ALTEA MEDICAL LLC

DEPARTMENT: Compliance	**POLICY:** C-19
PAGE: 1 of 3	**REPLACES POLICY DATED:** N/A
EFFECTIVE DATE: July 15, 2026	**APPROVED BY:** Karim Salamatian

CHARITY CARE, WAIVERS OF PATIENT SELF-PAYMENT, COPAYMENTS, CO-INSURANCE, AND DEDUCTIBLES

I. BACKGROUND/PURPOSE:

The purpose of this policy is to ensure that any decision to waive a patient's copayment, co-insurance, and/or deductible is based upon uniform and objective criteria and is in compliance with the Company's charitable intent. Patients are frequently covered either under a private health insurance policy or a Federal or state health care program, which usually places cost-sharing obligations on patients in the form of copayments, co-insurance, and/or deductible amounts. In connection with its mission and subject to the availability of resources, Company and its affiliated practices may waive certain self-payment, copayments, co-insurance, and/or deductible obligations for patients who are unable to pay or as otherwise outlined in this policy.

II. POLICY:

Company's general policy is to bill all patients and follow the normal billing cycle, including referral to collections for unpaid debt. However, a patient's self-payment, co-insurance and/or deductible may be waived in the following circumstances: 1) financial hardship; 2) risk management; or 3) failed collection efforts.

III. PROCEDURES:

A. Financial Hardship – A waiver for financial hardship may only be made in certain circumstances, described below, and must be documented in writing.

1. Decisions to waive a patient's co-insurance and/or deductible will be based solely upon the information that the Company or an affiliated practice requests from the patient seeking a waiver (the "Applicant").

2. Applicants requesting a waiver of co-insurance and/or deductible must provide the Company or the affiliated practice with the Applicant's most recent tax return, or other documentation of the Applicant's net income for the most recent year. Documentation received by the Company or an affiliated practice regarding the financial hardship of a patient will be filed with a copy of the applicable patient care report or other applicable patient care record. All information provided by an Applicant to the Company or an affiliated practice regarding a request for a waiver of co-insurance and/or deductible will be kept confidential by personnel, except as required by law.

3. The Company will approve a waiver of an Applicant's co-insurance and/or deductible only if the following criteria are met:

   a. The Applicant's net income for the previous year is equal to or less than $15,960[1] defined hardship level, as evidenced by the Applicant's most recent tax return or other documentation; and

   b. The Applicant has no current source of income in an amount equal to or greater than the $15,960[1] hardship level on an annualized basis.

4. If the Applicant does not qualify for a waiver of co-insurance and/or deductible, the Applicant will be notified of this determination in writing.

5. If an Applicant does qualify for a waiver of co-insurance and/or deductible, the Company will follow the following process:

   a. Complete a Waiver of Co-insurance and/or Deductible Certification Form, indicating that the income threshold level has been met. The Waiver of Co-insurance and/or Deductible Certification Form should be forwarded to the Compliance Officer for approval;

   b. Once approved, the Waiver of Co-insurance and/or Deductible Certification Form will be filed both on the Company's electronic billing system OR in Company's hard copy files, as applicable, and in accordance with the Company's Patient Records Policy; and

   c. Notify the Applicant of the approval in writing and inform the Applicant as to the nature and scope of the waiver.

6. Such a waiver will be coded in the electronic billing system for tracking purposes. The Compliance Department may monitor the approved requests for waiver to assure that such waivers are not routine.

7. With respect to the waiver of self-payments, copayments, co-insurance, and deductibles, Company personnel and personnel of its affiliated practices will not:

   a. Offer any waiver of copayments, co-insurance, and/or deductible to Company's patients, or potential patients, unless specifically authorized under this Policy;

[1] U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, 2026 Poverty Guidelines, available at https://aspe.hhs.gov/sites/default/files/documents/b1bfa16b20ae9b89d525bc35de7c1643/detailed-guidelines-2026.pdf.

b. Advertise this Policy to the general public or advertise that Medicare or private insurance is accepted as payment in full;

c. Advertise to the general public that patients will not incur out-of-pocket expenses;

d. Advertise the availability of waivers of co-insurance and deductible amounts in any way, except to advise individual patients or health care providers of the limited availability of such waivers upon indigence. Such advice by personnel will be limited to a statement that a waiver is available from the Company or an affiliated practice, but only under the strict criteria set forth in this policy;

e. Routinely use financial hardship forms which state that a patient is unable to pay co-insurance and deductible amounts without evidence that the income threshold level has been met;

B. Risk management – A waiver for risk management service (e.g., quality issues) may be made only upon the written approval of the affiliated practice's Medical Director and the Compliance Officer after consulting with legal counsel. If a deductible or co-insurance is waived for risk management purposes, then the private insurance payor will also be offered a refund, which will be documented.

C. Failed Collection Efforts – A waiver is made after reasonable efforts have failed to collect the co-payments or deductibles directly from the patient, referred to as bad debt write-offs. The billing department must follow standard collection procedures.

D. No other waivers are permitted unless approved in writing by the Compliance Officer.

IV. QUESTIONS:

Should you have any questions, comments, or concerns about this policy and associated procedures, we encourage you to raise them with your manager, the Compliance Officer, or through our Compliance Hotline (compliance@alteahc.com).