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August 28, 2017

Mr. Mike Liepman
President and Chief Executive Officer
Cascade Valley Hospital
300 Hospital Parkway
Mount Vernon, Washington 98274

Dear Mr. Liepman:

We write today to express serious concerns about Cascade Valley Hospital's (CVH) abdication of its legal responsibility to ensure that patients have access to pertinent information regarding hospital services and financial assistance.

Columbia Legal Services, a non-profit public interest law firm, has examined hospital Charity Care policies throughout Washington State and is engaging in an effort to contact hospitals to correct legal deficiencies within their policies.

In CVH's case, a thorough review of CVH's charity care policy revealed several legal shortfalls. CVH's on-line policy maintains that charity care coverage is canceled if the event that an outstanding balance is not paid. This policy has no basis in law.

We also noted that CVH's website contains links to different Charity Care applications. Both require a Social Security Number whereas the Washington State Hospital Association uniform form states this information is optional. Requiring an SSN places a chilling effect upon applications and denial of an application for this reason is a violation of state law. Both applications also require Charity Care applicants with incomes at or below 100% of poverty level to disclose assets. This runs contrary to WAC 246-453-050(1)(d)(ii) which states the existence and availability of family assets "may only be considered with regard to the applicability of the sliding fee schedule (above 100% FPL)."

CVH's 2008 Charity Care application accessed through the Hospital's "Understanding Charity Care" web page states twice that accounts already assigned to collections are not eligible for Charity Care. This statement runs contrary to WAC 246-453-020 which states that hospitals shall make Charity Care designations "at any time" and likely prevents persons eligible for charity care from applying. Hospitals are not absolved of the duty to provide charity care simply due to assignment to



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collections. Creating such a deadline violates Charity Care law, and prevents persons in greatest need from obtaining critical information regarding health care.

We urge you to immediately review your policies and practices and take all steps to remedy these deficiencies without delay. Systemic denial of Charity Care to patients could constitute a deceptive act in violation of the Washington Consumer Protection Act. We also encourage you to post your policy and an improved application on CVH's website to make it more accessible for consumers.

Please respond within 30 days regarding this issue and describe steps that will be taken to ensure that non-English proficient patients will receive equal access to Charity Care and other services.

Very truly yours,



D. Ty Duhamel, Attorney
Tony Gonzalez, Attorney