

A COLLEGE BEHAVIORAL HEALTH HOSPITAL

Manual: Business Office Owner: PFS Director	Debt Collection Billing and Collection Policy	Policy # GD/BO 800 Filled out by Coordinator
Origination Date: 12/01/2024	APPROVAL	
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Last Reviewed: 12/01/2024	Chief Financial Office	
Submitted By: PFS Director		

Policy Statement and Propose

This policy applies to the business office of Glendora Hospital and any outside agencies working on Glendora Hospital's behalf that have the responsibility to bill patients and applicable third-party payers accurately, timely, fairly, and consistently in accordance with all contractual obligations, laws, and regulations. Glendora Hospital will not threaten or treat patients or payers with disrespect or with an aggressive tone or behavior. Glendora Hospital collection practices shall not consider age, gender, race, social or immigrant status, sexual orientation, or religious affiliation.

It is the goal of this policy to provide clear and consistent procedure for Glendora Hospital, Billing Companies, Collection Agencies, and other third-party vendors when conducting billing and collections functions in a manner that promotes compliance, patient satisfaction, and eff. This policy allies to Glendora Hospital and any outside agencies working on our behalf.

Billing Procedure/Billing Third-Party Payers

For all patients with health insurance, Glendora Hospital will bill the third-party payer information as provided or verified by the patient on a timely basis.

If a third-party payer denies the claim due to Glendora Hospital in error, the business office will not bill the patient for any amount more than that for which the patient would have been liable had the third-party payer paid the claim. However, if the third-party payer denies the claim due to factors outside of Glendora Hospital's control, hospital staff will follow up with the third-party payer and patient as appropriate to facilitate a resolution to the claim. If a resolution cannot be determined after



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reasonable follow-up efforts, Glendora Hospital may bill the patient or take other actions consistent with current industry standards.

<u>Billing Uninsured Patients</u> For uninsured patients, Glendora Hospital shall promptly send the patient's bill for items and services provided to the Billing Company.

<u>Requesting and Itemized Bill</u> All patients may request an itemized statement for their account at any time.

Accessing Financial Assistance Information and Application Glendora Hospital will again provide a summary of its Financial Assistance Policy to all patients provided services at Glendora Hospital. All billed patients will have the opportunity to contact Glendora Hospital regarding financial assistance for their accounts. Financial assistance may include Charity Care/Free Care, discounted care, or other applicable programs.

Glendora Hospital financial assistance policy and application are available free of charge by visiting or contacting:

- o Glendora Hospital Admitting Office
- Patient Financial Services Department at:
 1725 Pacific Ave, Long Beach, CA 90813.
- Phone number: (562)-256-8314.
- Website at: <u>www.glendorahosptial.com</u>



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Glendora Hospital and the collection agencies, debt buyers, or other assignees not a subsidiary or affiliate of Glendora Hospital (the "Collection Agencies") shall not pursue collections from a patient who is attempting to qualify for financial assistance under Glendora Hospital's financial assistance policy and is attempting in good faith to settle an outstanding bill by negotiating a Reasonable Payment Plan. A "Reasonable Payment Plan" is stated as a monthly payment that does not exceed 10% of the patient's family income for a month, excluding deductions for Essential Living Expenses, or an amount as negotiated and arranged by Glendora Hospital's Patient Financial Services.

If Glendora Hospital determines that patient qualifies for charity care/free care or discounted care, Glendora Hospital will only use the patient's income and tax returns information for determining eligibility and debt due. Glendora Hospital will not use this information for collection activities. If the patient has already paid more than the amount due after financial assistance determination, Glendora Hospital shall refund the amount actually paid to Glendora Hospital in excess of the amount due including interest at the rate provided in the Code of Civil Procedure Section 685.010 from the date of Glendora Hospital's receipt of the overpayment.

Extended Payment Plans

Glendora Hospital and its Collection Agencies shall offer uninsured patients and insured patients with a responsibility portion the option to enter into an agreement to pay their patient responsibility portion and any other amounts due over time.

Teams of Extended Payment Plans

Glendora Hospital will also offer extended payment plans for those patients who indicate an ability to pay a patient responsibility amount in a single installment. The extended payment plan shall be negotiated between Glendora Hospital Patient Financial Services and the patient. All extended payment plans shall be interest-free.



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Declaring an Extended Payment Plan Inoperative

Glendora Hospital may declare an extended payment plan no longer operative after the patient fails to make all consecutive payments during a 90-day period. Before declaring the extended payment plan inoperative, Glendora Hospital or its Collection Agencies will make a reasonable attempt to contact the patient by the last known telephone number and provide notice in writing with the last known address to notify the patient that the extended payment plan may become inoperative and provide an opportunity to renegotiate. Glendora Hospital behalf will attempt to renegotiate the extended payment plan if requested by the patient.

Collection Practices

In compliance with relevant state and federal laws, and in accordance with the provisions outlined in this Billing and Collection Policy, Glendora Hospital and its Collection Agencies may engage in collection activities including Extraordinary Collections ("ECAs") to collect outstanding patient balances.

Glendora Hospital and its Collection Agencies shall not pursue collections from a patient who is attempting to qualify for financial assistance under Glendora Hospital's financial assistance policy and is attempting in good faith to settle an outstanding bill.

Extraordinary Collection Actions

ECAs include the following:

- Selling an individual's debt to another party except as expressly prohibited by federal law.
- \circ $\,$ Reporting adverse information about the individual to consumer credit bureaus.



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- Deferring or denying, or requiring a payment before providing, Medically Necessary Care (excluding emergency medical care) because of an individual's nonpayment of one or more bills for previously provided care covered under Glendora Hospital Financial Assistance Policy.
- o Certain actions that require a legal or judicial process as specified by federal law,

ECAs do not include any lien that a hospital is entitled to assert under state law on the proceeds of a judgment, settlement or compromise owed to an individual (or his or her representative) because of personal injuries for which a hospital provide care.

Initiating ECAs

After at least 180 days have passed since the initial billing statement was provided to the patient by Glendora Hospital's early out agency and the patient is ineligible for financial assistance or the patient has not responded to any attempt to bill or offer financial assistance, Glendora Hospital may place the patient's bill with a Collection Agency to pursue ECAs to collect outstanding balances at the discretion of the Director Financial Services or his/her designee. For patients found eligible for charity care/free care or discounted care under Glendora Hospital's Financial Assistance Policy, the Collection Agency may not use wage garnishments or file a lien against a patient's primary residence as means of collecting unpaid hospital bills.

If the patient has a pending appeal for coverage of the claim(s) and has made a reasonable effort to communicate with Glendora Hospital about the progress of the appeal, Glendora Hospital will wait until a determination of the appeal is made to place the patient's unpaid bill with the Collection Agency.



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Required Notices

Before initiating ECAs to obtain payment, the early out agency of Glendora Hospital shall send the patient notice with the following information:

- The date(s) of service of the bill that is being assigned to collections.
- The name of the entity the bill is being assigned or sold to
- A statement informing the patient how to obtain an itemized hospital bill from Glendora Hospital
- The name and plan type of the health care coverage for the patient on record with the hospital at the time of service or a statement that the hospital does not have that information.
- An application for the Glendora Hospital financial assistance program
- The date(s) the patient was originally sent a notice about applying for financial assistance, the date(s) the patient was sent a financial assistance application, and if applicable, the date a decision on the application was made.

Collection Agencies

Glendora Hospital will conduct ECAs, as required, through an external early out collection agency. Collection Agencies that collect unpaid patient bills on Glendora Hospitals behalf will be required to meet the same debt collection standards and comply with this Glendora Hospital Billing and Collection Policy.

If Glendora Hospital sells the patient's debt to debt buyer, it must:

 Include contractual language in the sales agreement in which the debt buyer agrees to return, and Glendora Hospital agrees to accept, any account in which the balance has been determined to be incorrect due to a third-party payer or the patient is eligible to charity care/free care or financial assistance.



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- Require the debt buyer to agree to not resell or otherwise transfer the debt (except to the originating hospital or tax-exempt organization as described in Health & Safety Code 127444 or if the debt buyer is sold or merged with another entity).
- Require the dept buyer to not charge interest of fees on the patient's dept.
- Require the debt buyer to be licensed as a debt collector by the Department of Financial Protection and Innovation.

Glendora Hospital will evaluate the performance of each Collection Agency at least on an annual basis, including patient reactions and complaints regarding Collection Agencies. Glendora Hospital will investigate and analyze complaints about the activities of Collection Agencies and promptly make and document any necessary corrections.

Additionally, Glendora Hospital should obtain written statements from the Collection Agency not less than annually attesting that they are following Glendora Hospital's policies and policies and complying with all state and federal laws.

Definitions

- **Bad Debt** Amounts considered to be uncollectible from accounts when the hospital cannot obtain reimbursement for care provided. This happens when patients are unable to pay their bills, but do not apply for charity care/free care, discounted care, Uncompensated care excludes other unfunded costs of care, such as underpayment from Medicare and Medi-Cal.
- Deductible and Co-Insurance Amounts Deductible and co-insurance amounts are amounts payable by patient for covered services, excluding medical and surgical expenses rendered by physicians and surgeons.



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- **Guarantor-** The person legally responsible for the payment of the patient's liability.
- **Non-collectable (Presumption of Non-collectability)-** If after reasonable and customary attempts to collect a bill, the debt remains unpaid after a minimum period of 120 days from the date the first bill is mailed to the beneficiary with no likelihood of recovery at any time in the future., the debt may be deemed uncollectible.
- Reasonable and Customary Attempts Once a balance has been identified as patient responsibility, the account will be adjusted to accurately reflect the amount due. The accounts are assigned to our Early Out Collection agency (HRMG). This will be accomplished by moving the amount to Patient Responsibility field. A minimum of (2) data mailers/statements will be sent to the guarantor notifying them that the balance of the account is due, included in the mailer/statement is a Charity Care/Free Care application for the patient to review and return in needed. HRMG (early out agency) will make calls to patients or assigned representative for the patient between 3-5 days upon receipt of the assigned account. The Glendora Hospital's business office will automatically document the in the patient comment filed that date the letter is sent. An exception to this step is the first data mailer is returned and the business office attempts to contact the patient are not successful, then the account will be forwarded to collections.

o Early Out Statement HRMG Collection Agency

HRMG makes calls to patients between 3-5 days after the account has been assigned. First notice goes out and calls made throughout the month and before month-end. A second notice will go out before month-end. Calls are initiated throughout the next 3 months. Final notice goes out at the end of the 3rd month. HRMG does not call patients before 8:00am or after 8:00pm. Holidays are excluded.



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- **<u>Billing Company</u>** a third-party billing company contracted by Glendora Hospital to assist in billing and collecting the patient's responsibility amount.
- <u>Collection Agency</u>- a collection agency contracted by Glendora Hospital, a debt buyer, or other assignees not a subsidiary of affiliated of Glendora Hospital that is attempting to collect, including through Extraordinary Collection Actions, unpaid bills for provided services.
- **Reasonable Payment Plan** A monthly payment that does not exceed 10% of the patient's family income for a month, excluding deductions for Essential Living Expenses.
- **Essential Living Expenses** Expenses for any of the following: rent, or house payment and maintenance, food and household supplies, utilities and telephone, clothing, medical and dental payments, insurance, school or child care, child or spousal support, transportation and auto expenses, including insurance, gas, and repairs, installment payments laundry and cleaning, and other extraordinary expenses.