Supplementary Online Content

Goodman C, Flanigan A, Probst JC, Bai G. Comparison of US hospital charity care policies before vs after onset of the COVID-19 pandemic. *JAMA Netw Open*. 2022;5(9):e2233629. doi:10.1001/jamanetworkopen.2022.33629

**eTable 1.** List of Hospitals in Our Sample Organized by State (n = 170)
**eTable 2.** Changes in Charity Care Policy, December 2019 vs December 2021

This supplementary material has been provided by the authors to give readers additional information about their work.
# eTable 1. List of Hospitals in Our Sample Organized by State (n = 170)

| State    | Hospital                                              | City             | Beds | Type                                      |
|----------|-------------------------------------------------------|------------------|------|------------------------------------------|
| Alabama  | UAB hospital                                          | Birmingham       | 1201 | Government - State                       |
|          | Huntsville                                            | Huntsville       | 903  | Government - Hospital District or Authority |
|          | Mobile Infirmary                                      | Mobile           | 689  | Voluntary non-profit - Private           |
| Alaska   | Providence                                            | Anchorage        | 379  | Voluntary non-profit - Church            |
| Arizona  | Banner - University Medical Center Phoenix            | Phoenix          | 733  | Voluntary non-profit - Other             |
|          | Banner Desert                                         | Mesa             | 615  | Voluntary non-profit - Private           |
|          | Banner - University Medical Center Tucson             | Tucson           | 479  | Voluntary non-profit - Private           |
| Arkansas | Baptist Health Medical Center - Little Rock           | Little Rock      | 814  | Voluntary non-profit - Private           |
|          | Mercy Hospital Fort Smith                             | Fort Smith       | 336  | Voluntary non-profit - Private           |
|          | St. Bernards Medical Center                           | Jonesboro        | 355  | Voluntary non-profit - Private           |
| California | Providence - Little Company of Mary Medical Center - Torrance | Torrance       | 442  | Voluntary non-profit - Church            |
|          | Dignity - Northridge Hospital                         | Northridge       | 424  | Voluntary non-profit - Private           |
|          | Stanford                                              | Stanford         | 477  | Voluntary non-profit - Private           |
|          | Cedars-Sinai                                          | Los Angeles      | 879  | Voluntary non-profit - Other             |
|          | Scripps Mercy Hospital San Diego                      | San Diego        | 523  | Voluntary non-profit - Private           |
|          | Sutter Bay - California Pacific - Pacific Campus      | San Francisco    | 480  | Voluntary non-profit - Private           |

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| State         | Hospital                  | City        | Zip | Type                          |
|--------------|---------------------------|-------------|-----|-------------------------------|
| Sutter Valley - Sutter Medical Center | Sacramento | 523 | Voluntary non-profit - Private |
| Community Regional Medical Center | Fresno | 909 | Voluntary non-profit - Private |
| Kaiser Permanente - Fontana | Fontana | 626 | Voluntary non-profit - Private |
| Colorado | Poudre Valley | Fort Collins | 258 | Voluntary non-profit - Private |
| UC-Health University | Denver | 655 | Government - Hospital District or Authority |
| UC-Health Central | Colorado Springs | 497 | Government - Local |
| North Colorado - Banner | Greeley | 225 | Voluntary non-profit - Private |
| Connecticut | Hartford | Hartford | 938 | Voluntary non-profit - Private |
| Yale | New Haven | 1540 | Voluntary non-profit - Private |
| Bridgeport | Bridgeport | 359 | Voluntary non-profit - Private |
| Delaware | Christiana Care | Newark | 1128 | Voluntary non-profit - Private |
| District of Columbia | Medstar - Georgetown | Washington, DC | 396 | Voluntary non-profit - Other |
| Medstar - Washington | Washington, DC | 752 | Voluntary non-profit - Other |
| Florida | UF Health Shands | Gainesville | 871 | Voluntary non-profit - Private |
| Florida Hospital Orlando | Orlando | 2635 | Voluntary non-profit - Private |
| Baptist Medical Center Jacksonville | Jacksonville | 903 | Voluntary non-profit - Private |
| Jackson Memorial | Miami | 1707 | Government - Hospital District or Authority |
| Georgia | Northside | Atlanta | 524 | Voluntary non-profit - Private |
| Kennestone | Atlanta | 662 | Government - Hospital District or Authority |
| Grady | Atlanta | 961 | Voluntary non-profit - Private |

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| Medical Center                        | City         | Zip   | Type                     |
|--------------------------------------|--------------|-------|--------------------------|
| Medical Center Navicent Health       | Macon        | 319   | Government - Hospital District or Authority |
| University Hospital                  | Augusta      | 319   | Government - Hospital District or Authority |
| Hawaii Pacific Health - Kapiolani Medical Center | Honolulu      | 319   | Voluntary non-profit - Private |
| Queen's Medical Center               | Honolulu     | 319   | Voluntary non-profit - Private |
| Idaho Saint Luke's                   | Boise        | 319   | Voluntary non-profit - Private |
| Illinois Southern Illinois Memorial Hospital | Carbondale     | 319   | Voluntary non-profit - Private |
| OSF St. Francis                      | Peoria       | 319   | Voluntary non-profit - Private |
| Rush University Medical Center       | Chicago      | 319   | Voluntary non-profit - Private |
| Northshore - Evanston                | Evanston     | 319   | Voluntary non-profit - Other |
| Northwestern Memorial Hospital       | Chicago      | 319   | Voluntary non-profit - Private |
| Carle Foundation                    | Urbana       | 319   | Voluntary non-profit - Private |
| Presence St. Joseph                  | Joliet       | 319   | Voluntary non-profit - Church |
| Indiana IU Health University         | Indianapolis | 319   | Voluntary non-profit - Private |
| Deaconess Midtown                    | Evansville   | 319   | Voluntary non-profit - Private |
| Parkview Regional Medical Center     | Fort Wayne   | 319   | Voluntary non-profit - Private |
| Methodist Hospitals - North Lake     | Gary         | 319   | Voluntary non-profit - Private |
| Iowa University of Iowa Hospitals and Clinics | Iowa City   | 319   | Government - State |
| Mercy Medical Center                 | Des Moines   | 319   | Voluntary non-profit - Private |
| Unity Point Health - Cedar           | Cedar Rapids | 319   | Voluntary non-profit - Private |

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| Region       | Hospital Name                                      | City          | Zip Code | Type of Organization |
|-------------|---------------------------------------------------|---------------|----------|----------------------|
| Kansas      | Rapids - St. Luke's                               | Kansas City   | 768      | Government - Hospital District or Authority |
|             | Stormont Vail                                     | Topeka        | 449      | Voluntary non-profit - Private          |
|             | Via Christi Saint Francis                         | Wichita       | 658      | Voluntary non-profit - Private          |
| Kentucky    | Norton                                            | Louisville    | 1364     | Government - Local                   |
|             | Saint Elizabeth                                   | Edgewood      | 487      | Voluntary non-profit - Church          |
|             | Owensboro Health Regional                         | Owensboro     | 477      | Voluntary non-profit - Private          |
| Louisiana   | Ochsner Medical Center                            | New Orleans   | 961      | Voluntary non-profit - Private          |
|             | Our Lady of the Lake                              | Baton Rouge   | 834      | Voluntary non-profit - Church          |
|             | Willis Knighton                                   | Shreveport    | 665      | Voluntary non-profit - Private          |
|             | Saint Francis Medical Center Downtown             | Monroe        | 507      | Voluntary non-profit - Private          |
| Maine       | Northern Light Eastern Maine Medical Center       | Bangor        | 349      | Voluntary non-profit - Private          |
|             | Maine Medical Center                              | Portland      | 637      | Voluntary non-profit - Private          |
| Maryland    | The Johns Hopkins Hospital                         | Baltimore     | 997      | Voluntary non-profit - Private          |
|             | University of Maryland Medical Center             | Baltimore     | 802      | Voluntary non-profit - Private          |
|             | Peninsula Regional Medical Center                 | Salisbury     | 281      | Voluntary non-profit - Private          |
|             | Holy Cross                                        | Silver Spring | 455      | Voluntary non-profit - Church          |
| Massachusetts| Beth Israel Deaconess                             | Boston        | 686      | Voluntary non-profit - Private          |
|             | Massachusetts General                             | Boston        | 1011     | Voluntary non-profit - Private          |
|             | Baystate Medical Center                            | Springfield   | 720      | Voluntary non-profit - Private          |
|             | UMass Memorial Medical Center -                    | Worcester     | 625      | Voluntary non-profit - Private          |

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| University Campus                                      | City         | ZIP | Ownership Type                      |
|--------------------------------------------------------|--------------|-----|------------------------------------|
| Beaumont Hospital, Royal Oak                           | Royal Oak    | 1089| Voluntary non-profit - Private     |
| Spectrum Health Butterworth                            | Grand Rapids | 1106| Voluntary non-profit - Private     |
| University of Michigan Hospitals and Health Centers    | Ann Arbor    | 998 | Voluntary non-profit - Private     |
| Henry Ford                                             | Detroit      | 682 | Voluntary non-profit - Private     |
| Mayo Clinic - St. Mary's Campus                        | Rochester    | 1297| Voluntary non-profit - Church      |
| University of Minnesota - Fairview Health              | Minneapolis  | 829 | Voluntary non-profit - Private     |
| Saint Cloud                                            | St. Cloud    | 487 | Voluntary non-profit - Private     |
| North Mississippi Medical Center                       | Tupelo       | 630 | Voluntary non-profit - Private     |
| Forrest General                                        | Hattiesburg  | 470 | Government - Local                 |
| Cox Hospital                                           | Springfield  | 670 | Voluntary non-profit - Private     |
| Barnes-Jewish                                          | St. Louis    | 1303| Voluntary non-profit - Other       |
| University of Missouri                                 | Columbia     | 587 | Government - State                 |
| Freeman West                                           | Joplin       | 391 | Voluntary non-profit - Private     |
| Benefis Healthcare                                     | Great Falls  | 478 | Voluntary non-profit - Private     |
| Kalispell Regional Medical Center                      | Kalispell    | 288 | Voluntary non-profit - Private     |
| Billings Clinic Hospital                               | Billings     | 283 | Voluntary non-profit - Private     |
| Bryan Medical Center                                   | Lincoln      | 559 | Voluntary non-profit - Private     |
| The Nebraska Medical Center                           | Omaha        | 532 | Voluntary non-profit - Private     |
| Renown Regional Medical Center                         | Reno         | 619 | Voluntary non-profit - Private     |

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| State         | Hospital Name                                      | City             | Zip   | Type                           |
|--------------|---------------------------------------------------|------------------|-------|--------------------------------|
| New Hampshire| Saint Rose Dominican Hospital - Siena Campus       | Henderson        | 326   | Voluntary non-profit - Private |
| New Hampshire| Dartmouth-Hitchcock                               | Lebanon          | 402   | Voluntary non-profit - Private |
| New Jersey   | Catholic Medical Center                           | Manchester       | 258   | Voluntary non-profit - Private |
| New Jersey   | Hackensack University Medical Center              | Hackensack       | 711   | Voluntary non-profit - Private |
| New Jersey   | Robert Wood Johnson University Hospital New Brunswick | New Brunswick   | 610   | Voluntary non-profit - Private |
| New Jersey   | Saint Joseph's University Medical Center          | Paterson         | 697   | Voluntary non-profit - Church  |
| New Jersey   | New Bridge Medical Center                         | Paramus          | 1013  | Government - Local             |
| New Mexico   | Presbyterian                                     | Albequerque      | 771   | Voluntary non-profit - Private |
| New York     | New York-Presbyterian                             | New York City    | 2410  | Voluntary non-profit - Private |
| New York     | Montefiore Hospital - Moses Campus                | New York City    | 1520  | Voluntary non-profit - Private |
| New York     | Long Island Jewish Medical Center                 | New York City    | 1547  | Voluntary non-profit - Private |
| New York     | The Mount Sinai Hospital                          | New York City    | 1103  | Voluntary non-profit - Private |
| New York     | North Shore University                            | Manhasset         | 1040  | Voluntary non-profit - Private |
| New York     | Buffalo General                                   | Buffalo           | 1068  | Voluntary non-profit - Private |
| New York     | Strong Memorial                                   | Rochester         | 823   | Voluntary non-profit - Private |
| North Carolina| Wake Forest University Baptist Medical Center     | Winston Salem    | 873   | Voluntary non-profit - Private |

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| Name                                   | City                         | Zip | Ownership Type                  |
|----------------------------------------|------------------------------|-----|---------------------------------|
| Novant Health Forsyth Medical Center    | Winston Salem                | 914 | Voluntary non-profit - Other    |
| Carolinas Medical Center               | Charlotte                    | 1229| Government - Hospital District or Authority |
| Duke University                        | Durham                       | 954 | Voluntary non-profit - Private  |
| Vidant Medical Center                  | Greenville                   | 909 | Voluntary non-profit - Private  |
| North Dakota                           |                              |     |                                 |
| Trinity                                | Minot                        | 493 | Voluntary non-profit - Private  |
| Sanford Bismarck Medical Center        | Bismarck                     | 237 | Voluntary non-profit - Private  |
| Altru                                  | Grand Forks                  | 299 | Government - Local              |
| Ohio                                   |                              |     |                                 |
| OhioHealth Riverside Methodist         | Columbus                     | 716 | Voluntary non-profit - Private  |
| ProMedica Toledo                       | Toledo                       | 720 | Voluntary non-profit - Private  |
| The Cleveland Clinic                   | Cleveland                    | 1283| Voluntary non-profit - Private  |
| Miami Valley                           | Dayton                       | 810 | Voluntary non-profit - Private  |
| Summa Akron City                       | Akron                        | 635 | Voluntary non-profit - Private  |
| Oklahoma                               |                              |     |                                 |
| Oklahoma University Medical Center     | Oklahoma City                | 711 | Voluntary non-profit - Private  |
| Saint Francis                          | Tulsa                        | 858 | Voluntary non-profit - Private  |
| Comanche County Memorial               | Lawton                       | 250 | Government - Hospital District or Authority |
| Oregon                                 |                              |     |                                 |
| Providence Saint Vincent Medical Center | Portland                    | 474 | Voluntary non-profit - Private  |
| Salem                                  | Salem                        | 423 | Voluntary non-profit - Other    |
| Asante Rogue Regional Medical Center   | Medford                      | 340 | Voluntary non-profit - Private  |
| Oregon Health and Science University Hospital | Portland | 556 | Voluntary non-profit - Other    |

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| State           | Hospital Name                          | City          | Zip Code | Ownership Type               |
|-----------------|----------------------------------------|---------------|----------|------------------------------|
| Peacehealth     | Sacred Heart Center at Riverbend       | Springfield   | 379      | Voluntary non-profit - Private |
| Pennsylvania    | Lehigh Valley Hospital - Cedar Crest   | Allentown     | 897      | Voluntary non-profit - Private |
|                 | UPMC Pinnacle Harrisburg               | Harrisburg    | 640      | Voluntary non-profit - Other  |
|                 | UPMC Presbyterian                      | Pittsburg     | 1483     | Voluntary non-profit - Private |
|                 | Thomas Jefferson University Hospital   | Philadelphia  | 899      | Voluntary non-profit - Private |
|                 | Reading                                 | West Reading  | 678      | Voluntary non-profit - Private |
| Rhode Island    | Rhode Island                           | Providence    | 693      | Voluntary non-profit - Private |
| South Carolina  | McLeod Regional Medical Center         | Florence      | 509      | Voluntary non-profit - Private |
|                 | Greenville Memorial                    | Greenville    | 814      | Voluntary non-profit - Private |
|                 | Palmetto Health Richland               | Columbia      | 721      | Voluntary non-profit - Private |
|                 | Medical University of South Carolina   | Charleston    | 773      | Government - State           |
| South Dakota    | Avera McKennan University Hospital      | Sioux Falls   | 636      | Voluntary non-profit - Private |
|                 | Regional Health Rapid City             | Rapid City    | 411      | Voluntary non-profit - Private |
| Tennessee       | Methodist University                   | Memphis       | 1383     | Voluntary non-profit - Church |
|                 | Vanderbilt University                  | Nashville     | 993      | Voluntary non-profit - Private |
|                 | Jackson-Madison County General         | Jackson       | 690      | Government - Hospital District or Authority |
| Texas           | Seton Medical Center                   | Austin        | 410      | Voluntary non-profit - Private |
| State          | Hospital Name                              | City         | Zip Code | Type                      |
|---------------|--------------------------------------------|--------------|----------|---------------------------|
| Texas         | Baylor University Medical Center at Dallas | Dallas       | 854      | Voluntary non-profit - Church |
|               | Methodist                                  | San Antonio  | 1576     | Proprietary (50% HCA)     |
|               | Memorial Hermann Southwest                 | Houston      | 1411     | Voluntary non-profit - Private |
|               | Texas Health Harris Methodist Fort Worth   | Fort Worth   | 666      | Voluntary non-profit - Church |
| Utah          | University of Utah Health Care             | Salt Lake City | 574    | Government - State         |
|               | McKay-Dee - Ogden                          | Ogden        | 312      | Voluntary non-profit - Private |
|               | Utah Valley - Provo                        | Provo        | 359      | Voluntary non-profit - Private |
| Vermont       | University of Vermont                      | Burlington   | 450      | Voluntary non-profit - Other |
| Virginia      | Sentara Norfolk General                    | Norfolk      | 524      | Voluntary non-profit - Other |
|               | Carilion Roanoke Memorial                  | Roanoke      | 703      | Voluntary non-profit - Private |
|               | Inova Fairfax                              | Falls Church | 334    | Voluntary non-profit - Private |
|               | Centra Lynchburg General                   | Lynchburg    | 703      | Voluntary non-profit - Private |
| Washington    | Swedish First Hill                         | Seattle      | 701      | Voluntary non-profit - Private |
|               | Saint Joseph Medical Center                | Tacoma       | 366      | Voluntary non-profit - Church |
|               | Providence Sacred Heart Medical Center     | Spokane      | 640      | Voluntary non-profit - Church |
| West Virginia | Charleston Area Medical Center             | Charleston   | 868      | Voluntary non-profit - Private |
|               | J.W. Ruby Memorial Hospital                | Morgantown   | 621      | Voluntary non-profit - Private |
|               | Saint Mary's                               | Huntington   | 379      | Voluntary non-profit - Church |

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| State      | Name of Hospital                                      | City     | Zip | Type                          |
|-----------|-------------------------------------------------------|----------|-----|-------------------------------|
| Wisconsin | Froedtert and the Medical College of Wisconsin        | Milwaukee| 553 | Voluntary non-profit - Private |
|           | Aurora Saint Luke’s Medical Center                   | Milwaukee| 919 | Voluntary non-profit - Private |
|           | Gundersen Lutheran Medical Center                    | La Crosse| 268 | Voluntary non-profit - Private |
|           | University Hospital                                   | Madison  | 609 | Government - Hospital District or Authority |
| Wyoming   | Cheyenne Regional Medical Center                      | Cheyenne | 222 | Voluntary non-profit - Other   |
|           | Wyoming Medical Center                                | Casper   | 163 | Government - Local            |

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### eTable 2. Changes in Charity Care Policy, December 2019 vs December 2021

| More generous | More restrictive | Indeterminate |
|---------------|-----------------|---------------|
| Increases free cutoff from 100% FPL to 200% FPL; Increases presumptive eligibility (including removal of requirement of $6,500 minimal balance for insured patients) | | |
| Increases discount care income cutoff from 300% FPL to 350% FPL; Adds retroactive for 6 months; Adds automatic discount of 35% regardless of charity care eligibility; Specifies discount percentage calculation; Reduces minimum balance eligibility from $25 to $10; Expands presumptive eligibility | Income cutoff for free care no longer specified | |
| Extensive addition of presumptive eligibility | Adds residency requirement to live in service area of hospital; Adds exclusion of "foreign | Adds clause allowing for changes to eligibility determinations during public health emergencies |
|                     |                     |                |
| Changes                                                                 | Details                                                                                           |
|------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| Decreases income cutoff for free care from 250% FPL to 200% FPL; Decreases discount cutoff from 500% FPL to 400% FPL (also technical change to discount calculation) | 50% of next $10k) would be excluded from consideration; Hardship discount section removed but appears it may be in a separate policy; Adds required minimum balance of $10 |
| Adds coverage of Medicaid denials; Increases income cutoff for free care from 200% FPL to 400% FPL; Increases income cutoff for discounted care from 450% FPL to 600% FPL | Eligible services clarified to include “hospital and its affiliated clinics,” however unclear whether clinic services were included before |
| Removes automatic self-pay discounts section; Lowers income range for eligibility for catastrophic coverage from 600% FPL to 450% FPL | Excludes out of network services |
| Excludes "office visits" including telehealth by Hartford Medical Group providers | |
| Expands residency eligibility from “US citizens and residents” to simply “live in the | |
| Description                                                                 | Description                                                                 |
|---------------------------------------------------------------------------|---------------------------------------------------------------------------|
| US;” Adds eligibility for insured patients to discounted care income tier |                                                                             |
| Expands residency eligibility from “US citizens and residents” to “live in the US;” Adds eligibility for insured patients to discounted care income-based tier |                                                                 |
| Adds eligibility for underinsured to the discount care income-based tier; Additional excluded assets (e.g. car and others under Social Security Act); Extends retroactive from 180 days to 240 days; Expands presumptive eligibility with several new options like WIC and out-of-state Medicaid; Removes citizenship requirement | Adds description of family/household income |
| Adds underinsured to the discount care income-based tier; Additional excluded assets including primary vehicle; Extends retroactive from 180 days to 240 days; Expands presumptive eligibility (e.g., receipt of WIC | Adds description of family/household income |

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| Changes to Medicaid |  |
|--------------------|---|
| and out-of-state Medicaid; Removes citizenship requirement | Removes coverage of rehabilitation hospital (despite ownership not changing) and includes a few additional narrow service exclusions |
| Increases free care income cutoff from 125% FPL to 200% FPL; Increases discounted care income cutoff from 270% FPL to 400% FPL; Includes underinsured in free care income-based tier; Extends extraordinary collection actions start time from 120 to 240 days | New state-based residency requirement (GA, NC, and SC), but underinsured restricted to GA residence only; Complex tiers of coverage based on balance; Specifies duration of six months; Changes family/household income from guarantor only to broader definition |
| As part of asset assessment, increases exclusion of primary vehicle from $10k to $15k; Increases duration from six months to one year | Narrows services to inpatient services excluding all professional services; Narrows residency eligibility to US citizens only; Excludes services for care related to criminal act, while |

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incarcerated or in custody, self-harm; As part of asset assessment, lowers allowable home value exclusion from $250k to 125k; Adds charity care co-pay for patient “dignity.” Adds clause that the hospital can use patient information as it sees fit, and if consent withdrawn patient can be removed from program; Removes discounted care income-based tier (previously 200% FPL to 400% FPL); Removes extensive presumptive eligibility; Removes underinsured eligibility

| Increases free care income cutoff from 150% FPL to 250% FPL; Increases discounted care income cutoff from 250% FPL to 400% FPL; Removes copays; Expands presumptive eligibility | Limits coverage of undocumented immigrants to ED services only; Shortens duration from one year to six months |
| Removes assets as part of eligibility for free care; |
| Expands services to include medications |  |  |
| Expands presumptive eligibility |  |  |
| Removes Illinois residency requirement for discounted care; Removes eligibility requirement of minimum balance of $300 | Reduces discounted care income cutoff from 600% FPL to 400% FPL | Additional language on family/household income definitions |
| Removes Illinois residency requirement for care related to “ultra rare” diseases; Improves catastrophic coverage lowering amount collected from 25% of annual income to 20% | Removes coverage for insurance co-pays |  |
| Increases free care income cutoff from 200% FPL to 250% FPL; Increases the discount at multiple tiers of eligibility; Improves catastrophic coverage lowering amount collected from 25% of annual income to 20% | Lowers allowable assets from equivalent of 600% FPL to 250% of FPL; Decreases duration from one year to six months |  |
| Increases free care income cutoff from 200% FPL to 300% FPL for families; Removes $100 deposit to apply; Increases duration from |  | Assets section shorter and generic, removed a relatively generous exclusion of house < |

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| Change                                                                 | Requirement          |
|----------------------------------------------------------------------|----------------------|
| Episodic to calendar year; Removes presumptive eligibility requirement that patient had clearly paid any co-pays or deductibles; Adds a section that gives specified discount to insured patients for "non-covered" services | $500k and vehicle <$50k |
| Adds discounted care income-based tier from 200% FPL to 250% FPL; Removes automatic exclusion for owning property other than primary residence; Removes inclusion of savings accounts in assets; Automatic 30% discount for all uninsured patients | $250% FPL |
| Adds discounted care income-based tier from 200% FPL to 400% FPL; Extends retroactive portion from six months to 12 months; Lowers eligibility requirement of minimum balance from $35 to $10 | Reduces duration from six months to episodic only; "Residents outside of US" no longer eligible; Lowers free care income cutoff from 300% FPL to 200% FPL |
| Adds limited amount of bariatric surgery (10/year) and contraceptive services (100/year); Drops SSN | Excludes coverage for "Medicaid spenddown" |

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| Requirement | Change |
|-------------|--------|
| Removes exclusion of care related to "illegal activity;" Shortens duration of residence from six months to three months | Adds asset review to eligibility, must be less than equivalent of 250% FPL |
| Increases duration from episodic to six months | Excludes "out of network" coverage; Disallows the option of choosing charity care rather than billing insurance |
| Adds retroactive coverage of calendar year | |
| Extends duration from episodic to three months | Removes exclusion of "housemates" in considering income |
| Increases free care income cutoff from 250% FPL to 275% FPL | Changes catastrophic discount language from "may be free" to "may be 10% of family income" |
| Increases free care income cutoff from 250% FPL to 275% FPL | Changes catastrophic discount language from "may be free" to "may be 10% of family income" |
| | Modifies language on discount amount |
| Increases free care income cutoff from 175% FPL to 200% FPL |  |
|---|---|
| Expands presumptive eligibility | In asset review excludes primary vehicle, but adds requirement that liquid assets must be <$10k; Lengthier description of family income; Removes some language on citizenship requirement but will review travel visa; Specifies free care and discounted care income cutoffs at 200% FPL and 400% FPL |
| Adds a few exclusions of assets including a car but assets only examined if balance > $50k or "apparent significant wealth" |  |
| Expands presumptive eligibility; Adds coverage of co-insurance payments; Excludes asset of primary vehicle from eligibility determination | Adds language to include immigrants |
|  | Adds duration of 1 year |
| Adds language about covering "out-of-network" and insured who exhausted benefits; Adds coverage for underinsured | Beaumont Medical Group added but unclear if true expansion; Self-pay discount and discounted care at incomes 200% FPL to 300% FPL changed from set rates to amounts generally billed |
| Increase free care income cutoff from 250% FPL to 300% FPL | Removes discounted care income tier (previously 250% FPL to 400% FPL) |
| Adds discounted care tier at incomes from 250% FPL to 400% FPL; Adds language to include underinsured; Adds coverage of copays, coinsurance, deductibles, and "out of network" care | Adds asset test but with generous exclusions (e.g., up to $1 million dollar residence) |
| | Newly specifies assets but generous exclusions (e.g., house and vehicle <$500k and liquid assets <$300k) |
| Adds coverage of copay, coinsurance, deductible; Adds "out of network" for emergent care; Adds ventilators and |
| Change | Description |
|--------|-------------|
| wheelchair to equipment covered | Adds clause that changes can be made during crises to "flex" financial assistance based on community needs |
| Removes all mention of asset tests; Reduces catastrophic coverage from balance of $100k to $75k | | |
| Removes exclusion of "non-resident/illegal aliens" for non-emergent care | Lowers income cutoff for presumptive eligibility from 200% FPL to 100% FPL; Adds "out of network" exclusion for non-emergent care | |
| Extensive addition of presumptive eligibility | Addition of service area requirement; Exclusion of any "foreign resident;" Decrease in income cutoff for free care from 250% FPL to 200% FPL; Decrease in discount cutoff from 500% FPL to 400% FPL (also makes technical change to discount calculation) | Specifies retroactive for 12 months; Removes language in assets that first $10k in assets (plus 50% of next $10k) would be excluded from consideration; Hardship discount section removed but appears it may be in a separate policy now; Adds required minimum balance of $10 |
| | Complex changes to calculations of discounts based on income tiers | |
| "Healthcare crisis" section added that specifically includes coverage of COVID testing and treatment | Removed complex statement on assets |
|---|---|
| Increases discounted care income cutoff from 400% FPL to 600% FPL | |
| Adds special retroactive coverage for COVID19 care for uninsured | |
| Removes outpatient pharmacy, reference lab, and outpatient clinic exclusion from services for "category 1" group; Adds specific income cutoff for "category 2 coverage" at 300% FPL (tiered coverage based on location of service and balance) | |
| Removes requirement of living in service area of hospital | |
| Changes the discounted care income tier of 400% FPL to 600% FPL from "possible discount" to definite discount; Adds standard 35% discount above 600% FPL; Raises cutoff of $250 to $750 balance for legal action; Increases | Adds that underinsured under 400% FPL get 40% discount, prior policy did not specify discounts |
| Duration from three to six months | Excludes birth control |
|-----------------------------------|------------------------|
| Reduces duration from six months to episodic |
| Increases discounted care income cutoff from 350% FPL to 400% FPL |
| Removes county-based service area requirement; Adds language about covering underinsured; Increases free care income cutoff from 250% FPL to 300% FPL; Adds presumptive eligibility for homeless and Medicaid-eligible |
| Disallows choosing to not run insurance in favor of charity care; Removes "upfront" 35% discount |
| Specifies discount percentage at discounted care income tier |
| Removes sentence excluding co-pay coverage; Extensive new presumptive eligibility |
| Changes language on assets from generic consideration of liquid/cash assets to include "non-cash" assets convertible to cash |
| Adds coverage of two renal transplants each year |
| Removes dental services |
| Allows eligibility for "foreign nationals" living in RI for >18 months |
| Adds language to further define "underinsured;" |
| Change Description                                                                 | Impact                                                                 | Impact Description                                                                 |
|----------------------------------------------------------------------------------|------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| Removes citizenship and state residency requirement                              | Adds "out of network" exclusion                                         | Residence requirement changed from county-based service area to "catchment area" without specification; Changes service exclusions from short list of specific services to general statement that hospitals make individual determinations; Adds use of third-party tool for eligibility determinations |
| Increases free income cutoff from 100% FPL to 200% FPL; Increases discounted care income cutoff from 200% FPL to 400% FPL; Increases equity cutoffs for assets ($50k to $100k for house, $1k to $10k liquid); Increases duration from six months to one year; Removes small copays, appears to have been only for uninsured | Removes coverage of urology, psychiatry, and orthopedics professional services |                                                                                     |
| Increases free income cutoff 150% FPL to 250% FPL; Expands presumptive eligibility criteria |                                                                 | Free care income cutoff specified at 250% FPL; Discounted care income cutoff specified at 300% |
| FPL; Family income, asset descriptions, and service exclusions are added but prior document references other documents with these that are unavailable |
|---|
| Increases free care income cutoff from 200% FPL to 225% FPL | Adds exclusion of "non-covered services" for insured patients; Removes exclusion of "shortfall between government reimbursement and cost" |
| Extends duration from six weeks to 12 weeks | Specifies asset exclusion > $20k total and changes from liquid assets only to broader consideration of assets |
| Clarifies duration of six months |  |
|  | Free care income cutoff specified at 150% FPL; Specifies that non-covered and non-allowed services under Medicaid will be considered |

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| Changes in Hospital 1 | Changes in Hospital 2 |
|-----------------------|-----------------------|
| Specifies free care income cutoff at 250% FPL and discounted care income cutoff at 500% FPL | Specifies free care income cutoff at 250% FPL and discounted care income cutoff at 500% FPL (a different hospital from above) |
| Free care income cutoff increased from 200% FPL to 300% FPL; Changes duration from retroactive only to six-month duration (or 12 months if fixed income); Adds catastrophic coverage section | New addition of asset test of <$50k to qualify at each level (excludes primary residence, vehicle, and retirement); Adds clause to make changes to policy during public health emergency |
| Removes the minimum $300 balance requirement for presumptive eligibility; Increases free care income cutoff from 200% FPL to 300% FPL; Increases discounted care income cutoff from 400% FPL to 500% FPL; Increases allowable assets from $15k to 25K |  |

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| Improves catastrophic coverage discount amount | Adds clause that changes may be made to the policy during national or state emergencies |
|-----------------------------------------------|----------------------------------------------------------------------------------|
| Adds discounted care income-based tier from 200% FPL to 400% FPL; Extends retroactive portion from six months to 12 months; Lowers eligibility requirement of minimum balance from $35 to $10 | Reduces duration from six months to episodic only; "Residents outside of US" no longer eligible; Lowers free care income cutoff from 300% FPL to 200% FPL | Adds generic sections on self-pay discounts and discounts for non-covered services but leaves changes up to individual hospitals |
| Removes the residency requirements of citizenship and service area | Excludes coverage of care related to personal injury, lawsuit, and workers compensation claims |
| Adds presumptive eligibility; Increases duration from episodic to six months | | |
| Increases percentage of discounts within discounted income tier | Narrows residency requirement from multiple counties to single county; |
| Excludes co-pays and deductibles |
|----------------------------------|
| Increases discounted care income cutoff moved from 275% FPL to 400% FPL; Removes requirement of $300 minimum balance for eligibility; Removes exclusion of "illegal aliens;" Expands presumptive eligibility |

Notes: Each row represents analysis of charity care policies for one hospital. Hospitals without available charity care policies are not shown. FPL stands for Federal Poverty Level.