General Policy Statement:

a) Wake Forest Baptist Medical Center (WFBMC) carefully evaluates the patient’s medical needs and the family’s financial status and without regard to race, ethnicity, citizenship, religion, gender, sexual preference, age or disability attempts to be as generous and responsible as possible to all patients requesting or requiring services.

b) It is the policy of WFBMC to:

i) Have a patient Financial Assistance Policy (FAP) that applies to financial assistance eligible patients receiving emergency and medically necessary care provided by WFBMC.

ii) Appropriately manage patient expectations regarding financial responsibility for non-emergent services and ensure that such patients have obtained financial clearance prior to receiving such services.

iii) Delay and reschedule services for non-emergent patients until financial clearance is obtained.

c) Scope:

i) This policy applies to (1) Wake Forest University Baptist Medical Center and its wholly-owned subsidiaries and affiliates (each, an “Affiliate”); (2) any other entity or organization in which Wake Forest Baptist Medical Center owns a direct or indirect equity interest greater than 50%; (3) any hospital or healthcare facility in which Wake Forest Baptist Medical Center or an Affiliate either manages or controls the day-to-day operations of the facility (each, a “WFBMC Facility”) (collectively, “WFBMC”); (4) substantially-related entities; and (5) non-hospital providers listed on Addendum E.
ii) Affiliates:
(1) North Carolina Baptist Hospital
(2) Lexington Medical Center
(3) Davie Medical Center
(4) Wilkes Medical Center
(5) Cornerstone Physicians
(6) Wake Forest University Baptist Medical Center Community Physicians
(7) Wake Forest University Health Sciences Faculty/Physicians
(8) Wake Forest University Health Sciences Fellows

d) WFBMC’s Patient Financial Assistance Policy consists of the following components:
   i) Financial Assistance Oversight Committee
   ii) Program Budget Process
   iii) Eligibility Criteria
   iv) Method for Applying for Financial Assistance
   v) Basis for Calculating Amounts Charged to Patients
   vi) Financial Assistance Discounts
   vii) Policy Publication Measures to Make Widely Available

e) Responsible Department/Party/Parties:
   i) Policy Owner: CFO, EVP Health System Affairs, and VP-Corporate Revenue Cycle
   ii) Procedure: Corporate Revenue Cycle, Clinical Operations
   iii) Supervision: Corporate Revenue Cycle
   iv) Implementation: Corporate Revenue Cycle, Clinical Operations
   v) Departments Affected: Corporate Revenue Cycle, Clinical Operations, Managed Care

2) Definitions: For purposes of this Policy, the following terms and definitions apply:

a) AGB Percentage: A percentage of gross charges that a hospital facility uses under 26 C.F.R. §1.501(r)-5(b)(3) to determine the AGB for any emergency and other medically necessary care it provides to a FAP-eligible individual.

b) All-Hospital Plain Language Summary: A written statement that notifies an individual that WFBMC offers financial assistance under the FAP for inpatient and outpatient hospital services and contains the information required to be included in such statement under the FAP for all WFBMC facilities. See Addendum F

c) Amounts Generally Billed (AGB): Amounts generally billed for emergency and other medically necessary care to individuals who have insurance covering such care determined in accordance with 26 C.F.R. §1.501(r)-5(b).

d) Application Period: The period during which WFBMC must accept and process an application for financial assistance under the FAP. The Application Period begins on the date the care is provided and ends on the 240th day after the WFBMC provides the first post-discharge billing statement for the care.

e) Charge Description Master (CDM): a list of services/procedures, room accommodations, supplies, drugs/biologics, and/or radiopharmaceuticals that may be billed to a patient registered as an inpatient or outpatient on a claim.
f) Charity Care: Services provided to a patient who does not have the financial ability to pay for medical care. Charity Care can be a partial discount or a full discount.

g) Elective Services: Services provided to a patient whose condition is such that a reasonable delay in treatment to permit the physician to exercise scheduling choices will not unfavorably affect outcome.

h) Emergency Medical Condition: A medical condition manifesting itself by acute symptoms of sufficient severity (including severe pain) such that the absence of immediate medical attention could reasonably be expected to result in placing the health of the individual (or, with respect to a pregnant woman, the health of the woman or her unborn child) in serious jeopardy, serious impairment to bodily functions, or serious dysfunction of any bodily organ or part, or with respect to pregnant woman who is having contractions that there is inadequate time to effect a safe transfer to another hospital before delivery, or that the transfer may pose a threat to the health or safety of the woman or her unborn child (42 U.S.C. §1395dd).

i) Extraordinary Collection Actions (ECA): Actions taken by a hospital facility against an individual related to obtaining payment of a bill for care covered under the hospital facility's FAP that require a legal or judicial process or involve selling an individual's debt to another party or reporting adverse information about the individual to consumer credit reporting agencies or credit bureaus or deferring, denying or requiring payment before providing medically necessary care due to prior non-payment.

j) FAP-Eligible Individual: A Responsible Individual eligible for financial assistance under the FAP without regard to whether the individual has applied for assistance, i.e.: charity care.

k) Financial Assistance Oversight Committee (FAOC): Operational committee responsible for establishing, reviewing, implementing and monitoring application of the WFBMC FAP.

l) Financial Assistance Policy (FAP): The WFBMC Financial Assistance Program for Patient Liability/Self Pay Policy, which includes eligibility criteria, the basis for calculating charges, the method for applying the policy and the measures to publicize the policy.

m) Financial Clearance: Confirmed arrangement for reimbursement of services based on insurance verification, securing a pre-certification, authorization or referral and patient liability resolution, and/or enrollment in a funding source including but not limited to Medicaid, COBRA, an Exchange plan, or confirmed eligibility for financial assistance/charity care.

n) Gross Charges: The full list price of services and supplies as listed in WFBMC’s Charge Description Master (CDM).

o) Guarantor: a person or entity that agrees to be responsible for his/her debt or performance under a contract or another's debt or performance under a contract, if the other fails to pay or perform.

p) Hospital Specific Plain Language Summary: A written statement that notifies a Responsible Individual that WFBMC offers financial assistance under the FAP for inpatient and outpatient hospital services provided at the WFBMC location from which the patient received services.
q) Household Income: Sources of income including but not limited to: Gross salary and wages, self-employment income, interest and dividends, real estate, rentals and leases, social security, alimony, child support, VA pension, settlement income, bonds, tax annuities, unemployment, disability payments, and public assistance.

r) Medical Indigence: The condition in which individuals are financially unable to access adequate medical care without depriving themselves and their dependents of food, clothing, shelter, and other essentials of living.

s) Medically Necessary Care: Services for a patient whose condition is such that while not likely to result in death or irreparable harm, it must be treated with dispatch and cannot wait for normal scheduling. Generally, the patient is scheduled for the first available and appropriate clinical accommodation.

t) Non-Elective Services
   i) Non-emergent services: Those services other than emergency and medically necessary care.
   
   ii) Emergent services: Services for a patient whose condition is such that the delay in treatment may result in death or permanent impairment of the individual’s health. Typically, patients may present through the Emergency Department, Labor and Delivery or as an emergency in the office.

u) Notification Period: The period during which WFBMC must notify a Responsible Individual about its FAP in order to have made reasonable efforts to determine whether the Responsible Individual is eligible under the FAP. The Notification Period begins on the first date care is provided to the patient and ends after 120 days after WFBMC provided the individual with the first post-discharge billing statement for the care.

v) Policy: As defined in the Policy on Creating and Amending Policy, a statement of principle that is developed for the purpose of guiding decisions and activities related to governance, administration, or management of care, treatment, services or other activities of WFBMC. A policy may help to ensure compliance with applicable laws and regulations, promote one or more of the missions of WFBMC, contain guidelines for governance, and set parameters within which faculty, staff, students, visitors and others are expected to operate.

w) Reservation of Right to Seek Reimbursement of Charges from Third Parties: In the event that any first or third party payor is liable for any portion of an Uninsured Patient’ s bill, WFBMC will seek full reimbursement of all charges incurred by the patient at the Hospital’s Usual and Customary Charges from such first or third party payors, including situations governed by the provisions of N.C.G.S. Section 135-48.37, et seq. (or the analogous provisions of the laws of other states as applicable) despite any financial assistance granted pursuant to this policy.

x) Responsible Individual: An individual person (non-corporate or other entity) that includes the patient, guarantor, and any other individual person legally responsible for paying for medical services provided to patient at WFBMC.

y) Service Area: Physical addresses within zip codes bound by or intersecting one of the nineteen North Carolina counties WFBMC has defined as its service area (See
Addendum B - Service Area Zip Codes).

7) Single Patient Account: A report or description of a single event or visit

aa) Substantially-Related Entity (SRE): a hospital facility treated as a partnership in which WFBMC or an affiliate owns greater than 35% capital or profits or is a general partner/managing member or in which WFBMC has sufficient control over the hospital operations.

bb) Underinsured Patient: A patient whose health insurance plan will not cover a specific service or procedure at any hospital or healthcare facility, or if the patient has exhausted their medical or pharmacy benefit for a specified time period.

c) Uninsured Patient: A patient that presents for healthcare services without any type of health insurance or sponsorship (government or privately-funded).

d) Usual and Customary Charges: The rates for services covered under this FAP that are filed annually with the North Carolina Department of Health and Human Services or other applicable state agency/third party. If rates are not required to be filed annually with any state agency by the relevant Hospital, then the Usual and Customary Charges will be the rates for Covered Services as set forth in the Charge Description Master (CDM) or applicable price schedule at the time the Covered Services are rendered.

e) WFUBMC: Wake Forest University Baptist Medical Center and all affiliated organizations including Wake Forest University Health Sciences (WFUHS), North Carolina Baptist Hospital (NCBH), all on-site subsidiaries as well as those off-site governed by WFBMC policies and procedures.

3) Policy Guidelines:

a) Control and Reporting Mechanisms

i) Financial Assistance Oversight Committee (FAOC)

(1) It is the Policy of WFBMC to establish and maintain a FAOC for the purpose of establishing, reviewing, implementing and monitoring application of the WFBMC FAP.

(2) The FAOC will meet no less than annually to review the FAP and be staffed by:

(a) Vice President Corporate Revenue Cycle
(b) Vice President Faith and Health Ministries
(c) Director of Cash Posting & Customer Service
(d) Assistant Vice President Registration & Financial Clearance
(e) Director of Outpatient Registration
(f) Director of Operations - Downtown Health Plaza
(g) Director of Strategic Planning - Community Health Needs Assessment
(h) NCBH Center Community Representative
(i) Lexington Medical Center Community Representative
(j) Davie Medical Center Community Representative
b) Eligibility Criteria

i. WFBMC will provide financial assistance under this policy in the form of discounts from Gross Charges to Responsible Individuals who meet eligibility criteria as follows:

(1) Services for which discounts apply must be emergency or medically necessary care.
(2) Patient must be a valid resident within a zip code bounded by or intersecting one of the nineteen counties defined as WFBMC's Service Area.
(3) If household income is ≤ 400% of federal poverty level, patient must first enroll in all other primary payer programs for which patient is eligible and must assign benefits to WFBMC.
(4) Enrollment with a primary payer is not required if the policy premium associated with the enrollment will result in Medical Indigence.
(5) For patients with a third-party payer source, a balance remaining after insurance has paid will qualify for a discount if the balance results in Medical Indigence.
(6) If household income is > 400% of federal poverty level, patient is not eligible for financial assistance under this FAP.

ii. WFBMC reserves the right to reverse any discount adjustments provided under the FAP if WFBMC learns that that the information provided during the determination process was false or misleading, or if WFBMC later learns of a funding or payment source that was or becomes available to pay for the relevant medical services.

4) Basis for Calculating Amounts Charged to Patients:

a) Certain requirements include:

i) WFBMC will charge Responsible Individuals meeting FAP eligibility criteria an amount not to exceed Amounts Generally Billed (AGB) to patients covered by Medicare or private health insurance for emergency or other medically necessary care and less than gross charges for all other medical care covered under this policy.

ii) WFBMC annually calculates the AGB percentage under the look-back method using claims allowed by private insurers and Medicare fee-for-service over the immediately preceding year. These claims are multiplied by the associated gross charges for the same time period to yield the AGB percentage.

iii) WFBMC calculates Amounts Generally Billed for emergency and other medically necessary care provided to FAP eligible patients by multiplying the gross charges for the care provided by the AGB percentage.

iv) WFBMC will begin applying the AGB percentage by the 120th day after the 12-month period used to calculate the percentage.

5) Methods for Applying for Financial Assistance:

a) Prospective Application

i) It is the Policy of WFBMC to employ a pre-service financial clearance process prior to approval and delivery of all services other than Emergency Medical Care or screening exams in the hospitals' emergency departments to determine
if an Emergency Medical Condition exists.

ii) In conjunction with the WFBMC pre-service financial clearance process, WFBMC pre-registration staff will screen all Responsible Individuals seeking non-emergent services to determine the ability to pay their liability for the requested services (Addendum A).

b) Retrospective Application

i) It is the Policy of WFBMC to comply fully with all obligations imposed by the Emergency Medical Treatment and Active Labor Act ("EMTALA") and related regulations including but not limited to providing services without regard to a patient's ability to pay (and without the necessity of any pre-treatment financial screening) the provision of a medical screening exam to any patient who comes to a WFBMC Emergency Department and requests an examination or treatment for a medical condition, including active labor, and the provision of either stabilizing treatment or an appropriate transfer for patients with Emergency Medical Conditions.

ii) Without regard to a patient's ability to pay and without requirement of a pre-admission financial screening or clearance, WFBH will provide to any patient who requests services for an Emergency Medical Condition the full range of medically necessary services required to stabilize such condition that are routinely provided by WFBMC to other patients. For purposes of this procedure, the definition of "Emergency Medical Conditions" shall be as provided by 42 U.S.C. §1395dd.

iii) Patients who are provided services pursuant to paragraph (i) and (ii) above, are referred to Financial Counseling on a post-admission basis for determination of FAP eligibility.

iv) In the process of determining FAP eligibility, no actions are to be taken by WFBMC staff to discourage individuals from seeking emergency medical care or otherwise interfere with the provision of emergency medical care.

c) Presumptive Application

i) It is the Policy of WFBMC to avoid billing and Extraordinary Collections Actions (ECAs) against any individual who would otherwise be FAP eligible.

ii) It is the Policy of WFBMC to use commercially available financial profiling and credit scoring technologies to presumptively screen Responsible Individuals to determine eligibility for WFBMC's financial assistance discounts under its FAP before ECAs are initiated. Patients with household income of 200% and under the FPL will be granted a 100% financial assistance discount.

iii) If the FAP presumptive eligibility screening process provides reasonable indications that the individual would otherwise be FAP eligible had the individual actually applied for FAP, WFBMC will accept these findings and presumptively award FAP eligibility consistent with the Financial Assistance Discounts under the FAP.

d) Billing and Collections
i) It is the Policy of WFBMC to not engage in ECAs against a Responsible Individual before making reasonable efforts, as defined under federal regulation, to determine whether the individual is FAP eligible.

ii) WFBMC reserves the right to employ ECAs against individuals deemed not FAP eligible after reasonable efforts have been made to determine FAP eligibility.

iii) Refer to WFBMC Policy 03-002-104 Billing and Collections for a complete description of WFBMC patient billing and collections policies. Copies may be obtained at the following web address:


e) Financial Assistance Discounts

i) It is the Policy of WFBMC that no FAP eligible individual will be charged more for emergency care or other Medically Necessary Care than AGB.

ii) The minimum financial assistance discount available to FAP eligible individuals under this FAP will be equal to the AGB.

iii) The maximum financial assistance discount available to FAP-eligible individuals under this FAP will be 100%, less any applicable co-payment amount.

iv) WFBMC reserves the right to reverse any discount adjustments provided under the FAP if WFBMC learns that that the information provided during the determination process was false or misleading, or if WFBMC later learns of a funding or payment source that was or becomes available to pay for the relevant medical services.

v) It is the Policy of WFBMC to use a sliding fee schedule in relation to federal poverty thresholds updated annually by the U.S. Census Bureau after publication in the Federal Register.

1) FAP eligible individuals with a household income less than or equal to 200% of the Federal Poverty Level (FPL) threshold will be granted a 100% discount against Gross Charges, less a nominal co-payment as follows:

   (i) $100.00 per each inpatient admission.
   (ii) $50.00 per each emergency department visit, if the EMTALA screening exam determines that an Emergency Medical Condition does not exist. If the assessing provider determines that an Emergency Medical Condition exists, no co-payment will be assessed.
   (iii) $0.00 per each primary or specialty care visit.

2) FAP eligible individuals with Household Incomes greater than 200% but less than or equal to 300% of the FPL Threshold will be granted a 75% discount against Gross Charges.

3) FAP eligible individuals with Household Incomes greater than 300% but less than or equal to 400% of the FPL Threshold will be granted a 67% discount against Gross Charges.

4) If the AGB Percentage exceeds the 67% discount amount, WFBMC will apply the
AGB percentage since no FAP eligible individual will be charged more for emergency care or other Medically Necessary Care than AGB. Please refer to AGB calculations online at:

http://www.wakehealth.edu/Financial-Assistance.htm

6) Policy Publication Measures to Make Widely Available:

a) It is the policy of WFBMC that members of the public may obtain a free written copy (in English, Spanish, and any other language as required under federal law and regulation) of:

1) The WFBMC FAP;
2) FAP Application; and
3) Plain Language Summary of the FAP:

   (1) Online at:

   (2) Request to:
       Financial Assistance
       Wake Forest University Baptist Medical Center 100 Kimel Forest Drive
       Winston Salem, NC 27103

   (3) In public locations of the hospital, including the emergency department, admissions area or the cashier locations at:
       1. North Carolina Baptist Hospital (336) 716-0681
       2. Lexington Medical Center (336) 716-0681
       3. Davie Medical Center (336) 716-0681
       4. Wilkes Medical Center (336) 651-8011, (336) 651-8129, or (336) 651-8062

b) WFBMC will take measures to inform patients and visitors and to make available to the public information about its financial assistance policy by:
   1) Notifying and informing patients about the FAP during intake and discharge by offering a paper copy of the Plain Language Summary of the FAP;
   2) Placing a conspicuous written notice on the billing statement;
   3) Placing conspicuous public displays in the hospital with signs and brochures; and
   4) Providing via information sheets and pamphlets in the emergency department and other local public agencies and non-profits that serve the needs of the communities’ low income population.

7) Review/Revision/Implementation:

a) Review Cycle: This policy shall be reviewed by the CFO, EVP of Health System Affairs, and VP of Revenue Cycle every three years from the recorded effective date.

b) Office of Record: After authorization, WFBMC’s Legal Department shall house this policy in a policy database and shall be the office of record for this policy

8) Related Policies:
a. Appropriation of Baptist Benevolent Fund
b. 03-200-102 Pre-Service Financial Clearance
c. 03-200-104 Billing and Collections
d. 03-200-105 Guarantor Financial Discharge
e. 03-200-106 Uninsured Patient Discount Policy

9) Governing Law or Regulations:

   a) Internal Revenue Code, Section 501 (26 U.S.C. § 501) and the regulations thereunder.

10) Attachments:

   a. Addendum A - Community Benefit/Statement of Income Application
   b. Addendum B - Service Area Zip Codes
   c. Addendum C - North Carolina Residency Declaration
   d. Addendum D - Amounts Generally Billed Calculation
   e. Addendum E - Non-hospital facility providers covered under FAP
   f. Addendum F - Approval Authority
Wake Forest Baptist Health
Patient Financial Statement

Addendum A

FOR INTERNAL USE ONLY

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Immediate Family Members Living in the Home: (Less than 18 years old or full time student)

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Employment Information for Patient/Parent/Legal Guardian

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Social Security Retirement / Disability / Survivor Income / SSI / Veteran / Child Support / Work First Family / Unemployment

Current Accessible Trust Fund

| Type: | Monthly Amt: | Received by: | Date Began: |

By my signature below, I certify that the above information is an accurate and complete statement of my current financial position and give my permission to verify this information. WFBI reserves the right to reduce a discount previously recorded if it is determined that additional third party payer resources were available, or the information provided was false.

Signed By: __________________________ Date: __________________________

Relationship to Patient: __________________________
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This form is used to verify that ________________________________, is a resident of North Carolina and resides at __________________________________________.

(Applicant(s) Name)

(Physical Address)

I have personal knowledge that the above-named:

____ Intends to live in North Carolina permanently
____ Intends to remain in North Carolina for an indefinite period of time
____ Entered North Carolina in order to seek employment
____ Entered North Carolina with a job commitment

I hereby declare that the above information is true and accurate:

________________________________________
(Signature)

________________________________________
(Relationship)

________________________________________
(Date)

________________________________________
(Address)

________________________________________
(Phone Number)
Declaración de Residencia
de North Carolina

Este formulario sirve para verificar que, ____________________________, es
(Nombre del aplicante)
residente de North Carolina, y reside en ____________________________
(Dirección)

Yo tengo entendimiento personal que la persona nombrada:

___ Tiene la intención de vivir en North Carolina permanentemente
___ Tiene la intención de vivir en North Carolina por un tiempo indefinido
___ Entro a North Carolina con la intención de buscar empleo
___ Entro a North Carolina con un empleo prometido

Yo declare que la información anotada es verdadera y precisa:

(Firma)

(Relación)

(Fecha)

(Dirección)

(No Telefónico)
Please refer to Addendum D online at:

- [http://www.wakehealth.edu/Financial-Assistance.htm](http://www.wakehealth.edu/Financial-Assistance.htm)
Addendum E

Non-Hospital Providers providing emergency and other medically necessary care that are covered under North Carolina Baptist Hospital FAP

- Wake Forest University Health Sciences Faculty/Physicians
- Wake Forest University Health Sciences Fellows
- Wake Forest University Baptist Medical Center Community Physicians
- Cornerstone Physicians

Non-Hospital Providers providing emergency and other medically necessary care that are not covered under North Carolina Baptist Hospital FAP

- None
Approval Authority

Required approval levels for authorizing financial assistance application amounts:

<table>
<thead>
<tr>
<th>Amount</th>
<th>Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>$0-$4,999</td>
<td>Staff</td>
</tr>
<tr>
<td>$5,000-$14,999</td>
<td>Assistant Manager</td>
</tr>
<tr>
<td>$15,000-$49,999</td>
<td>Manager</td>
</tr>
<tr>
<td>$50,000-$114,999</td>
<td>Director</td>
</tr>
<tr>
<td>$115,000 and Over</td>
<td>Assistant VP or VP</td>
</tr>
</tbody>
</table>