



March 5, 2008

Douglas Reilly  
Bureau of Licensure and Certification  
New York State Department of Health  
161 Delaware Ave.  
Delmar, N.Y. 12054

RE: Project No. 061218 - Charity Care Compliance Plan

Dear Doug:

In an effort to keep you apprised of our progress and to follow-up on our conversation, the enclosed document is an outline of our Work Plan to revise and implement our Charity Care Compliance plan as requested by the Department of Health in conjunction with the recommendation of the Public Health Council.

In addition, I have enclosed a revised sample letter that reflects the most recent language regarding charity care regulations.

We anticipate that the survey, subsequent results and final report of our findings will be completed by June 30, 2008. If this time line does not meet your expectations or that of the Public Health Council, please let me know.

If you require additional information or have questions, please do not hesitate to contact me at 716-961-4502.

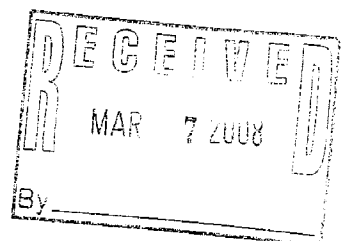
Regards,



Todd Brason  
CEO

Enclosures

344 DELAWARE AVENUE • BUFFALO/NEW YORK • 14202  
PHONE: 716/856-7500 • FAX: 716/856-7506  
WWW.WILLCARE.COM



[WILLCARE LETTERHEAD]  
SAMPLE LETTER TO *HOSPITAL DISCHARGE PLANNERS*

Discharge Planner  
Erie County Medical Center  
462 Grider Street  
Buffalo NY 14215

Re: Identifying Patients for Charity Home Care Services

Dear Discharge Planner:

WILLCARE has established a new policy for extending 'charity care' services as required by state regulation (10 NYCRR 763.11(a)(11)). As part of this new policy and initiative, WILLCARE is requesting your help in identifying patients who are eligible for free or reduced fee home health services as part of WILLCARE's charity care program. WILLCARE provides certified home health care services in Erie and Chautauqua counties. Certified home care services include nursing, physical, occupational, and speech therapy, social services, nutrition, medical equipment supply, and personal care. WILLCARE is committed to providing free or reduced fee home health services to individuals in Erie and Chautauqua counties who meet the state's eligibility criteria.

Medically necessary free or reduced fee home health care services will be provided by WILLCARE for patients who are:

1. Unable to pay full charges; or
2. Are not eligible for covered benefits under Title XVIII or XIX of the Social Security Act; or
3. Not covered by private insurance; AND
4. Whose household income is less than 200% of the federal poverty level (see 2007 federal poverty levels attached).

We are committed to providing care to patients who qualify for charity care under the state's criteria. However, it is often difficult for us to identify patients who may be eligible for such care. Given your access to patients in need of home health care services, we hope that you will be able to identify patients who qualify for WILLCARE's charity care program. If you believe someone may be eligible, please contact our Central Intake Department at 856-7500 and our staff will assist you in determining the patient's eligibility.

We appreciate your efforts on behalf of those in need of care.

Sincerely,

Todd W. Brason  
President/CEO

Enclosure

<u>CHARITY CARE WORK PLAN</u>	<u>Completion Date</u>
Finalize Charity Care Policy and Procedure	DONE
Revise patient intake forms to document eligibility for the provision of charity care services or applicable costs that exceed reimbursement.	DONE
Add disclaimer to our community education materials that outlines our policy.	DONE
Appoint Charity Care Service Coordinator in both WNY and Hudson Valley to assist and monitor charity care services and provide Administrator monthly progress reports.	March 15, 2008
Create survey tool to evaluate potential needs for charity care services in WNY and Hudson Valley.	March 15, 2008
Draft and circulate letter to discharge planners, social workers, etc. for community awareness campaign.	March 30, 2008
Develop data base of hospital discharge planners, health care facilities, clinics, and related institutions that provide medical assistance and care to the indigent population that might have need or knowledge of charity care patients.	April 1, 2008
Mail survey to entire data base with return date expected of 30 days.	May 1, 2008
Draft and finalize report to document survey results. Follow-up with facilities that responded with concerns or experience difficulty in obtaining home health services for charity care eligible patients.	June 30, 2008
Develop monthly tracking tool and/or financial reports to monitor charity care program.	DONE