Due Diligence Performed Across Industry:

- The American Collection Agency and HFMA have been mostly silent on this topic. HFMA states to focus efforts on existing financial assistance and account resolution policies, to ensure everyone who is eligible for financial assistance is receiving it.
- Two Health Systems we contacted are manually placing accounts on hold from collection practices, when the patient discloses a financial hardship related to COVID-19.
- Two Health Systems we contacted in Ohio have temporarily suspended outbound collection activities from their Bad Debt vendors.

Recommendation:

In response to the National Emergency declared on March 13, 2020, related to COVID-19, Trinity Health will adjust follow-up collection practices on outstanding patient responsibility balances. Recognizing the anticipated material impact to many of the communities that we serve, we are prepared to make the following revisions to our patient collection practice through April 30, 2020.

- Continue to send referral files to our Early-Out and Bad Debt vendors as normal.
- Early-Out to continue outbound calls with a focus on assessing financial assistance eligibility for patients that are unable to pay their balance (charity; 0% loan program, etc.). Scripting would be softened as we navigate through this crisis.
- Bad Debt vendors will suspend all outbound collections activities as we continue to evaluate options.
- Suspend sending accounts to the credit bureau.
- Evaluate need for additional customer service support and move collections / out-bound call staff from the Bad Debt vendors to support intake calls where needed.
• Extend payment plans on a case by case basis

This guideline applies to all patient responsibility balances, loan programs, early out placements, and bad debt placements.

**Summary of Current Plan for Front-End:**