



Public Health

POLICY

Clinical Administration Policy

Policy Title: Public Health Provider - Charity Care Program	Policy Number: PH.CLN.07
Approved by: Director/Deputy Director Signature: <u>Verinder Tanuja</u>	Date: <u>9/25/2023</u>
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I. PURPOSE:

This policy will serve to implement Tarrant County Public Health’s (TCPH), Public Health Provider – Charity Care (PHP-CC) program. PHP-CC authorizes TCPH to provide preventive and clinical care to all persons regardless of ability to pay, in alignment with state and federal guidelines and eligibility criteria.

II. SCOPE:

All Clinical Divisions and clinical programs, excluding the Travel Clinic, under the TCPH organizational structure.

III. DEFINITIONS:

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

1. **Charity Care:** Healthcare services for free, or at a discount, to individuals who meet the established criteria. Charity Care does not include bad debt, courtesy allowances, or discounts given to patients who do not meet Tarrant County Public Health’s Charity Care Policy (HHSC Ch. 533).
2. **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 patient claims someone as a dependent on their income tax return, they may be considered a dependent for purposes of the provision of financial assistance.
3. **Family Income:** Family Income is determined using the Census Bureau definition, which uses the following income when computing federal poverty guidelines:
 - a. 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.
 - b. Noncash benefits (such as food stamps and housing subsidies) do not count.
 - c. Determined on a before-tax basis.
 - d. Excludes capital gains or losses.
 - e. If a person lives with a family, includes the income of all family members (Nonrelatives, such as housemates, do not count).



Public Health

POLICY

4. **Federal Poverty Level (FPL):** A measure defined by the United State Department of Health and Human Services based on gross income and household size to indicate poverty threshold.
5. **Federal Poverty Standard:** Thresholds met by holding to the FPL of the current year.
6. **Indigent Persons:** Patients who are uninsured and are experiencing financial hardship or have an income level at specified thresholds based on federal poverty levels.
7. **Patient:** A person who, to receive medical care, consults with or is seen by a physician or other healthcare professional.
8. **Responsible Party:** The individual who is responsible for the payment of any public health medical charges which are not covered by a third-party payor.
9. **Third Party Coverage:** An obligation on the part of an insurance company, health care services contractor, health maintenance organization, group health plan, government program (Medicare, Medicaid, or medical assistance programs).
10. **Underserved populations:** Consumers who share one or more of the following characteristics:
 - a. Receive fewer health care services.
 - b. Encounter barriers to accessing primary health care services (e.g., economic, cultural, and/or linguistic).
 - c. Have a lack of familiarity with the health care delivery system.
 - d. Face a shortage of readily available providers.
11. **Uninsured:** Consumers who have no insurance or third-party coverage to assist with meeting the Consumer's payment obligations.
12. **Underinsured:** The patient has some level of insurance or third-party assistance but still has out-of-pocket expenses that exceed his or her financial abilities.
13. **Vulnerable populations:** Consumers who share one or more of the following characteristics. They may:
 - a. Have a high risk for multiple health problems and/or pre-existing conditions.
 - b. Have limited life options (e.g., financial, educational, housing)
 - c. Display fear and distrust in accessing government programs or disclosing sensitive information about family members.
 - d. Have a limited ability to understand or give informed consent without the assistance of language services (e.g., consumers with LEP or cognitive impairments)
 - e. Have mobility impairments.
 - f. Have a lack of access to transportation services.
 - g. Have a lowered capacity to communicate effectively.
 - h. Face any type of discrimination.



Public Health

POLICY

IV. POLICY:

To fulfill its commitment to provide Charity Care, Tarrant County Public Health (TCPH) provides no charge and sliding scale discounted services to indigent persons. The Federal Poverty Level guidelines assist TCPH's Business Office in making consistent and objective decisions regarding eligibility for Charity Care. Charity Care shall be based on an individualized determination of financial need and shall not consider age, gender, race, ethnicity, sexual orientation, or religious affiliation.

Eligible Services

1. Public Health services designed to protect and promote the general population's health and to prevent higher cost interventions. These services are according to the Texas Administrative Code 355.8215
2. These services include,
 - a. Tuberculosis identification, diagnosis, and treatment
 - b. Sexually transmitted diseases identification, diagnosis, and treatment
 - c. Immunizations (clinical services and administration with the exclusion of travel immunizations)
 - d. Dental care, if available
 - e. Chronic disease screening, monitoring and self-management.

Eligibility Determination

1. Eligibility determinations and decisions regarding collection of amounts owed to TCPH by responsible parties shall be made in accordance with this Policy and the TCPH Charity Care Eligibility Determination Procedure.
2. TCPH will not impose unreasonably burdensome application procedures for Charity Care eligibility upon the responsible party, and will consider any physical, mental, intellectual, or sensory deficiencies or language barriers which may hinder the responsible party's capability of complying with the application process.
3. TCPH must make every reasonable effort to determine the existence or nonexistence of any available third-party coverage that might cover in full or in part the charges for services provided to each patient.

Eligibility Criteria

1. Responsible parties must be uninsured and meet one or more of the following criteria to qualify for Charity Care:
 - a. All responsible parties with family income at or below 100% of the federal poverty standard, adjusted for family size, shall be determined to be indigent persons, and qualify for the full amount of charges related to public health medical services to be covered by Charity Care.
 - b. Responsible parties with family income between 101% and 400% of the federal poverty standard, adjusted for family size, shall be determined to be indigent persons qualifying for discounts from charges related to appropriate public health medical services in accordance with the (below) Federal Poverty Standard.



Public Health

POLICY

Federal Poverty Standard	Charity Care Adjustment
0 to 100%	100% of cost of services
101% to 200%	75% of cost of services
201% to 300%	50% of cost of services
301% to 400%	40% of cost of services

- c. Experiencing homelessness.
- d. Currently (at the time of billing) eligible for Medicaid but did not have Medicaid on the Date of Service.
- e. Eligible for participation in Women, Infants and Children programs (WIC).
- f. Eligible for food stamps (SNAP/Lone Star Card/EBT/TANF)
- g. Eligible for subsidized school lunch program.
- h. Eligible for subsidized housing or rent voucher from federal, state, housing authority or city.
- i. Receiving services from a school-based referral program.

Eligibility Determination Verification

TCPH personnel will work with responsible parties to determine eligibility for Charity Care. Any responsible party determined to be Charity Care eligible shall make every reasonable effort to provide qualifying documentation as outlined in the TCPH Charity Care Eligibility Determination Procedure; within fourteen calendar days to TCPH.

Inability to Pay

1. Per the Texas Administrative Code (Sec. 121.006) any person receiving clinical services at TCPH may not be denied services for inability to pay.
2. Those persons and responsible party who cannot pay the assigned fee for a service due to financial hardship shall receive the service free of charge, and no bill shall be issued for the rendered service this is in alignment with the Texas Local Government Code (12.032 Health & Safety Code).

Notice Requirements

1. TCPH's Charity Care Policy shall be posted or prominently displayed within public areas of clinical services as well as the TCPH website. This policy shall be provided to the responsible party and explained by eligibility personnel at the time that TCPH requests information regarding the availability of any third-party coverage.
2. The written notices, verbal explanations, policy summary and application form will be available in any language spoken by more than ten percent of the population in TCPH's service area and interpreted for other non-English speaking or limited-English speaking patients and for other patients who cannot



Public Health

POLICY

understand the writing and/or explanation. A list of non-English translation(s) of these are made available.

3. TCPH has established a standardized training program on its Charity Care policy and the use of interpreter services to assist persons with limited English proficiency and non-English-speaking persons in understanding information about its Charity Care policy. TCPH will provide regular training to front-line staff and any other appropriate staff, to answer Charity Care questions.

Participating Providers

This policy applies to services provided by all clinical programs provided by TCPH, multi-service centers, mobile units, and in home care. (TCPH Clinical Services)

Confidentiality

All information relating to the applications will be kept confidential. Copies of documents that support the application will be kept with the application form. All records will be retained.

References & Resources

1. Texas Health and Safety Code Ch. 12, 533 and 534
2. Texas Administrative Code 355.8215 and 355.8217
3. <https://pfd.hhs.texas.gov/>