# Oklahoma Heart Hospital System Billing and Collection Policy

## **Billing and Collection Policy**

### **PURPOSE:**

This policy applies to the Oklahoma Heart Hospital and its Physicians, together with our Financial Assistance Policy, and 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 there under. This policy establishes the actions that may be taken in the event of nonpayment for medical care provided by OHH and OHH Physicians, including but not limited to extraordinary collection actions (ECA). The guiding principles behind this policy are to treat all patients and Individual(s)'s Responsible equally with dignity and respect and to ensure appropriate billing and collection procedures are uniformly followed and to ensure that reasonable efforts are made to determine whether the Individual(s) Responsible for payment of all or a portion of a patient account is eligible for assistance under the Financial Assistance Policy.

#### **POLICY:**

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

- 1. OHH will not engage in ECAs, either directly or by any debt collection agency or other party to which the hospital 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.
- 2. Notice of the FAP and all applicable documents are available on the Oklahoma Heart Hospital website at <a href="https://www.okheart.com">www.okheart.com</a> or paper copies can be requested at all Hospital locations.
- 3. 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 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 limited to:
  - a. An accurate summary of the hospital services covered by the statement
  - b. The charges for such services
  - c. 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)
  - d. 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.
- 4. 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 statements must be provided to the Responsible Individual(s) at least 30 days before the deadline specified in the statement. 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.
- 5. Prior to initiation of any ECAs, an oral attempt will be 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.
- 6. ECAs may be commenced as follows:
  - a. If any Responsible Individual(s) fails to apply for financial assistance under the FAP by 120 days after the first post discharge statement, and the Responsible Parties have received a statement with a Billing Deadline described above, then OHH or its contracted collection agency may initiate ECAs.
  - b. 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 initiated until after each of the following steps has been completed: a. The OHH System Business Office 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. OHH System Business Office provides the Responsible Individual(s) with at least 30 days' prior written notice of the ECAs that OHH or its contracted collection agency may initiate against the Responsible Individual(s) if the FAP application is not

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completed or payment is not made; provided, however, that the Completion Deadline for payment may not be set prior to 120 days after the first post discharge statement. c. If the Responsible Individual(s) who has submitted the incomplete application completes the application for financial assistance, and the OHH System Business Office determines definitively that the Responsible Individual(s) is ineligible for any financial assistance under the FAP, OHH will inform the Responsible Individual(s) in writing the denial and include a 30 days' prior written notice of the ECAs that OHH or its contracted collection agency may initiate against the Responsible Individual(s); provided, however, that the Billing Deadline may not be set prior to 120 days after the first post discharge statement. d. 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.

- c. 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, OHH will suspend ECAs while such financial assistance application is pending.
- d. After the commencement of ECAs is permitted, 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 of the OHH System Business Office shall be required before initial lawsuits may be initiated. OHH and its 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.

### **Policy Availability:**

Contact the OHH System Business Office at 405-608-1200 for information regarding eligibility or the programs that may be available to you, to request a copy of the FAP, FAP application form, or Collection Policy to be mailed to you, or if you need any of the mentioned documents translated to Spanish. All applicable information in both English and Spanish are available on our website at <a href="https://www.okheart.com">www.okheart.com</a> or in person at our OHH Systems Business Office located at 7800 N.W. 85<sup>th</sup> Terrace, Suite 200 Oklahoma City OK, 73132-3385.