Billing and Collection Policy

Policy Owner: Revenue Cycle Administration

- I. POLICY
 - A. <u>Policy.</u> It is the policy of Augusta University Health System (AUHS) and its tax-exempt subsidiaries and affiliates (collectively, "Augusta University Health") to provide medically necessary health care services to all patient's without regard to the patient's ability of pay, at each applicable Augusta University Health location (as defined below). Within limitations as established by federal and state regulations, Augusta University Health expects payment for services for amounts not otherwise covered by third party insurance or from patients eligible for full financial assistance. As such, Augusta University Health takes a number of steps through patient communication, billing statements and other actions to obtain payment for services as outlined in this Policy. Augusta University Health also provides, without discrimination, care for Emergency Medical Conditions (as defined below) to individuals without regard to such individual's ability to pay, as more specifically set forth in Augusta University Health's separate Emergency Medical Treatment & Labor Act (EMTALA) Policy #177, a copy of which can be obtained free of charge from any one of the sources or locations listed in Section III. F. of this Policy.
 - <u>Purposes.</u> The purpose of this Policy is to (a) clearly define billing and collection efforts taken by Augusta University Health to obtain payment for outstanding amounts owed by patients who are ineligible for Financial Assistance after appropriate screening and after which applicable discounts are posted accordingly, including but not limited to, Amounts Generally Billed (AGB); (b) establish acceptable payment options available to patients to make payment for outstanding balance(s) owed where by such actions prevent further collection activity; and (c) establish guidelines and general timing thresholds of billing and collection efforts including Extraordinary Collection Actions (ECA) when appropriate.
 - C. <u>Adoption of Policy</u>. The Board of Directors of Augusta University Health and each of its tax exempt subsidiaries and affiliates that provides medically necessary health care at one or more locations, has adopted the following policies and procedures for the provision of Billing and Collections.

II. DEFINITIONS

For purposes of this Policy, the terms below shall be defined as follows:

- A. **"AGB"** means the amounts generally billed by the applicable Augusta Health University location for emergency and other Medically Necessary care to individuals who have insurance covering that care, calculated using the look-back method under 26 C.F.R. § 1.501(r). Further information about calculation of AGB can be obtained from any of the sources or locations listed in Section III. K. of the Financial Assistance Policy.
- B. **"ECA"** means any extraordinary collection action taken by Augusta University Health to enforce payment or make demand for all or any part of debt, or an agent of Augusta University Health,

including and without limitation to, reporting of debt to a credit bureau through a third party debt collector or agency, judgement of debt for garnishment of wages or bank accounts, or other legal or judicial actions. No ECA action shall occur earlier than 120 days from the first post discharge billing statement.

- C. **"Financial Assistance"** means any financial assistance in the form of free or discounted care granted to an eligible individual pursuant to the Financial Assistance Policy. Qualified individuals are eligible for Financial Assistance up to 240 days after the first post discharge billing statement.
- D. **"Hospital Facility"** means a facility (whether operated directly or through a joint venture arrangement) that is required by the State of Georgia to be licensed, registered, or similarly recognized as a hospital. "Hospital Facilities" means collectively, more than one Hospital Facility. As it relates to this Policy, applicable locations include:
 - Augusta University Medical Center,
 - Augusta University Children's Hospital of Georgia,
 - Roosevelt Warm Springs Long Term Acute Care Hospital,
 - Roosevelt Warm Springs Inpatient Rehabilitation Hospital.
- E. **"Policy"** means this "Billing and Collection Policy" of Augusta University Health, as amended from time to time.
- F. **"Prompt Pay Discount"** means patients with amounts owed who are ineligible for full Financial Assistance (FAP) are eligible for a ten (10%) percent discount, excluding copay, if payment is made within five (5) business days after the date of service. This discount is an administrative adjustment and is not considered financial assistance.
- G. **"Uninsured"** means a patient of an Augusta University Health Hospital Facility or Provider who has not level of insurance, third party assistance, medical savings account, or claims against one or more third parties covered by insurance, to pay or assist with such individual's payment obligations for the provision of Eligible Services. A patient with Out-of-Network coverage is not considered Uninsured for purposes of this Policy.

III. PROCEDURES

A. <u>Billing.</u> Account balances owed by patients after third party insurance payment for amounts related to deductible, coinsurance, copay, non-covered or otherwise allowable for patient billing by insurance including Uninsured patients ineligible for financial assistance, are billed uniformly regardless of insurance coverage type, i.e., Medicare or Commercial. Each billing statement contains information including but not limited to Payment Options, plain language summary

information on Financial Assistance, telephone number for Customer Service of (706)721-2961 to obtain copies of the Financial Assistance Policy and website

https://www.augustahealth.org/patient-family-information/financial-assistance/financialassistance-policy for questions or additional information. A plain language summary of Financial Assistance shall be given to patients during admission or discharge. Notice of potential ECA is given only after all billing statement cycles are complete. The following table shows Augusta University Health's internal billing statement cycles before any account balance is subject to ECA.

Billing Statement Cycle	Days From Post Discharge Billing	ECA?
Statement Cycle		
1	30 days	No
2	60 days	No
3	90 days	Final Notice of possible ECA.
4	120 days	Returned to AUH and referred to
		collection agency or processed as
		Presumptive Charity.

Patients may apply for Financial Assistance at any time during Augusta University Health's billing statement cycle. When this occurs, further billing statements are held and all activity to collect balances owed is likewise held until which time final disposition of Financial Assistance is determined, usually within thirty (30) days.

- B. <u>Collections.</u> Delinquent account balances owed by patients after third party insurance for amounts related to deductible, coinsurance, copay, non-covered or other allowed for patient billing by insurance including Uninsured patients ineligible for financial assistance, are referred to one of two external collection agencies based on the patient's last name. Each external collection agency is required to comply with, and acting in such a manner consistent with all federal and state regulations, Augusta University Health's Financial Assistance Policy and this Policy. Augusta University Health does not refer, sell or transfer ownership of any individual account balance to any third party debt purchasing company nor allows for charging of interest against delinquent account balances. Notwithstanding as stated, Augusta University Health gives consent and authorization to external collection agencies the following ECA's only after a minimum of 120 days from the first billing statement:
 - 1. Reporting of debt to credit bureaus after at least a thirty (30) day notice of ECA.
 - Garnishment of tax refunds applicable to South Carolina residents only and in accordance with the Setoff Debt and GEAR Collection Programs through the South Carolina Association of Counties and South Carolina law.
 - 3. ECA's such as liens on property and garnishment of wages are permitted only after (1) written authorization is granted by Augusta University Health, (2) verification FAP plain language summary was provided and communicated upon discharge, (3) all billing statements were provided and documented and (4) at least one notice of potential ECA was provided.

- 4. ECA's to seize individual bank accounts, actions that may lead to individual arrest or writ of body attachment are strictly prohibited.
- 5. As related to collection of account balances and any potential qualifying ECA's, each account balance is evaluated and managed separately.
- C. <u>Financial Assistance.</u> At any time during the Billing and Collections process or up to 240 days from the post discharge billing statement date without limitation above, individuals may apply for Financial Assistance at which time Augusta University Health will suspend all collection activity, including any ECA's, until the application is approved or denied. If Financial Assistance is approved, all ECA's are to be canceled or reversed and refund of amounts ultimately determined to be patient payments. Individuals approved or denied for Financial Assistance, or have incomplete applications are notified by letter or contacted by Customer Service of the determination. All associated account activity shall be documented and retained for review and audit for compliance to Policy.
- D. <u>Payment Plans.</u> Augusta University Health as a means to offer payment options to resolve account balances, shall extend internally managed monthly payment plans with equal payment installments up to six (6) months without interest. Individuals requiring longer periods to resolve account balances, may choose Augusta University Health's patient financing program offered by a third party. Payment options including information about payment plans is communicated by website, billing statements, and by contacting Customer Service at (706)721-2961.
- E. <u>Bankruptcy.</u> Upon notice of Bankruptcy, Augusta University Health shall stop all collection activity and ECA's, document account(s) and post the applicable adjustment code equal to the remaining balance.
- F. <u>Sources of Additional Information</u>. Copies of this Policy, the AGB calculation, Financial Assistance Policy, Financial Assistance Application, and the EMTALA Policy, may be obtained from or at any one or more of the following sources or locations:
 - 1. Any Customer Service, Patient Access, Patient Registration or Front Desk areas at any Augusta University Health Facility;
 - 2. Emergency Department and admission areas;
 - 3. By calling Augusta University Health Customer Service at (706)721-2961; and
 - 4. Augusta University Health's website at www.augustahealth.org.