

Washington Hospital Healthcare System Debt Collection Policy

Purpose

The purpose of this policy is to ensure that the appropriate collection steps are taken with regards to self pay balances. The policy includes when and under whose authority patient debt is advanced for collection, whether the collection activity is conducted by the hospital, affiliate or subsidiary of the hospital, or by an external collection agency, maintains State and Federal standards and practices for the collection of a debt, as well as provides the Patient Notice at Debt Collection.

Policy

Washington Hospital will notify patients timely and ethically of all billing and collection activity as well as defining standards and practices for the collection of debt.

Accounts are referred to a collection agency after 180 days of standard hospital patient billing activity. All patient debt is carefully reviewed and approved by Patient Accounting Staff, the Patient Account Manager, the Director of Financial Services, as well as the Vice President & Chief Revenue Officer.

All state and federal debt collection statutory requirements are adhered to by the collection agency including but not limited to, the Rosenthal Fair Debt Collection Practices Act, the Hospital Fair Pricing Act, and the Federal Debt Collection Practices Act including a statement that the Federal Trade Commission enforces the federal act.

Procedure

- The Collection cycle generates our first statement once payment has been transferred to the patient bucket, or if true Private/Self Pay statement is generated at time of initial billing. The follow-up schedule includes a series of five statements and one Good-Bye letter before agency collection activity begins and continues.
- The first collection statement is designed to support each type of account based on the scenario. The series begins with a Patient Balance Statement which is defined to when the account balance is a patient liability either after final insurance payment or if a true self pay patient balance. This cycle continues with the first statement letter 1 at day 29 continuing with statement letter 2 through 5 automatically every 30 days through day 150. At day 150 a follow up patient statement letter is sent offering the patient to make arrangements, apply for financial assistance, or pay in full before the account is assigned to a debt collection agency.
- Statements sent to private pay/uninsured patients include a notice that financial assistance is available by contacting the name and number provided on their statement. Uninsured patients seen in our patient services are offered a discount

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of 35 - 45% of total charges depending on if a District resident. Refer to the Washington Health Financial Assistance Policy.

- Payment arrangements are offered to provide every effort to work with the patient based on their situation within reasonable financial practice. Patient may also be eligible for our Charity program if they meet the criteria for assistance under the Financial Assistance Policy. Applications are routinely submitted, as received, for review by the Financial Assistance Coordinator, and approval of the Vice President & Chief Revenue Officer.

Our collection practice is standardized for both inpatient and outpatient in efforts to offer every opportunity to support our patients.

- Before assigning a bill to collections, Washington Hospital will send a patient a notice with the following information:
 - The date(s) of service of the bill
 - The name of the entity that will collect on the bill
 - A statement informing the patient how to obtain an itemized bill
 - An application for the hospital's charity care and financial assistance program
 - The date(s) the patient was initially sent a notice about applying for financial assistance, the date(s) the patient was provided with a financial assistance application, and, if applicable, the date a decision on the application was rendered
- Notifications of adverse information is not reported to a consumer credit reporting agency nor are civil actions commenced against a patient for nonpayment at any time. Washington Hospital not any of its contracted debt collection agency(ies) will use any of the following as a means of collecting unpaid hospital bills:
 - Wage garnishments
 - Sale of any property owned, in part or completely, by the patient
 - Liens on any real property owned by the patient
- All accounts over \$5,000 are reviewed by the Patient Accounting Manager and then submitted for final approval by the Director of Patient Financial Services and Vice President & Chief Revenue Officer.