

Current Status: <i>Active</i>	
	Origination: <i>01/2025</i>
	Last Approved: <i>N/A</i>
	Next Review: <i>01/2028</i>
Debt Collection	

I. POLICY STATEMENT:

The purpose of the Policy is to comply with and provide information regarding the billing and collection of patient debt, pursuant to the California Health and Safety Code, the Federal Patient Protection and Affordable Care Act, and the policies and practices of NorthBay Health.

II. SCOPE:

Organization wide.

III. DEFINITIONS:

- A. **Extraordinary Collection Action (ECA)** - Are excessive collection activities, as defined by the IRS and Treasury, that healthcare organizations may only take against an individual to obtain payment for care after reasonable efforts have been made to determine whether the individual is eligible for financial assistance. NorthBay does not engage in any Extraordinary Collection Actions (ECA).
- B. **Financial Assistance** - Program designed to help meet the needs of low income, uninsured and the under-insured patients in our community who express financial hardships with paying the out-of-pocket expenses for medically necessary services provided by NorthBay Health.
 - 1. NorthBay Health’s Financial Assistance Policy and Application can be obtained from the NorthBay Health website, any NorthBay Health hospital-based location, or by contacting our Financial Assistance Line at (707) 646-5637.
- C. **Guarantor** - For the purposes of this Policy, the individual who is financially responsible for payment of an account balance. The guarantor may or may not be the patient.

IV. POLICY:

Under the authority of the Vice President, Revenue Cycle Services or above, NorthBay Health will provide clear and consistent guidelines for conducting billing and collection functions accurately and in a timely manner that promotes compliance with the law. NorthBay Health will make diligent efforts to inform patients of their financial responsibilities and available financial assistance options, as well as follow up with patients regarding outstanding accounts before engaging in collection actions to obtain payment.

V. PROCEDURE:

NorthBay Health may assign an account to a contracted collection agency if reasonable efforts were made to mail at least 4 guarantor statements after the date of discharge from the outpatient or inpatient care, with the final statement indicating the account may be placed with a collection agency. The assignment of accounts to a debt collector will not exceed the limits that fall within the No Surprises Act.

- A. Accounts with returned mail are eligible for collection assignment after all good faith attempts have been made to locate an alternate address.
- B. If a patient currently has accounts with unresolved bad debt balances, NorthBay Health reserves the right to send other open accounts with patient balances to collections earlier.
- C. NorthBay Health will make diligent efforts to inform patients of their financial responsibilities and available financial assistance options.
- D. Collection actions will be temporarily suspended if a completed Financial Assistance Program (FAP) Application with all required supporting documentation is received.
- E. Documentation obtained from income tax returns or paystubs for the charity care or discounted care eligibility determinations cannot be used for collection activities.
- F. If the Guarantor disagrees with the balance, they may request their account balance be researched and verified prior to account assignment to a collection agency.
- G. NorthBay Health may recall an account from a collection agency at its discretion and/or according to state or federal laws or regulations.

- H. NorthBay Health may choose to work the accounts to resolution with the Guarantor or a third party as needed or place the accounts with another collection agency.
- I. NorthBay does not engage in any Extraordinary Collection Action (ECA) as defined under Definitions (III.A) of this policy.

VI. REFERENCES:

Administrative Manual - [Financial Assistance Program Policy](#)

VII. APPROVAL REQUIREMENTS

- A. Policy Owner (Content Expert): Director, Patient Access
- B. Policy & Procedure Committee
- C. Vice President, Revenue Cycle Management
- D. Executive Vice President, Chief Financial Officer
- E. Board of Directors