

TITLE: Billing and Collection Policy

PURPOSE: UF Health Rehabilitation Hospital – North bills patients and applicable third-party payers after health care services have been provided. This policy provides clear and consistent guidelines for conducting billing and collections functions in a manner that promotes compliance, patient satisfaction and efficiency.

- Using billing statements and written correspondence, we will make diligent efforts to inform patients of their financial responsibilities and available financial assistance options, as well as follow up with patients regarding outstanding accounts.
- This policy requires us to make reasonable efforts to determine a patient's eligibility for financial assistance under our financial assistance policy before engaging in extraordinary collection actions to obtain payment.

DEFINITIONS:

- **Extraordinary Collection Actions:** A list of collection activities, as defined by the IRS and the Treasury, which health care organizations may only take against an individual to obtain payment for care *after* reasonable efforts have been made to determine whether the individual is eligible for financial assistance. These actions include reporting adverse information to credit bureaus/reporting agencies and pursuing legal/judicial actions.
- **Financial Assistance Policy:** A separate policy that describes UF Health Rehabilitation Hospital – North's financial assistance program — including the criteria patients must meet to be eligible for financial assistance as well as the process by which they may apply for assistance.
- **Reasonable Efforts:** A certain set of actions a health care organization must take to determine whether an individual is eligible for financial assistance under a financial assistance policy. In general, reasonable efforts may include making presumptive determinations of eligibility for full or partial assistance as well as providing individuals with written notifications about the FAP and application processes.
- **Application Period:** The period during which UF Health Rehabilitation Hospital – North must accept and process an application for financial assistance under its FAP submitted by an individual in order to have made reasonable efforts to determine whether the individual is eligible for financial assistance under the policy. The application period begins on the date the care is provided and ends on the later of the 240th day after the date that the first post-discharge billing statement for the care is provided, or at least 30 days after UF Health Rehabilitation Hospital – North provides the individual with a written notice that sets forth a deadline after which extraordinary collection actions may be initiated.

PROCEDURE: To establish a billing and collections policy that is in compliance with Section 501(r) of the Internal Revenue Code and the regulations promulgated thereunder. This policy was adopted by the Board of Directors in June 2016 and is reviewed each year thereafter.

I. Insurance Billing

- A. For insured patients, UF Health Rehabilitation Hospital – North will bill applicable third-party payers (based on information provided by or verified by the patient) in a timely manner.
- B. If a claim is denied or not processed by a payer due to an error on our behalf, you will not be billed for any amount in excess of what you would have owed had the payer paid the claim.
- C. If a claim is denied or not processed by a payer due to factors outside of our organization's control, staff will follow up with the payer and the patient as appropriate to facilitate resolution of the claim. If resolution does not occur after prudent follow-up efforts, UF Health Rehabilitation Hospital – North may bill you or take other actions consistent with current regulations and industry standards.

II. Patient Billing

- A. Uninsured patients will be billed directly and timely, and will receive a statement as part of the organization's normal billing process.
- B. Uninsured patients who are not eligible for financial assistance under the Financial Assistance Policy may be eligible for a self-pay discount of 45% off of UF Health Rehabilitation Hospital – North's gross charges. Any self-pay discount applied will be reversed if insurance coverage is located.
- C. The self-pay discount does not relieve nor forgive point-of-service cash payments you may be required to pay. Also, the discount will not be applied to any "cosmetic" or other elective services.
- D. If you are insured, after claims have been processed by third-party payers, UF Health Rehabilitation Hospital – North will bill you in a timely manner for the amount you are responsible for as determined by your insurance benefits.
- E. You may request an itemized statement for their accounts at any time.
- F. If you dispute your account and request documentation regarding your bill, staff members will provide the requested documentation in writing within 10 days (if possible) and will hold your account for at least 30 days before referring the account for collection.
- G. UF Health Rehabilitation Hospital – North may approve payment plan arrangements for patients who indicate they may have difficulty paying their balance in a single installment.
 - 1. The Central Billing Office has the authority to make exceptions to this policy on a case-by-case basis.

UF Health Rehabilitation Hospital – North is not required to accept patient-initiated payment arrangements and may refer accounts to a collection agency as outlined below if you are unwilling to make acceptable payment arrangements or have defaulted on an established payment plan.

III. Collections Practices

- A. In compliance with relevant laws, and in accordance with the provisions outlined in this policy, UF Health Rehabilitation Hospital – North may engage in collection activities — including extraordinary collection actions — to collect outstanding balances.
- B. General collection activities may include follow-up calls on statements.

- C. Patient balances may be referred to a third party for collection. UF Health Rehabilitation Hospital – North will maintain ownership of any debt referred to collection agencies, and patient accounts will be referred for collection only with the following caveats:
1. There is a reasonable basis to believe the patient owes the debt.
 2. Third-party payers have been properly billed, and the remaining debt is the patient's responsibility. A patient shall not be billed for any amount an insurance company is obligated to pay.
 3. UF Health Rehabilitation Hospital – North will not refer accounts for collection while a claim is still pending payer payment. However, UF Health Rehabilitation Hospital – North may classify certain claims as “denied” if such claims are in “pending” mode for an unreasonable length of time, despite efforts to facilitate resolution.
 4. Accounts will not be referred for collection where the claim denial was due to a UF Health Rehabilitation Hospital – North error. However, the patient portion of such claims may be referred for collection if unpaid.
 5. UF Health Rehabilitation Hospital – North will not refer accounts for collection where the patient has initially applied for financial assistance and the patient has not yet been notified of the decision, provided the patient has complied with the information requests delineated during the application process.

IV. Reasonable Efforts and Extraordinary Collection Actions

- A. Before engaging in extraordinary collection action(s), UF Health Rehabilitation Hospital – North must make certain reasonable efforts to determine whether an individual is eligible for financial assistance under our financial assistance policy:
1. ECAs may begin only when 120 days have passed since the first post-discharge statement was provided.
 2. We must provide the individual with a written notice that indicates financial assistance is available for eligible individuals, identify the extraordinary collection action(s) that UF Health Rehabilitation Hospital – North (or other authorized party) intends to initiate to obtain payment for your care, and state a deadline after which such collection action(s) may be initiated that is no earlier than 30 days after the date that written notice is provided.
 3. Provide a plain-language summary of the Financial Assistance Policy along with the final notice prior to the extraordinary collection action(s).
- B. After making reasonable efforts to determine financial assistance eligibility as outlined above, UF Health Rehabilitation Hospital – North (or its authorized business partners) may take any of the following extraordinary collection action(s) to obtain payment for care:
1. Report adverse information to credit reporting agencies and/or credit bureau.
 2. Attorney engagements which may or may not lead to a lawsuit.
- C. UF Health Rehabilitation Hospital – North is ultimately responsible for taking reasonable efforts to determine whether an individual is eligible for financial assistance and for deciding whether the organization may proceed with any of the extraordinary collection action(s) outlined in this policy.

V. Financial Assistance

- You will have the opportunity to contact UF Health Rehabilitation Hospital – North regarding financial assistance for your accounts, payment plan options and other applicable programs. Any self-pay or financial assistance discount applied will be reversed if insurance, TPL, a settlement and/or other miscellaneous source is identified.
- Our financial assistance policy is available in English and Spanish. Request a free copy by:
 - a. Calling (904) 427-1179.
 - b. Accessing the website via the following link:
<https://rehabhospitals.UFHealth.org/north>
 - c. Visiting in person at the following location:
UF Health Rehabilitation Hospital – North Admissions Department, 15255
Max Leggett Parkway, Jacksonville, FL 32218.

VI. Processing Financial Assistance Policy Applications

UF Health Rehabilitation Hospital – North will process applications for financial assistance in accordance with the provisions set forth below:

1. Submission of Complete Financial Assistance Policy Application:

- a. If you submit a complete application during the application period, UF Health Rehabilitation Hospital – North will:
 - i. Suspend any extraordinary collection actions against you (with respect to charges to which the financial assistance application under review relates);
 - ii. Make a determination as to whether you are eligible for assistance under the Financial Assistance Policy and notify you in writing of the eligibility determination (including, if applicable, the assistance for which you are eligible) and the basis for this determination;
 - iii. If UF Health Rehabilitation Hospital – North determines you are eligible for assistance under the Financial Assistance Policy, UF Health Rehabilitation Hospital – North Hospital will:
 - Provide you with a statement that indicates the amount you owe for your care as a Financial Assistance Policy-eligible individual (if you are eligible for assistance other than free care) and how that amount was determined and states, or describes how you can get information regarding the AGB for the care.
 - Refund to you any amount you have paid for your care (whether to the hospital facility or any other party to whom the hospital facility has referred or sold your debt for the care) that exceeds the amount you are determined to be personally responsible for paying as a Financial Assistance Policy-eligible individual, unless such excess amount is less than \$5 (or such other amount published in the Internal Revenue Bulletin).
 - Take all reasonably available measures to reverse any extraordinary collection actions (with the exception of a sale of debt) taken against you to obtain payment for your care.

- b. If, upon receiving a complete Financial Assistance Policy application from an individual whom UF Health Rehabilitation Hospital – North believes may qualify for Medicaid, UF Health Rehabilitation Hospital – North may postpone determining whether you are eligible for financial assistance under the financial assistance policy for your care until after your Medicaid application has been completed and submitted and a determination as to your Medicaid eligibility has been made.

2. Submission of Incomplete Financial Assistance Policy Application

- a. If you submit an incomplete application for financial assistance during the application period, UF Health Rehabilitation Hospital – North will:
 - i. Suspend any extraordinary collection actions against you (with respect to charges to which the financial assistance application under review relates);
 - ii. Provide you with a written notice that describes the additional information and/or documentation required under the Financial Assistance Policy or Financial Assistance Policy application form that you must submit to UF Health Rehabilitation Hospital – North Hospital to complete application for financial assistance.
- b. If you have submitted an incomplete financial assistance policy application during the application period and subsequently complete the financial assistance policy application during the application period (or, if later, within a reasonable timeframe given to respond to requests for additional information and/or documentation), you will be considered to have submitted a complete financial assistance policy application during the application period.

VII. Miscellaneous Provisions

1. **Anti-Abuse Rule** — UF Health Rehabilitation Hospital – North will not base its determination that you are not eligible for financial assistance on information that UF Health Rehabilitation Hospital – North has reason to believe is unreliable or incorrect or on information obtained from you under duress or through the use of coercive practices.
2. **No Waiver of Financial Assistance Policy Application** — UF Health Rehabilitation Hospital – North will not seek to obtain a signed waiver from you stating you do not wish to apply for assistance under the Financial Assistance Policy, or receive the information described above, in order to determine you are not eligible for financial assistance.
3. **Agreements with Other Parties** — If UF Health Rehabilitation Hospital – North sells or refers your debt related to care to another party, UF Health Rehabilitation Hospital – North will enter into a legally binding written agreement with the party that is reasonably designed to ensure that no extraordinary collection actions are taken to obtain payment for the care until reasonable efforts have been made to determine whether you are eligible for financial assistance for your care.
4. **Providing Documents Electronically** — UF Health Rehabilitation Hospital – North may provide any written notice or communication described in this policy electronically (for example, by email) to any individual who indicates he or she prefers to receive the written notice or communication electronically

VIII. Customer Service

During the billing and collections process, UF Health Rehabilitation Hospital – North will provide quality customer service by implementing the following guidelines:

1. UF Health Rehabilitation Hospital – North does not allow abusive, harassing, offensive, deceptive or misleading language or conduct by its employees.

2. UF Health Rehabilitation Hospital – North will maintain a process for patient questions and/or disputes. This information will be listed on all bills and collections statements sent.
3. After receiving a communication from a patient (by phone or in writing), UF Health Rehabilitation Hospital – North staff will return phone calls as promptly as possible (but no more than two business days after the call/correspondence was received) and will respond to written correspondence within 10 days.
4. UF Health Rehabilitation Hospital – North will maintain a log of patient complaints that will be available for audit.