



Freebies, Waivers and Copays One Pager

There are a number of rules governing the ability to provide free things to patients or waive their co-pays. Before you implement a process check in with your legal team.

Public Policy Reasons for These Rules

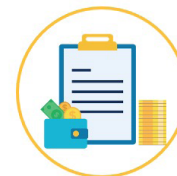


Concern about over-utilization



Compliance with Payor contracts

Shift to having consumers pay for something when they receive care – to align incentives & not to be wasteful



Integrity of charges

If *routinely* waiving for Medicare or Medicaid for example, your charges are likely improper

Common Questions:

Can We Routinely Waive Patient Copays?

Probably not unless another exception applies (e.g., Patient Financial Need). Tread carefully and seek advice before you do this.

Can We Give Patients a Discount For Prompt Payment?

Only if:

1. The amount of the fees discounted would bear a reasonable relationship to the amount of avoided collection costs.
2. Third-party Payors are notified of the prompt pay policy(ies)
3. The discount opportunity is not advertised

Can We Give a Patient Discount for Financial Need?

Yes if:

- The waiver is not part of any advertisement or solicitation
- The waiver is not tied to other items/services reimbursed by Medicare/Medicaid
- the waived service/item is tied to the medical care of the patient
- Good faith determination of financial need

Can We Offer Patients a Self-Pay Discount?

It is complicated; call your Legal team.

Can We Give Professional Courtesy Discounts?

Yes, but don't get carried away.

Can We Give Free Goods or Services to Patients?

Generally yes, but an analysis may be required prior to offering to patients.

What if the Item/Service Increases a Patient's Access to Care?

This is generally okay as long as certain requirements are met (watch our episode for the full requirements).

