

UNIVERSITY OF MARYLAND UPPER CHESAPEAKE HEALTH

Conversion of University of Maryland
Harford Memorial Hospital to a Freestanding Medical Facility
Matter No. 17-12-004

Responses to Additional Information Questions Dated November 13, 2019

Applicants' Responses to Additional Information Requests Dated November 13, 2019

Charity Care

1. Based on staff review of the Charity Care policy submitted, the UCHS charity care policy is ambiguous with regard to its compliance with the "Determination of Probable Eligibility" subpart of this standard, because it states that bank statements or other types of documentation "may be required" in order to render a "Determination of Probable Eligibility". Charity care policy and/or procedures that require documentation for a determination of probable eligibility will not pass muster with this standard.¹

Please amend your policy and any related documents or forms to comply with this portion of the standard. See the attached guidance for applicants and staff, which is meant to clarify the requirements.

Applicants' response: The University of Maryland Medical System's ("UMMS") Central Business Office issued a Financial Assistance Policy and Procedure applicable to all of UMMS' acute hospital facilities. A copy of the UMMS Financial Assistance Policy and Procedure as updated on September 18, 2019 is attached as **Exhibit 8**. This Financial Assistance Policy and Procedure was originally adopted at University of Maryland Upper Chesapeake Health System ("UM UCH") on July 1, 2019. As set forth on pages 6 through 8 of UMMS Financial Assistance Policy and Procedure, a determination of probable eligibility will be made within two business days and documentation is not required to obtain a determination of probable eligibility. The relevant language is quoted in Table in response to Request 2. Also attached as **Exhibit 9** is UM UCH's Financial Assistance Program Application form.

¹ Requiring a completed application with documentation does not comply with this standard, which is intended to ensure that a procedure is in place to inform a potential charity/reduced fee care recipient of his/her probable eligibility within two business days of initial inquiry or application for Medicaid based on a simple and expeditious process.

A two-step process that allows for a probable determination to be communicated within two days based on an abridged set of information, followed by a final determination based on a completed application with the required documentation is permissible. But the policy must include the more easily navigated determination of probable eligibility.

As set forth in **Exhibit 8** and quoted in the Table below in response to Request 2, a completed financial assistance application form is not required in order to obtain a determination of probable eligibility. Instead, designated staff at UM UCH facilities, including UCMC and HMH, consult with patients via phone or in person to determine if the patient meets financial assistance criteria based on family size and income. A completed financial assistance application form with supporting documentation is only required for a final determination of eligibility. **Exhibit 8**, page 8, Procedures, Section 2(a)-(e).

2. Please complete the table below so that MHCC staff can confirm compliance with each section of the charity care standard. For each of the following subparts of this standard, quote the language from the policy that meets each provision, and give a citation to the section of the policy where that language can be found.

Applicants' response:

Standard	Quote from the policy	Section citation
<p>10.24.19.04C Charity Care Policy. Each hospital shall have a written policy for the provision of charity care for indigent patients to ensure access to services regardless of an individual's ability to pay. (a) The policy shall provide:</p>		
<p>(i) Determination of Probable Eligibility. Within two business days following a patient's request for charity care services, application for medical assistance, or both, the hospital must make a determination of probable eligibility.</p>	<p><u>"Presumptive Financial Assistance</u> Patients may also be considered for Presumptive Financial Assistance Eligibility. There are instances when a patient may appear eligible for financial assistance, but there is no financial assistance form on file. There is adequate information provided by the patient or through other sources, which provide sufficient evidence to provide the patient with financial assistance. In the event there is no evidence to support a patient's eligibility for financial assistance, UMMS reserves the right to use outside agencies or information in determining estimated income amounts for the basis of determining financial assistance eligibility and potential reduced care rates. Once determined, due to the inherent nature of presumptive circumstances, the only financial assistance that can be granted is a 100% write-off of the account balance. Presumptive Financial Assistance Eligibility shall only cover the patient's specific date of service. Presumptive eligibility may be determined on the basis of individual life circumstances that may include: a. Active Medical Assistance pharmacy coverage b. Specified Low Income Medicare (SLMB) coverage</p>	<p>Exhibit 8 Page 6 (Presumptive Eligibility)</p>

	<p>c. Primary Adult Care (PAC) coverage d. Homelessness e. Medical Assistance and Medicaid Managed Care patients for services provided in the ER beyond the coverage of these programs f. Medical Assistance spend down amounts g. Eligibility for other state or local assistance programs h. Patient is deceased with no known estate i. Patients that are determined to meet eligibility criteria established under former State Only Medical Assistance Program j. Non-US Citizens deemed non-compliant k. Non-Eligible Medical Assistance services for Medical Assistance eligible patients l. Unidentified patients (Doe accounts that we have exhausted all efforts to locate and/or ID) m. Bankruptcy, by law, as mandated by the federal courts n. St. Clare Outreach Program eligible patients o. UMSJMC Maternity Program eligible patients p. UMSJMC Hernia Program eligible patients”</p> <p style="text-align: center;">* * *</p> <p>“2. When possible effort will be made to provide financial clearance prior to date of service. Where possible, designated staff will consult via phone or meet with patients who request Financial Assistance to determine if they meet preliminary criteria for assistance.</p> <p>a. Staff will complete an eligibility check with the Medicaid program for Self Pay patients to verify whether the patient has current coverage.</p> <p>b. Preliminary data will be entered into a third party data exchange system to determine probably eligibility. To facilitate this process each applicant must provide information about family size and income. To help applicants complete the process, we will provide an application that will let them know what paperwork is required for a final determination of eligibility.</p> <p>c. Applications initiated by the patient will be tracked, worked and eligibility determined within the third party data and workflow tool. A letter of final determination will be submitted to each patient that has formally requested financial assistance. Determination of Probable Eligibility will be provided within two business days following a patient’s request for charity care services, application for medical assistance, or both.” (emphasis added).</p>	<p>Exhibit 8 Page 8 Procedures Section 2.a.- c.</p>
(ii) Minimum Required Notice of Charity Care Policy.		
1. Public notice of information regarding the hospital’s charity care policy shall be distributed through methods designed to	See response to COMAR 10.24.19.04C(a)(ii)(2) and (ii)(3) below.	

<p>best reach the target population and in a format understandable by the target population on an annual basis;</p>		
<p>2. Notices regarding the hospital's charity care policy shall be posted in the admissions office, business office, and emergency department areas within the hospital.</p>	<p>"The University of Maryland Medical System ("UMMS") is committed to providing financial assistance to persons who have health care needs and are uninsured, underinsured, ineligible for a government program, or otherwise unable to pay, for emergent and medically necessary care based on their individual financial situation.</p> <p>It is the policy of the UMMS hospitals to provide Financial Assistance based on indigence or high medical expenses for patients who meet specified financial criteria and request such assistance. The purpose of the following policy statement is to describe how applications for Financial Assistance should be made, the criteria for eligibility, and the steps for processing applications.</p> <p>UMMS will post notices of financial assistance availability in each UMMS hospital's emergency room (if any) and admissions areas, as well as the Billing Office. Notice of availability will also be sent to the patient with patient bills. Signage in key patient access areas will be made available. A Patient Billing and Financial Assistance Information Sheet will be provided before discharge, and it (along with this policy and the Financial Assistance Application) will be available to all patients upon request and without charge, both by mail and in the emergency room (if any) and admissions areas. This policy, the Patient Billing and Financial Assistance Information Sheet, and the Financial Assistance Application will also be conspicuously posted on the UMMS website (www.umms.org)."</p> <p>The financial assistance policy is also posted on UM UCH's website on a page dedicated to financial assistance at the link provided below:</p> <p>https://www.umms.org/uch/patients-visitors/for-patients/financial-assistance</p>	<p>Exhibit 8 Page 2</p>
<p>3. Individual notice regarding the hospital's charity care policy shall be provided at the time of preadmission or admission to each person who seeks services in the hospital.</p>	<p>"Individual notice regarding the hospital's Financial Assistance Policy shall be provided at the time of preadmission or admission to each person who seeks services in the hospital."</p>	<p>Exhibit 8 Procedures Section 2.g.</p>

Observation

3. Although Observation spaces were reduced in the FMF (from 24 to 17, or 29%) in the most recent modification of the exemption request, space was not reduced and the estimated project cost increased by \$3.9M (7.5%). Please explain:
 - a) Why this somewhat significant reduction in observation beds did not result in downsizing the building's footprint.

Applicants' response: The building footprint remained the same because the freestanding medical facility is located below a proposed special psychiatric hospital. Reducing the building footprint to accommodate the reduced observation department would adversely affect the building plans for the space directly above and below the freestanding medical facility's observation department. Based on UM UCH's current architectural and engineering design, to reduce the building footprint of the freestanding medical facility and to eliminate shell space at the co-located special psychiatric hospital would cost at least \$865,500 and add four to five months to the project schedule.

- b) Why the project cost increased despite a downsized scope.

Applicants' response: There are two primary factors that account for the additional project cost. First, estimated construction costs have increased since the initial CON application filed in November 2018 due to inflation. Industry standard is typically a 3% increase annually

Second, during further development of the design plans, additional items were identified that were not taken into account in the projected construction costs submitted with the initial CON application filed in November 2018. Such items include:

- a. Additional high density concrete at the service drive.
- b. An additional canopy at in the Service area.
- c. Two additional, upsized elevators.
- d. Additional ballistic glazing requirements.
- e. Additional impact resistant glazing requirements
- f. Additional under floor moisture protection.
- g. Additional structural steel.
- h. A voice annunciated fire alarm system.
- i. A new fire pump.
- j. Accommodations for an expanded secondary critical power requirements.

Utilization, Revenue, and Expense Projections

4. For which rate-regulated outpatient services is the applicant seeking authorization?

Applicants' response: At UC FMF, the Applicants are seeking rate-regulation from the HSCRC for emergency, observation, and related ancillary services, including imaging, laboratory, and pharmacy. As described on page 12 of the October 21, 2019 Modified Request for Exemption from CON Review to convert HMH to a freestanding medical facility, the

HSCRC is required to regulate these services at a freestanding medical facility pursuant to COMAR 10.37.10.07-2.

5. Provide documentation that the applicant has met the following subparts of COMAR 10.24.19.04C.

- a) The applicants receive a determination from HSCRC, issued pursuant to COMAR 10.37.10.07-2D, regarding each outpatient service to be provided at the proposed FMF for which the applicants seek rate regulation. (COMAR 10.24.19.04C(3)(c)(v))

Applicants' response: As described above in response to Request 4, the Applicants are seeking rate-regulation from the HSCRC for emergency, observation, and related ancillary services, including imaging, laboratory, and pharmacy, at UC FMF. Pursuant to COMAR 10.37.10.07-2, the HSCRC is required to regulate each of these services at a freestanding medical facility. The Applicants anticipate that the HSCRC is awaiting a request from the staff of the Maryland Health Care Commission before the HSCRC will provide documentation of approval of rate regulated services at UC FMF.

- b) The applicants receive approved rates from HSCRC for each rate-regulated outpatient service at the proposed FMF. (COMAR 10.24.19.04C(3)(c)(vi))

Applicants' response: The Applicants are in discussions with the HSCRC for rate-regulated services at UC FMF. Since UC FMF is not projected to open until fiscal year 2022, the Applicants do not anticipate that the HSCRC will approve rates for UC FMF until the facility is built and shortly before the facility opens.

- c) The revenue estimates for emergency services and other outpatient services specified by the HSCRC under Health-General Article §19-201(d)(iv) and COMAR 10.37.10.07-2 are consistent with utilization projections and the most recent HSCRC payment policies for FMFs. (COMAR 10.24.19.04C(3)(f)(iii))

Applicants' response: The Applicants anticipate that the HSCRC is awaiting a request from the staff of the Maryland Health Care Commission before the HSCRC will provide documentation that the revenue estimates for emergency and outpatient services at UC FMF are consistent with utilization projections and the most recent HSCRC payment policies for freestanding medical facilities.

6. Please describe where UM UCH is in the process of negotiations with HSCRC regarding its GBR proposal.

Applicants' response: The Applicants received a letter from Gerald Schmith, Director Revenue and Regulation Compliance dated July 2, 2019 requesting additional information than what had been previously provided. *See Exhibit 10.* UM UCH's response to this request has been on hold following discussions between Commission staff and the Applicants until the filing

of the modified CON application to establish a special psychiatric hospital and modified requests for exemption from CON review to merge and consolidate HMH and UCMC and to convert HMH to a freestanding medical facility. The Applicants are in the process of responding to the HSCRC's request and are planning to meet with HSCRC staff to discuss the information request in December 2019.

Table of Exhibits

Exhibit	Description
8	UMMS Financial Assistance Policy and Procedure
9	UM UCH Financial Assistance Application Form
10	July 2, 2019 Letter from Gerald Schmith to Steve Witman

Table of Tables

Description

I hereby declare and affirm under the penalties of perjury that the facts stated in UCMC's and HMH's response to the Commission's Requests for Additional Information dated November 13, 2019 are true and correct to the best of my knowledge, information, and belief.

11.25.19

Date



Lyle E. Sheldon
President and Chief Executive Officer
University of Maryland Upper
Chesapeake Health System

I hereby declare and affirm under the penalties of perjury that the facts stated in UCMC's and HMH's response to the Commission's Requests for Additional Information dated November 13, 2019 are true and correct to the best of my knowledge, information, and belief.

11.25.19

Date



Robin Luxon
Senior Vice President, Corporate
Planning, Marketing & Business
Development
University of Maryland Upper
Chesapeake Health System

I hereby declare and affirm under the penalties of perjury that the facts stated in UCMC's and HMH's response to the Commission's Requests for Additional Information dated November 13, 2019 are true and correct to the best of my knowledge, information, and belief.

11/25/2019

Date



Stephen Witman
Senior Vice President, Chief Financial
Officer
University of Maryland Upper
Chesapeake Health System

I hereby declare and affirm under the penalties of perjury that the facts stated in UCMC's and HMH's response to the Commission's Requests for Additional Information dated November 13, 2019 are true and correct to the best of my knowledge, information, and belief.

11-25-19


Date



Amale Obeid
Director of Planning and Business
Development
University of Maryland Upper
Chesapeake Health System

I hereby declare and affirm under the penalties of perjury that the facts stated in UCMC's and HMH's response to the Commission's Requests for Additional Information dated November 13, 2019 are true and correct to the best of my knowledge, information, and belief.

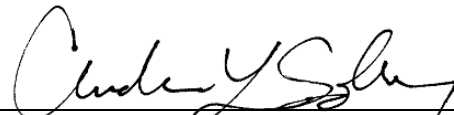
11/27/19
Date


Phillip D. Crocker
Project Manager
University of Maryland Upper
Chesapeake Health System

I hereby declare and affirm under the penalties of perjury that the facts stated in UCMC's and HMH's response to the Commission's Requests for Additional Information dated November 13, 2019 are true and correct to the best of my knowledge, information, and belief.


11/25/2019

Date



Andrew L. Solberg
A.L.S. Healthcare Consultant Services


EXHIBIT 8

 <ul style="list-style-type: none"> University of Maryland Medical Center University of Maryland Medical Center Midtown Campus University of Maryland Rehabilitation & Orthopaedic Institute University of Maryland St. Joseph Medical Center University of Maryland Baltimore Washington Medical Center University of Maryland Shore Medical Center at Chestertown University of Maryland Shore Medical Center at Dorchester University of Maryland Shore Medical Center at Easton University of Maryland Charles Regional Medical Center University of Maryland Upper Chesapeake Health University of Maryland Capital Region Health 	The University of Maryland Medical System Central Business Office Policy & Procedure	<i>Policy #:</i> TBD
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POLICY

This policy applies to the following hospital facilities of the University of Maryland Medical System (“UMMS hospitals”):

- University of Maryland Medical Center (UMMC)
- University of Maryland Medical Center Midtown Campus (MTC)
- University of Maryland Rehabilitation & Orthopaedic Institute (UMROI)
- University of Maryland St. Joseph Medical Center (UMSJMC)
- University of Maryland Baltimore Washington Medical Center (UMBWMC)
- University of Maryland Shore Medical Center at Chestertown (UMSMCC)
- University of Maryland Shore Medical Center at Dorchester (UMSMCD)
- University of Maryland Shore Medical Center at Easton (UMSME)
- University of Maryland Charles Regional Medical Center (UMCRM)
- University of Maryland Upper Chesapeake Health (UCHS)
- University of Maryland Capital Region Health (UM Capital)

 <ul style="list-style-type: none"> University of Maryland Medical Center University of Maryland Medical Center Midtown Campus University of Maryland Rehabilitation & Orthopaedic Institute University of Maryland St. Joseph Medical Center University of Maryland Baltimore Washington Medical Center University of Maryland Shore Medical Center at Chestertown University of Maryland Shore Medical Center at Dorchester University of Maryland Shore Medical Center at Easton University of Maryland Charles Regional Medical Center University of Maryland Upper Chesapeake Health University of Maryland Capital Region Health 	The University of Maryland Medical System Central Business Office Policy & Procedure	<i>Policy #:</i>	TBD
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The University of Maryland Medical System (“UMMS”) is committed to providing financial assistance to persons who have health care needs and are uninsured, underinsured, ineligible for a government program, or otherwise unable to pay, for emergent and medically necessary care based on their individual financial situation.

It is the policy of the UMMS hospitals to provide Financial Assistance based on indigence or high medical expenses for patients who meet specified financial criteria and request such assistance. The purpose of the following policy statement is to describe how applications for Financial Assistance should be made, the criteria for eligibility, and the steps for processing applications.

UMMS will post notices of financial assistance availability in each UMMS hospital’s emergency room (if any) and admissions areas, as well as the Billing Office. Notice of availability will also be sent to the patient with patient bills. Signage in key patient access areas will be made available. A Patient Billing and Financial Assistance Information Sheet will be provided before discharge, and it (along with this policy and the Financial Assistance Application) will be available to all patients upon request and without charge, both by mail and in the emergency room (if any) and admissions areas. This policy, the Patient Billing and Financial Assistance Information Sheet, and the Financial Assistance Application will also be conspicuously posted on the UMMS website (www.umms.org).

Financial Assistance may be extended when a review of a patient’s individual financial circumstances has been conducted and documented. This should include a review of the patient’s existing medical expenses and obligations (including any accounts having gone to bad debt except those accounts that have gone to lawsuit and a judgment has been obtained) and any projected medical expenses. Financial Assistance Applications may be offered to patients whose accounts are with a collection agency.

UMMS retains the right in its sole discretion to determine a patient’s ability to pay. All patients presenting for emergency services will be treated regardless of their ability to pay. For emergent/urgent services, applications to the Financial Clearance Program will be completed, received, and evaluated retrospectively and will not delay patients from receiving care.

 <ul style="list-style-type: none"> University of Maryland Medical Center University of Maryland Medical Center Midtown Campus University of Maryland Rehabilitation & Orthopaedic Institute University of Maryland St. Joseph Medical Center University of Maryland Baltimore Washington Medical Center University of Maryland Shore Medical Center at Chestertown University of Maryland Shore Medical Center at Dorchester University of Maryland Shore Medical Center at Easton University of Maryland Charles Regional Medical Center University of Maryland Upper Chesapeake Health University of Maryland Capital Region Health 	The University of Maryland Medical System Central Business Office Policy & Procedure	<i>Policy #:</i>	TBD
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This policy was adopted for University of Maryland St. Joseph Medical Center (UMSJMC) effective June 1, 2013.

This policy was adopted for University of Maryland Medical Center Midtown Campus (MTC) effective September 22, 2014.

This policy was adopted for University of Maryland Baltimore Washington Medical Center (UMBWMC) effective July 1, 2016.

This policy was adopted for University of Maryland Shore Medical Center at Chestertown (UMSMCC) effective September 1, 2017.

This policy was adopted for University of Maryland Shore Medical Center at Dorchester (UMSMCD) effective September 1, 2017.

This policy was adopted for University of Maryland Shore Medical Center at Easton (UMSMCE) effective September 1, 2017.


This policy was adopted for University of Maryland Charles Regional Medical Center (UMCRM) effective December 2, 2018.

This policy was adopted for University of Maryland Upper Chesapeake Health (UCHS) effective July 1, 2019

This policy was adopted for University of Maryland Capital Region Health (UM Capital) effective September 18, 2019

PROGRAM ELIGIBILITY


Consistent with their mission to deliver compassionate and high quality healthcare services and to advocate for those who do not have the means to pay for medically necessary care, UMMC, MTC, UMROI, UMSJMC, UMBWMC, UMSMCC, UMSMCD, UMSMCE, UMCRM, UCHS, and UM Capital hospitals strive to ensure that the financial capacity of people who need health care services does not prevent them from seeking or receiving care.

 <ul style="list-style-type: none"> University of Maryland Medical Center University of Maryland Medical Center Midtown Campus University of Maryland Rehabilitation & Orthopaedic Institute University of Maryland St. Joseph Medical Center University of Maryland Baltimore Washington Medical Center University of Maryland Shore Medical Center at Chestertown University of Maryland Shore Medical Center at Dorchester University of Maryland Shore Medical Center at Easton University of Maryland Charles Regional Medical Center University of Maryland Upper Chesapeake Health University of Maryland Capital Region Health 	The University of Maryland Medical System Central Business Office Policy & Procedure	<i>Policy #:</i> TBD
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Specific exclusions to coverage under the Financial Assistance Program:

The Financial Assistance Program generally applies to all emergency and other medically necessary care provided by each UMMS hospital, as well as certain entities related to such hospitals listed in Attachment B. However, the Financial Assistance Program does not apply to any of the following:

1. Services provided by healthcare providers not affiliated with UMMS hospitals (e.g., durable medical equipment, home health services).
2. Patients whose insurance program or policy denies coverage for services by their insurance company (e.g., HMO, PPO, or Workers Compensation), are not eligible for the Financial Assistance Program.
 - a. Generally, the Financial Assistance Program is not available to cover services that are denied by a patient's insurance company; however, exceptions may be made on a case by case basis considering medical and programmatic implications.
3. Cosmetic or other non-medically necessary services.
4. Patient convenience items.
5. Patient meals and lodging.
6. Physician charges related to the date of service are excluded from this UMMS financial assistance policy. Patients who wish to pursue financial assistance for physician-related bills must contact the physician directly.
 - a. A list of providers, other than the UMMS hospital itself, delivering medically necessary care in each UMMS hospital that specifies which such as providers are not covered by this policy (as well as certain such providers that are covered) may be obtained on the website of each UMMS Entity.

 <ul style="list-style-type: none"> University of Maryland Medical Center University of Maryland Medical Center Midtown Campus University of Maryland Rehabilitation & Orthopaedic Institute University of Maryland St. Joseph Medical Center University of Maryland Baltimore Washington Medical Center University of Maryland Shore Medical Center at Chestertown University of Maryland Shore Medical Center at Dorchester University of Maryland Shore Medical Center at Easton University of Maryland Charles Regional Medical Center University of Maryland Upper Chesapeake Health University of Maryland Capital Region Health 	The University of Maryland Medical System Central Business Office Policy & Procedure	<i>Policy #:</i>	TBD	
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Patients may be ineligible for Financial Assistance for the following reasons:

1. Have insurance coverage through an HMO, PPO, Workers Compensation, Medicaid, or other insurance programs that deny access to the Medical Center due to insurance plan restrictions/limits.
2. Refusal to be screened for other assistance programs prior to submitting an application to the Financial Clearance Program.
3. Refusal to divulge information pertaining to a pending legal liability claim.
4. Foreign-nationals traveling to the United States seeking elective, non-emergent medical care.

Patients who become ineligible for the program will be required to pay any open balances and may be submitted to a bad debt service if the balance remains unpaid in the agreed upon time periods.

Unless they meet Presumptive Financial Assistance Eligibility criteria, patients shall be required to submit a complete Financial Assistance Application (with all required information and documentation) and determined to be eligible for financial assistance in order to obtain financial assistance. Patients who indicate they are unemployed and have no insurance coverage shall be required to submit a Financial Assistance Application before receiving non-emergency medical care unless they meet Presumptive Financial Assistance Eligibility criteria. If the patient qualifies for COBRA coverage, patient's financial ability to pay COBRA insurance premiums shall be reviewed by the Financial Counselor/Coordinator and recommendations shall be made to Senior Leadership. Individuals with the financial capacity to purchase health insurance shall be encouraged to do so, as a means of assuring access to health care services and for their overall personal health.


Those with income up to 200% of Maryland State Department of Health and Mental Hygiene Medical Assistance Planning Administration Income Eligibility Limits for a Reduced Cost of Care ("MD DHMH") are eligible for free care. Those between 200% to 300% of MD DHMH are eligible for discounts on a sliding scale, as set forth in Attachment A.

 <ul style="list-style-type: none"> University of Maryland Medical Center University of Maryland Medical Center Midtown Campus University of Maryland Rehabilitation & Orthopaedic Institute University of Maryland St. Joseph Medical Center University of Maryland Baltimore Washington Medical Center University of Maryland Shore Medical Center at Chestertown University of Maryland Shore Medical Center at Dorchester University of Maryland Shore Medical Center at Easton University of Maryland Charles Regional Medical Center University of Maryland Upper Chesapeake Health University of Maryland Capital Region Health 	The University of Maryland Medical System Central Business Office Policy & Procedure	<i>Policy #:</i>	TBD	
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Presumptive Financial Assistance

Patients may also be considered for Presumptive Financial Assistance Eligibility. There are instances when a patient may appear eligible for financial assistance, but there is no financial assistance form on file. There is adequate information provided by the patient or through other sources, which provide sufficient evidence to provide the patient with financial assistance. In the event there is no evidence to support a patient's eligibility for financial assistance, UMMS reserves the right to use outside agencies or information in determining estimated income amounts for the basis of determining financial assistance eligibility and potential reduced care rates. Once determined, due to the inherent nature of presumptive circumstances, the only financial assistance that can be granted is a 100% write-off of the account balance. Presumptive Financial Assistance Eligibility shall only cover the patient's specific date of service. Presumptive eligibility may be determined on the basis of individual life circumstances that may include:

- a. Active Medical Assistance pharmacy coverage
- b. Specified Low Income Medicare (SLMB) coverage
- c. Primary Adult Care (PAC) coverage
- d. Homelessness
- e. Medical Assistance and Medicaid Managed Care patients for services provided in the ER beyond the coverage of these programs
- f. Medical Assistance spend down amounts
- g. Eligibility for other state or local assistance programs
- h. Patient is deceased with no known estate

 <ul style="list-style-type: none"> University of Maryland Medical Center University of Maryland Medical Center Midtown Campus University of Maryland Rehabilitation & Orthopaedic Institute University of Maryland St. Joseph Medical Center University of Maryland Baltimore Washington Medical Center University of Maryland Shore Medical Center at Chestertown University of Maryland Shore Medical Center at Dorchester University of Maryland Shore Medical Center at Easton University of Maryland Charles Regional Medical Center University of Maryland Upper Chesapeake Health University of Maryland Capital Region Health 	The University of Maryland Medical System Central Business Office Policy & Procedure	<i>Policy #:</i>	TBD	
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- i. Patients that are determined to meet eligibility criteria established under former State Only Medical Assistance Program
- j. Non-US Citizens deemed non-compliant
- k. Non-Eligible Medical Assistance services for Medical Assistance eligible patients
- l. Unidentified patients (Doe accounts that we have exhausted all efforts to locate and/or ID)
- m. Bankruptcy, by law, as mandated by the federal courts
- n. St. Clare Outreach Program eligible patients
- o. UMSJMC Maternity Program eligible patients
- p. UMSJMC Hernia Program eligible patients

Specific services or criteria that are ineligible for Presumptive Financial Assistance include:


- a. Uninsured patients seen in the Emergency Department under Emergency Petition will not be considered under the presumptive financial assistance program until the Maryland Medicaid Psych program has been billed.

PROCEDURES


1. There are designated persons who will be responsible for taking Financial Assistance applications. These staff can be Financial Counselors, Patient Financial Receivable Coordinators, Customer Service Representatives, etc.

 <p>University of Maryland Medical Center University of Maryland Medical Center Midtown Campus University of Maryland Rehabilitation & Orthopaedic Institute University of Maryland St. Joseph Medical Center University of Maryland Baltimore Washington Medical Center University of Maryland Shore Medical Center at Chestertown University of Maryland Shore Medical Center at Dorchester University of Maryland Shore Medical Center at Easton University of Maryland Charles Regional Medical Center University of Maryland Upper Chesapeake Health University of Maryland Capital Region Health</p>	The University of Maryland Medical System Central Business Office Policy & Procedure	<i>Policy #:</i> TBD
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2. When possible effort will be made to provide financial clearance prior to date of service. Where possible, designated staff will consult via phone or meet with patients who request Financial Assistance to determine if they meet preliminary criteria for assistance.
 - a. Staff will complete an eligibility check with the Medicaid program for Self Pay patients to verify whether the patient has current coverage.
 - b. Preliminary data will be entered into a third party data exchange system to determine probably eligibility. To facilitate this process each applicant must provide information about family size and income. To help applicants complete the process, we will provide an application that will let them know what paperwork is required for a final determination of eligibility.
 - c. Applications initiated by the patient will be tracked, worked and eligibility determined within the third party data and workflow tool. A letter of final determination will be submitted to each patient that has formally requested financial assistance. Determination of Probable Eligibility will be provided within two business days following a patient's request for charity care services, application for medical assistance, or both.
 - d. If a patient submits a Financial Assistance Application without the information or documentation required for a final determination of eligibility, a written request for the missing information or documentation will be sent to the patient. This written request will also contain the contact information (including telephone number and physical location) of the office or department that can provide information about the Financial Assistance Program and assistance with the application process.
 - e. The patient will have thirty (30) days from the date this written request is provided to submit the required information or documentation to be considered for eligibility. If no data is received within the 30 days, a letter will be sent notifying the patient that the case is now closed for lack of the required documentation. The patient may re-apply to the program and initiate a new case by submitting the missing information or documentation 30 days after the date of the written request for missing information/documentation.
 - f. For any episode of care, the Financial Assistance Application process will be open up to at least 240 days after the first post-discharge patient bill for the care is sent.

 <ul style="list-style-type: none"> University of Maryland Medical Center University of Maryland Medical Center Midtown Campus University of Maryland Rehabilitation & Orthopaedic Institute University of Maryland St. Joseph Medical Center University of Maryland Baltimore Washington Medical Center University of Maryland Shore Medical Center at Chestertown University of Maryland Shore Medical Center at Dorchester University of Maryland Shore Medical Center at Easton University of Maryland Charles Regional Medical Center University of Maryland Upper Chesapeake Health University of Maryland Capital Region Health 	The University of Maryland Medical System Central Business Office Policy & Procedure	<i>Policy #:</i>	TBD	
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- g. Individual notice regarding the hospital's Financial Assistance Policy shall be provided at the time of preadmission or admission to each person who seeks services in the hospital.
3. There will be one application process for UMMC, MTC, UMROI, UMSJMC, UMBWMC, UMSMCC, UMSMCD, UMSMCE, UMCRCMC, UCHS, and UM Capital. The patient is required to provide a completed Financial Assistance Application orally or in writing. In addition, the following may be required:
- a. A copy of their most recent Federal Income Tax Return (if married and filing separately, then also a copy spouse's tax return); proof of disability income (if applicable), proof of social security income (if applicable). If unemployed, reasonable proof of unemployment such as statement from the Office of Unemployment Insurance, a statement from current source of financial support, etc ...
 - b. A copy of their most recent pay stubs (if employed) or other evidence of income.
 - c. A Medical Assistance Notice of Determination (if applicable).
 - d. Copy of their Mortgage or Rent bill (if applicable), or written documentation of their current living/housing situation.
- If a patient submits both a copy of their most recent Federal Income Tax Return and a copy of their most recent pay stubs (or other evidence of income), and only one of the two documents indicates eligibility for financial assistance, the most recent document will dictate eligibility. Oral submission of needed information will be accepted, where appropriate.
4. In addition to qualifying for Financial Assistance based on income, a patient can qualify for Financial Assistance either through lack of sufficient insurance or excessive medical expenses based on the Financial Hardship criteria discussed below. Once a patient has submitted all the required information, the Financial Counselor will review and analyze the application and forward it to the Patient Financial Services Department for final determination of eligibility based on UMMS guidelines.
- a. If the patient's application for Financial Assistance is determined to be complete and appropriate, the Financial Coordinator will recommend the patient's level of eligibility and forward for a second and final approval.

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- i) If the patient does qualify for Financial Assistance, the Financial Coordinator will notify clinical staff who may then schedule the patient for the appropriate hospital-based service.
- ii) If the patient does not qualify for Financial Assistance, the Financial Coordinator will notify the clinical staff of the determination and the non-emergent/urgent hospital-based services will not be scheduled.

(1) A decision that the patient may not be scheduled for hospital-based, non-emergent/urgent services may be reconsidered by the Financial Clearance Executive Committee, upon the request of a Clinical Chair.


5. Once a patient is approved for Financial Assistance, Financial Assistance coverage is effective for the month of determination and a year prior to the determination. However, an UMMS hospital may decide to extend the Financial Assistance eligibility period further into the past or the future on a case-by-case basis. If additional healthcare services are provided beyond the eligibility period, patients must reapply to the program for clearance. In addition, changes to the patient's income, assets, expenses or family status are expected to be communicated to the Financial Assistance Program Department. All Extraordinary Collections Action activities, as defined below, will be terminated once the patient is approved for financial assistance and all the patient responsible balances are paid.
6. Account balances that have not been paid may be transferred to Bad Debt (deemed uncompensated care) and referred to an outside collection agency or to the UMMS hospital's attorney for legal and/or collection activity. Collection activities taken on behalf of the hospital by a collection agency or the hospital's attorney may include the following Extraordinary Collection Actions (ECAs):
 - a. Reporting adverse information about the individual to consumer credit reporting agencies or credit bureaus.
 - b. Commencing a civil action against the individual.

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- c. Placing a lien on an individual's property. A lien will be placed by the Court on primary residences within Baltimore City. The hospital will not pursue foreclosure of a primary residence but may maintain its position as a secured creditor if a property is otherwise foreclosed upon.
 - d. Attaching or seizing an individual's bank account or any other personal property.
 - e. Garnishing an individual's wage.
7. ECAs may be taken on accounts that have not been disputed or are not on a payment arrangement. ECAs will occur no earlier than 120 days from submission of first post-discharge bill to the patient and will be preceded by a written notice 30 days prior to commencement of the ECA. This written notice will indicate that financial assistance is available for eligible individuals, identify the ECAs that the hospital (or its collection agency, attorney, or other authorized party) intends to obtain payment for the care, and state a deadline after which such ECAs may be initiated. It will also include a Patient Billing and Financial Assistance Information Sheet. In addition, the hospital will make reasonable efforts to orally communicate the availability of financial assistance to the patient and tell the patient how he or she may obtain assistance with the application process. A presumptive eligibility review will occur prior to any ECA being taken. Finally, no ECA will be initiated until approval has been obtained from the CBO Revenue Cycle.
 8. If prior to receiving a service, a patient is determined to be ineligible for financial assistance for that service, all efforts to collect co-pays, deductibles or a percentage of the expected balance for the service will be made prior to the date of service or may be scheduled for collection on the date of service.
 9. A letter of final determination will be submitted to each patient who has formally submitted an application. The letter will notify the patient in writing of the eligibility determination (including, if applicable, the assistance for which the individual is eligible) and the basis for the determination. If the patient is determined to be eligible for assistance other than free care, the patient will also be provided with a billing statement that indicates the amount the patient owes for the care after financial assistance is applied.
 10. Refund decisions are based on when the patient was determined unable to pay compared to when the patient payments were made. Refunds will be issued back to the patient for credit balances, due to patient payments, resulting from approved financial assistance on considered balance(s). Payments received for care rendered during the financial assistance eligibility window will be refunded, if the amount exceeds the patient's determined responsibility by \$5.00 or more.

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11. If a patient is determined to be eligible for financial assistance, the hospital (and/or its collection agency or attorney) will take all reasonably available measures to reverse any ECAs taken against the patient to obtain payment for care rendered during the financial assistance eligibility window. Such reasonably available measures will include measures to vacate any judgment against the patient, lift levies or liens on the patient's property, and remove from the patient's credit report any adverse information that was reported to a consumer reporting agency or credit bureau.
12. Patients who have access to other medical coverage (e.g., primary and secondary insurance coverage or a required service provider, also known as a carve-out), must utilize and exhaust their network benefits before applying for the Financial Assistance Program.
13. The Financial Assistance Program will accept the Faculty Physicians, Inc.'s (FPI) completed financial assistance applications in determining eligibility for the UMMS Financial Assistance program. This includes accepting FPI's application requirements.
14. The Financial Assistance Program will accept all other UMMS hospital's completed financial assistance applications in determining eligibility for the program. This includes accepting each facility's application format.
15. The Financial Assistance Program does not cover Supervised Living Accommodations and meals while a patient is in the Day Program.
16. Where there is a compelling educational and/or humanitarian benefit, Clinical staff may request that the Financial Clearance Executive Committee consider exceptions to the Financial Assistance Program guidelines, on a case-by-case basis, for Financial Assistance approval.
 - a. Faculty requesting Financial Clearance/Assistance on an exception basis must submit appropriate justification to the Financial Clearance Executive Committee in advance of the patient receiving services.
 - b. The Chief Medical Officer will notify the attending physician and the Financial Assistance staff of the Financial Clearance Executive Committee determination.

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Financial Hardship

The amount of uninsured medical costs incurred at either, UMMC, MTC, UMROI, UMSJMC, UMBWMC, UMSMCC, UMSMCD, UMSMCE, UMCRM, UCHS, and UM Capital will be considered in determining a patient's eligibility for the Financial Assistance Program. The following guidelines are outlined as a separate, supplemental determination of Financial Assistance, known as Financial Hardship. Financial Hardship will be offered to all patients who apply for Financial Assistance and are determined to be eligible.

Medical Financial Hardship Assistance is available for patients who otherwise do not qualify for Financial Assistance under the primary guidelines of this policy, but for whom:


- 1) Their medical debt incurred at UMMC, MTC, UMROI, UMSJMC, UMBWMC, UMSMCC, UMSMCD, UMSMCE, UMCRM, UCHS, and UM Capital exceeds 25% of the Family Annual Household Income, which is creating Medical Financial Hardship.

For the patients who are eligible for both, the Reduced Cost Care under the primary Financial Assistance criteria and also under the Financial Hardship Assistance criteria, UMMC, MTC, UMROI, UMSJMC, UMBWMC, UMSMCC, UMSMCD, UMSMCE, UMCRM, UCHS, and UM Capital will grant the reduction in charges, which is balance owed that is greater than 25% of the total annual household income.

Financial Hardship is defined as facility charges incurred at UMMC, MTC, UMROI, UMSJMC, UMBWMC, UMSMCC, UMSMCD, UMSMCE, UMCRM, UCHS, and UM Capital for medically necessary treatment by a family household over a twelve (12) month period that exceeds 25% of that family's annual income.

Medical Debt is defined as out of pocket expenses for the facility charges incurred at UMMC, MTC, UMROI, UMSJMC, UMBWMC, UMSMCC, UMSMCD, UMSMCE, UMCRM, UCHS, and/or UM Capital for medically necessary treatment.


Once a patient is approved for Financial Hardship Assistance, coverage will be effective for the month of the first qualifying date of service and a year prior to the determination. However, an UMMS hospital may decide to extend the Financial Hardship eligibility period further into the past or the future on a case-by-case basis according to their spell of illness/episode of care. It will cover the patient and the eligible family members living in the household for the approved reduced cost and eligibility period for medically necessary care.

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All other eligibility, ineligibility, and procedures for the primary Financial Assistance program criteria apply for the Financial Hardship Assistance criteria, unless otherwise stated above.

Appeals

- Patients whose financial assistance applications are denied have the option to appeal the decision.
- Appeals can be initiated verbally or written.
- Patients are encouraged to submit additional supporting documentation justifying why the denial should be overturned.
- Appeals are documented within the third party data and workflow tool. They are then reviewed by the next level of management above the representative who denied the original application.
- If the first level of appeal does not result in the denial being overturned, patients have the option of escalating to the next level of management for additional reconsideration.
- The escalation can progress up to the Chief Financial Officer who will render a final decision.
- A letter of final determination will be submitted to each patient who has formally submitted an appeal.

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ATTACHMENT A

Sliding Scale – Reduced Cost of Care

MD DHMH 2019 Income Elig Limit Guidelines		Income Level	S	Income Level	Income Level	Income Level	Income Level	Income Level	Income Level	Income Level	Income Level	Income Level
		Up to 200%	L	Level	Level	Level	Level	Level	Level	Level	Level	Level
		Pt Resp 0%	I	Pt Resp 10%	Pt Resp 20%	Pt Resp 30%	Pt Resp 40%	Pt Resp 50%	Pt Resp 60%	Pt Resp 70%	Pt Resp 80%	Pt Resp 90%
HH	100% MD DHMH	100% Charity	D	90% Charity	80% Charity	70% Charity	60% Charity	50% Charity	40% Charity	30% Charity	20% Charity	10% Charity
Size	Max	Max	I	Max	Max	Max	Max	Max	Max	Max	Max	Max
1	\$17,244	\$34,488	N	\$36,212	\$37,937	\$39,661	\$41,386	\$43,110	\$44,834	\$46,559	\$48,283	\$51,731
2	\$23,364	\$46,728	G	\$49,064	\$51,401	\$53,737	\$56,074	\$58,410	\$60,746	\$63,083	\$65,419	\$70,091
3	\$29,448	\$58,896		\$61,841	\$64,786	\$67,730	\$70,675	\$73,620	\$76,565	\$79,510	\$82,454	\$88,343
4	\$35,532	\$71,064	S	\$74,617	\$78,170	\$81,724	\$85,277	\$88,830	\$92,383	\$95,936	\$99,490	\$106,595
5	\$41,652	\$83,304	C	\$87,469	\$91,634	\$95,800	\$99,965	\$104,130	\$108,295	\$112,460	\$116,626	\$124,955
6	\$47,748	\$95,496	A	\$100,271	\$105,046	\$109,820	\$114,595	\$119,370	\$124,145	\$128,920	\$133,694	\$143,243

*All discounts stated above shall be applied to the amount the patient is personally responsible for paying after insurance reimbursements.

*Amounts billed to patients who qualify for Reduced-Cost of Care on a sliding scale (or for Financial Hardship Assistance) will be less than the amounts generally billed to those with insurance (AGB), which in Maryland is the charge established by the Health Services Cost Review Commission (HSCRC). UMMS determines AGB by using the amount Medicare would allow for the care (including the amount the beneficiary would be personally responsible for paying, which is the HSCRC amount; this is known as the "prospective Medicare method".

Effective 7/1/19

EXHIBIT 9



Please complete, sign, and return this application with the following required documentation:

- **Income (Including all of the following documents you currently receive):**
Copy of last 2 pay stubs or copy of W-2 form from most recent tax year filed for all who apply; including patient, patient spouse, patient guarantor (Parent(s) of children under 21 yrs old) living in the household. Documentation of Social Security/Social Security Disability or any other additional household income.
- **Copy of Mortgage/Rent Bill.**
- **If you applied for Medical Assistance, a copy of your approval or denial letter.**

If you are unable to supply any of the required documents above, please complete form FAF 116 attached.

Patient Information

Last Name:	First:	M.I.:
Social Security #:	Date of Birth:	

Guarantor (Responsible Party) If same as Patient skip to Part II, otherwise complete all fields.

Last Name:	First:	M.I.:
Social Security #:	Date of Birth:	Relationship to Patient:

Part II (Copy of W-2 form(s) from most recent year filed OR last two pay check stubs required)

Street Address:		Apt:
City:	State:	ZIP:
Home Phone: ()	Cell Phone: ()	Marital Status:
Employers Name and Address:		
Monthly Gross Income: \$	Monthly Net Income: \$	
Position/Title:	Length of Current Employment:	
Are you a Legal Resident of the United States:	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Spouse

Last Name:	First:	M.I.:
Employer Name/Address:		Phone #:
Position/Title:	Length of Employment:	
Monthly Gross Income: \$	Monthly Net Income: \$	

Household Information (Name and Date Of Birth of all persons in household, excluding self or spouse)

Name:	DOB:	Relation to Patient:
Name:	DOB:	Relation to Patient:
Name:	DOB:	Relation to Patient:
Name:	DOB:	Relation to Patient:
Name:	DOB:	Relation to Patient:

Additional Household income

Checking Account Balance:	Monthly Unemployment Amount:
Savings Account Balance:	Monthly Social Security Amount:
Public Assistance/ Food Stamps:	Monthly Workers Compensation Amount:
Monthly Child Support Amount:	Other:

Monthly Expenses (Copy of Mortgage/Rent payment required)	
Mortgage/Rent Payment:	Cable:
Utilities:	Visa:
Telephone:	Mastercard:
Cell Phone:	Department Store:
Car Payment:	Other:

Health Insurance Information (Copy of Medical Assistance Approval or Denial letter you received is required)	
Name Of Company:	Effective Date:
Have you applied for Medical Assistance: Yes <input type="checkbox"/> No <input type="checkbox"/>	When:
Where:	Name of Caseworker & phone #:
Outcome/Reason for Denial:	

Disability Information	
Is the Patient Disabled: Yes <input type="checkbox"/> No <input type="checkbox"/>	Length Of Disability:
Name of Physician:	Physician Phone Number:

Third Party Liabilities (Auto Accident, Workers Compensation, Bodily Injury, or other legal claim)			
Injuries/Illness result of an Auto Accident	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Date of Incident:
Injuries/Illness occurring at your workplace?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Date of Incident:
Injuries/Illness result of a Crime?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Date of Incident:
Injuries/Illness resulting in legal action?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Date of Incident:

Third Party Liability Claims are ineligible for Financial Assistance until all means of payment are exhausted. Failure to disclose information pertaining to any third party liability claim will deem patient ineligible for Financial Assistance.

I declare that I have examined this application and to the best of my knowledge all information in it or otherwise provided to UMMS and it's practices is true, correct, and complete. I understand that misrepresentation of this information may cancel any financial assistance I may be provided and that I will then be liable for all medical charges. By signing and submitting this request, I give UMMS, and it's facility practices permission to determine my need for financial assistance; including review of my credit file. I also give permission to UMMS to release or disclose this information to University Physicians Inc. for the purpose of evaluating my financial status in response for assistance with my physician bills. I understand that it is my responsibility to advise UMMS of any changes in status in regards to my income or assets while this application is in process.

Patient/Guarantor Signature

Date

Spouse's Signature

Date

If you have any questions or need assistance completing this application, please call the Financial Assistance Dept. (410) 821-4140, Monday through Friday, 8:00am - 4:30pm. Mail this application, **along with required documents to: UMMS, 11311 McCormick Rd, Suite 230, Hunt Valley, MD 21031.**

EXHIBIT 10

**State of Maryland
Department of Health**

**Nelson J. Sabatini
Chairman**

**Joseph Antos, PhD
Vice-Chairman**

Victoria W. Bayless

John M. Colmers

James N. Elliott, M.D.

Adam Kane

Jack C. Keane



**Katie Wunderlich
Executive Director**

**Allan Pack, Director
Population Based
Methodologies**

**Chris Peterson, Director
Payment Reform &
Provider Alignment**

**Gerard J. Schmith, Director
Revenue & Regulation
Compliance**

**William Henderson, Director
Medical Economics &
Data Analytics**

Health Services Cost Review Commission

4160 Patterson Avenue, Baltimore, Maryland 21215
Phone: 410-764-2605 · Fax: 410-358-6217
Toll Free: 1-888-287-3229
hsrc.maryland.gov

July 2, 2019

Mr. Steve Witman
Senior Vice President, Chief Financial Officer
University of Maryland, Upper Chesapeake Health System
500 Upper Chesapeake Drive
Bel Air, Maryland 21014

Dear Steve,

After reviewing the materials that we have received regarding the University of Maryland-Upper Chesapeake Health System's (UCHS) proposal to restructure the campuses of Upper Chesapeake Medical Center (UCMC) and Harford Memorial Hospital (HMH) the staff has determined that it will need to review additional information. The staff needs the additional information in order to better evaluate UCHS' proposal in terms of the overall financial viability of the proposal and the impact on HSCRC regulated services as well as unregulated services.

The staff has reviewed the sources and uses of funds included in the CON and the request for exemption from CON review for the proposed project. The staff has also reviewed the information provided in the recent UCHS Power Point presentations as well as the letter dated May 29, 2019 summarizing the proposal. The staff has had difficulty understanding the various costs and revenue associated with the different components of the project outlined in the information provided to date.

As we understand the CON information, the Power Point presentations and the May 29, 2019 letter, UCHS is proposing the following new or renovated facilities in the Aberdeen area:

1. The medical office building.
2. A free-standing psychiatric hospital.
3. A free-standing medical facility (FMF).
4. An unregulated free-standing surgery center.

Please provide a sources and uses of funds analysis for each of these facilities separately so that staff can determine the amount of projected depreciation and interest expense associated with each of the four facilities in Aberdeen broken down between HSCRC regulated and unregulated

services. The staff would also like to know details of the purchase of the MOB including; address, square feet of building and lot, previous owners, and appraisals. Was UCHS intending to use any of the proceeds from the sale of the Bulle Rock property that was previously purchased for a new facility for the new proposed project.

In addition, please provide separate detailed projected financial statements for the first five years of operations for each of the four facilities. These projected financial statements should include assumed HSCRC regulated and unregulated revenue by department, numbers of FTE's and salaries by department, and sufficient supporting information explaining the remaining expenses.

Please provide this information as soon as possible so that staff can respond to your requests. If you have any questions, please feel free to call me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gerard J. Schmith".

Gerard J. Schmith
Director of Revenue and Compliance

Cc: Katie Wunderlich
Paul Parker
Ben Steffen
Joe Delenick
Joe Schott