionals in the local community, considered to be essential for the provision of services, negotiated without coercion, and entered into at the client's initiative and with the client's informed consent. Social workers who accept goods or services from clients as payment for professional services assume the full burden of demonstrating that this arrangement will not be detrimental to the client or the professional relationship.

(c) Social workers should not solicit a private fee or other remuneration for providing services to clients who are entitled to such available services through the social workers' employer or agency.

The Sliding Fee Discount Program is designed to provide free or discounted care to those who have no means, or limited means, to pay for their mental health services (Uninsured or Underinsured).

In addition to quality healthcare, clients are entitled to financial counseling by someone who can understand and offer possible solutions for those who cannot pay in full. The clinician's role and the Business Office Manager's role is that of patient advocate, that is, one who works with the patient to find reasonable payment alternatives.

Our Healing Ground PLLC will offer a Sliding Fee Discount Program to all who are unable to pay for their services. Our Healing Ground PLLC will base program eligibility on a person's ability to pay and will not discriminate on the basis of an individual's race, color, sex, national origin, disability, religion, age, sexual orientation, or gender. The Federal Poverty Guidelines are used in creating and annually updating the sliding fee schedule (SFS) to determine eligibility.

PROCEDURE: The following guidelines are to be followed in providing the Sliding Fee Discount Program.

1. Notification: Our Healing Ground will notify patients of the Sliding Fee Discount Program by:
 - Payment Policy Brochure will be available to all clients at the time of service.
 - Notification of the Sliding Fee Discount Program will be offered to each client upon initiation of services.
 - Sliding Fee Discount Program application will be included with collection notices sent out by Our Healing Ground.
 - An explanation of our Sliding Fee Discount Program and our application form are available on Our Healing Ground's website.
 - Our Healing Ground places notification of Sliding Fee Discount Program in the clinic waiting area.

- Additionally, Our Healing Ground provides notification of Sliding Fee Discount Program when client updates annual intake paperwork.
2. All patients seeking healthcare services at Our Healing Ground are assured that they will be served regardless of ability to pay. No one is refused service because of lack of financial means to pay.
 3. Request for discount: Requests for discounted services may be made by clients, family members, human services staff or others who are aware of existing financial hardship. The Sliding Fee Discount Program will only be made available for clinic visits. Information and forms can be obtained from your clinician, business office manager, and the business website.
 4. Administration: The Sliding Fee Discount Program procedure will be administered through the business office manager or their designee. Information about the Sliding Fee Discount Program policy and procedure will be provided to clients, family members, human services staff or whomever requests it and assistance will be offered for completion of the application. Dignity and confidentiality will be respected for all who seek and/or are provided healthcare services.
 5. Completion of Application: The client/responsible party must complete the Sliding Fee Discount Program application in its entirety. Our Healing Ground staff are available to support client/ responsible party in completion of the Sliding Fee Application. By signing the Sliding Fee Discount Program application, persons are confirming their income to Our Healing Ground PLLC as disclosed on the application form.

7. Eligibility: Discounts will be based on income and family size only. Our Healing Ground uses the Census Bureau definitions of each.

a. Family is defined as: a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

b. Income 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. *Noncash benefits (such as food stamps and housing subsidies) do not count.*

8. Income verification: Applicants must provide one of the following: prior year W- 2, two most recent pay stubs, letter from employer, or Form 4506-T (if W-2 not filed). Self-employed individuals will be required to submit detail of the most recent three months of income and expenses for the business. Adequate information must be made available to determine eligibility for the program. Self- declaration of Income may be used. Patients who are unable to provide written verification must provide a signed statement of income.

9. Discounts: Those with incomes at or below 100% of poverty will receive a full 100% discount for clinical services. Those with incomes above 100% of poverty, but at or below 200% of poverty, will be charged a nominal fee according to the attached sliding fee schedule. The sliding fee schedule will be updated during the first quarter of every calendar year with the latest Federal Poverty Guidelines.

10. Nominal Fee: clients with incomes above 100% of poverty, but at or below 200% poverty will be charged a nominal fee according to the attached sliding fee schedule and based on their family size and income. However,

patients will not be denied services due to inability to pay. The nominal fee is not a threshold for receiving care and thus is not a minimum fee or co-payment.

11. **Waiving of Charges:** In certain situations, clients may not be able to pay the nominal or discount fee. Waiving of charges may only be used in special circumstances and must be approved by Our Healing Ground PLLC CEO, CFO, or their designee. Any waiving of charges should be documented in the client's file along with an explanation (e.g., ability to pay, good will, health promotion event).

12. **Applicant notification:** The Sliding Fee Discount Program determination will be provided to the applicant(s) in writing and will include the percentage of Sliding Fee Discount Program write off, or, if applicable, the reason for denial. If the application is approved for less than a 100% discount or denied, Our Healing Ground PLLC will work with client/ responsible party to establish payment arrangements. Sliding Fee Discount Program applications cover outstanding patient balances for six months prior to application date and any balances incurred within 12 months after the approved date, unless their financial situation changes significantly. The applicant has the option to reapply after the 12 months have expired or anytime there has been a significant change in family income. When the applicant reapplies, the look back period will be the lesser of six months or the expiration of their last Sliding Fee Discount Program application.

13. **Refusal to Pay:** If a client verbally expresses an unwillingness to pay or vacates the premises without paying for services, the patient will be contacted in writing regarding their payment obligations. If the patient is not on the sliding fee schedule, a copy of the sliding fee discount program application will be sent with the notice. If the patient does not make effort to pay or fails to respond within 60 days, this constitutes refusal to pay. At this point in time, Our Healing Ground PLLC can explore options not limited to, but including offering the client a payment plan or waiving of charges.

14. **Record keeping:** Information related to Sliding Fee Discount Program decisions will be maintained and preserved in a centralized confidential file located in the Business Office Manager's Office, in an effort to preserve the dignity of those receiving free or discounted care.

a. Applicants that have been approved for the Sliding Fee Discount Program will be logged in Our Healing Ground PLLC's practice management system, noting names of applicants, dates of coverage and percentage of coverage. This record is HIPAA compliant.

b. The Business Office Manager will maintain an additional monthly log identifying Sliding Fee Discount Program recipients and dollar amounts. Denials and applications not returned will also be logged. This is a locked document, with access provided to the business manager and the CFO/CEO.

15. **Policy and procedure review:** Annually, the amount of Sliding Fee Discount Program provided will be reviewed by the CEO/CFO and Business Office Manager. The SFS will be updated based on the current Federal Poverty Guidelines. Pertinent information comparing amount budgeted and actual community care provided shall serve as a guideline for future planning. This will also serve as a discussion base for reviewing possible changes in our policy and procedures and for examining institutional practices which may serve as barriers preventing eligible patients from having access to our community care provisions.

16. **Budget:** During the annual budget process, an estimated amount of Sliding Fee Discount Program service will be placed into the budget as a deduction from revenue.

Secured document not attached: Sliding Fee Scale Client List

Approval:	Katrina Gregor MSW, LICSW CEO/CFO
Revised:	June 8, 2020; May 1, 2021, May 1 2022
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See Appendix:

C 2022 Fee Schedule

D 2022 Sliding Fee Schedule

E Sliding Fee Application Brochure

F Sliding Fee Scale Office Signage

G Electronic Sliding Fee Notice