FY16 Credit & Collection and Financial Assistance Policy
Summary of Changes

To conform to HSN and IRS regulations, our single Credit and Collection policy is now two distinct policies – Credit and Collection and Financial Assistance Policy. There were minimal changes to credit and collection requirements and significant changes to financial assistance.

Most notably –

Credit & Collection Policy – Actual policy has gone from 30 pages to 9 pages as the financial assistance components were moved to a separate policy. There is no change in services that are covered or the 120 day requirement. The most notable change is clear definition of Extraordinary Collection Efforts, i.e. liens, wage garnishment, etc… We do not engage in extraordinary collection efforts.

Financial Assistance Policy – We have developed a comprehensive Financial Assistance Policy (FAP) that was derived from both the IRS 501r regulations and MHA guidance. The policy adheres to federal and state regulations. There are no residency restrictions and the policy applies to medically necessary services only. As required, George developed an Amount Generally Billed (AGB) using blend of Medicare and all commercial payer rates which is 51%. We are using this to reduce patient charges for qualified applicants. Patients whose adjusted gross income is 200% or less of the FPL will receive a 100% discount, and patients whose adjusted gross income is between 201% - 300% of the FPL will receive a 50% discount. Patients who qualify for medical hardship based on medical bills =/> 25% of gross income will receive a 65% reduction. There are very specific requirements for applying for our FAP, and that is only after a patient has applied for state/federal assistance and been denied. As such FAP becomes the payer of last resort. The policy must be widely publicized – website, sent to patients with bills, etc.... The policy must be translated to the lesser of - any language that is the primary language of 5% of our patient population or 1,000 people. As a result our policy and corresponding documents have been translated into 8 different languages.

The policies are due to the state of 9/8/16 and must be available on our website shortly thereafter.