

BILLING & COLLECTION POLICY

POLICY: St. Anthony Regional Hospital will fairly and consistently bill patients for healthcare services provided. St. Anthony Regional Hospital will follow collection procedures to collect from patients their financial portion of healthcare costs. Patients who have the means to pay for their portion of healthcare costs are expected to do so.

SCOPE: St. Anthony Regional Hospital and Nursing Home is under the umbrella of one tax identification number and is a 501(C) (3) tax-exempt facility.

PRINCIPLES: Patients who have the ability to pay a portion of their healthcare costs have a responsibility to seek available insurance coverage and in addition pay their portion of healthcare services. St. Anthony Regional Hospital has the obligation to seek payment from patients. This policy is a guide to billing patients for their healthcare costs provided to them and for collection on accounts when patients have not upheld their financial responsibility to satisfy their accounts.

DEFINITIONS:

1. Patients. Includes either the patient and/or patient's guarantor.
2. Hospital. Includes all entities providing healthcare on behalf of St. Anthony Regional Hospital and Clinics.
3. Emergency Medical Care. Defined by EMTALA as a condition manifesting itself by acute symptoms of sufficient severity (including severe pain) such that the absence of immediate medical attention could reasonably be expected to result in placing the individual's health [or the health of an unborn child] in serious jeopardy, serious impairment to bodily functions, or serious dysfunction of bodily organs. This includes pregnant women with an emergency condition must be treated until delivery is complete, unless a transfer under the statute is appropriate.
4. Medically Necessary Care. Healthcare services or supplies needed to prevent, diagnosis or treat an illness, injury, condition, disease, or is symptoms that meet accepted standards of medicine.
5. Financial Assistance. The CARES Program is the Financial Assistance Policy (FAP) at St. Anthony Regional Hospital whereby patients can apply for assistance to satisfy their healthcare responsibilities.
6. Plain Language Summary. A document that is easy to read and understand the use and summarizes the St. Anthony CARES Program and the application process.
7. CARES-Eligible Patients. Patients who follow the procedures outlined in this policy and are determined to be eligible for financial assistance under this policy.
8. Extraordinary Collection Actions (ECA). The following actions are considered to be Extraordinary Collection Actions:
 - a. Reporting a patient's delinquent debt to a credit bureau
 - b. Selling a patient's debt to a third party

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- c. Placing a lien on a patient's property
- d. Foreclosing on a patient's real property
- e. Attaching or seizing a patient's bank account or any other personal property
- f. Commencing a civil action against a patient
- g. Causing a patient's arrest
- h. Causing a patient to be subject to a writ of body attachment
- i. Garnishing a patient's wages

The following actions are not considered to be Extraordinary Collections Actions:

- a. Filing a claim in bankruptcy
- b. Writing off an account to bad debt
- c. Sending a patient a bill
- d. Calling a patient by telephone
- e. Placing a lien against third parties that caused a patient's injuries
- f. Charging interest on medical debt

- 9. Post-Discharge Billing Statement. The first billing statement sent to the patient after services are rendered and the patient has been discharged.

- 10. Application Period. Period in which St. Anthony Regional Hospital must accept and process financial assistance applications. This process begins on the date care is provided and ends the 240th day after the first post-discharge billing statement or can also be the deadline indicated by the hospital for the application deadline or the deadline for providing additional information.

BILLING AND COLLECTION GUIDELINES: St. Anthony Regional Hospital will provide reasonable options for patients who are making a good faith effort to pay their bills, however, patients are expected to pay the amounts due for healthcare services received and collection will be part of the process, if indicated.

Reasonable efforts will be extended to patients to make them aware of the CARES Program (St. Anthony Regional Hospital Financial Assistance Policy) and the process for applying. No Extraordinary Collection Actions (ECAs) will be put in place prior to exhausting the financial assistance policy (FAP) first.

Reasonable Efforts include all of the following actions by St. Anthony Regional Hospital:

- 1. Providing written notice to the patient on their billing statements from the payment processor that Financial Assistance is available.

- 2. Making a determination regarding Financial Assistance eligibility if the patient submits a complete CARES application during the Application Period.

- 3. Notifying a patient who submits an incomplete CARES application about how to complete it properly, and giving the patient a reasonable opportunity to do so. The Hospital must provide this notification in writing and must provide contact information for resources in assisting the patient with completing the CARES application.

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4. Providing a Plain Language Summary identifying the ECAs that the Hospital may take if needed, and stating a deadline after which ECAs may be initiated that is no earlier than 30 days after the date when the written notice is provided.

Once reasonable efforts are met by the Hospital, please refer to the St. Anthony Regional Hospital Financial Assistance Policy which can be attained by mail, on the St. Anthony Regional Hospital & Nursing Home website and in person at the Patient Finance department.

BILLING AND COLLECTION PROCESS: If a patient does not complete a CARES application or does not qualify for the CARES program, then the contracted payment processor, Avadyne Health will continue to collect the debt.

Payment in full is expected upon receipt of the first post-discharge billing statement unless other acceptable arrangements are made with Avadyne Health.

If no payments are made or no payment plan is established with Avadyne Health, then the account will be transferred to an ECA within a minimum of 120 days after the first post-discharge billing statement.

The contracted ECAs with St. Anthony Regional Hospital are H&R Accounts and Automated Accounts Management System (AAMS).