# Public Health Department Health Care Centers Sliding Fee Scale and Health Center Board Update

Santa Barbara County Board of Supervisors September 1, 2015

### Background

- Recent federal policy clarifications
- Operational Site Visit (OSV) (March 2015)
  - 4 of 19 requirements did not pass
    - Fees, Governance, Contracts, Credentialing/Privileging
    - Much better than other Public Entities
      - (Avg. 7of 19 not pass)
  - OSV Team impressed and complimentary
  - Corrective Action Plan for 4 deficiencies
  - These actions address 2 of 4.

#### Fee Ordinance Changes

Current Medical Services Fees and Sliding Fee Scale structure were adopted on October 21, 2014.

#### **OSV** Finding

#### Sliding Fee Scale Structure:

- Must have a flat fee for uninsured under 100% of FPL or no charge
- Must have 3 discount levels between 100% and 200% of FPL
  - Currently have 2 levels



#### **Proposed Changes**

Based on our Site Visit Report and review of current requirement, we propose the following revenue-neutral changes and recommendations to comply:

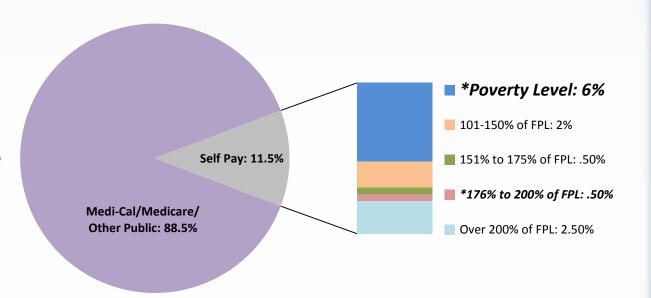
- Establish a flat, fixed fee of \$45 for uninsured patients under 100% of federal poverty level (FPL).
  - Includes all services, procedures, and tests (including lab tests and x-ray) performed. (Not pharmaceuticals)
- Establish a third level of discount for patients with incomes between 100% and 200% of FPL.



The recommendations have been reviewed and approved by the Auditor-Controller and the Health Center Board.

#### Current Health Center Patient Population

100% of Federal Poverty Level (FPL) patients represent **6%** of total patients seen.



Projected PHD Health	"Insured"	Self-Pay (FPL = Federal Poverty Level)					
Center population (using 30,000 unique patients per year):	Medicare/ Medi-Cal	<100% of FPL	101%-150% of FPL	151%-175% of FPL	176%-200% of FPL	>200% of FPL	
% of Patients	88.5%	6%	2%	.50%	.50%	2.5%	
# of Patients	26,550	1,800	600	150	150	750	
Approx. Single Adult Income Level	<\$16,243	<\$11,770	\$11,771 - \$17,655	\$17,656- \$20,598	\$20,599 - \$23,540	>\$23,541	

## Comparison of Sliding Fee Scales Using a projection of 30,000 annual patients seen and current percentages of uninsured

Sliding Fee Scale (Adopted 10/21/2014)	%	Sliding Fee Scale (Proposed)	% or \$	% of Annual Patients	# of Annual Patients
0% to 100% of FPL	72%	0% to 100% of FPL	\$45	6%	1,800
101% to 150% of FPL	60%	101% to 150% of FPL	60%	2%	600
151% to 200% of FPL	45%	151% to 175%	50%	.5%	150
		176% to 200%	45%	.5%	150
Over 200% of FPL	0%	Over 200% of FPL	0%	2.5%	750

#### **Additional Considerations**

- The fixed fee will not disadvantage the patient and is set at a level which directly compares to the existing 72% discount for an established visit and Lab tests.
- Patients and physicians will benefit from greater predictability in what our most indigent patients are charged.
- Patients will be asked for a small deposit if they do not have the \$45 at the time of their visit.



 No one will be turned away based on their ability to pay.

#### Governance

Health Center Board (often 501(c)(3)

- 1. Complies with Section 330
- 2. Maintains key authorities over operations.
- 3. Evaluation for Executive Director

Co-Applicant Agreement

Responsibilities

Federal HRSA/BPHD

Section 330 (e&h) grant funds

Board of Supervisors (Public Entity)

- 1. Grantee
- Financial management
- 3. Personnel policies
- Employs Executive Director

## Governance Changes

- HRSA policy changes and OSV findings
  - Ordinance Amendment
    - Board Members and selection
    - No longer serves as Co-Applicant Agreement
  - Co-Applicant Agreement (new)
    - Clarifies authorities and responsibilities
      - Board of Supervisors- authorities that <u>cannot</u> be delegated (personnel and financial)
      - Health Center Board- operational oversight except for authorities reserved for Board of Supervisors
        - » Board member liability coverage
  - Draft Co-Applicant Agreement approved by OSV Team and Health Center Board

# Questions? Recommendations for Approval

- a) Approve the amended Fee Ordinance and Sliding Fee Scale, effective January 1, 2016.
  - 1. Incorporates new "flat, fixed fee" of \$45 for patients with incomes below 100% of FPL.
  - 2. Includes additional discount level for patients with incomes between 100% and 200% of FPL.
- b) Approve the amended Health Center Board Ordinance
- c) Approve the FQHC Co-Applicant Agreement
- d) Add the Health Center Board as an additional insured on the "County's General Liability coverage.



BARBARA COUNTY