

Key Therapeutics, LLC

Policy and Procedure for Providing Good Faith Estimates

Policy Effective Date: 1/1/2022

Policy: Company will comply with the Good Faith Estimates Rule at 45 CFR Subpart G and applicable state laws that require Company to provide cost information to additional categories of individuals/patients.

Procedure for Website and Office Notice: Company will post a notice on its website and in its office stating that certain patients are entitled to receive a Good Faith Estimate (“GFE”) upon request and upon scheduling.

Procedure for Providing GFEs: Company will provide a Good Faith Estimate (“GFE”) to existing and potential patients who are uninsured or who have insurance but wish to self-pay (not including patients who plan to submit their own out of network claims to their health plan) upon scheduling an appointment and upon request.

Procedure: Company staff will use the following procedures upon receiving a request for a GFE or upon scheduling a patient who is uninsured or has insurance but chooses not to use it and wishes to self-pay. Upon receiving a call from a prospective patient, Company will:

- Ask the individual if they have health insurance
- If individual has insurance, ask if individual plans to use their insurance. If you are out of network with the individual’s health plan and the individual does not have out of network benefits *or* the individual is choosing not to use their health plan benefits, the individual is considered self-pay and is entitled to a GFE.
- If the individual has out of network benefits and plans to submit his/her own claims to the health plan for reimbursement, the patient is not considered self-pay and is not entitled to a GFE *even if the patient pays Company privately at the time of service.*
- Inform the **uninsured and self-pay** individual of their right to obtain a GFE upon request or upon scheduling.
- Any inquiry about Company’s costs by an individual who is uninsured or wishes to self-pay will be treated as a request for a GFE.
- Upon receiving a request for a GFE before scheduling, Company will
 - Provide a GFE for all services the individual will likely want or need from Company verbally based on Company’s estimated fees per visit or fees per CPT code, whichever applies.
 - Follow up with a written GFE within 1 business day by email or U.S. mail per the individual’s preference.
- Following the provision of a verbal GFE or upon scheduling, Company will:
 - Inquire whether the individual wants the written GFE by email or U.S. mail. Any GFE provided electronically must be in a form that can be printed *and* saved.
 - Provide a written GFE on the Company approved form or the CMS model form:
 - within 3 days of scheduling when the appointment is scheduled 3 or more days in advance.

- within 1 day of scheduling when the appointment is scheduled in less than 3 days.
- Provide a GFE at the time of the first appointment if the patient schedules the appointment 1-2 days in advance.
- **NOTE:** A GFE is required upon scheduling *even if* a GFE has already been provided upon request before scheduling.

Procedure for Estimating Costs:

- Company will provide individual with a cost per visit estimate using Company’s fee schedule for CPT codes or the per visit rate (whichever is applicable) and provide the GFE as a “Recurring” visit when possible.
- If possible or upon request, Company will estimate the total number of treatment sessions required so individual can get an estimate of the total cost for the entire plan of care.
- Cost estimates will be limited to service that are expected to be provided within one calendar year. (See Changing/Updating GFEs below for care that extends past one year from the initial GFE.

Changes to GFEs:

- If a GFE was given to the individual upon request and before scheduling, a new GFE must be provided upon scheduling *even if the GFE has not changed*. If the GFE has not changed, Company will just reissue the original GFE.
- A new GFE will be provided to any and all patients whose GFE has changed for any reason.
- A new GFE will be provided to all entitled patient in advance of any increases to Company’s fees schedule.
- Recurring GFEs will be updated each year by **January 1** in accordance with Company’s updated/current fee schedule.

Disputes:

- If disputes about fees arise, Company will work with the patient to resolve the dispute.
- If the patient files a request for dispute resolution while still being treated, care will not be adversely affected.
- Company will not pursue legal or collection action against a patient who has filed a dispute while the dispute resolution process is being carried out.