



Greenwood Leflore Hospital
www.glh.org

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BILLING AND COLLECTIONS POLICY

Purpose:

To ensure that Greenwood Leflore Hospital (“Hospital”) bills and collects from patients in compliance with Internal Revenue Code Section 501(r) and its implementing regulations and requirements.

Definitions:

1. “Extraordinary Collection Actions (‘ECA’)” include the following actions that Hospital may take related to obtaining payment of a bill for medical care:
 - a. Selling an individual’s debt to another party;
 - b. Reporting adverse information about the individual to consumer credit reporting agencies or credit bureaus;
 - c. Deferring, denying, or requiring a payment before providing medically necessary care because of an individual’s non-payment of one or more bills for previously provided care that may be eligible for financial assistance; and/or
 - d. Actions that require a legal or judicial process, including liens, foreclosures, attachments, seizures, civil actions, arrests, writs of body attachment, or garnishments.
2. “Application Period” means the period during which Hospital must accept and process an application for financial assistance. The Application Period begins on the date Hospital provides the first billing statement to the patient and ends two hundred and forty (240) days thereafter, unless Hospital extends this time period for patients to submit information and documents required for an incomplete application submitted during the Application Period.

Procedure:

1. Collection letters/statements will be sent out when the patient’s responsibility is determined.
2. Patient accounts will be referred to an “early out” collection agency forty-five (45) days after the first collection letter/statement.

3. Accounts will be managed by the early-out agency for a minimum of ninety (90) days before being returned to Hospital. The agency may contact the patient by telephone or in writing to collect the past due amount. The “early out” agency will not engage in any ECAs against the patient.
4. Hospital will not undertake any ECA against an individual prior to undertaking reasonable efforts to determine whether an individual is eligible for assistance under Hospital’s Financial Assistance Policy (“FAP”). The Hospital Business Office is responsible for determining whether Hospital has made reasonable efforts (as described below) to determine whether an individual is FAP-eligible before engaging in any ECAs against the individual.
5. Hospital shall make the following reasonable efforts to determine whether an individual is eligible for assistance under its FAP before engaging in an ECA to obtain payment:
 - a. Hospital shall wait a minimum of one hundred and twenty (120) days from the date of the patient’s first post-discharge billing statement to initiate an ECA; and
 - b. Hospital shall notify the patient in writing at least thirty (30) days prior to commencing an ECA. Such notification shall include a copy of Hospital’s FAP Summary and state that financial assistance is available for eligible individuals, identify the ECA(s) that Hospital intends to pursue, and state a deadline after which ECA(s) may be initiated that is no earlier than thirty (30) days after the date that the written notice is provided. Hospital shall also make a reasonable effort to orally notify the patient about Hospital’s FAP and about how the individual may obtain assistance with the FAP application process prior to initiating an ECA.
6. If an incomplete financial assistance application is received during the two hundred and forty (240) day Application Period, Hospital shall:
 - a. Suspend any pending ECAs pending a determination of whether the individual is eligible for assistance under the FAP;
 - b. Provide a written notice to the applicant that describes the additional information or documents required under the FAP, provide a reasonable deadline to complete the application, and provide the telephone number and physical location of the Hospital office or department that can provide information about the FAP, and provide assistance in applying; and
 - c. Process the application, if the application is timely completed during the two hundred and forty (240) day Application Period or, if later, within the reasonable extended time period Hospital gives to submit missing information or documents.
7. If a complete application is received during the two hundred and forty (240) day Application Period, including any extended time period Hospital gives to supplement an incomplete application, Hospital will take the following actions:
 - a. Suspend any pending ECAs pending a determination of whether the individual is eligible for assistance under the FAP; and

- b. Make a determination of eligibility for assistance and notify the applicant in writing of the eligibility determination.