

## Billing and Collection Policy

Minnesota's "Debt Fairness Act"

- MN Stat 62J: Affecting all Minnesota-based healthcare providers.
- MN Stat 332C: Affecting all Minnesota residents with medical debt.

The goal of this policy to provide clear and consistent guidelines for conducting billing and collections functions in a manner that promotes compliance, patient satisfaction, and efficiency.

### **GUIDELINES/DEFINITIONS:**

**Billing error:** means an error in a bill from a health care provider to a patient for health treatment or services that affects the amount owed by the patient according to that bill. Billing errors include but are not limited to miscoding of a health treatment or service, an error in whether a health treatment or service is covered under the patient's health plan, or an error in determining the cost-sharing balance owed by the patient.

### **POLICY/PROCEDURE:**

Consulting Radiologists, Ltd. shall publicly publish this collection policy by clearly posting it on our website and making it available to any individual who requests a copy.

After our patients have received services, it is the policy of Consulting Radiologists, Ltd. and its employed providers, collectively "Consulting Radiologists, Ltd.", to bill patients and applicable payers accurately and in a timely manner. During this billing and collection process, staff will provide quality customer service and timely follow-up, and all outstanding accounts will be handled in accordance with federal and state statutes.

### **Patient Billing**

- A. All uninsured patients will be billed directly and in a timely manner, and they will receive an itemized statement as part of the Consulting Radiologists, Ltd.'s normal billing process.
- B. For insured patients, after claims have been processed by third-party payers, Consulting Radiologists, Ltd. will bill patients in a timely manner for their respective liability amounts as determined by their insurance benefits.
- C. Consulting Radiologists, Ltd. shall include the following disclosure when initially contacting a Minnesota debtor by mail to collect a medical debt in a type size or font which is equal to or larger than the largest other type size or font used in the text of the notice:  
  
*"If you feel that your billing questions have not been addressed, please contact Consulting Radiologists first at 612-573-2200 and allow us the opportunity to address those concerns. If you continue to have unresolved concerns, you may contact the Minnesota Attorney General's Office by telephone at 651-296-3353 or 1-800-657-3787. You have the right to hire your own attorney to represent you in this matter."*
- D. Consulting Radiologists, Ltd. will make diligent efforts to inform patients regarding their outstanding balance through correspondence, which may include billing statements, written correspondence, email, text messages, chat bots, and/or phone calls. For the patient's convenience, these methods may include automated telephone dialing systems or an artificial or prerecorded voice. The patient or recipient may opt-out of a communication method by

discontinuing communication through such channel and following the opt-out procedures associated with the communication channel or contacting the business office directly. If the patient or recipient opts-out of a communication method, their record shall be updated to reflect their communication preference and further communication through the channel shall be ceased. If an account has been referred to a third party for collection or legal action, patient communication may be referred through that third party entity.

- E. All patients may request an itemized statement of their account at any time.
- F. If a patient disputes their account and requests documentation regarding the bill, staff members will address their concern, provide the requested documentation, and hold the account for at least 30 days before resuming billing or collection efforts.
- G. If Consulting Radiologists, Ltd. determines or receives notice that a bill may contain billing errors:
  - a. Consulting Radiologists, Ltd. will review and correct any billing errors found. During the review, Consulting Radiologists, Ltd. will not bill the patient for any service subject to the review.
  - b. Consulting Radiologists, Ltd. or the patient's health plan company will notify the patient within 30 days of the potential billing error, including Consulting Radiologists, Ltd.'s obligation to review and fix any billing error found and not to bill for any services subject to review.
  - c. Upon completion of the review and correction of any billing errors, Consulting Radiologists, Ltd. or their health plan company will notify the patient of the review results and refund any overpayments before continuing with patient billing for those services.
- H. Consulting Radiologists, Ltd. will not deny medically necessary health treatments or services due to an outstanding patient balance. For any outstanding patient balance, Consulting Radiologists, Ltd. will request the patient to enroll in a reasonable payment plan.
- I. Consulting Radiologists, Ltd. may approve payment plan arrangements for patients who indicate they may have difficulty paying their balance in a single installment.
  - a. Reasonable payment plans may take into account any information disclosed by the patient regarding the patient's ability to pay, provided the patient has supplied reasonable verification of their inability to pay the full amount of the debt in one payment. If the patient is unable to make all or part of the agreed-upon installment payments, the patient must communicate their situation to Consulting Radiologists, Ltd. and must negotiate a reasonable resolution.
  - b. Patient Billing Manager has the authority to make exceptions to this policy on a case-by-case basis for special circumstances.
  - c. Consulting Radiologists, Ltd. is not required to accept patient-initiated payment arrangements and may refer accounts to a collection agency as outlined below if the patient is unwilling to make acceptable payment arrangements, has defaulted on an established payment plan, or fails to communicate their financial situation with an accompanying affordable payment.
- J. Any overpayment will be refunded upon the patient request or the conclusion of a billing error review. Otherwise, overpayments of \$1.00 or more will be refunded. If approved, the refund will be issued within 30 days. Any overpayment, uncashed refund check, or other credit not

sufficiently resolved will follow the Unclaimed Funds program of the patient's state and such funds will be remitted to state entities for the patient to claim at a later date.

### **Collections Practices**

- A. In compliance with relevant state and federal laws, Consulting Radiologists, Ltd. may engage in collection activities to collect on delinquent patient balances using methods mentioned above.
- B. Patient balances may be referred to a third party for collection or legal action at the discretion of Consulting Radiologists, Ltd. Consulting Radiologists, Ltd. will maintain ownership of any debt referred to a third party for collections. Accounts will be referred for collections or legal action only with the following caveats:
  - a. There is a reasonable basis to believe the patient owes the debt.
  - b. All known third-party payors have been properly billed by Consulting Radiologists, Ltd., such that any remaining debt is the financial responsibility of the patient, and Consulting Radiologists, Ltd. will not bill the patient for any amount that an insurance company is obligated to pay;
  - c. Consulting Radiologists, Ltd. has offered the patient a reasonable payment plan where the patient has indicated an inability to pay the full amount of the debt in one payment.
- C. Collection activity on the account may continue until:
  - a. Paid or settled in full,
  - b. Notification and discharged from bankruptcy,
  - c. Notification and closure of the estate through probate,
  - d. Detection and verification of fraud or identity theft,
  - e. Upon return of accounts from the collection agency,
  - f. The statute of limitations for legal actions has expired, or
  - g. At the discretion of Consulting Radiologists, Ltd.

### **Customer Service**

- A. During the billing and collection process, Consulting Radiologists, Ltd. will provide quality customer service by implementing the following guidelines:
  - a. Consulting Radiologists, Ltd. will enforce a zero tolerance standard for abusive, harassing, offensive, deceptive, or misleading language or conduct by its employees.
  - b. Consulting Radiologists, Ltd. will maintain a streamlined process for patient questions and/or disputes. Contact information will remain listed on all patient bills and collection statements sent.
  - c. After receiving a communication from a patient by phone or in writing, Consulting Radiologists, Ltd. staff will return phone calls to patients as promptly as possible after the call was received.
  - d. Consulting Radiologists, Ltd. shall not exercise any actions that would be considered prohibited by any state or federal law in the process of collecting medical debt.