

CareForum 2022

The WellSky® Conference

Patient Communication Trends and Collection Law Changes

Bruce Gehring, Allegiance Group

Dan Rabin, Berman & Rabin

Diane Poole, WellSky

9/8/2022

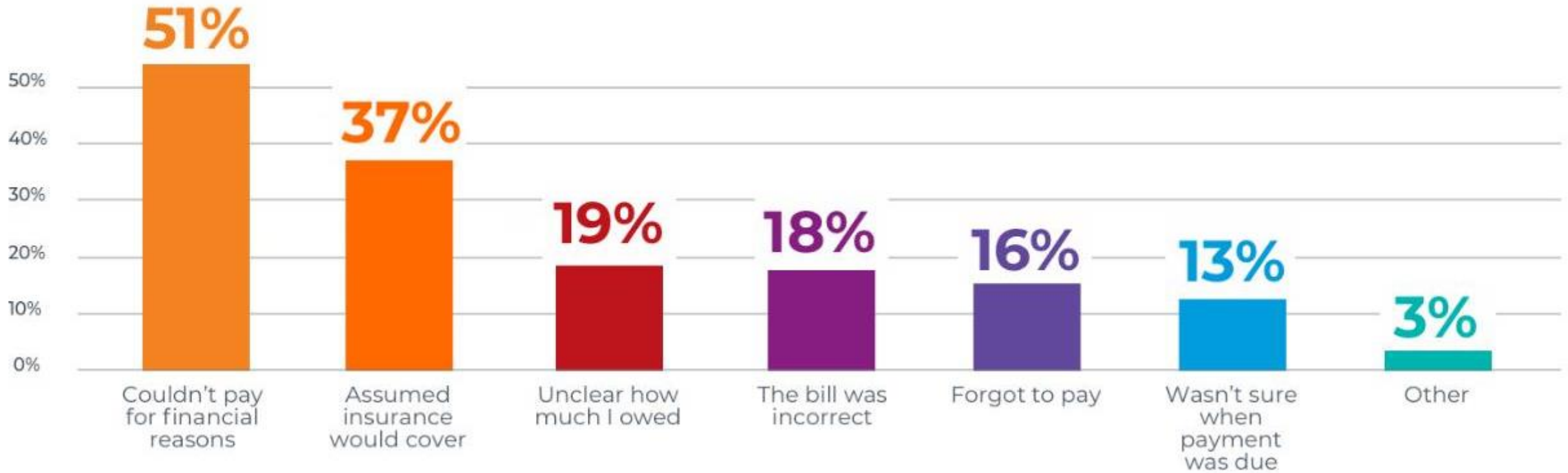
Decorative geometric shapes in teal, dark blue, and orange on the right side of the slide.

Agenda

- Understanding why patients don't pay
- Reaching your patients to drive interaction and payment
- Collecting accounts before they go past due
- Pursuing patients who don't pay
- Incorporating the collection law & CBR changes
- Utilizing an attorney

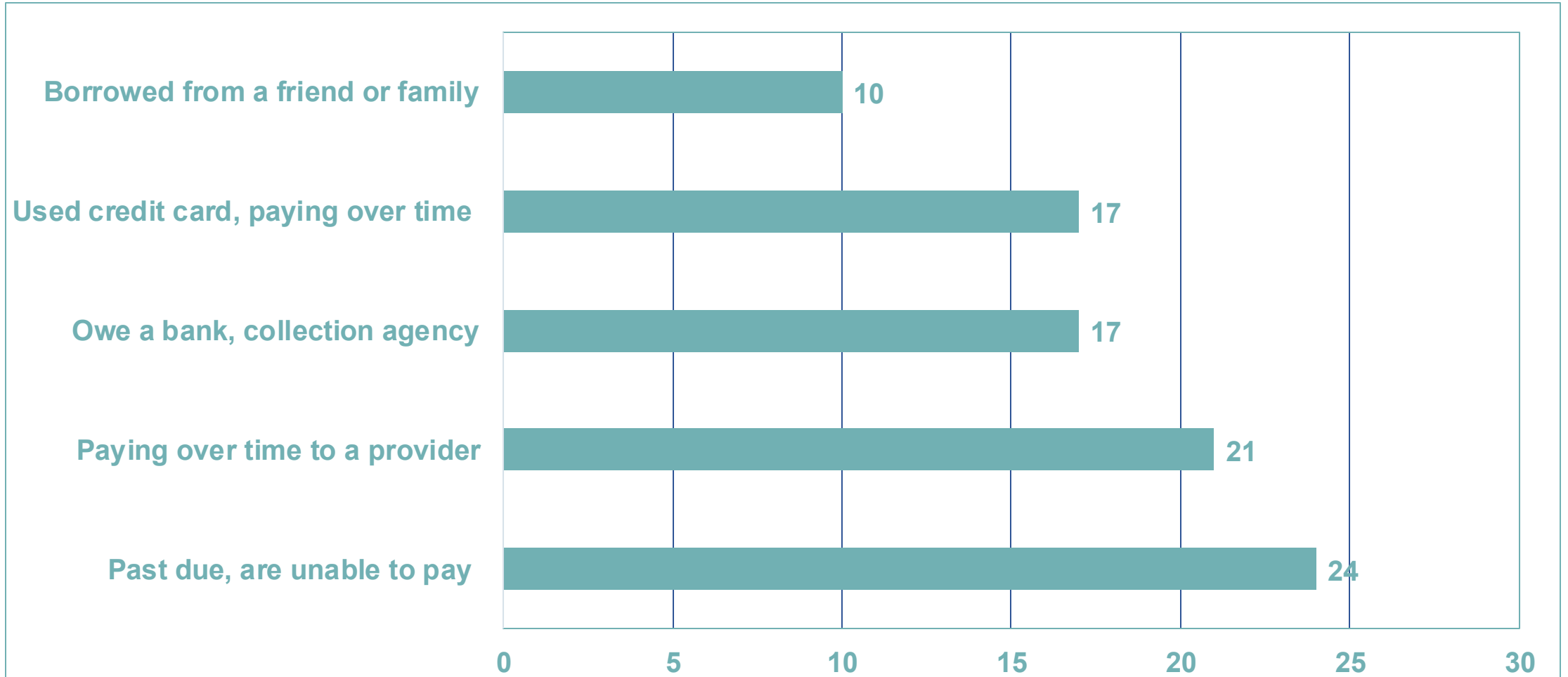
Understanding why patients don't pay

Why consumers are late on a medical bill?



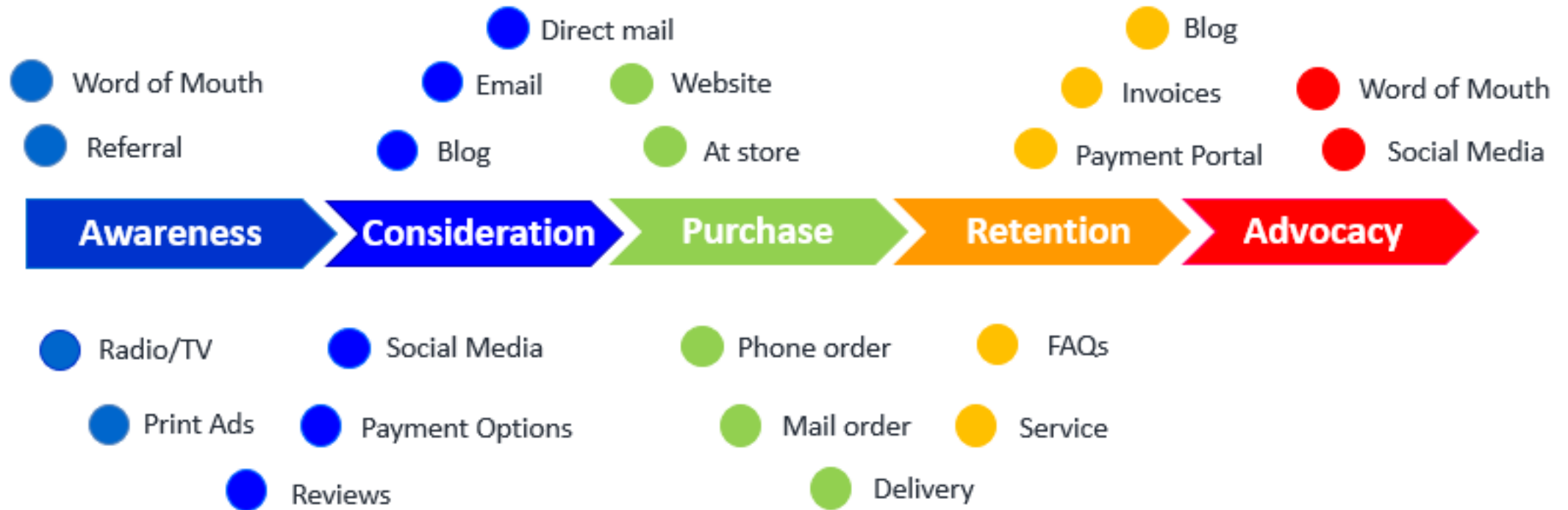
Source: Discover

4 in 10 adults currently have debt due to medical bills

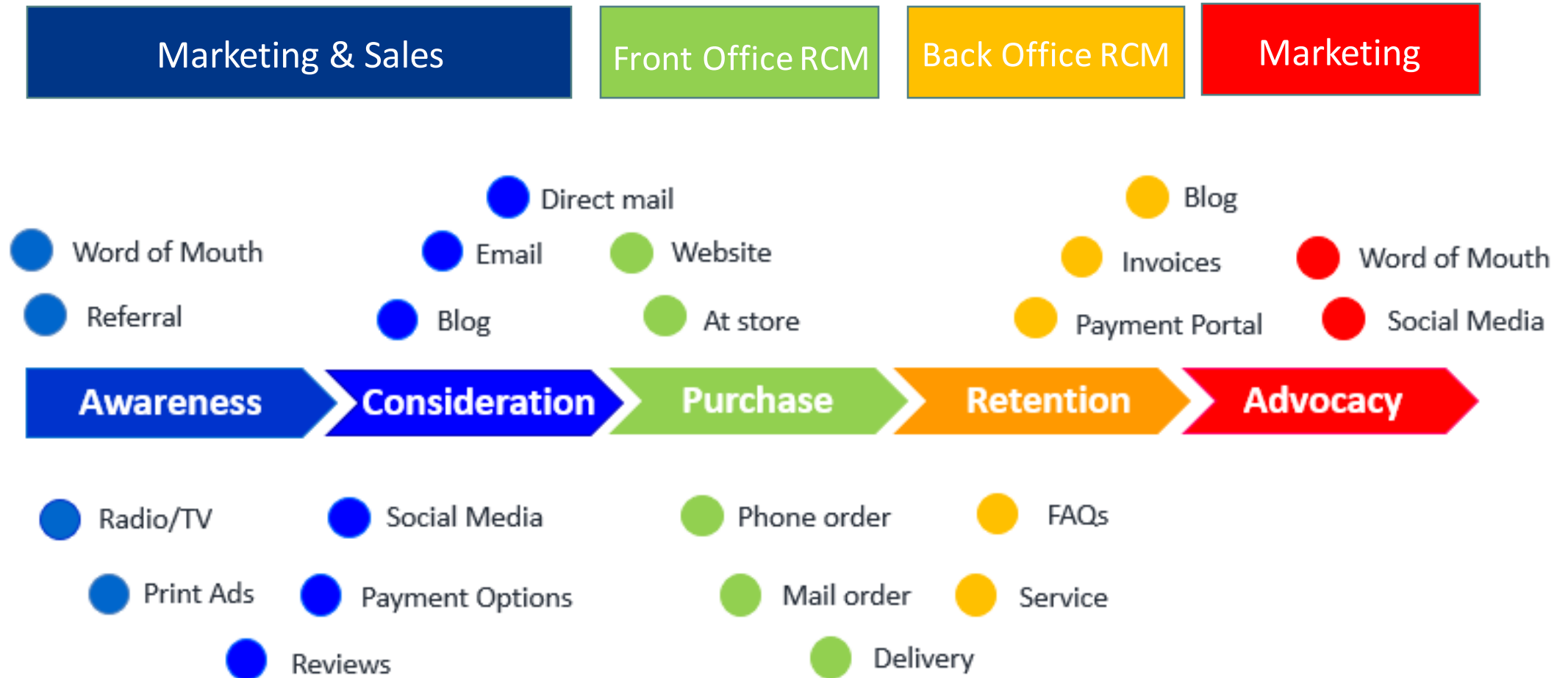


Reaching your patients to drive
interaction and payment

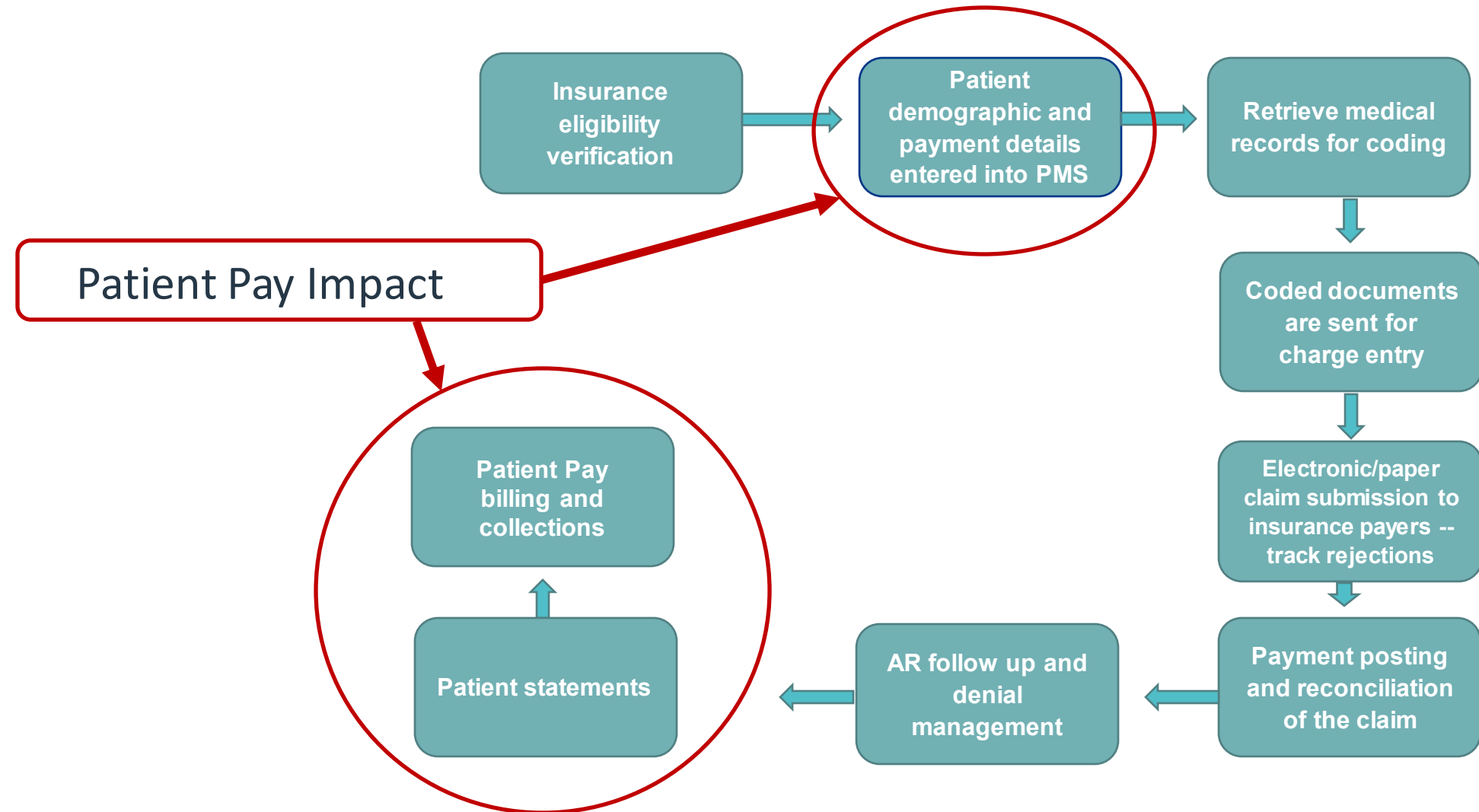
Patient journey



Business function vs. patient journey



Patient pay sweet spot – healthcare RCM



What to communicate

- Key Messaging
 - Align messaging with your value proposition
 - What clients need to know
 - Easy to understand, avoid jargon
 - Adapt to your target audience

How to reach your prospects and customers

Channels

Billing Actions

Booth

Company Events

Conversations with Rep

Customer Support

Channels

Digital Marketing

Content

E-commerce

Follow-up

Correspondence

Intake – Face-to-Face

IVR

Mobile

Online Advertisements

Online Chat

Open House

Point of Sale

Product Catalogs

Product Feedback

Referrals

Refill Reminders

Self-Serve Resources

Social Media

Surveys

Text

Upsell/Cross-Sell Emails



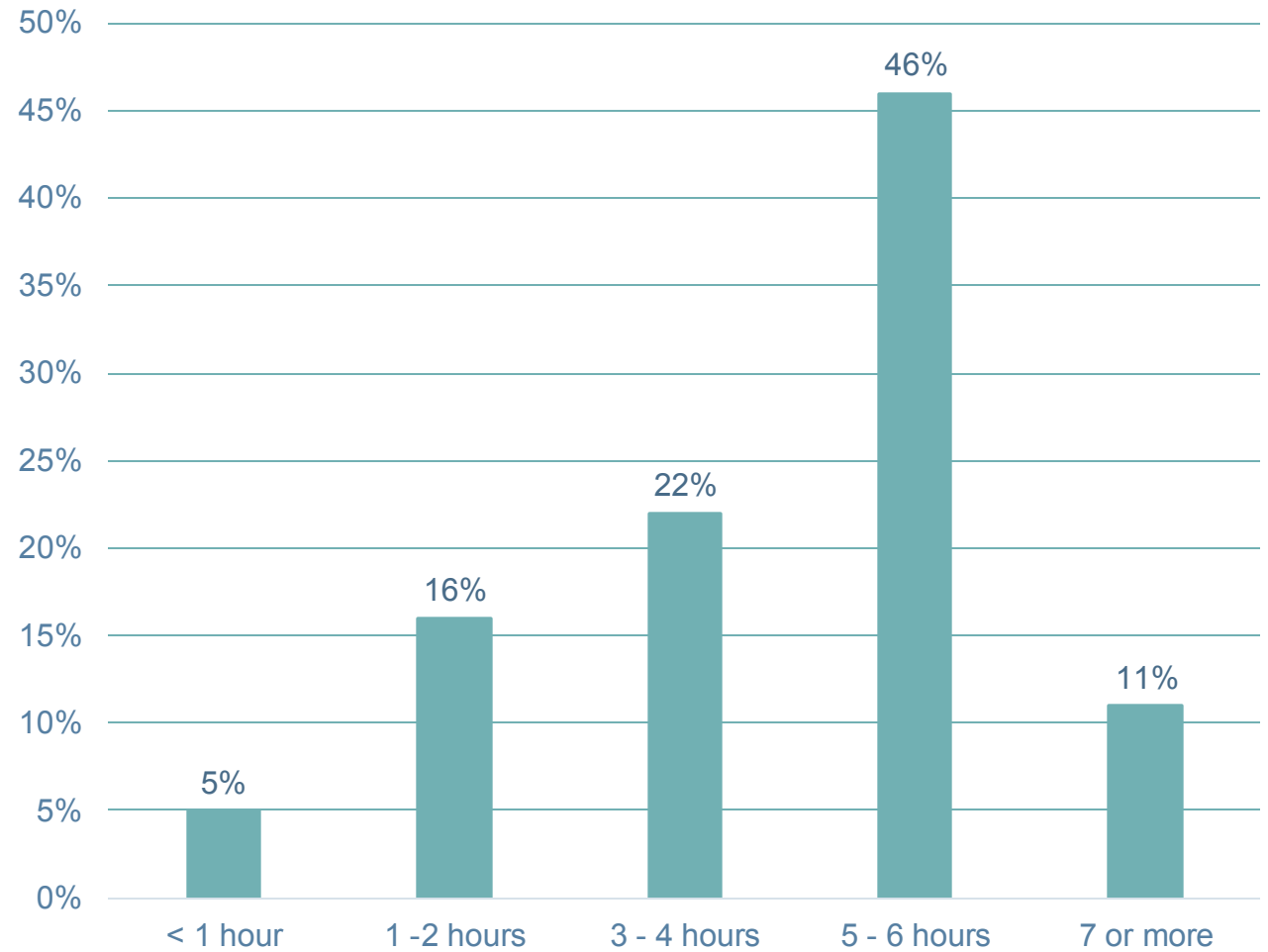
Mobile

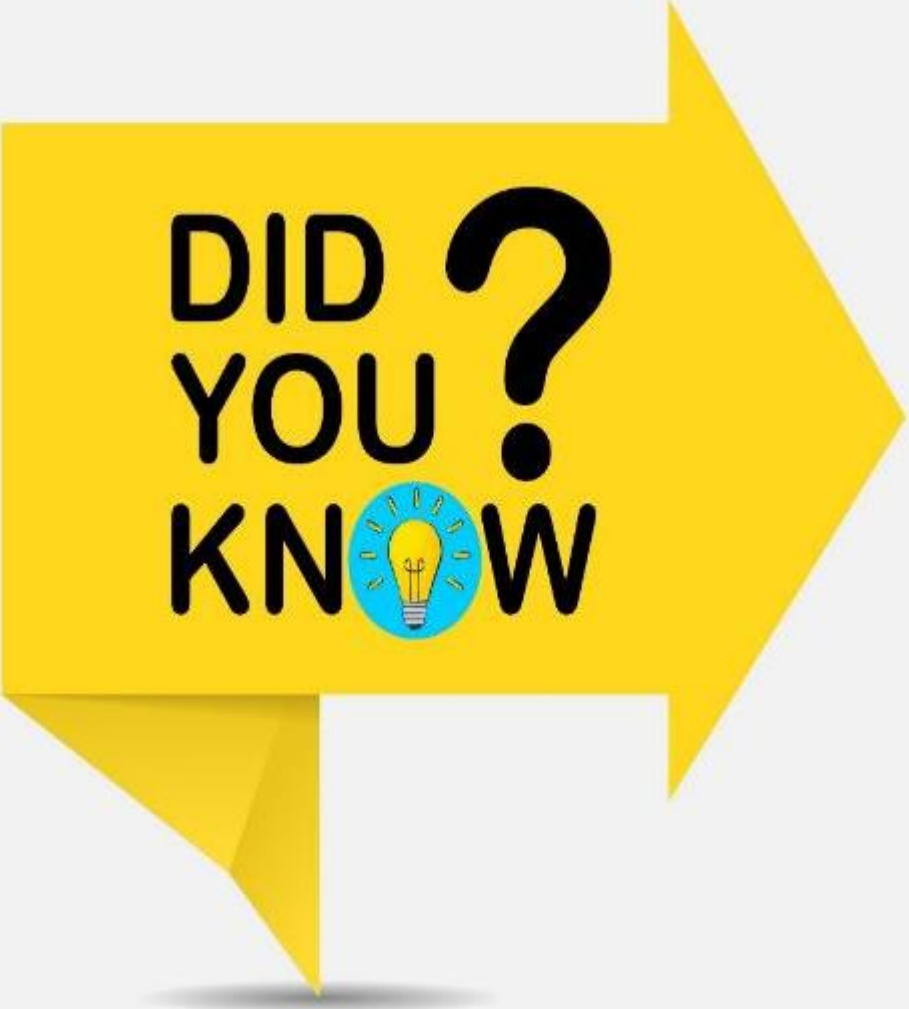


**DID
YOU
KNOW**



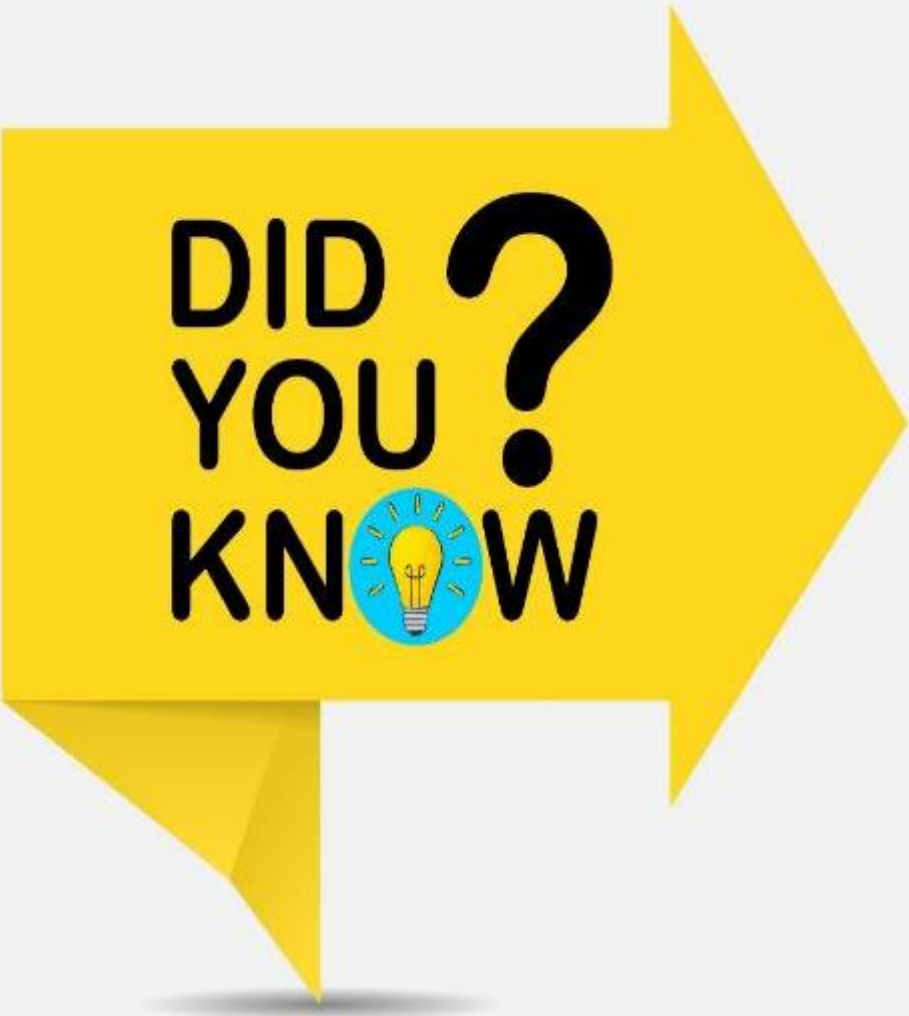
In 2021, Statistical surveyed daily cell phone use:





**DID
YOU
KNOW**

- This is no surprise that usage is up from pre-pandemic levels in 2019 when the average was 3 hours and 43 minutes a day on mobile devices.
- 79% of smartphone users have made a purchase online using their mobile device in the last 6 months.
- A positive brand experience on mobile will make 89% of people more likely to recommend a brand.
- 70% of smartphone users have bought something in a store after using their phone to discover more information.
- 83% of mobile users say that a seamless experience across all devices is very important.

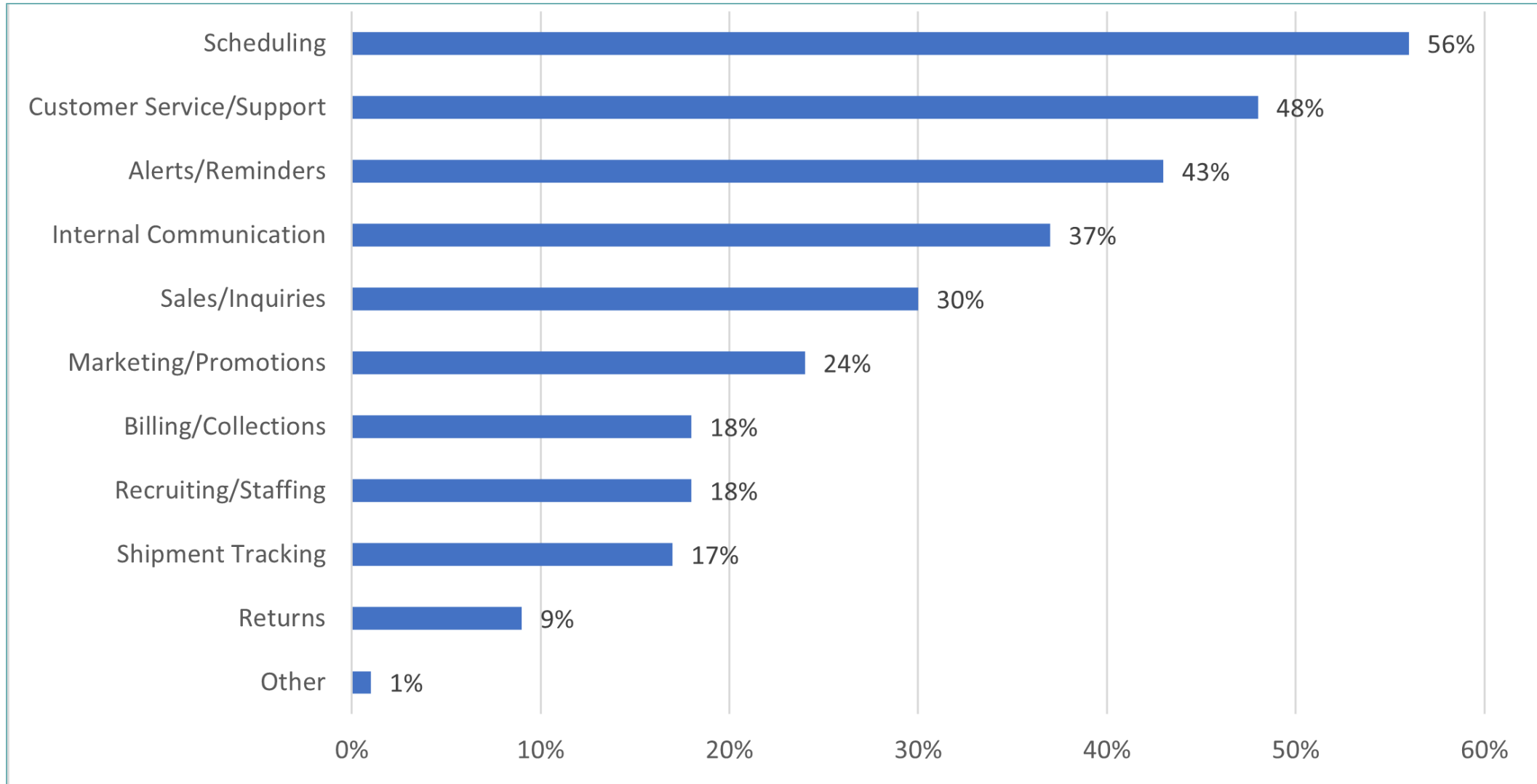


**DID
YOU?
KNOW**

Texting

- 81% of Americans text regularly
- 97% of American adults text weekly
- On average, Americans text twice as much as they call
- 95% of text messages are read within 3 minutes
- Average response time for a text is 90 seconds

Why businesses use texting



Collecting account balances before
they go past due

How much does it cost?

1 in 3 patients whose balances exceed \$200 do not pay them in full

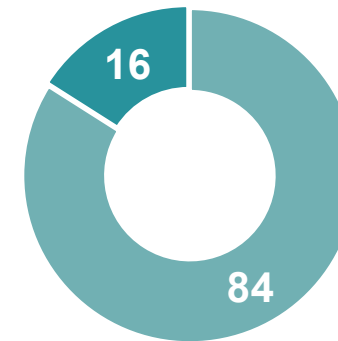
On average, providers mail **4+ statements** before sending an account to collections

After a balance is sent to collections, the odds of full recovery are just 7.4%

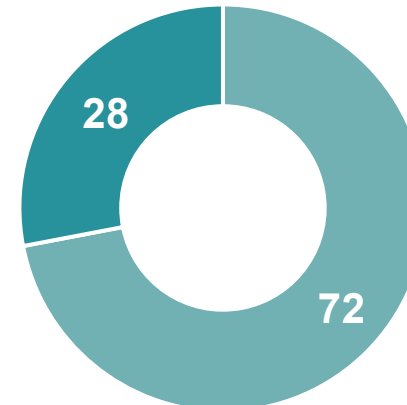
What consumers expect

- Contactless payments
- Payment portals
- Automated transactions
- Electronic communications

Prefer electronic payment methods

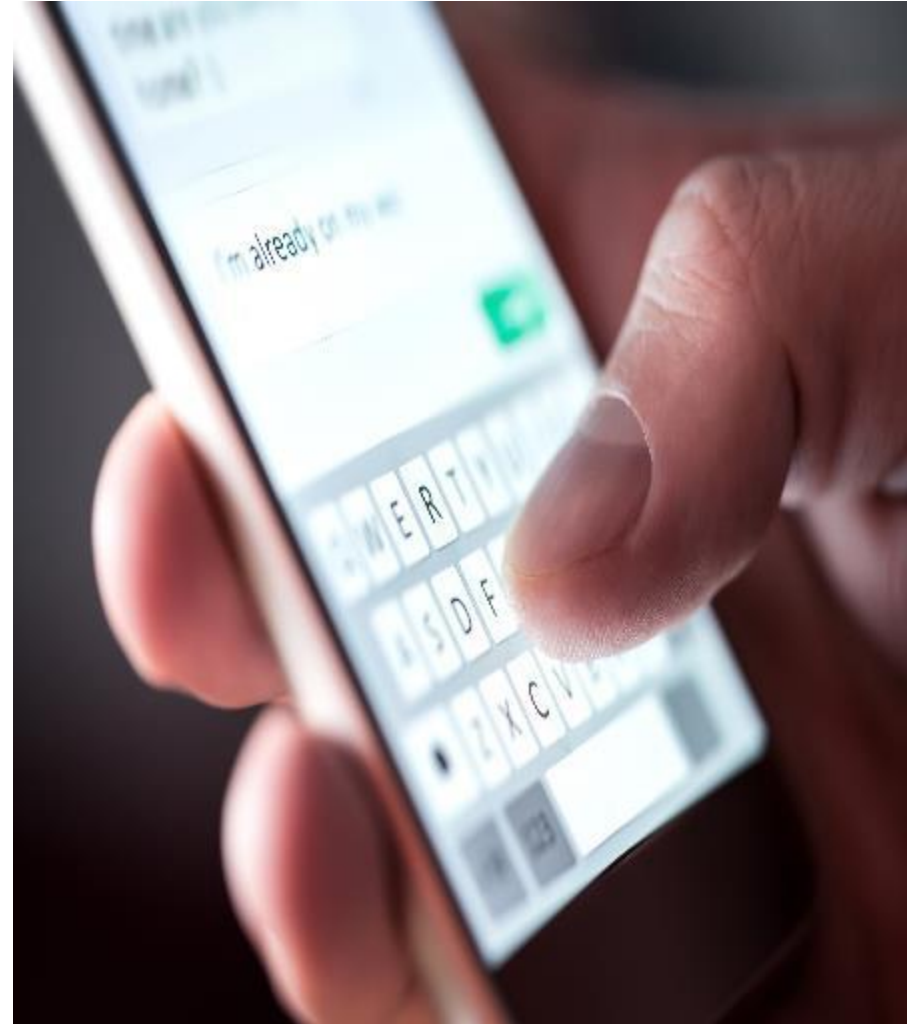


Want electronic statements



Collecting the right info

- What payment information will you collect?
- Are you capturing emails
- Are you capturing home and cell phone numbers?



When will you contact your patient?

- Timing is critical
- Be respectful
- Test day of week/time of day
- Make changes as needed

	Workflow Activity	Day
Phase 1	Invoice Statements - paper/eDelivery	1
	Reminder TXT	10
	Early Reminder Call	30
Phase 2	Collection Statement 1 paper/eDelivery	40
	Reminder TXT	45
	Early Reminder Call	55
	Collection Statement 2 paper/eDelivery	65
	Reminder TXT	70
	Late Reminder Call	80
	Collection Statement 4 paper/eDelivery	90
	Reminder TXT	95

Other	Bad mailing address TXT	as detected
	Bad mailing address Reminder call	as detected
	Payment plan due date Reminder call	as detected
	Bad email address TXT	as detected
Future	Autopay precharge TXT	5 days prior
	Autopay payment confirm TXT	on charge date

- Use a color statement
(Distinguish from an EOB)
- Clearly indicate the amount the patient owes
- Combine invoices into a single statement which reduces paper

22

Texting best practices

- Personalize text message, when possible
- Clear, concise message
- Opt-out option
- Contact information
- Easy authentication

Payment portal

Use all touchpoints to drive patients to the patient or payment portal!

Sign In

Full Account Access + Bill Pay

[Forgot your Username?](#)

[Forgot your Password?](#)

OR


Quick Bill Pay with your Invoice


No account required.

Log In

QuickPay With Your Smartphone

No account required.
Receive a link, install the app, and pay your bill within seconds.
Standard messaging and data rates may apply.


 PAY NOW


Powered by 

Don't have an account?

[Sign Up](#)

Registration Advantages

 View / Update account information.

 View payment and invoice history.

Need Help?

[How to log in or register](#)

Patient Communication Workflow

Phase 1	<p>Current (0-30 days)</p> <ul style="list-style-type: none"> • Paper invoice statements • Emails • Texts • Reminder calls
Phase 2	<p>Past Due (31-90 days)</p> <ul style="list-style-type: none"> • Paper collection statements • Emails • Texts • Reminder calls • Phase 2 Complete report
Phase 3	<p>First Party Pre-Collections (91-275 days)</p> <p>Phase 3A</p> <ul style="list-style-type: none"> • Pre-collection messaging designed to solve delinquent problems <p>Phase 3B</p> <ul style="list-style-type: none"> • Live first-party operators help collect debt • Phase 3 Complete report <p>Phase 3C</p> <ul style="list-style-type: none"> • Final statement
Phase 4	<p>Final Collections (276+ days)</p> <p>Phase 4A (Attorney)</p> <ul style="list-style-type: none"> • Attorney demand letter • Follow-up calls for 90 days <p>Phase 4B (Collection agency)</p> <ul style="list-style-type: none"> • Initial scrub and account placement • Credit bureau reporting • Follow-up calls

When patients don't pay

Patients who don't pay

- Payment plans
- Recurring charges
- Waiving fees
- Discounts
- Settlements



Defining when to write-off an account

- Be firm
- Empower your staff
- Pick a day
- Write off/turn over to third party
- Track results



Incorporating the Collection Law and Credit Bureau Reporting Changes

Regulation F

- Requirements to provide validation information at the outset of collection communications
- Required actions prior to the debt collector reporting a consumer's debt to CRAs, including the three major credit reporting agencies, and
- A prohibition on suing or threatening to sue a consumer to collect a debt for which the applicable statute of limitations has expired (a "time-barred debt").
- Also, important to remain current re: state-analog statutes, especially those specifically concerning medical collections, or those requiring additional disclosures (e.g., New Mexico now requires website disclosures)

Validation information requirements

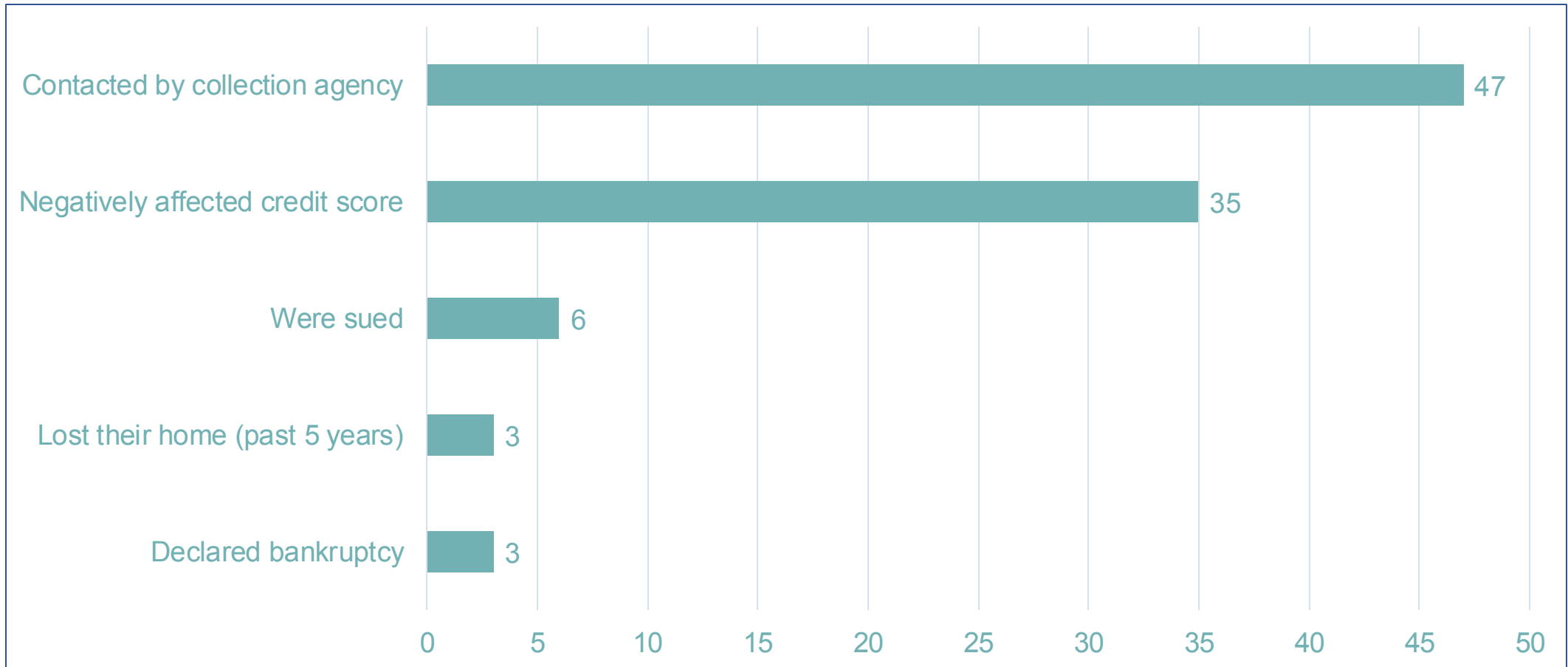
- Debt collector communication disclosure
- Name and mailing information
- Account number
- Itemization-related information
 - An itemization of the current amount of the debt reflecting interest, fees, payments, and credits since the itemization date.
- Current amount of the debt: the amount of the debt as of when the validation information is provided
- Information about consumer protections
- Consumer-response information:
 - Prepared statements and prompts that the consumer may use to take certain actions, such as disputing the debt.

CBR changes

- Consumer Financial Protection Bureau (CFPB) is focusing on medical provider collection activities
- Effective **7/1/22**
 - No credit bureau reporting against accounts **under 365 days** from date of service (previously 180 days)
- Additional requirement effective **3/1/2023**
 - No credit bureau reporting against accounts **under \$500**

Utilizing an Attorney or Third Party Agency

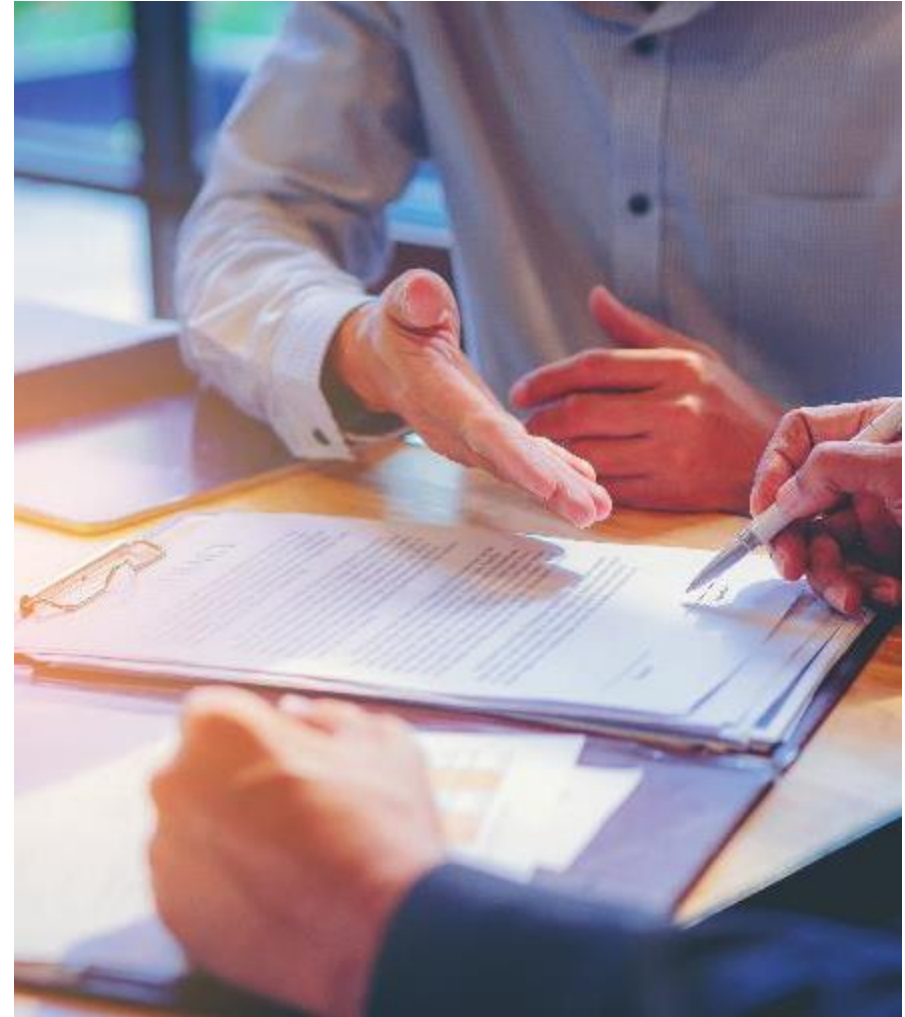
Impact of collection agencies



Source: KFF Health Care Debt Survey 2022

Substantive review

- Necessary documentation
 - Contract
 - Invoices
 - Customer info
 - Payment History
- Identify shortcomings



Scrubs

- Bankruptcy
- Deceased
- Military (SCRA)



Demand letters & telephone collections

- Initial demand letter
- Follow-up demand letters
- Demand letter review
- Professional collectors



Judicial Actions

- General suits
- Suits for replevin
- Venue
- Documentation
- Petition & request summons
- Judgment
- Post-judgment
 - Recovery of Equipment
 - Collections





Questions?

Thank you!



Contact us:

Bruce Gehring

Allegiance Group

SVP, Business Development

bgehring@allegiance-group.com

Dan Rabin

Berman & Rabin

President, Attorney

DRabin@bermanrabin.com

Learn more about WellSky Revenue Cycle Services

Delivering timely, compliant, and
accurate billing for home infusion



Request a consultation today!

