



## AGENDA MEMORANDUM

Action Item for the City Council Meeting September 21, 2021

**DATE:** September 14, 2021  
**TO:** Peter Zanoni, City Manager  
**FROM:** Robert Rocha, Fire Chief  
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**Amendment to the City Council Policy 29 – Charitable Care Policy for City EMS to Increase Income Requirements**

**CAPTION:**

Resolution amending the City Council Policy 29 – Charitable Care Policy for City Emergency Medical Services specifying guidelines for waiving Emergency Medical Services charges to increase the income requirements for patients eligible to participate in Government Healthcare Programs from at or below 200% to at or below 400% the Family Poverty Line.

**SUMMARY:**

This resolution amends the current City Council Policy 29 – Charitable Care Policy for City Emergency Medical Services (EMS) specifying guidelines for waiving EMS charges to increase the income requirements for patients eligible to participate in Government Healthcare Programs from at or below 200% to at or below 400% the Family Poverty Line (FPL). This allows for a potential increase EMS revenue that the Corpus Christi Fire Department receives through the Charitable Care Policy.

**BACKGROUND AND FINDINGS:**

The Corpus Christi Fire Department (CCFD) is committed to providing the highest quality care to all its patients. CCFD recognizes that some patients may be unable to pay for all or a portion of the services provided by CCFD. As such, the proposed Charitable Care Policy will set criteria for receiving financial assistance for patients who meet certain socioeconomic thresholds. Charity Care is financial assistance provided based on ability to pay. No patient will be denied financial assistance because of gender, race, creed, color, national identity/ethnic origin, religion, age, sexual orientation or disability. In addition, CCFD will provide, without discrimination, care for emergency medical conditions to individuals regardless of whether they are eligible for financial assistance.

As of October 1, 2019, the Center for Medicare and Medicaid Services began requiring EMS providers to establish a Charitable Care policy in order to maintain eligibility for future Texas Ambulance Supplemental Payment Program (TASPP) reimbursements. The policy must be in writing and approved by the governing body overseeing the EMS provider for eligibility. Rules for Charity Care Policies can be found in 1 Tex. Admin. Code § 355.8210 (2019) which refers to the charity-care principles of the Healthcare Financial Management Association Principles and Practices Board Statement 15 (December 2012). Funding for the TASPP is authorized by the 1115 Transformation Waiver Uncompensated Care pool. Beginning in FY 2020, the TASPP moved to using only Charity Care for reimbursement calculations based on the EMS provider's Charity Care policy.

A patient is only eligible for Financial Assistance after all other financial resources available to the patient have been exhausted and the patient is without sufficient income to cover out of pocket expenses, as determined by CCFD or its contracted EMS billing company, Digitech. Existing and potential financial resources for the patient, including but not limited to, private health insurance and any governmental healthcare program, will be reviewed. Currently, ability to pay is set at an annual income less than 200% of the Federal Poverty level (FPL). The FPL is used to calculate eligibility for certain programs and benefits, including savings on marketplace health insurance, Medicaid, and Children's Health Insurance Program (CHIP) coverage. This table identifies a patient's earnings, based on the number of uninsured family/ household members, by percentage of the Federal Poverty Level.

**FY2020 Health and Human Services FPL**

Annual Income of Federal Poverty Level					
Persons in family/household	FPL	200%	300%	400%	500%
1	\$12,760	\$25,520	\$38,280	\$51,040	\$63,800
2	\$17,240	\$34,480	\$51,720	\$68,960	\$86,200
3	\$21,720	\$43,440	\$65,160	\$86,880	\$108,600
4	\$26,200	\$52,400	\$78,600	\$104,800	\$131,000
5	\$30,680	\$61,360	\$92,040	\$122,720	\$153,400
6	\$35,160	\$70,320	\$105,480	\$140,640	\$175,800
7	\$39,640	\$79,280	\$118,920	\$158,560	\$198,200
8	\$44,120	\$88,240	\$132,360	\$176,480	\$220,600

For families/households with more than 8 persons, add \$4,480 for each additional person.

In order to qualify for the program, patients must complete an application with the CCFD's contracted EMS billing company for financial assistance or fall under presumptive eligibility. Presumptive eligibility may be determined in lieu of reviewing a financial assistance application. Patients who meet any of the criteria for presumptive eligibility will be deemed eligible for a 100% discount and will not be asked to submit an application for financial assistance. Patients who meet the presumptive criteria must not have other forms healthcare coverage such as private insure of government provided healthcare. Current presumptive eligibility criteria include:

- a. Homeless as screened by a CCFD Paramedic.
- b. Qualification for Christus Spohn's, CCMC's, or Driscoll Children's Charitable Care Policy.
- c. Eligible for governmental healthcare program, but not on the date of service or for a non-covered service.

- d. Enrolled in one or more governmental non-healthcare programs for low-income individuals having eligibility criteria at or below 200% of the FPL.
- e. Identified utilizing third party software as having eligibility criteria at or below 200% of the FPL.
- f. Registered in the Corpus Christi Coordinated Entry Program through the Salvation Army.

Without current data available, CCFD used local hospital criteria of 200% of the FPL to determine eligibility. During the FY 2020 TASPP application process, Public Consulting Group (PCG), identified a large amount of Charity Care utilizing the third-party software, Transunion, to determine eligibility. This data showed it captured 71% of CCFD's uninsured, unpaid patients as eligible for Charity Care reimbursement using 200% of the FPL. If CCFD had adjusted the policy to 400%, it could have captured 96%, instead of 71%. Increasing to 400% would increase CCFD's reimbursement opportunity with little to no impact on standard billing revenue.

**ALTERNATIVES:**

The alternative is to keep the current Charitable Care Policy as is and bypass the potential to increase EMS revenue.

**FISCAL IMPACT:**

Increase in EMS revenue through the Charitable Care Policy.

**Funding Detail:**

Fund:	1020	General Fund
Organization/Activity:	35100	City Ambulance
Mission Element:	888	Revenue
Project # (CIP Only):	N/A	
Account:	321025	TASPP Ambulance Suppl Paymt Prgm

**RECOMMENDATION:**

Staff recommends City Council authorize the resolution amendment to change the Charitable Care Policy to increase TASPP revenue collection for FY 2022 and on.

**LIST OF SUPPORTING DOCUMENTS:**

Resolution