

SOUTHERN NEVADA HEALTH DISTRICT DIVISION POLICY/PROCEDURE/PROTOCOL



DIVISION: Clinical Services, FQHC	NUMBER:
PROGRAM: Division Wide	CS/FQHC-ADM- F-003
TITLE: Sliding Fee Discount Program	ORIGINATION DATE: 9/17/19
APPROVED BY:	LAST REVISION: 1/8/20
EXECUTIVE DIRECTOR/CHIEF MEDICAL OFFICER:	
Fermin Leguen, MD, MPH Effective Date	LAST REVIEW: 1/8/20
DIRECTOR OF CLINICAL SERVICES/	
CHIEF ADMINISTRATIVE NURSE:	NEXT REVIEW: 1/8/21
Jan Pupipi 1/17/20.	
JoAnn Rupiper, RN, BSN, MPH Effective Date	

I. PURPOSE

To provide a consistent and fair Sliding Fee Discount Program for all patients according to grant requirements and Section 330(k)(3)(G) of the PHS Act and HRSA, Chapter 9 Sliding Fee Discount Program of the Health Center Program Compliance Manual.

II. SCOPE

Applies to all Workforce members that process the Sliding Fee Discount Program for clients seeking services in Clinical Services (CS) and Federally Qualified Health Center (FQHC) divisions.

III. POLICY

- A. The Health District is committed to providing essential health care services regardless of the patient's ability to pay. The Health District adheres to state/federal rules and regulations including but not limited to Title X and Ryan White Programs regarding the Sliding Fee Discount Program. Discounts are available based upon family size (self-declared) and income for patients without health insurance and for patients with third party insurance that does not cover or only partially covers fees.
- B. Health District clinics offer a Sliding Fee Discount Program including, but not limited to, the TB Clinic and the FQHC division known as the Southern Nevada Community Health Care Center (SNCHC) that includes Refugee Health Clinic, Family Health Care Clinic, Dental Clinic, Ryan White Program and Sexual Health Clinic.
- C. The Health District provides Sliding Fee Discount Program information to all clients that is prominently displayed in common client areas and Health District media. Information is available in appropriate language and literacy levels for the client population served. Patients may apply for a discount at any time.
- D. The Health District will base eligibility for discounts only 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 identity.

- E. The SNCHC creates and annually updates the sliding fee schedule (SFS) to determine eligibility based on the Federal Poverty Guidelines (FPG) https://aspe.hhs.gov/poverty-guidelines.
 - 1. The household current income and size is applied to the FPG for determining use of the sliding fee schedule. Definitions of current income and household size is noted in Appendix A. See CS-ADM-SOP-003 for specific procedure. For Ryan White Program, only the individual's income is applied to the sliding fee schedule.
 - 2. The Health District charges a nominal fee (\$20.00 for 2020) that is reviewed annually and may be subject to change. For Family Planning and Ryan White clients, the Health District waives the nominal fee based on grant requirements for patients with income ≤ 100% FPG.
 - a. Data from patient satisfaction surveys will be utilized to determine if the nominal fee is considered adequate by patients.
 - 3. Insured clients above 100% of the FPG and ≤ 200% (250% for Family Planning and 400% for Ryan White) will be charged the lower of two options: the insurance co-pay or fees based on the sliding fee scale. See policy CS-RW-000-A RW Cap on Charges for additional guidelines.
- F. Individuals do not qualify for the Sliding Fee Discount program if:
 - 1. Have household income over the 200% FPG and receive services in the Southern Nevada Community Health Care Center (includes Family Health Care Clinic, Dental Clinic and Sexual Health Clinic) and TB Clinic.
 - 2. Have household income over 250% and receive services in the Family Planning Program.
 - 3. Have <u>individual</u> income over 400% and receive services in the Ryan White programs.
- G. For a minor seeking confidential services in the Sexual Health Clinic and Family Planning Clinic, a client with the age of ≤ 18 years old and they indicate that their parent(s) are not aware of the client seeking reproductive health, the Health District will apply the sliding fee scale based only on the client's income. If the client (≤ 18 years old) indicates that their parent(s) are aware they are seeking services (not confidential), the client and parental income will be utilized.
- H. For the RW clients <18, RW grant funded clinic services require parent or guardian consent unless special approval is received from the funder. If client receives special approval for grant funded services from RW funder, the Health District will use minor client's individual income.
- Additional discounts may be available to patients who meet criteria for state or county-funded indigent care programs. Additional discounts are dependent on availability of funds.

- J. The eligibility for discounts is certified at least annually using the current FPG. The Health District evaluates, at least once every three years, its sliding fee discount program. At a minimum, the Health District:
 - 1. Collects utilization data that allows it to assess the rate at which patients within each of its discount pay classes, as well as those at or below 100% of the FPG, are accessing health center services;
 - 2. Utilizes this and, if applicable, other data (for example, results of patient satisfaction surveys or focus groups, surveys of patients at various income levels) to evaluate the effectiveness of its sliding fee discount program in reducing financial barriers to care; and
 - 3. Identifies and implements changes as needed.

APPENDIX A

Definition of Economic Unit/Family Size

The family size/economic unit is the number of persons, related and/or unrelated, living together as one economic unit and whose production of income and consumption of food, goods, and services are shared with the following guidelines and exceptions:

- 1. A Foster child is counted as a family of one.
- 2. Persons who are claimed as dependents for income tax purposes may be counted as a member of the family whether they reside with the family or not.
- 3. A child is counted as a member of the family with whom s/he lives. In cases of dual custody of a child, the child is counted as member of the family with whom h/she spends the majority of time during the prior month.
- 4. A pregnant woman <u>will</u> be counted as two (or more depending on the number of embryos or fetuses) unless she specifically waives the increase in number.
- 5. Minor children who live with their parents, spouses or unmarried couples that live together should count in the total household size.

Definition of Current Income

Current income is defined as all gross income before deductions are made for income taxes, social security taxes, insurance premiums, child support, car payments etc. All income from the prior 30 days will normally be considered. Occasionally it may be appropriate to consider current income to be income that will be available to the family in the next 30 days (e.g. the sole supporter of the family has just been laid off and has been authorized to receive unemployment for the next 6 months). Income includes the following:

- 1. wages, salary, commissions, or fees.
- 2. net income from farm and non-farm self-employment.
- 3. Social Security benefits.
- 4. dividends or interest on savings or bonds.
- 5. income from estates or trusts, on investments or net rental income.
- 6. public assistance or welfare payments.

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- 7. unemployment payments.
- 8. Government, civilian employee or military retirement or pensions or veteran's payments.
- 9. private pensions or annuities or insurance benefits.
- 10. alimony or child support payments
- 11. other income includes, but is not limited to, cash amounts received or withdrawn from any source including savings, investments, trust accounts and other resources which are readily available to the family.

Income Exclusions

Exclusions from income include, but are not limited to, the following:

- 1. Any basic allowance for quarters (BAQ) received by military services personnel for privatized on-base or off-base housing and cost of living allowance
- 2. The value of in-kind housing and other in-kind benefits (some employer's process salary payments for the dollar amount contributed to health insurance as part of the employee's gross income for tax saving purposes, even though the employee never actually receives the income directly.)
- 3. Non-cash food assistance, payments from the Home Energy Assistance Act of 1980
- 4. Payment for child care under the Child Care and Development Block Grant
- 5. Student financial assistance used for expenses related to the costs of attendance at the educational institution. Financial aid used to cover other expenses such as room and board and dependent care expenses should be included in the income calculations. (i.e.: Pell Grants, National Direct Student Loans, Work Study)
- 6. EITC refund/payment

Acceptable documents for proof of income include:

- 1. Check stubs stating current amount of earnings. A handwritten pay check stub may be accepted if the clinic staff can verify it is a valid payroll check. Check stubs should be consecutive and from month (30 days) prior to scheduled certification appointment.
- 2. W-2 forms with corresponding income tax returns
- 3. Signed statement from employer
- 4. Checking or saving account statement, if reflective of current income
- 5. Current tax records: An IRS U.S. Individual Income Tax Return 1040 form
- 6. Income receipt book or other accounting records for self-employment