

System Policy and Procedures

TITLE: Billing and Collection Effective Date: November 22, 2021 <u>Christopher K. Dorman</u> President/CEO	FACILITIES: ☒ Tift Regional Medical Center ☒ Southwell Medical ☒ Southwell Ambulatory Facilities ☐ Southwell Health and Rehabilitation ☒ Southwell Medical Rural Health Clinics	FUNCTION: Finance <u>Kim Wills</u> SVP, Chief Financial Officer
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Application:

This Policy applies to the selected facilities above. Such facilities are referred to as a "Facility" in the singular and collectively as "Facilities".

Definitions:

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

“Billing Deadline” means the date after which Southwell or collection agency may initiate an ECA against a Responsible Individual(s) who has failed to submit an application for financial assistance under the FAP. The Billing Deadline must be specified in a written notice to the Responsible Individual(s) provided at least thirty (30) days prior to such deadline, but no earlier than one hundred twenty (120) days after the first post discharge statement.

“Completion Deadline” means the date after which Southwell or collection agency may initiate or resume an ECA against an Individual(s) who has submitted an incomplete FAP if that Individual(s) has not provided the missing information and/or documentation necessary to complete the application or denied application. The Completion Deadline must be specified in a written notice and must be no earlier than the later of (1) 30 days after Southwell provides the Individual(s) with this notice; or (2) the last day of the Application Period.

“Extraordinary Collection Action (ECA)” means any action against an Individual(s)

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Responsible for a bill related to obtaining payment of a Self-Pay Account that requires a legal or judicial process or reporting adverse information about the Responsible Individual(s) to consumer credit reporting agencies/credit bureaus. ECAs do not include transferring of a Self-Pay Account to another party for purposes of collection without the use of any ECAs.

“FAP-Eligible Individual(s)” means a Responsible Individual(s) eligible for financial assistance under the FAP without regard to whether the Individual(s) has applied for assistance.

“Financial Assistance Policy (FAP)” means Southwell’s Financial Assistance Program for Uninsured Patients Policy, which includes eligibility criteria, the basis for calculating charges, the method for applying the policy, the measures to publicize the policy, and sets forth the financial assistance program.

“PFS” means Patient Financial Services, the operating unit of Southwell responsible for billing and collecting Self-Pay Accounts.

“Plain Language Summary” means a written statement that notifies an Individual(s) that Southwell offers financial assistance under the FAP for inpatient and outpatient hospital services and contains the information required to be included in such statement under the FAP.

“Responsible Individual(s)” means the patient and any other individual(s) having financial responsibility for a Self-Pay Account. There may be more than one Responsible Individual(s).

“Self-Pay Account” means that portion of a patient account that is the individual responsibility of the patient or other Responsible Individual(s), net of the application of payments made by any available healthcare insurance or other third-party payer (including co-payments, co-insurance and deductibles), and net of any reduction or write off made with respect to such patient account after application of an Assistance Program, as applicable.

“SM” means Southwell Medical, a campus of Tift Regional Medical Center.

“Southwell Ambulatory Facilities” or “SWA Facilities” means the physician practices and health care facilities owned and operated by Southwell Ambulatory, Inc.

“Southwell Facilities” or “Southwell”: This includes hospital campuses, Tift Regional Medical Center and Southwell Medical, a campus of Tift Regional Medical Center and hospital based physician services to include Anesthesiologists, Cardiovascular Surgery Critical Care Physicians, Emergency Room Physicians, Hospitalists and Oncology and other physician clinics that fall under the scope of this policy. Community physicians and independent specialists who are not employed by Southwell or its subsidiaries will not subject to this Policy. A current list of Southwell Facility locations can be found at <http://www.mysouthwell.com/FinancialAssistance>.

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“Southwell Medical Rural Health Clinics” means the rural health clinics owned and operated by Southwell d/b/a Southwell Medical

“TRHS” means Tift Regional Health System, Inc.

“TRMC” means Tift Regional Medical Center.

Purpose:

This Policy applies to Southwell and, together with the System Policy, [*Financial Assistance*](#) (“FAP”), is intended to meet the requirements of applicable federal, state, and local laws, including, without limitation, Section 501(r) of the Internal Revenue Code of 1986, as amended, and the regulations thereunder. Although the Southwell Facility Hospitals are subject to the Internal Revenue Code Section 501(r) and are required to have a financial assistance policy, the Southwell Ambulatory Facilities are not. Nonetheless, except as otherwise indicated in this Policy, this Policy applies to the Tift Regional Medical Center, Southwell Medical, hospital based physician services and Southwell Ambulatory facilities.

This Policy establishes the actions that may be taken in the event of nonpayment for medical care provided by Southwell Facilities, including but not limited to extraordinary collection actions. The guiding principles behind this Policy are to treat all patients and Responsible Individual(s) equally with dignity and respect, to ensure appropriate billing and collection procedures are uniformly followed and to ensure that reasonable efforts are made to determine whether the Responsible Individual(s) for payment of all or a portion of a patient account is eligible for assistance under the System Policy, <http://www.mysouthwell.com/FinancialAssistance>.

Policy:

Subject to compliance with the provisions of this Policy, Southwell may take any and all legal actions, including Extraordinary Collection Actions, to obtain payment for medical services provided.

- A. Southwell will not engage in ECAs, either directly or by any debt collection agency or other party to which Southwell has referred the patient’s debt, before reasonable efforts are made to determine whether a Responsible Individual(s) is eligible for assistance under the FAP.
- B. All patients are offered a Plain Language Summary and an application form for financial assistance under the FAP as part of the discharge or intake process from a hospital.
- C. At least three separate statements for collection of Self-Pay Accounts shall be mailed or emailed to the last known address of each Responsible Individual(s); provided, however, that no additional statements need be sent after a Responsible Individual(s) submits a complete application for financial assistance under the FAP or has paid- in-full. At least

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sixty (60) days shall have elapsed between the first and last of the required three mailings. It is the Responsible Individual(s) obligation to provide a correct mailing address at the time of service or upon moving. If an account does not have a valid address, the determination for "Reasonable Effort" will have been made. All Single Patient Account statements of Self-Pay Accounts will include, but not be limited to:

1. An accurate summary of the hospital services covered by the statement;
 2. The charges for such services;
 3. The amount required to be paid by the Responsible Individual(s) (or, if such amount is not known, a good faith estimate of such amount as of the date of the initial statement); and
 4. A conspicuous written notice that notifies and informs the Responsible Individual(s) about the availability of Financial Assistance under the hospital FAP including the telephone number of the department and direct website address where copies of documents may be obtained.
- D. At least one of the statements mailed or emailed will include written notice that informs the Responsible Individual(s) about the ECAs that are intended to be taken if the Responsible Individual(s) does not apply for financial assistance under the FAP or pay the amount due by the Billing Deadline. Such statement must be provided to the Responsible Individual(s) at least thirty (30) days before the deadline specified in the statement.
- E. Responsible Individual(s) propensity to pay will be scored based on that assessment of the Responsible Individual(s) likelihood to pay and dollar amount of the Self-Pay account.
- F. Prior to initiation of any ECAs, an oral attempt is made to contact Responsible Individual(s) by telephone at the last known telephone number, if any, at least once during the series of mailed or emailed statements if the account remains unpaid. During all conversations, the patient or Responsible Individual(s) will be informed about the financial assistance that may be available under the FAP.
- G. ECAs may be commenced as follows:
1. If any Responsible Individual(s) fail to apply for financial assistance under the FAP by one hundred twenty (120) days after the first post discharge statement, and the Responsible Parties have received a statement with a Billing Deadline described in Section E. above, then Southwell or collection agency may initiate ECAs.
 2. If any Responsible Individual(s) submits an incomplete application for financial assistance under the FAP prior to the Application Deadline, then ECAs may not be

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initiated until after each of the following steps has been completed:

- a. PFS provides the Responsible Individual(s) with a written notice that describes the additional information or documentation required under the FAP in order to complete the application for financial assistance, which notice will include a copy of the Plain Language Summary.
 - b. PFS provides the Responsible Individual(s) with at least thirty (30) days' prior written notice of the ECAs that Southwell or collection agency may initiate against the Responsible Individual(s) if the FAP application is not completed or payment is not made; provided, however, that the Completion Deadline for payment may not be set prior to one hundred twenty (120) days after the first post discharge statement.
 3. If the Responsible Individual(s) who has submitted the incomplete application completes the application for financial assistance, and PFS determines definitively that the Responsible Individual(s) is ineligible for any financial assistance under the FAP, Southwell will inform the Responsible Individual(s) in writing the denial and include a thirty (30) days' prior written notice of the ECAs that Southwell or collection agency may initiate against the Responsible Individual(s); provided, however, that the Billing Deadline may not be set prior to one hundred twenty (120) days after the first post discharge statement.
 4. If the Responsible Individual(s) who has submitted the incomplete application fails to complete the application by the Completion Deadline set in the notice provided pursuant to Section G.2.b. above, then ECAs may be initiated.
 5. If an application, complete or incomplete, for financial assistance under the FAP is submitted by a Responsible Individual(s), at any time prior to the Application Deadline, Southwell will suspend ECAs while such financial assistance application is pending.
- H. After the commencement of ECAs is permitted under Section G. above, collection agencies shall be authorized to report unpaid accounts to credit agencies, and to file judicial or legal action, garnishment, obtain judgment liens and execute upon such judgment liens using lawful means of collection; provided, however, that prior approval by the Southwell Legal Department shall be required before initial lawsuits may be initiated. Southwell and external collection agencies may also take any and all legal other actions including but not limited to telephone calls, emails, texts, mailing notices, and skip tracing to obtain payment for medical services provided.

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POLICY AVAILABILITY

Individuals may contact the TRHS Business Office at 229-353-6124 (option 2) for information regarding eligibility or the programs that may be available, to request that a copy of the FAP, the FAP application form, or Collection Policy be mailed to you, or if you need a copy of the FAP, FAP application form, or Collection Policy translated to Spanish. Full disclosure of the FAP, FAP application form, and Collection Policy may be found at www.mysouthwell.com. A paper copy of the Southwell FAP, FAP application form, and Collection Policy can be obtained at the TRHS Patient Financial Services located at 907 E. 18th Street, Tifton, Georgia 31794 or at the TRMS Facility admissions and registration areas or emergency department located at 907 E. 18th St., Tifton, Georgia 31794 or at Southwell Medical, a campus of Tift Regional Medical Center admissions and registration areas located at 260 M.J. Taylor Road, Adel, Georgia 31620.

Original Effective Date: March 1, 2019

Revise/Review History:

January 2020

November 2021

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