

Policy Name: Billing and Collections Policy
Policy Owner: Revenue Cycle
Policy Approval Entities: Mary Free Bed Rehabilitation Center Board of Trustees
Original/Revised Date: Revised 5/2017
Last Reviewed:

Scope of Policy

- Applies to all listed below:**
- Limited to those specified:**
 - Mary Free Bed Rehabilitation Hospital
 - MFB Outpatient Services
 - MFB Orthotics & Prosthetics + Bionics
 - All MFB Service Locations
 - All Medical Staff
 - MFB Medical Group
 - MFB Network Employees
 - Department/Service/Other (specify):

I. Purpose

Mary Free Bed Rehabilitation Hospital’s (MFB) mission is to restore independence, hope, and freedom through rehabilitation to people with disabilities. Mary Free Bed strives to provide people with disabilities the opportunity to achieve independence through rehabilitation regardless of a person’s ability to pay for such medically necessary services. This billing and collection policy is consistent with the MFB mission. It is intended to comply with applicable federal and Michigan laws.

II. Definitions

A. **Collection Actions:** Actions that may be taken by MFB, or a third party acting on behalf of MFB, that require legal or judicial process.

B. **Community Financial Aid:** Assistance provided to applicants meeting MFB’s established criteria to relieve them of all or part of their financial obligation for medically necessary care provided by MFB. Find Mary Free Bed’s Financial Assistance Policy here: www.maryfreebed.com/financial-assistance/

C. **Payment Plan:** An interest-free payment plan that is agreed to by both MFB and the patient, or patient’s guarantor, for out-of-pocket fees.

D. **Self-Pay Accounts:** Accounts receivable that patients, or their guarantors, are obligated to pay directly to MFB. These may include balances due from uninsured patients, insurance deductible and copayments or amounts due after insurance claims have been paid, or balances due after adjustments have been made in accordance to the MFB Community Financial Aid policy.

III. Policy

Under this policy, no extraordinary collection actions will be pursued against a patient, or patient guarantor, before reasonable efforts have been made to determine whether the patient, or patient guarantor, is eligible for assistance under the MFB Community Financial Aid policy.

Mary Free Bed provides access to care and financial aid without regard to race, gender, national origin, handicap, age, HIV status, sexual orientation, religious beliefs, or source of payment.

This policy and the MFB Community Financial Aid policy serve as the basis for collection practices for patient accounts, such as:

- 1) Resolution of patient payment obligations
- 2) Assistance with application for financial aid

Pre-determined out-of-pocket expenses are payable at or prior to service. If this is not feasible, Mary Free Bed will assist patients with payment arrangements and/or financial assistance requirements.

Mary Free Bed Rehabilitation Hospital will obtain insurance information from the patient, or patient guarantor, in order to bill the primary, secondary and tertiary insurance. Patients, or their guarantors, must cooperate and provide complete and accurate insurance information.

Mary Free Bed will bill the patient's insurance company based on the assignment of benefits authorization signed by the patient/guarantor.

Mary Free Bed will inform patients, or patient guarantors, of the process by which they may question or dispute any bill they believe to be inaccurate. All disputes or billing inquiries will be responded to within five working days after receipt. Collection activities will be discontinued during the dispute resolution process.

Self-pay accounts will not be subject to bad debt collection actions within 120 days of issuing the initial patient invoice and without first making reasonable efforts to determine whether that patient is eligible for Community Financial Aid.

Collection agencies may be used in pursuing payment for patient self-pay balances. The MFB policy does not allow harassing, abusive, oppressive, false, deceptive or misleading language or conduct to be used by its collection agencies responsible for collecting outstanding patient self-pay accounts.

All collection agencies working on behalf of MFB will have in place a written contract that will specify that their collection processes must conform to MFB policies and applicable federal and Michigan laws. A copy of the MFB Billing and Collection and Community Financial Aid Policies will be provided to collection agencies working with MFB self-pay accounts to assure compliance.

Legal action may be utilized by the collection agencies authorized by MFB to collect patient self-pay balances. These actions may be initiated against a patient, or patient guarantor, for non-payment of a MFB self-pay account.

If a legal judgment is obtained, Mary Free Bed and its collection agencies may pursue the post judgment remedies of periodic garnishment, also known as wage garnishment, and non-period garnishment, also known as bank or tax garnishment. Liens on insurance settlements associated with the medical treatment provided by MFB, for which there is an outstanding balance, may also be pursued. Mary Free Bed and its collection agencies will not pursue the post judgment remedies of judgment liens against real property or personal property executions. Mary Free Bed authorizes its collection agencies to report information on patient self-pay accounts to consumer credit reporting agencies.

Third party collection agencies working on behalf of MFB will be monitored to assure compliance with the MFB Community Financial Aid and Billing/Collection policies. Regular audits are performed on accounts. Patient, or guarantor, complaints will be tracked and monitored on a regular basis.

It is the policy of MFB to protect the confidentiality of each patient, or patient guarantor, regarding financial information and the handling of personal health information.

Any abusive, harassing, misleading language or improper collections conduct by MFB employees or collection agency staff will be subject to corrective action.

Mary Free Bed Rehabilitation Hospital will comply with all federal and Michigan laws rules and regulations and reporting requirements that may apply to activities conducted pursuant this policy. Information on the billing and collection practices provided under this policy will be reported annually on the IRS Form 990 Schedule H.

Procedure

Billing and Collections procedures are outlined in detail in the MFB Billing and Collections procedure manual. This manual identifies the billing and collection processes that are shared by, and individual to, each department.

Title/Committee	Date Approval	Revision Comments (3 years of revisions)