POLICY

It is policy of Salus Behavioral Health ("Salus") to collect or attempt to collect all co-payments and/or deductible amounts owed for the provision of medical services and to be in compliance with federal and state statutes with govern such practices.

PROCEDURE

It is unlawful to routinely waive/fail to collect or discount co-payments, deductibles, coinsurance or other patient responsibility payments per the federal false claims act, many state false claims acts, federal anti-kickback statutes, and state and federal insurance fraud laws. It is also in violation of many managed care contracts. Salus will not waive or reduce a patient’s obligation to pay co-payments and/or deductible amounts owed for the provision of medical services, with a few exceptions described below. This policy applies to patients who are covered by any third party payor (whether governmental or private).

Salus will allow waiver or reduction of co-insurance or deductible amounts in the following situations:

1. Salus will waive a patient’s co-pay and/or deductible if Salus receives written confirmation from a skilled nursing facility that the skilled nursing facility has determined that the waiver is appropriate under its charitable or financial indigency policies.
2. Salus will waive a patient’s co-pay and/or deductible, on a case-by-case basis, when the cost of billing and collection of the debt would exceed, or be disproportionate to, the amount to be collected.
3. Salus will waive a patient’s co-pay and/or deductible in the event Salus decides to apply a no charges and discounts policy equally to all payors for a particular patient. The “no charges” and discounts must be granted on a case-by-case basis and not across entire groups of individuals, such as physicians’ families. If Salus desires to provide a discount to the patient under this exception, then all payors that the patient is covered by must receive the same discount. For example, if Salus wants the patient to pay nothing, then no insurance or government payor would be billed. The patient’s charges would be written-off to $0. If Salus wants to give the patient a 75% discount, then all payors for that patient should receive a 75% discount.
4. It is not acceptable to waive or reduce co-pay and/or deductible amounts if there was not a reasonable effort made to collect a patient’s balance or if the waiver or reduction involves applying the discount to a patient’s balance without also providing the same discount to all other payors.

Salus shall follow the following procedures with respect to waiver or reduction of co-pay and/or deductible amounts:
1. Decisions to waive a patient’s co-pay and/or deductible should be made on a case-by-case basis and not be based on a specific group of patients for reasons unrelated to indigency.

2. Salus shall not offer any waiver of co-pays or deductibles to potential patients or to facilities with which it wishes to contract for the provision of services.

3. Salus shall not advertise to facilities with which it wished to contract that “patients will incur no out-of-pocket expenses” or that “Medicare or private insurance is accepted as payment in full”.

4. Salus shall not advertise the availability of waivers or reductions of co-pays and deductibles in any way, except to advise individual patients, patient family members responsible for the financial matters of the patient or facility administrators of the limited availability of such waivers upon inquiry.

5. Salus shall not charge Medicare beneficiaries higher amounts than those made to other persons for similar services.

6. If a patient’s, patient family members responsible for the financial matters of the patient or a facility administrators requests Salus to waive or reduce a patient’s co-pay or deductible, request must be made such that the entire bill be reduced by the same percentage for all payors.

7. Salus can only waive a patient’s co-pay or deductible due to financial hardship if written confirmation is received from the facility where the patient is currently admitted that the patient is indigent.

8. Salus must follow its standard collection procedures for all patient accounts. The patient’s balance may be waived or reduced when they reach bad debt status.

9. It is acceptable to write-off all patient balances after reasonable collection efforts have been made. Also, the cost of collecting patient balances may be written-off if the balance would exceed the amount collected.