

**Title: Financial Assistance Policy****Home Department: Patient Services****IMPORTANT NOTICE:**

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## I. Purpose

- a. As part of our mission, Cedars-Sinai Medical Center, Cedars-Sinai Marina Hospital, Cedars-Sinai Medical Care Foundation ("CSMCF"), Huntington Hospital and Huntington Health Physicians (each separately, the "Organization") are committed to meeting the health care needs of all patients in the community and based on the following principles:
  - i. Treating all people equitably, with dignity, respect and compassion;
  - ii. Serving the emergency health care needs of all, regardless of a patient's ability to pay; and
  - iii. Assisting patients who cannot pay for part or all of the care they receive.
- b. This Financial Assistance Policy ("Policy") demonstrates the Organization's commitment to our mission, vision and principles by helping to meet the needs of the low-income uninsured patients and the underinsured patients in our community. As part of fulfilling this commitment, the Organization provides medically necessary services, without cost or at a reduced cost, to patients who qualify under this Policy.
- c. This Policy provides guidelines for identifying patients who may qualify for financial assistance and establishes the financial screening criteria to determine which patients qualify for financial assistance.

## II. Policy

- a. **Definitions.** Capitalized terms used in this Policy are defined in the "Definitions" section at the end of this Policy or when first used.
- b.

**Covered Under this Policy.** The Policy only applies to services provided by the Organization and by: faculty physicians in their capacity as faculty, CSMCF and Huntington Health physicians including physicians employed by medical groups that have a professional services agreement with them, and the Cedars-Sinai emergency physicians. Emergency physicians at Organization hospitals other than Cedars-Sinai who provide emergency medical services are required by law to provide discounts to

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uninsured patients or patients with high medical costs who are at or below 400 percent of the FPL.

- c. **Facilities, Physicians and Other Providers Not Covered by this Policy May Have Separate Financial Assistance Policies.** Community members of the Organization's Medical Staff (i.e., providers not part of the Organization) may also make financial assistance available to their patients. The Organization will make available, on its website, a list of information it has regarding these physicians indicating whether specific physicians (or their medical group) will: (i) provide equivalent discounts from the physician's professional fees to low-income uninsured patients as the Organization provides, based on the criteria set forth in the Policy; (ii) accept the Organization's determination of a patient's eligibility for financial assistance; and (iii) comply with all applicable federal, state and local laws, regulations, ordinances and orders with respect to the collection of consumer debt accounts. The Organization will not be responsible for such physicians' administration of financial assistance programs or their billing practices.
- d. **Help Paying Your Bill - Eligibility Criteria**
- i. **Financial Assistance.** Charity Care will be made available to patients whose family income is at or below 400 percent of the current year's FPL. Patients whose income ranges between 401 to 600 percent of the current year's FPL also qualify for a Discount Payment. A financial assistance application ("Application") must be completed. Assets will not be considered in determining eligibility for discounts. Attachment B describes the methodology for ranges of financial assistance available from the Organization.
  - ii. **Pre-Service Patients (Elective/Non-Emergent Care).** Patients scheduled as elective inpatients, scheduled as non-emergent outpatients or for follow-up care following discharge require prior approval for financial assistance by the Vice President, Finance and Chief Revenue Cycle Officer or their designee. Only medically necessary procedures are eligible for approval. The Organization retains the right to prospectively not grant financial assistance in connection with a patient's proposed non-emergency and other non-medically necessary

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care based on the need of the Organization to judiciously allocate its financial and clinical resources.

- iii. **Additional Financial Resources and Required Patient Cooperation.** Patients approved for assistance under this Policy agree to continuously cooperate in the process needed to obtain reimbursement for the Organization's services from third party sources such as the California Victims of Crime funds, the County Trauma Program, the Medi-Cal program, and health plans that offer coverage through the California Health Benefit Exchange (the "Exchange"). A patient's application for third party coverage for the patient's health care costs shall not preclude eligibility for assistance under this Policy. A patient shall, as a condition of Charity Care, apply for coverage under Medi-Cal, Healthy Families, and the County Trauma Program as applicable and, where appropriate, coverage under the Exchange. The foregoing shall also apply to patients residing out of state and their application for Medicaid within their state. Before receiving a Discount Payment, the Organization may request that the patient be screened for Medi-Cal eligibility, so that the patient receives information on Medi-Cal benefits. However, Medi-Cal enrollment will not be required to receive a Discount Payment.

The Organization will make appropriate referrals to local county agencies including Healthy Families, Covered California, Medi-Cal or other programs to determine potential eligibility for those programs.

The Organization shall be entitled to bill any third-party insurer providing coverage to a patient, including any source of third-party liability. Health insurers and health plans are prohibited from reducing their reimbursement of a claim to the Organization even if the Organization has waived all or a portion of a patient's bill pursuant to this Policy.

- iv. **Self-Pay Patients.** The Organization has made an assumption based on its historical experience and the current insurance environment that patients who lack insurance are not able to afford insurance. The Organization presumes that these patients are eligible for financial assistance programs and will make the following assistance available to all such patients unless the patient makes other arrangements for services provided by the Organization. The discounted amount, not billed to the patient, is uncompensated care that will be reported

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by the Organization consistent with guidelines in the Centers for Medicare & Medicaid Services' Provider Reimbursement Manual, chapter 15-2, section 4012.

1. Self-Pay patients will automatically be billed at a discounted amount determined by multiplying the total charges by the Organization's AGB percentage for applicable inpatient services, emergency room services or outpatient, non-emergent services.
  2. Self-Pay patients are eligible for these discounts without submitting an Application. This financial assistance does not extend to elective procedures unless a specific agreement is made between the Organization and the patient.
- v. **Medically Indigent Patients (Not Otherwise Eligible for a Discount).** Patients who are Medically Indigent but who are not otherwise eligible for financial assistance under this Policy may still request financial assistance in accordance with the process set forth in this Policy. The request for financial assistance due to Medical Indigency must be approved by Vice President, Finance and Chief Revenue Cycle Officer or their designee, in their discretion.
- e. **Financial Assistance Administration.** The Organization utilizes a single, unified patient Application for financial assistance. The process is designed to give each applicant an opportunity to receive the maximum financial assistance benefit for which they may qualify. Any patient who requests financial assistance will be asked to complete an Application.
- i. **How to Apply.** The Application process can be initiated by the patient or any staff member of the Organization by contacting Patient Financial Advocates at 310-423-5071 or via email to [patient.billing@cshs.org](mailto:patient.billing@cshs.org). This process includes the following:
    1. Patients are provided with the Application, a Medi-Cal Application and information on Credit Counseling.
    2. Applicants are offered assistance in completing the forms by Patient Financial Advocates at Cedars-Sinai South Tower, Street Level, Room 1740.

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3. The Application may be completed orally with assistance from Organization staff but will still require a patient or representative to sign the Application.

## **ii. Reviewing Application**

1. **Determination.** Eligibility guidelines are calculated using the current FPL as the measure of eligibility.
2. **Determinations by Affiliates and Approved Community Partners.** Patients who have recently had financial assistance applications approved by certain affiliates or Community Partners of the Organization, may be approved on an expedited basis by the Organization, at the Organization's discretion. The Organization will advise patients applying for financial assistance if such expedited approval is available.
3. **Assets.** Assets will not be included in determining eligibility for Charity Care or Discount Payment.

**Income.** For purposes of determining eligibility for Charity Care or a Discount Payment, documentation of income shall be limited to recent pay stubs or income tax returns of the patient and, as requested by the Organization, the patient's family. The Organization may accept other forms of documentation of income but shall not require those other forms.

4. **Deductions.** Other financial obligations including essential living expenses and other items of reasonable and necessary nature will be considered.
5. **Patient Maximum Out-of-Pocket Expense.** Any payment from a patient for services covered by this Policy shall be limited to no greater than the AGB.
6. **Reevaluation.** Eligibility may be reevaluated by the Organization if any of the following occur:
  - a. Patient income changes.
  - b. Patient family size changes.

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- c. A determination is made that any part of the financial assistance Application is false or misleading, in which case the initial financial assistance may be retroactively denied.

- iii. **Submitting Required Documentation.** The Organization requests various documents from patients applying for financial assistance in order to substantiate their eligibility. The documents may include, but are not limited to, the following:
  - 1. Completed Application. Patients may apply for Charity Care or a Discount Payment at any time.
  - 2. Income documents may include pay stubs or income tax return.
  - 3. Other documents may include:
    - a. Health Savings Account statement showing the available balance for the current plan year.
    - b. The Organization may require that the patient be screened for Medi-Cal eligibility so that the patient receives information on the benefits of Medi-Cal coverage.
    - c. The Organization shall not require a patient to apply for Medicare, Medi-Cal, or other coverage before the patient is screened for, or provided, a Discount Payment. When screening for eligibility for a Discount Payment, the Organization may require the patient to participate in a screening for Medi-Cal eligibility.
- iv. **Submitting Completed Application.** If a patient submits a completed Application then the Organization shall:
  - 1. Immediately take all reasonably available measures to suspend or reverse any ECAs taken against the patient to obtain payment for the care. Such reasonably available measures generally include, but are not limited to, advising collection agencies to cease collection activities, measures to vacate any judgment against the patient, lift any levy or lien on the patient's property, and remove from the patient's credit report any

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adverse information that was reported to a consumer reporting agency or credit bureau.

2. Make a determination on eligibility or identify if Application is incomplete or requires additional information, within a reasonable time.
3. Promptly notify the patient in writing of the eligibility determination, including, if applicable, the assistance for which the patient is eligible and the basis for the determination.
4. If the patient is eligible for financial assistance, then the Organization shall notify the patient in writing of eligibility, available assistance, the basis for determination and the service dates covered.
  - a. If there is no patient responsibility, then no further steps are required other than refunding amounts paid as provided in the "Refunds" section of this Policy. If there is a remaining balance, then the Organization shall also notify the patient in writing, the amount the patient owes for care and describe how the patient can get additional account information.
  - b. Once a patient is approved for financial assistance, the patient will not be charged more for emergency or other medically necessary care than the AGB.
  - c. Approvals of eligibility may only be made by individuals specifically authorized by the Organization. This individual currently is the Vice President, Finance and Chief Revenue Cycle Officer or their designee.
- v. **Determination Letter.** After a patient submits a complete application and submits the required documentation, the Organization will send a letter to



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indicate the determination of approval or ineligible. The letter will include the following:

1. A clear statement of the determination for patient's eligibility for financial assistance.
2. If the patient was ineligible for financial assistance, a clear statement explaining why the patient was denied.
3. If the patient was ineligible due to a service that was not medically necessary, the attending physician of the service will have attested to this prior to the denial.
4. If the patient was approved for a Discount Payment, a clear explanation of the reduced bill and instruction on how the patient may obtain additional information regarding a reasonable payment plan, if applicable.
5. Contact information for the Organization, including department, contact name and where the patient may appeal the Organization's decision.
6. Information on the Department of Health Care Access and Information's (HCAI) Hospital Bill Complaint Program.
7. Information on the Health Consumer Alliance.

- vi. **Patients with Limited Information for Application.** The absence of patient financial data available to the Organization does not preclude eligibility for financial assistance. In evaluating all factors pertaining to a patient's clinical, personal and demographic situation, and alternative documentation (including information that may be provided by other charitable organizations), the Organization may determine a patient is eligible for financial assistance by making reasonable assumptions regarding the patient's income.
- vii. **Incomplete Application.** If a patient submits an incomplete Application, then the Organization shall promptly provide the patient with a written notice that describes the additional information and/or documentation required for the Application and include contact information for Application processing. If the



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patient subsequently completes the Application, then the Application will be considered complete.

- viii. **Anti-Abuse Rule for Applications with Questionable Information.** The Organization shall not make determinations that a patient is not eligible for financial assistance based on information it has reason to believe is unreliable or incorrect or on information obtained from the patient under duress or through the use of coercive practices. A coercive practice includes delaying or denying emergency medical care to a patient until the patient has provided information requested to determine whether the patient is eligible for financial assistance for the care being delayed or denied.
- ix. **Handling of Incomplete Applications.** The Organization may consider a patient's failure to provide reasonable and necessary documentation in making its financial assistance determinations. However, the Organization will act reasonably and make the best determination it can with the available information.
- x. **Presumptive Eligibility.** The Organization may determine that the patient is eligible for financial assistance for the current services based on information it has obtained or assessed without looking to the patient to provide all information required by the usual Application process or the fact that the patient has no health insurance. The Organization's determination may include reliance on a prior determination by the Organization, information provided by another provider of the patient, or a general assessment of information available to the Organization's staff. In such cases, the Organization shall (a) notify the patient of the basis for the presumptive eligibility determination and the manner in which the patient may apply for more generous assistance available under the Policy; (b) advise the patient that they may submit an Application at any time to review the patient's eligibility for more generous assistance for the services; and if the patient submits a complete Application seeking more generous assistance, then determines whether the patient is eligible for a more generous discount and takes the other steps required by this Policy with regard to completed Applications. Self-Pay patients receiving

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discounts described in this Policy shall receive such notice by means of the Plain Language Summary (see Attachment A) printed on their statements.

- xi. **Patient Waivers Do Not Relieve the Organization of Obligation to Undertake Reasonable Efforts to Determine Eligibility.** Obtaining a verbal or written waiver from a patient, such as a signed statement that the patient does not wish to apply for assistance under the Policy or receive the information to be provided to patients under this Policy, will not itself constitute a determination that the patient is not eligible and will not satisfy the requirement to make reasonable efforts to determine whether the patient is eligible before engaging in ECAs against the patient.
- xii. **Payment Plans.** When a patient is determined eligible for a Discount Payment through financial assistance and a balance remains, then they shall have the option to pay through a scheduled term payment plan. The Organization will discuss plan options with the patient and develop term payment plans. The payment plans are interest free. The Organization may consider Health Savings Accounts when establishing the terms of a Payment Plan. See the Organization's Debt Collection policy for additional details.
- xiii. **Dispute Resolution.** In the event a dispute arises regarding qualification for financial assistance, the patient may submit a written appeal for reconsideration with the Organization. The written appeal should explain the rationale for dispute and include supporting documentation. The Organization's Manager of Customer Service and Operations or their designee will promptly review the appeal and provide the patient with a written determination. In the event the patient believes a dispute remains after the first appeal, the patient may request in writing, a review by the Organization's Vice President, Finance and Chief Revenue Cycle Officer or their designee who shall review and provide a final written determination.
- xiv. **Confidentiality of Application Information.** The Organization shall maintain all information received from patients requesting eligibility under this Policy as confidential information. Information concerning income obtained as part of the Application and approval process shall be maintained in a file that is separate from information that may be used to collect amounts owed.

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**d. Term**

- i. The initial financial assistance for Financially Qualified Patient's approval is valid for a period of six (6) months from the date the Application was complete. Eligibility may be reassessed, upon patient request, at the end of the initial approval period. At the Organization's election, a new six (6) month approval period may be authorized without a new Application. After twelve (12) months, a new Application must be completed by the patient. Starting with the date the final Application is approved, open, qualified accounts will be written-off to financial assistance based on the level of assistance granted. On a go-forward basis, qualified accounts for the next six (6) months would be eligible for financial assistance write-off.

**e. Notices, Written Communications and Statements**

- i. The Organization provides the following notices and information regarding financial assistance:
  - a. This Policy.
  - b. A Plain Language Summary of the Policy. The Plain Language Summary shall be a clear, concise, and easy to understand document that notifies patients and other individuals that the Organization offers financial assistance under this Policy. The Plain Language Summary shall be drafted in a manner that sets out relevant information including the information required by State and Federal laws such as the eligibility requirements and assistance offered under this Policy, a brief summary of how to apply for assistance under this Policy, and information for obtaining additional information and assistance, including copies in other languages.
  - c. A list of Providers that may make financial assistance available to the Organization's patients.

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- d. The Application.
  - e. The Organization's Debt Collection Policy.
- ii. These materials shall be made available in a variety of ways including:
  - a. **Website.** The Financial Assistance Policy, the Financial Assistance Application, and a Plain Language Summary of the Financial Assistance Policy are located on this Organization's website: [cedars-sinai.org/billing-insurance/help-paying-your-bill.html](https://cedars-sinai.org/billing-insurance/help-paying-your-bill.html)
  - b. **Email or Paper Copies.** Copies of any of the materials referenced in this Policy may be obtained by making a request to Patient Services at 323-866-8600 or via email to [patient.billing@cshs.org](mailto:patient.billing@cshs.org)
  - c. **Posted Signage.** The Plain Language Summary shall be posted in the following locations: the Emergency Department, the Admitting Department, any Billing Department if accessible to public, centralized and decentralized registration areas and other outpatient settings, including observation units.
- iii. **Registration and Billing Notices.** Patients will be provided various information and notices in their registration and billing communications. For example, see the Organization's Debt Collection Policy.
- iv. **Notification to the Community.** The Organization shall take various efforts to widely publicize its Financial Assistance programs, such as distributing information to targeted community organizations or other means of alerting the community to the availability of the Organization's Financial Assistance programs.
- f. **Translations and Interpreter Services.** Patient communications shall comply with the requirements of the Organization. Without limiting the foregoing, notices, formal communications and signage under this Policy shall be in English and in the additional languages required by state and federal laws. Those additional languages are Spanish, Farsi, Russian, Armenian, Chinese, Korean, Vietnamese, Arabic and Czech.. Additionally, patients may contact the Organization to be connected with interpreter services for

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communication and translation of Policy-related documents in other foreign languages and American Sign Language (ASL). Also, copies of these documents can be provided in large print and audio, upon request to the Patient Services Department.

- g. **Medically Necessity/Clinical Determinations.** The evaluation of the necessity for medical treatment of any patient will be based upon clinical judgment, regardless of insurance or financial status. In cases where an emergency medical condition exists, any evaluation of financial arrangements will occur only after an appropriate medical screening examination has occurred and necessary stabilizing services have been provided in accordance with all applicable state and federal laws.
- h. **Refunds.** The Organization will reimburse patients for amounts they paid in excess of the amount due pursuant to this Policy, including any interest paid, at the rate of ten percent (10%) per annum. If the amount due to the patient is less than \$5.00 (or such other amount set by the Internal Revenue Service), the Organization is not required to reimburse the patient or pay interest. The Organization shall refund the patient within 30 days.
- i. **Collections.** For additional information on collection actions, please see the Debt Collection Policy.
- j. **Reporting.** The Organization will submit this Policy to HCAI every other year on or before January 1 or within thirty (30) days of any update to this Policy. If there are no significant changes since the Policy was previously submitted, the Organization shall notify HCAI within thirty (30) days prior to the January 1 of the Organization's next biennial reporting date. Significant changes include any change that could affect patient access to eligibility for discounted payment or any other protections outlined by federal and state requirements. Each policy submission to HCAI shall include a statement of certification (see Attachment D) under penalty of perjury, which includes the following: (i) A certification that the submitter is duly authorized to submit the policies. (ii) The submitted policies are true and correct copies of the Organization's policies.

**III. Hospital Bill Complaint Program.** Patients that believe they have been wrongly denied financial assistance may file a complaint with the State of California's Hospital Bill Complaint Program. To learn more information or to file a complaint go to the HCAI website or [HospitalBillComplaintProgram.hcai.ca.gov](http://HospitalBillComplaintProgram.hcai.ca.gov).

# POLICY



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**IV. More Help.** For patients that need help paying a bill, there are free consumer advocacy organizations that will help patients understand the billing and payment process. Patients may call the Health Consumer Alliance at 888-804-3536 or go to [healthconsumer.org](http://healthconsumer.org) for more information.

**V. Record Retention.** The Organization will maintain all records relating to money owed by a patient or guarantor for 5 years, including, but not limited to: (a) documents related to litigation filed by the Organization, (b) a contract and significant related records by which the Organization assigns debt to a third party, (c) a list, updated at least annually, of every person, including the person's name and contact information, that is either: (i) a debt collector to whom the Organization assigned medical debt or (ii) retained by the Organization to pursue litigation for debts owed by patients on behalf of the Organization.

**VI. Approval by Board of Directors and Continuing Review.** This Policy, the Debt Collection Policy, and all material changes to these policies must be approved by the Organization's Board of Directors. The Organization shall routinely review this Policy together with the Debt Collection Policy, and the status of collection efforts to ensure they are best serving patients and the community. However, administrative changes to the Attachments identified in Section VII of this Policy may be made by management without Board approval so long as the changes do not conflict with this Policy (e.g., language clarifications, changes to reflect operational process that implement the Policy, updates to comply with changes in applicable laws, regulation, or IRS guidance, and updates to reflect the most recent Federal Poverty Guidelines).

## **VII. Definitions**

- a. **Amounts Generally Billed ("AGB")** means the amounts generally billed for emergency or other medically necessary care to patients who have insurance covering such care, determined in accordance with 26 C.F.R. §1.501(r)-5(b). Additional information on how the Organization calculates AGB shall be set forth on Attachment C to this Policy and will be included in filings made available to the public on the State of California's Department of Health Care Access and Information website at [syfphr.hcai.ca.gov/](http://syfphr.hcai.ca.gov/).
- b. **Application** means the Organization's Application for financial assistance.
- c. **Assets** mean only "monetary assets." This includes assets that are readily convertible to cash, such as bank accounts and publicly traded stocks. Retirement plans, deferred

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compensation plans (both qualified and nonqualified under the IRS code) will not be considered.

- d. **Charity Care** means free care.
- e. **Community Partners** means supportive relationships with other community agencies, examples include Planned Parenthood or Saban Community Clinic.
- f. **Discount Payment** or **Discounted Payment** means any charge for care that is reduced but not free.
- g. **Essential Living Expenses** means 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 childcare, child or spousal support, transportation and auto expenses, including insurance, gas, and repairs, installment payments, laundry and cleaning, and other extraordinary expenses.
- h. **Extraordinary Collection Actions ("ECAs")** means collection activities that the Organization will not undertake before making reasonable efforts to determine whether a patient is eligible for financial assistance under this Policy. ECAs are specifically described in the Debt Collection Policy.
- i. **Federal Poverty Level ("FPL")** means the measurement used to determine poverty in the United States and is published periodically by the Department of Health and Human Services ("DHHS") on their website, [aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines](https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines).
- j. **Financially Qualified Patient** means a patient who has requested financial assistance from the Organization and has completed and submitted an Application. Review of the Application shows that the patient is eligible for financial assistance and the Application is approved in accordance with this Policy or the patient has been



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determined by the Organization to be presumptively eligible for financial Assistance under this Policy.

- k. **Financial Assistance** means arrangements under this Policy for health care services to be provided at no charge or a reduced charge to the patient. Reduced charges are generally pursuant to a payment plan or an automatic discount for Self-Pay patients.
- l. **Health Savings Account** is any account established by a patient or member of a Patient's Family on a pre-tax basis that is available to pay for certain medical expenses of the patient, and possibly others.
- m. **High Medical Costs** means the annual out-of-pocket costs of a patient whose family income exceeds the Organization's thresholds for financial assistance. These costs include: (1) Annual out-of-pocket costs incurred by a patient at the Organization's hospital that exceed the lesser of 10 percent of the patient's current family income or family income in the prior 12 months; (2) Annual out-of-pocket expenses that exceed 10 percent of the patient's family income, if the patient provides documentation of the patient's medical expenses paid by the patient or the patient's family in the prior 12 months; or (3) A lower level as may be from time to time set out in this Policy.
- n. **Medical Indigency** means a patient who is unable to pay for services due to unexpected high-cost care but who does not qualify for financial assistance under this Policy.
- o. **Medically Necessary** means health care services performed that is necessary and clinically appropriate to evaluate, diagnose, or treat a patient in accordance with generally accepted standards of medical practice and is not primarily for the convenience of the patient or provider.
- p. **Out-of-Pocket Costs** means any expenses for medical care that are not reimbursed by insurance or a health coverage program including a Health Savings Account. Such costs include as an example Medicare copays or Medi-Cal cost sharing.
- q. **Patient Family** means: for persons 18 years of age and older, spouse, domestic partner and dependent children under 21 years of age, or any age if disabled whether living at home or not and for persons under 18 years of age, or for a dependent child

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18 to 20 years of age, inclusive, parent, caretaker relatives, and parent's or caretaker relatives' other dependent children under 21 years of age, or any age if disabled.

- r. **Payment Plan** means an agreement between the Organization and the patient, whereby the Organization has offered, and the patient has accepted, the opportunity to pay off their liability in monthly payments not exceeding 10% of the patient's family income for a month, excluding deductions for essential living expenses.
- s. **Underinsured** means patients who have health insurance but are unable to meet their share of costs due to high premiums or out-of-pocket costs.
- t. **Uninsured** means patients who do not have health insurance coverage through a private health insurer, Medicare, Medicaid, or other government-sponsored plan.

**VII. References.** State and federal laws referenced in the development of this Policy include but are not limited to:

- a. U.S. Internal Revenue Code Section 501(r)(3).
- b. California Health & Safety Code Section 127400-127462 (Hospital Fair Pricing Policies and Emergency Physician Fair Pricing Policies).
- c. California Assembly Bill 1020: Health Care Debt and Fair Billing.
- d. California Assembly Bill 532: Fair Billing Policies.
- e. Office of General, Department of Health and Human Services ("OIG") guidance regarding financial assistance to uninsured and underinsured patients, and IRS regulations.
- f. Any implementing regulations and agency guidance regarding any of the foregoing.

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## **VIII. List of Attachments**

- A. Summary of Financial Assistance Policy - Plain Language Summary
- B. Financial Assistance for Charity Care or a Discount Payment by Federal Poverty Guidelines
- C. Amounts Generally Billed
- D. Statement of Certification

## **HISTORY:**

**ORIGINAL ISSUE: 05/01/03**

**POLICY VERSION EFFECTIVE DATE: 01/01/25**

**LAST REVIEW DATE: 01/01/24**

## **Attachment A**

### **Summary of Financial Assistance Policy – Plain Language Summary**

As part of our mission, Cedars-Sinai Medical Center, Cedars-Sinai Marina Hospital, Cedars-Sinai Medical Care Foundation, Huntington Hospital, and Huntington Health Physicians (each separately, the “Organization”) are committed to providing access to quality healthcare for the community and treating all of our patients with dignity, compassion and respect. This includes providing services without charge, or at significantly discounted prices, to eligible patients who cannot afford to pay for care as provided by our financial assistance policy (the “Policy”). We also offer our patients a variety of options to meet their financial needs, even if they do not qualify for assistance. This document is our plain language summary (the “Summary”) of the Policy.

#### **Help paying your bill**

Charity Care will be made available to patients receiving medically necessary procedures and whose income is at or below 400% of the current year’s federal poverty level (FPL). Patients whose income ranges between 401%–600 % of the FPL also qualify for a Discount Payment, using a sliding scale based on family size, income level and insurance status. Patients scheduled as elective inpatients, scheduled as non-emergent outpatients or for follow-up care following discharge require the prior approval by the vice president, Finance and Chief Revenue Cycle Officer or their designee. If a patient does not qualify for entirely free services but is eligible for a discount under the Policy, the patient will not be charged more than amounts generally billed by the Organization for emergency or other medically necessary care.

#### **Physicians and services**

The Policy only applies to services provided by the Organization and by: faculty physicians in their capacity as faculty, CSMCF and Huntington Health physicians including physicians employed by medical groups that have a professional services agreement with them, and the Cedars-Sinai emergency physicians. Emergency physicians at Organization hospitals other than Cedars-Sinai who provide emergency medical services are required by law to provide discounts to uninsured patients or patients with high medical costs who are at or below 400 percent of the federal poverty level.

#### **How to apply**

Patients seeking free or discounted care under the Policy will need to complete a financial assistance application (the “Application”) and submit any required documentation. The Application and documentation will go through a review process by the Organization.

Free copies of this Summary, the Policy or the Application are available in English, Spanish, Farsi, Russian, Armenian, Chinese, Korean, Vietnamese, Arabic or Czech. To request copies or to get additional information, including questions on the financial assistance process, you may:

- Ask representatives at the registration or admissions desks.



- Call Patient Services at 323-866-8600.
- Visit the Organization's website at [cedars-sinai.org/billing-insurance-records/help-paying-your-bill.html](https://cedars-sinai.org/billing-insurance-records/help-paying-your-bill.html)

If you have a disability and need an accessible alternative format for the above materials or if you speak another language than those listed, please contact Patient Services and they can offer you an alternative format or connect you with our Interpreter Services department for further assistance.

### **Arrangements for self-pay**

Patients who do not qualify for free or discounted care under the Policy may find other programs of the Organization helpful. Patients who lack insurance may receive a substantial discount, similar to the discounts we provide to managed-care insurance plans for eligible services.

### **Regulatory notice for collections**

We do refer some delinquent accounts to third-party collection agencies. These agencies must follow all California and federal laws as well as comply with the Organization's policies and procedures. For more information about debt collection activities, you may contact the Federal Trade Commission by phone at 877-FTC-HELP (877-382-4357). In the event your account is referred to a collection agency and you experience problems, contact our Patient Services for support at 323-866-8600.

### **Protections for surprise medical bills.**

All patients are afforded protections against surprise medical bills. Please see the "Notice to Patients – Your Rights and Protections Against Surprise Medical Bills" on our website or ask for a copy.

- Cedars-Sinai: [cedars-sinai.org/programs/support-services/patient-rights.html](https://cedars-sinai.org/programs/support-services/patient-rights.html)
- Huntington Health: [huntingtonhealth.org/patients/cost-of-care/no-surprises-act-nsa-surprise-medical-bills-no-surprise-billing-policies/](https://huntingtonhealth.org/patients/cost-of-care/no-surprises-act-nsa-surprise-medical-bills-no-surprise-billing-policies/)

### **Hospital Bill Complaint Program**

If you believe you were wrongly denied financial assistance, you may file a complaint with the State of California's Hospital Bill Complaint Program. Go to [HospitalBillComplaintProgram.hcai.ca.gov](https://HospitalBillComplaintProgram.hcai.ca.gov) for more information and to file a complaint.

### **More Help**

Help paying your bill – There are free consumer advocacy organizations that will help you understand the billing and payment process. You may call the Health Consumer Alliance at 888-804-3536 or go to [healthconsumer.org](https://healthconsumer.org) for more information.

### **Additional resources and information:**

- Patients may be eligible for government assistance programs, such as Medi-Cal or subsidized coverage through Covered California. The Patient Financial Advocate ("PFA") office has onsite staff to answer patient questions and provide assistance with applying for these programs. The PFA office can be contacted at 310-423-5071.
- For questions regarding commercial health insurance, call 1-800-CEDARS1 or 800-233-

2771.

- For information on the Organization's pricing and tool for shoppable services, visit the website

[mycslink.cedars-sinai.org/mycslink/GuestEstimates/](https://mycslink.cedars-sinai.org/mycslink/GuestEstimates/)



## Attachment A (Continued)

<b>Financial Assistance Tagline Sheet</b>	
<b>English:</b> ATTENTION: If you need help in your language, call 323-866-8600 or visit the PFA office, 8 a.m.-4:30 p.m., Monday through Friday, at 8700 Beverly Blvd., South Tower, Room 1740, Los Angeles, CA 90048. Aids and services for people with disabilities, like documents in large print or audio are also available. These services are free.	
<b>Spanish:</b> ATENCIÓN: Si necesita ayuda en su idioma, llame al 323-866-8600 o visite la oficina de PFA, de 08:00 a. m. a 04:30 p. m., de lunes a viernes, en 8700 Beverly Blvd., South Tower, Room 1740, Los Angeles, CA 90048. También hay ayuda y servicios disponibles para personas con discapacidades, como documentos con letra grande o en audio. Estos servicios son gratuitos.	
<b>Chinese-Simplified:</b> 注意: 如果您需要以您的语言获得帮助, 请致电 323-866-8600 或造访 PFA 办公室, 服务时间为周一至周五上午 8:00 至下午 4:30, 地址为 8700 Beverly Blvd., South Tower, Room 1740, Los Angeles, CA 90048。我们还为残障人士提供援助和服务, 例如大字体文件或音频。这些服务均为免费。	
<b>Vietnamese:</b> CHÚ Ý: Nếu quý vị cần trợ giúp bằng ngôn ngữ của mình, vui lòng gọi 323-866-8600 hoặc đến tại văn phòng PFA, 8 sáng – 4:30 chiều, Thứ Hai đến Thứ Sáu, tại địa chỉ 8700 Beverly Blvd., South Tower, Room 1740, Los Angeles, CA 90048. Các trợ cụ và dịch vụ dành cho người khuyết tật, chẳng hạn như tài liệu ở dạng chữ in khổ lớn hoặc tệp âm thanh cũng có sẵn. Các dịch vụ này được miễn phí.	
<b>Tagalog:</b> PAUNAWA: Kung kailangan mo ng tulong sa iyong wika, tumawag sa 323-866-8600 o bisitahin ang tanggapan ng PFA, 8 a.m.-4:30 p.m., Lunes hanggang Biyernes, sa 8700 Beverly Blvd., South Tower, Room 1740, Los Angeles, CA 90048. Available din ang mga tulong at serbisyo para sa mga taong may kapansanan, tulad ng mga dokumentong nakasulat sa malalaking titik o naka-audio. Ang mga serbisyonang ito ay walang bayad.	
<b>Korean:</b> 참고 사항: 귀하의 언어로 도움이 필요하시면 월요일부터 금요일 오전 8시~오후 4시 30분에 전화 323-866-8600번으로 연락하시거나 PFA 사무실을 방문해 주십시오. 주소는 8700 Beverly Blvd., South Tower, Room 1740, Los Angeles, CA 90048입니다. 큰 활자 또는 오디오 문서 등 장애인을 위한 지원 및 서비스도 제공됩니다. 해당 서비스는 무료입니다.	
<b>Armenian:</b> ՈՒՇԱԴՐՈՒԹՅՈՒՆ՝ Եթե օգնության կարիք ունեք ձեր լեզվով, զանգահարեք 323-866-8600 հեռախոսահամարով կամ այցելեք PFA-ի գրասենյակը, 8:00-ից-16:30, երկուշաբթիից ուրբաթ, այս հասցեով՝ 8700 Beverly Blvd., South Tower, Room 1740, Los Angeles, CA 90048: Հաշմանդամների համար տրամադրվել են նաև օգնություններ և ծառայություններ, օրինակ՝ խոշոր տպատառերով փաստաթղթեր կամ ձայնագրված նյութեր: Այս ծառայություններն անվճար են:	
<b>Farsi:</b> توجه: اگر نیاز به کمک به زبان خود دارید، با 323-866-8600 تماس بگیرید یا در روزهای دوشنبه تا جمعه از ساعت 8 صبح تا 4:30 عصر به دفتر PFA به نشانی 8700 Beverly Blvd., South Tower, Room 1740, Los Angeles, CA 90048 مراجعه کنید. کمک‌ها و خدماتی، مانند اسناد با چاپ درشت یا در قالب صوتی، نیز برای افراد دارای معلولیت در دسترس است. این خدمات رایگان هستند.	
<b>Russian:</b> ВНИМАНИЕ: если вам нужна помощь на русском языке, позвоните по номеру 323-866-8600 или посетите отдел помощи пациентам по финансовым вопросам (PFA) по адресу 8700 Beverly Blvd., South Tower, Room 1740, Los Angeles, CA 90048. График работы отдела: с понедельника по пятницу с 08:00 до 16:30. Лицам с ограниченными возможностями бесплатно предоставляются вспомогательные средства и услуги, например документы, напечатанные крупным шрифтом, или в аудиоформате.	





## **Attachment B**

### **Financial Assistance for Charity Care or Discount Payment by Federal Poverty Guidelines**

To find your Federal Poverty Level percentage ("FPL%") and for updated annual salary amounts by family size ranges, visit the Organization's website at <https://www.cedars-sinai.org/billing-insurance-records/help-paying-your-bill.html>

The Organization uses the following Federal Poverty Level ("FPL") and insurance guidelines to determine a discount:

	Charity Care	Discount Payment			
FPL %	<b>400%</b>	<b>450%</b>	<b>500%</b>	<b>550%</b>	<b>600%</b>
<b>Uninsured</b>	100%	95%	90%	85%	85%
<b>Underinsured</b>	100%	90%	80%	70%	60%

#### **Illustrative Example:**

If you are a family of 3 with an annual salary equal or less than 500% of the FPL, then you would be eligible for either an:

- Uninsured discount at 90% - for patients with no insurance plan
- Underinsured discount at 80% - for patients who have health insurance but are unable to meet their share of costs due to high premiums or out-of-pocket costs.

You can view the federal poverty guidelines at [aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines](https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines).

### **Attachment C**

#### **Amounts Generally Billed**

Amounts Generally Billed ("AGB") means the amounts generally billed for emergency or other medically necessary care to patients who have insurance covering such care, determined in accordance with 26 C.F.R. §1.501(r)-5(b).

The Organization will use the Look-Back Method for determining the maximum amount that would be billed to:

- An eligible inpatient using the average Medicare and commercial inpatient reimbursement rate. To further benefit an eligible inpatient, the Organization will use the lower of the AGB or the Medicare MS-DRG reimbursement amount for this episode of care in determining an eligible patient's liability.
- An eligible outpatient using the average Medicare and commercial outpatient reimbursement rate.
- An eligible emergency room patient using the average Medicare and commercial emergency room reimbursement rate.

Inpatient, outpatient and emergency room reimbursement rates are calculated at least annually using the most recently closed Medicare accounts from the past 12 months.

To find the AGB percentages, updated annually, visit the Organization's website at [cedars-sinai.org/billing-insurance-records/help-paying-your-bill.html](https://cedars-sinai.org/billing-insurance-records/help-paying-your-bill.html).

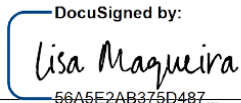
**Attachment D**  
**Statement of Certification**

This Policy and its attachments will be submitted to the Department of Health Care Access and Information (HCAI). Additionally, it will be made available on the Organization's website.

The Organization attests under penalty of perjury to the following:

1. The individual submitting the policy is duly authorized to submit policies on behalf of the Organization.
2. The submitted policy is a true and correct copy for which this certification is attached.

DocuSigned by:

  
56A5E2AB375D487...

Lisa Maqueira  
Vice President, Finance and Chief Revenue Cycle Officer

11/6/2024

Date

# POLICY



Effective Date: 01/01/2025

## Title: Debt Collections Policy

Home Department: Patient Services

### IMPORTANT NOTICE:

The official version of this document is contained in the Policy and Procedure Manager (PPM) and may have been revised since the document was printed.

## Debt Collections Policy

### I. Purpose

- a. Cedars-Sinai Medical Center, Cedars-Sinai Marina Hospital, Cedars-Sinai Medical Care Foundation ("CSMCF"), Huntington Hospital and Huntington Health Physicians (each separately, the "Organization") provide compassionate care to patients when they need hospital services. All patients or their guarantors have a financial responsibility related to services received at the Organization, and must make arrangements for payment, either before or after services are rendered. Such arrangements may include payment by an insurance plan, including programs offered through the Federal and California government. Payment arrangements may also be made directly with the patient, subject to the payment terms and conditions of the Organization. The Organization is committed to ensuring that conversations about financial obligations do not unreasonably impact the scheduling of care.
- b. This Policy sets out the guidelines and procedures for establishing fair, reasonable, and consistent means for collection of patient accounts owed to the Organization and ensures the Organization and any collection agency that the Organization partners with, treat all patients, their families, and other contacts with fairness, dignity, compassion, and respect. Additionally, this Policy ensures that the Organization and its assigned collection agencies comply with all applicable Federal and California law, organizational policies and procedures, and industry best practices including, without limitation, the following laws and their implementing regulations:
  - i. 26 U.S.C. Section 501 (r) et. seq. Additional Requirements for Certain Hospitals.
  - ii. 15 U.S.C. Section 1692 et seq. Debt Collection Practices.
  - iii. California Civil Code section 1788 et seq. Fair Debt Collection Practices.
  - iv. California Health & Safety Code section 1339.50 et seq. Payers' Bill of Rights.
  - v. California Health & Safety Code section 127400 et seq. Hospital Fair Pricing Policies.
  - vi. The American Hospital Association Patient Billing Guidelines Affirmation.

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## II. Policy

### a. General Practices

- i. If a patient account is payable by insurance, then the initial bill will be forwarded directly to the designated insurer to obtain any or all amounts owed by the insurer.
- ii. Patient balances, after insurance payments, will be billed directly to the patient.
- iii. The Organization and the patient share responsibility for timely and accurate resolution of all patient accounts. Patient cooperation and communication is essential to this process. The Organization shall make reasonable and consistent efforts to assist patients with the fulfillment of their financial responsibilities.
- iv. Payment Plans may be arranged with the Organization, on a case-by-case basis. Payment plans may be established in connection with the granting of assistance under the Organization's Financial Assistance Policy or as part of a debt payment arrangement between the Organization and a patient.
  1. Payment plans are free of interest charges and set-up fees.
  2. The Organization may consider Health Savings Accounts when establishing the terms of a payment plan.
  3. It is the patient or guarantor's responsibility to contact the Organization if circumstances change, and payment plan terms cannot be met.
  4. Once approved, any failure to pay in accordance with the payment plan terms will constitute a default, and the Organization may cancel the payment plan and begin collection activities only after the patient's failure to make payments in the amount due over any continuous 90-day period, in accordance with Federal and California law.
    - a. Prior to canceling a payment plan, the Organization shall make a reasonable attempt to notify the patient both orally and in writing that the payment plan may be cancelled, allowing the patient another opportunity to respond and renegotiate the payment plan terms.
    - b. Upon any cancellation of a payment plan, the patient's financial responsibility shall not exceed the discounted principal amount agreed under the payment plan and the patient shall receive

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credit for any payments previously made under the extended payment plan.

- v. The Organization requires a patient or guarantor to pay the Organization the entire amount of any reimbursement sent directly to the patient or guarantor by a third-party payer for the Organization's services. If a patient receives a legal settlement, judgment, or award under a liable third-party action that includes payment for health care services or medical care related to the injury, the Organization requires the patient or guarantor to reimburse the Organization for the related health care services rendered up to the amount reasonably awarded for that purpose.
- vi. The Organization provides the following information and special assistance to all patients:
  - 1. The Plain Language Summary of the Financial Assistance Policy.
  - 2. A Financial Assistance Application ("Application") and/or an application to Medi-Cal or other appropriate government assistance program to uninsured patients, receiving non-emergency services, upon admission or prior to discharge, or in some circumstances, within 72-hours of providing services.
  - 3. Assistance in applying for its financial assistance or government assistance, at no cost to the patient.
  - 4. A written bill for services rendered by the Organization.
  - 5. A summary statement, upon request, with the expected payment by insurance, if applicable, and any or all amounts due and payable by the patient.
  - 6. A written request that the patient provide information on their health insurance coverage, if not already provided.

### b. Required Approvals for Extraordinary Collection Actions

The Organization complies with Federal and California legal and regulatory requirements related to debt collection practices. The Organization shall not initiate an Extraordinary Collection Action except in accordance with this Policy, and



## Title: Debt Collections Policy

Home Department: Patient Services

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applicable law. The Organization and any collection agency the Organization partners with:

- i. Are never permitted to engage in the following ECAs or collection practices:
  1. Sell patient debt.
  2. Garnish an individual's wages.
  3. Foreclose on real property.
  4. Lien on any real property owned, in part or completely, by the patient.
  5. Attach or seize an individual's bank account or other personal property.
  6. Cause an individual's arrest or writ of body attachment.
  7. Provide notice or conduct a sale of any real property owned, in part or completely, by the patient.
  8. Require payment before providing medically necessary care due to outstanding bills for prior care.
  9. Defer or deny medically necessary care because of non-payment of a bill for previously provided care covered under the Financial Assistance Policy.
  10. Report adverse information to a consumer credit reporting agency.
  11. Commence civil action against the patient for nonpayment before 180 days after initial billing.
- ii. Shall receive approval from the Chief Financial Officer or their designee, as approved by the Chief Financial Officer and President, prior to initiating any other collection activity.
- iii. Shall not use information obtained by the Organization in connection with a patient's Application for financial assistance for collection activities.

### c. Suspending Collection Actions

- i. **Pending Application.** If a patient has properly submitted an approved Application, then the Organization shall immediately suspend assignment of an account to a collection agency, or any initiated ECA until the application process is complete, or 30 days, whichever time period is longer.
- ii. **Pending government-sponsored coverage.** For patients who have an application pending for government-sponsored coverage or programs, the

## Title: Debt Collections Policy

Home Department: Patient Services

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- Organization shall not knowingly assign the account to a collection agency prior to 240 days from the date of initial billing, post-discharge.
- iii. **Cooperation to settle outstanding bill.** The Organization shall not knowingly assign an account to a collection agency for patient portions that qualify for financial assistance, or if the patient has negotiated a payment plan and is reasonably cooperating to settle an outstanding bill. Collection activities will resume in accordance with applicable laws and regulations if the patient/guarantor becomes delinquent in fulfilling the payment plan.
  - iv. **Pending notice of Hospital Bill Complaint Program.** All payment collection activities by the Organization's collection agencies shall stop upon receipt of notice that a patient has submitted a complaint to the Department of Health Care Access and Information's ("HCAI") Hospital Bill Complaint Program. Collection agency activities will not resume until the complaint has been resolved, as confirmed by HCAI.
- d. **Reasonable Steps to Determine Eligibility for Financial Assistance.** Prior to assigning an account to a collection agency or initiating any ECA, the Organization shall have taken the following steps to determine a patient's financial assistance eligibility, as applicable:
- i. **Reasonable Efforts Based on Notifications, Screenings and Amounts Not Eligible**
    - 1. The Organization shall notify patients of its financial assistance program before assigning an account to a collection agency or initiating any ECA to obtain payment for the care.
    - 2. If the patient has not submitted a Application, or is determined ineligible for financial assistance, then ECAs may be initiated only as permitted by applicable law and in accordance with this Policy.
    - 3. The Organization shall not assign any patient account to a collection agency unless the Organization has first performed to the best of its ability, with reasonable effort, a patient profile/screen, and determined to its satisfaction that the patient:
      - a. Does not qualify for alternative payor sources.

## Title: Debt Collections Policy

Home Department: Patient Services

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- b. Is not agreeable to applying for government insurance or programs.
    - c. Is not agreeable to payment plan/extended payment plan or is no longer cooperating with a negotiated payment plan.
  - ii. **Presumptive Eligibility.** The Organization may determine that the patient is eligible for financial assistance based on a presumptive eligibility process. Additional information regarding presumptive eligibility is found in the Financial Assistance Policy.
  - iii. **Final Notice and Notifications to Patients 30 Days Before Actions.**
    - 1. In compliance with Federal law, at least 30-days before assigning an account to a collection agency or initiating any ECAs, the Organization shall:
      - a. Provide the Plain Language Summary.
      - b. Identify the ECAs that the Organization intends to initiate and state a deadline after which they may be initiated, which can be no earlier than 30 days after the date that the written notice is provided.
      - c. Prior to initiating any ECAs, the Organization shall make a reasonable effort to orally notify the patient about the financial assistance program and how the patient may obtain assistance with the Application.
    - 2. In compliance with California law, before the Organization assigns a bill to collections, the Organization shall send the patient a final notice with the following information:
      - a. The name of the entity to which the bill is being assigned.
      - b. Date(s) of service of the bill that is being assigned.
      - c. Name and plan type of the health coverage for the patient.
      - d. Date(s) associated with financial assistance notices, applications, and/or decisions.
      - e. An Application for financial assistance.
      - f. Information on how to obtain an itemized bill.

## Title: Debt Collections Policy

Home Department: Patient Services

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- iv. **Notification Before Actions in the Event of Multiple Episodes of Care.** The Organization may satisfy the notification requirements described above for multiple episodes of care in a notice that covers multiple billing statements. However, if aggregated, then the Organization must refrain from assigning debt to a collection agency or initiating an ECA until 120 days after it provided the first post-discharge billing statement for the most recent episode of care, included in the aggregation.

### e. Assignment of Patient Accounts to Collection Agencies

- i. When the Organization assigns an account to a collection agency, the amount that will be assigned for collection will be the amount remaining after any and all prior discount arrangements or waivers have been applied to the account balance.
- ii. Account balances meeting certain thresholds are reviewed by either the Associate Director or Executive Director of Patient Services. Additionally, the Organization has established minimum thresholds for assigning accounts to a collection agency.
- iii. If a collection agency determines that a patient account qualifies for an alternative source of payment or is uncollectable, then the collection agency shall return the account to the Organization with an explanation of the determination and the supporting data. The Organization will attempt to collect from the alternate source and/or work to qualify the patient for financial assistance.
- iv. If a patient asks a collection agency whether the Organization offers a discount from its billed amount based on a patient's status as a cash-paying patient (no third-party coverage), then the collection agency will promptly validate for the patient the discount applied to all cash-paying patients and, if appropriate, notify the patient of the Organization's financial assistance program. If the patient desires to negotiate an additional discount above the discount provided, then the agency may notify the Organization for authority to adjust the account as appropriate.

## Title: Debt Collections Policy

Home Department: Patient Services

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Prior to filing any legal action against a patient, the collection agency shall ensure all legal and regulatory requirements related to fair debt collection practices are met and have confirmed multiple attempts were made to reach and negotiate with the patient. Any such action shall receive the prior written approval from the Vice President, Finance and Chief Revenue Cycle Officer or their designee.

- f. **No Assignment or Subcontracting.** Collection agencies may not assign or subcontract the collection of any account without:
  - i. The prior written consent of the Vice President, Finance and Chief Revenue Cycle Officer or their designee; and
  - ii. A written agreement by the assignee or subcontractor to comply with this Policy and Federal and California requirements.
- g. **General Requirements Prior to Collection Agency Action**
  - i. **Consistency in Billing Statements.** At the time of billing, the Organization shall provide to all low-income uninsured patients the same information concerning services received and amounts billed related to those services as it provides to all other patients who receive care at the Organization. The term "low-income uninsured patient" is a patient eligible for assistance under the Financial Assistance Policy.
  - ii. **Notice of Financial Assistance Availability.** In its collection letters and statements to all patients, the Organization shall include language to inform patients if they meet certain income requirements, then they may be eligible for government-sponsored payor programs or financial assistance from the Organization. Patient bills shall also include the name/title or department and telephone number to contact for additional information.
- h. **Relationships with Collection Agencies**
  - i. **Compliance with Law, Policies and Standards.**
    - 1. Collection agencies contracted with the Organization must attest to, and always comply with Federal and California laws applicable to the collection of consumer and patient debts.

# POLICY



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2. Collection agencies are required to treat patients, their families, and other contacts fairly, and with dignity, compassion and respect.
3. Collection agencies must review and comply with the Organization's policies and standards, including, without limitation, the payment plan provisions of this Policy and the Financial Assistance Policy.
- ii. **Standards for Contracting with Collection Agencies.** The Organization shall not engage any collection agency to collect patient accounts unless:
  1. The arrangement is set forth in a written agreement signed by the collection agency and the Vice President, Finance and Chief Revenue Cycle Officer or their designee and
  2. The written agreement attaches this Policy, or includes language that matches this Policy, as an exhibit and requires the collection agency to comply.
- i. **Recordkeeping**
  - i. The Organization shall maintain adequate documentation to ensure compliance with the requirements of this Policy.
  - ii. The Organization shall submit this Policy to the California Department of Health Care Access and Information ("HCAI") as required by applicable law.
  - iii. Each Collection Agency that contracts with the Organization is required to maintain adequate documentation to show compliance with the requirements of Federal and California consumer debt collection laws and all other requirements based on the most current version of this Policy and the Financial Assistance Policy.
  - iv. The Organization will maintain all records relating to money owed by a patient or guarantor for 5 years, including, but not limited to: (a) documents related to litigation filed by the Organization, (b) a contract and significant related records by which the Organization assigns debt to a third party, (c) a list, updated at least annually, of every person, including the person's name and contact information, that is either: (i) a debt collector to whom the Organization assigned medical debt or (ii) retained by the Organization to pursue litigation for debts owed by patients on behalf of the Organization.

# POLICY



Effective Date: 01/01/2025

**Title: Debt Collections Policy**

**Home Department: Patient Services**

## IMPORTANT NOTICE:

The official version of this document is contained in the Policy and Procedure Manager (PPM) and may have been revised since the document was printed.

### III. Definitions

- a. **Collection Agency** means an outside agency assigned debt collection activities for the Organization.
- b. **Extraordinary Collection Actions ("ECAs")** means collection activities that the Organization will not undertake before making reasonable efforts to determine whether a patient is eligible for financial assistance under this Policy. Extraordinary Collection Actions are defined in the Code of Federal Regulations, 26 CFR Section 501(r)-6.
- c. **Financial Assistance Application** means the application that can be used to participate in the Organization's financial assistance program. Additional information on the application processes can be found in the Financial Assistance Policy.
- d. **Financial Assistance Program** mean's the Organization's program that utilizes a single, unified patient application for both full and partial financial assistance. Additional information on the program can be found in the Financial Assistance Policy.
- e. **Medical Debt** means a debt owed by a consumer to a person whose primary business is providing "medical services, products, or devices" or to that person's agent or assignee, for the provision of medical services, products, or devices. Medical debt includes, but is not limited to, medical bills that are not past due or that have been paid.
- f. **Medical service**, product, or device does not include cosmetic surgery, but does include, without limitation, all of the following: (a) Any service, drug, medication, product, or device sold, offered, or provided to a patient by licensed health care facilities or providers, (b) Initial or subsequent reconstructive surgeries, and follow-up care deemed necessary by the attending physician and surgeon, (c) Initial or subsequent prosthetic devices, and follow-up care deemed necessary by the attending physician and surgeon, or (d) A mastectomy.



# POLICY



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- g. **Payment Plan** means an agreement between the Organization and the patient, whereby the Organization has offered, and the patient has accepted the opportunity to pay off their liability in monthly payments. Eligibility is based on certain family income thresholds, excluding deductions for Essential Living Expenses.
- h. **Plain Language Summary** means a document that notifies patients and other individuals that the Organization offers financial assistance under the Financial Assistance Policy in accordance with Federal and California law. The document is clear, concise, and easy to understand. Additional information on the Plain Language Summary can be found in the Financial Assistance Policy.

# POLICY



Effective Date: 01/01/2025

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## Statement of Certification

This Policy will be submitted to the Department of Health Care Access and Information (HCAI). Additionally, it will be made available on the Organization's website.

The Organization attests under penalty of perjury to the following:

1. The individual submitting the policy is duly authorized to submit policies on behalf of the Organization.
2. This submitted policy is a true and correct copy of the Policy for which this certification is included.

DocuSigned by:

*Lisa Maqueira*  
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Lisa Maqueira

Vice President, Finance and Chief Revenue Cycle Officer

11/6/2024

Date