

Type of Policy:	PUBLIC	Category:	REVENUE MANAGEMENT
Title:	<i>FINANCIAL ASSISTANCE POLICY (FAP)</i>	Policy #:	1001
Page:	1 of 11	Replaces #:	5706-0504
Issue Date:	10/01/2016	Developed By:	Revenue Management Michele T. Napier, Chief Revenue Officer
Revision Dates:	3/18; 9/19; 2/20; 11/20, 8/23, 1/25	Approved By:	Signature On File Bernadette Spong, Chief Financial Officer

I. POLICY:

This policy establishes Orlando Health’s financial assistance processes that assume proportionate responsibility for health care services to members of the community who cannot afford to pay for emergency or medically necessary medical treatment.

II. DEFINITIONS:

When used in this policy these terms have the following meanings:

- A. Amounts Generally Billed (“AGB”): amounts generally billed to patients for emergency or other medically necessary care.
- B. Application Period: the period during which Orlando Health must accept and process an application for financial assistance under its FAP submitted by an individual in order to have made reasonable efforts to determine whether the individual is eligible for financial assistance under the policy. The Application Period begins on the date the medical care is provided, and ends on the later of either the 240th day after the date the first post-discharge billing statement is provided or at least 30 days after Orlando Health provides the individual with a written notice that sets a deadline after which ECAs may be initiated.
- C. Extraordinary Collection Actions (“ECAs”): per IRS Guidelines, any action against an individual related to obtaining payment of a Self-Pay Account that requires legal or judicial process or involves selling of Self-Pay Account to another party or reporting adverse information about the Guarantor to consumer credit reporting agencies or credit bureaus.
- D. Financial Assistance Policy (“FAP”): Orlando Health’s Financial Assistance Policy.
- E. FAP-Eligible Individual: an individual eligible for financial assistance under Orlando Health’s FAP (without regard to whether the individual has applied for assistance under the FAP).
- F. Federal Poverty Guidelines (“FPG”): a measure of income issued every year by the Department of Health and Human Services (“HHS”). Federal poverty guidelines are used to determine eligibility for certain programs and benefits, including savings on Marketplace health insurance, and Medicaid and CHIP coverage.
- G. Guarantor: individual receiving care and/or the financially responsible party.
- H. Health Savings Account (“HSA”): a tax-advantaged medical savings account available to those enrolled in a high-deductible health plan (“HDHP”).
- I. Patient/Agent/Legal Representative: a person who, under applicable law, has the authority to act on behalf of an individual. A legal representative includes a healthcare surrogate, proxy, guardian, or parent or other person acting in place of a parent (in loco parentis) for an un-emancipated minor, or an executor or administrator of an estate.
- J. Medically Indigent/Catastrophic Support: financial support provided to the patient/guarantor when medical expenses exceed fifteen percent (15%) of the annual family/household gross income for those with FPG of equal to or lower than five hundred percent (500%).
- K. Self-Pay Uninsured Account: an account for which no third-party payor or insurance is responsible and is the responsibility of the Patient/Guarantor.
- L. Self-Pay After Insurance Account: an account in which a third-party payor has submitted payment and remaining amounts are the responsibility of the Patient/Guarantor. This can include, but is not limited to, co-insurance, co-pays, and/or deductibles.

III. PROCEDURE:

Type of Policy:	PUBLIC	Category:	REVENUE MANAGEMENT
Title:	<i>FINANCIAL ASSISTANCE POLICY (FAP)</i>	Policy #:	1001
Page:	2 of 11	Replaces #:	5706-0504
Issue Date:	10/01/2016	Developed By:	Revenue Management Michele T. Napier, Chief Revenue Officer
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A. Requirements

1. Orlando Health complies with Section 501(r) of the Internal Revenue Code which requires hospital organizations to establish a written financial assistance policy. A hospital organization is an organization recognized (or seeking to be recognized) as described in section 501(c)(3) that operates one or more hospital facilities.
2. This policy must be approved by the Board of Directors or an authorized body of the tax-exempt hospital.
3. All Orlando Health employed physicians must follow Orlando Health’s FAP. Contracted, community/private providers are not required to participate in Orlando Health’s financial assistance program. A list of employed Orlando Health physicians is made available on the Orlando Health website. In addition, a list of all contracted, community/private providers, who deliver emergency or other medically necessary care in the hospital facilities, can be found on our website, and will be provided free of charge upon request. Reference the supporting documentation link at the end of this policy.
4. Orlando Health’s FAP, Plain Language Summary, and Guarantor Financial Statement Application (“GFSA”) are readily available to patients, visitors, and members of the community free of charge on the Orlando Health website. Paper copies are available upon request via mail, and at admitting and emergency business office locations. The Plain Language Summary is available in public areas of the hospitals, and paper copies are provided to patients upon registration/intake at the hospital. Reference the supporting documentation link at the end of this policy to obtain copies of documents online.
5. The FAP, Plain Language Summary, and GFSA are made available in English and in the primary language of residents who represent the lesser of five percent (5%) of the community served or 1,000 individuals by our hospitals. Orlando Health will perform a yearly analysis of languages reflected in our community. Translations can be found in the supporting documentation link at the end of this policy.
6. Amounts Generally Billed (“AGB”): Orlando Health determines the AGB for care by using the billing and coding process it would use if the individual were a Medicare fee-for-service beneficiary and setting AGB for the care at the amount it determines Medicare and the Medicare beneficiary together would be expected to pay for the care.
 - a. Orlando Health has determined AGB by using the prospective Medicare method.
 - b. Orlando Health reviews the AGB annually.
 - c. Whenever Orlando Health provides emergency or other medically necessary care to a FAP-eligible individual, these guidelines apply.
7. As a private, not-for-profit teaching hospital, Orlando Health provides comprehensive health care. Services are provided to all regardless of race, color, national origin, sex, age, disability, gender identity, or sexual orientation.
8. In accordance with the Emergency Medical Treatment and Labor Act (EMTALA), individuals will not be refused treatment when suffering a true medical emergency, regardless of their ability to pay. Orlando Health will not engage in actions that discourage individuals from seeking emergency medical care, such as by demanding that emergency department patients pay before receiving treatment for emergency medical conditions or by permitting debt collection activities that interfere

Type of Policy:	PUBLIC	Category:	REVENUE MANAGEMENT
Title:	<i>FINANCIAL ASSISTANCE POLICY (FAP)</i>	Policy #:	1001
Page:	3 of 11	Replaces #:	5706-0504
Issue Date:	10/01/2016	Developed By:	Revenue Management Michele T. Napier, Chief Revenue Officer
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- with the provision of emergency medical care. The emergency condition of a patient will be determined by the treating physician relying on his/her experience, training, and ethics.
9. Medically necessary care is determined by the treating physician relying on his/her experience, training, and ethics.
 10. For all elective and scheduled procedures, Orlando Health may exercise the right to defer services for Patients/Agents unwilling to pay all their financial responsibility or commit to a reasonable payment plan.
- B. Federal Poverty Guidelines
1. The set minimum amount of gross income that a family/household needs for food, clothing, transportation, shelter, and other necessities. In the United States, this level is determined by the Department of Health and Human Services.
 2. Annually, the federal government establishes the poverty income guidelines for the year and publishes them on the Federal Register. The Orlando Health financial assistance program uses these guidelines when determining eligibility for free care, and the most current guidelines will be used during the screening process. Reference the supporting documentation link at the end of this policy.
 3. Uninsured individuals or family/households who meet three hundred percent (300%) or below of FPG will qualify for financial assistance for their financial responsibility for services that are eligible in this policy.
 4. Individuals or family/households with insurance/third party coverage who meet two hundred twenty five percent (225%) or below of FPG will qualify for financial assistance for their self-pay after insurance financial responsibility for services that are eligible in this policy.
 5. Under the provisions of Section 501(r), Orlando Health is required to limit charges for those patients that are determined eligible for financial assistance.
- C. Eligibility
1. Patient/Guarantor seeking financial assistance consideration will be required to complete the application process and provide the following information as needed:
 - a. Full legal name.
 - b. Household income for the previous 12-month period.
 - c. Number of household members.
 - d. Income tax returns or other form of income attestation, including W2 forms, IRS 1099 documents, pay stubs, and bank statements.
 - e. Disclosure of assets that are convertible to cash and unnecessary for daily living.
 - f. Signature certification on completed Guarantor Financial Statement Application (GFSA).
 - g. An electronic link to the application can be found in the supporting documentation at the end of this policy.
 2. Patients/Guarantors, who meet eligibility requirements and reside where Orlando Health operates acute care facilities, will be offered financial assistance.
 3. US citizens with a valid Social Security Number (“SSN”) who reside outside of the area and legally permitted Out of Country patients that have been given a government issued Tax ID Number (“TIN”) are eligible for financial assistance consideration. Documentation of extenuating circumstances must be provided, and approval will be made on a case-by-case basis.

Type of Policy:	PUBLIC	Category:	REVENUE MANAGEMENT
Title:	<i>FINANCIAL ASSISTANCE POLICY (FAP)</i>	Policy #:	1001
Page:	4 of 11	Replaces #:	5706-0504
Issue Date:	10/01/2016	Developed By:	Revenue Management Michele T. Napier, Chief Revenue Officer
Revision Dates:	3/18; 9/19; 2/20; 11/20, 8/23, 1/25	Approved By:	Signature On File Bernadette Spong, Chief Financial Officer

4. Individuals who comply with the requirements outlined in this FAP will be considered for free care. Those who are not compliant with the requirements of this FAP may be deemed ineligible. In addition to meeting the other requirements outlined within this policy, Patients/Guarantors are expected to cooperate with the following:
 - a. Patients/Guarantors shall cooperate in supplying all third-party information including motor vehicle or other accident information, requests for Coordination of Benefits (“COB”), or other information necessary to adjudicate claims, etc.
 - b. Patients/Guarantors will exhaust all funding resources including Marketplace Healthcare Exchange plans, HSA, employer group medical plans, self-insured plans, crowdfunding accounts including GoFundMe and similar initiatives, and healthcare cost sharing ministries and/or groups, prior to being considered for financial assistance.
 - c. Patients/Guarantors that have been identified as having Medicaid qualifiers shall cooperate with the pending Medicaid process. In order to receive healthcare financial assistance, the patient must apply for Medicaid assistance and be denied for any reason other than the following:
 - 1) Did not apply.
 - 2) Did not follow through with the application process.
 - 3) Did not provide requested verifications.
5. Financial assistance may be denied if there is reasonable suspicion of the accuracy of the application. If the Patient/Guarantor supplies the needed documentation and information requested to clarify information the application may be reconsidered. The potential reconsideration will be reviewed and handled on a case-by-case basis.
6. Individuals who are uninsured and meet one or more of the following are presumed to be eligible for financial assistance:
 - a. discharged to a skilled nursing facility.
 - b. documented homelessness.
 - c. deceased with no probate/estate.
 - d. receipt of an Order of Discharge as part of personal bankruptcy proceedings.
7. Individuals are deemed eligible via Independent Eligibility Assessment to have a payment capability score of low or unknown. The Independent Eligibility Assessment consists of algorithms that incorporate data from credit bureaus, demographic databases, and hospital specific data. The third-party credit report data and other publicly available data sources utilize healthcare industry-recognized predictive model that is based on the public record databases to calculate a socio-economic and financial capability score. Information gleaned from this Independent Eligibility Assessment will constitute adequate documentation of financial need under this policy to infer and classify individuals into respective economic means categories irrespective of whether complete documentation has been voluntarily provided.
8. Orlando Health will work with approved community not-for-profit agencies and county and state funded programs, including but not limited to the Health Care Responsibility Act (“HCRA”). These programs serve the underinsured and uninsured with financial criteria screening policies similar to this FAP, and will be accepted under this program.

Type of Policy: PUBLIC	Category: REVENUE MANAGEMENT
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Title: FINANCIAL ASSISTANCE POLICY (FAP)	Policy #: 1001
Page: 5 of 11	Replaces #: 5706-0504
Issue Date: 10/01/2016	Developed By: Revenue Management Michele T. Napier, Chief Revenue Officer
Revision Dates: 3/18; 9/19; 2/20; 11/20, 8/23, 1/25	Approved By: Signature On File Bernadette Spong, Chief Financial Officer

9. Orlando Health reserves the right to clarify information obtained during the screening process, including assets found or available lines of credit.
10. Patients/Guarantors deemed medically indigent or who meet catastrophic guidelines of balances exceeding fifteen percent (15%) of their family/household income, but no greater than five hundred percent (500%) FPG, will be considered for free care.
11. Patients with Florida Medicaid health coverage will be considered eligible for free care if Florida Medicaid denies payment for emergency and/or medically necessary services.

D. Application Process

1. Patient can receive assistance with the application process through the following methods:
 - a. Financial Counselors are available at Orlando Health hospital facilities and will assist patients with the completion of the application before, during, and after their hospital stay.
 - b. Financial Assistance representatives are available Monday – Friday, 8:00 a.m. – 4:30 p.m. They can be reached by phone at (321) 843-8955, or by e-mail: FinancialAssistance@orlandohealth.com.
2. Patients can apply for financial assistance as follows:
 - a. Complete and submit a GFSA to Orlando Health for evaluation.
 - b. During the patient’s hospital stay, representatives are available to provide assistance with GFSA completion.
 - c. Request the GFSA in writing or access it on the Orlando Health website or present in person at an Orlando Health facility.
 - d. Patients/Guarantors may be asked to provide copies of previous income tax returns if necessary.
 - e. Reference the supporting documentation link at the end of this policy.

E. Determination

1. Reference the Orlando Health Patient Billing and Collections Policy (Self Pay) available in supporting documentation link at the end of this policy for additional details.
2. Orlando Health will review the financial assistance applications for completion and accuracy during the “Application Period”. This is the period during which Orlando Health must accept and process financial assistance applications submitted by the Patient/Guarantor. This period ends after the 240th day after the first post patient discharge statement. Orlando Health representatives will review for the following:
 - a. Validate household income and expense information.
 - 1) Family income includes but is not limited to wages, salaries, social security benefits, strike benefits, unemployment benefits, child support, inheritance, alimony, spouse’s income, Workers Compensation, pension disability benefits, investment dividends, and interest. The Patient/Guarantor must also include the total gross income for all working family household members including those who are under the age of 18.
 - 2) Family household members include patient, spouse, and natural or adopted children under the age of 18. If a dependent is handicapped and over the age of 18, he or she is included in the family size.

Type of Policy:	PUBLIC	Category:	REVENUE MANAGEMENT
Title:	<i>FINANCIAL ASSISTANCE POLICY (FAP)</i>	Policy #:	1001
Page:	6 of 11	Replaces #:	5706-0504
Issue Date:	10/01/2016	Developed By:	Revenue Management Michele T. Napier, Chief Revenue Officer
Revision Dates:	3/18; 9/19; 2/20; 11/20, 8/23, 1/25	Approved By:	Signature On File Bernadette Spong, Chief Financial Officer

- b. If application is incomplete:
 - 1) Orlando Health will provide a written notice to the Patient/Guarantor that describes the additional information and/or documentation necessary to fully complete the financial assistance application.
 - 2) Orlando Health will provide at least one written notice to the Patient/Guarantor that communicates the collection processes to be initiated if claim(s) are not satisfied.
- c. If the application is approved, an approval letter with specific details will be sent to the Patient/Guarantor. Approved financial assistance will extend twelve (12) months prior or twelve (12) months after original application approval date.
- d. If application is denied, a denial letter with specific details will be sent to the Patient/Guarantor, making reasonable contact efforts. Orlando Health will continue with the normal collection process.
- 3. ECAs are actions that Orlando Health may take in the event of non-payment and can be found in detail in the Patient Billing & Collections Policy (Self Pay).
 - a. Orlando Health reserves the right to sell a debt to an external agency in pursuit of payment resolution.
- F. Patients/Guarantors eligible for financial assistance in accordance with this policy will receive a sixty percent (60%) self-pay discount on total charges for all services with exception of exclusions listed in Section G below.
- G. Exclusions
Financial assistance does not apply to:
 - 1. Elective care.
 - 2. Special package-priced programs such as cosmetics, bariatric, etc.
 - 3. Other non-medically necessary services as determined by the policy.
 - 4. Transplant and transplant related services.
 - 5. Patients/Guarantors who have not exhausted all healthcare related funding sources.
 - 6. Patients covered by a plan that uses reference-based pricing for payment of hospital services, and under which, the patient may be indemnified by a third-party for payment of the services if legal action is pursued.
- H. Public Awareness
 - 1. Orlando Health will notify and inform members of the community served by Orlando Health of the FAP in a manner reasonably calculated to reach those members who are most likely to require financial assistance from the facility.
 - 2. Orlando Health will make information available:
 - a. At appropriate community outreach events.
 - b. Through digital signage and paper brochures available and public to facility visitors.
- I. Coverage: the FAP applies to all acute care hospitals and hospital-based off-campus emergency departments owned and operated by Orlando Health. Attachment A contains a list of applicable facilities.
- J. Contact information, including the financial assistance team, the hospital billing team, and the physician billing team can be found in Attachment A, on Orlando Health’s website, and may be requested in person at any Orlando Health facilities.

Type of Policy:	PUBLIC	Category:	REVENUE MANAGEMENT
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Page:	7 of 11	Replaces #:	5706-0504
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IV. DOCUMENTATION:

None.

V. REFERENCES:

- A. Orlando Health Patient Billing & Collections Policy (Self Pay), 1017: <https://www.orlandohealth.com/patients-and-visitors/patient-financial-resources/pay-your-bill/financial-assistance>
- B. Orlando Health Provider Listing: <https://www.orlandohealth.com/patients-and-visitors/patient-financial-resources/pay-your-bill/financial-assistance>
- C. Orlando Health Bayfront Hospital Provider Listing: <https://www.bayfronthealth.com/patient-information/financial-information/financial-assistance-program>
- D. Orlando Health Financial Assistance Application: <https://www.orlandohealth.com/patients-and-visitors/patient-financial-resources/pay-your-bill/financial-assistance>
- E. Orlando Health Financial Assistance Policy Plain Language Summary: <https://www.orlandohealth.com/patients-and-visitors/patient-financial-resources/pay-your-bill/financial-assistance>
- F. Language Translations of Orlando Health FAP, Plain Language Summary, and GFSA: <https://www.orlandohealth.com/patients-and-visitors/patient-financial-resources/pay-your-bill/financial-assistance>
- G. U.S. Department of Health and Human Services Poverty Guidelines: <https://aspe.hhs.gov/poverty-guidelines>
- H. Federal Register Vol. 79 No. 250: <https://www.gpo.gov/fdsys/pkg/FR-2014-12-31/pdf/2014-30525.pdf>
- I. United States Internal Revenue Service (2019), “Requirements for 501(c)(3) Hospitals Under the Affordable Care Act – Section 501(r)” <https://www.irs.gov/charities-non-profits/charitable-organizations/requirements-for-501c3-hospitals-under-the-affordable-care-act-section-501r>

VI. ATTACHMENTS:

List of acute care hospitals and hospital-based off-campus emergency departments owned and operated by Orlando Health, 4 pages



1414 Kuhl Ave.
 Orlando, Florida 32806
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Title: **FINANCIAL ASSISTANCE POLICY (FAP)**

Policy #: **1001**

Attachment A – List of Applicable Facilities

North Florida Region

Financial Assistance Team Contact Information

In Person: at any hospital facility
 Telephone: (321) 843-8955
 Email Address: FinancialAssistance@orlandohealth.com
 Website: <https://www.orlandohealth.com/patients-and-visitors/patient-financial-resources/pay-your-bill/financial-assistance>

Mailing Address:
 Orlando Health
 Attn: Financial Assistance Team
 P.O. Box 560176
 Orlando FL 32856

Hospital and Physician Billing Team Contact Information

In person: at any hospital facility or physician’s office
 Telephone: (321) 841-2596 and (877) 793-0145
 Website: <https://www.orlandohealth.com/patients-and-visitors/patient-financial-resources>

Hospital Billing Mailing Address:
 Orlando Health
 Attn: Patient Accounting Central Business Office
 P.O. Box 560176
 Orlando FL 32856

Physician Billing Mailing Address:
 Orlando Health
 Attn: Physician Billing Central Business Office
 P.O. Box 560176
 Orlando FL 32856

Orlando Health South Seminole Hospital
 555 West State Road 434
 Longwood, Florida 32750
 Phone: (407) 767-1200

Orlando Health Emergency Room – Lake Mary
 380 Rinehart Road
 Lake Mary, FL 32746
 Phone: (321) 842-0550

Orlando Health South Lake Hospital Emergency Room – Blue Cedar
 22316 US Highway 27
 Leesburg, FL 34748
 Phone: (352) 536-8831

Orlando Health Lake Mary Hospital
 380 Rinehart Road
 Lake Mary, FL 32746
 Phone: (407) 767-1200

Orlando Health South Lake Hospital
 1900 Don Wickham Drive
 Clermont, Florida 34711
 Phone: (352) 394-4071

Orlando Health South Lake Hospital Joe H and Loretta Scott Emergency Room – Four Corners
 16966 Cagan Ridge Boulevard
 Clermont, FL 34714
 Phone: (352) 536-8821



1414 Kuhl Ave.
 Orlando, Florida 32806
 321.843.7000

Title: **FINANCIAL ASSISTANCE POLICY (FAP)**

Policy #: **1001**

Attachment A – List of Applicable Facilities

Orlando Florida Region

Financial Assistance Team Contact Information

In Person: at any hospital facility
 Telephone: (321) 843-8955
 Email Address: FinancialAssistance@orlandohealth.com
 Website: <https://www.orlandohealth.com/patients-and-visitors/patient-financial-resources/pay-your-bill/financial-assistance>

Mailing Address:
 Orlando Health
 Attn: Financial Assistance Team
 P.O. Box 560176
 Orlando FL 32856

Hospital and Physician Billing Team Contact Information

In person: at any hospital facility or physician’s office
 Telephone: (321) 841-2596 and (877) 793-0145
 Website: <https://www.orlandohealth.com/patients-and-visitors/patient-financial-resources>

Hospital Billing Mailing Address:
 Orlando Health
 Attn: Patient Accounting Central Business Office
 P.O. Box 560176
 Orlando FL 32856

Physician Billing Mailing Address:
 Orlando Health
 Attn: Physician Billing Central Business Office
 P.O. Box 560176
 Orlando FL 32856

Orlando Health Orlando Regional
 Medical Center
 52 W. Underwood Street
 Orlando, Florida 32806
 Phone: (321) 841-5111

Orlando Health Jewett Orthopedic
 Institute
 1717 S Orange Ave Ste 103
 Orlando, FL 32806
 Phone: (407) 236-0404

Orlando Health Arnold Palmer
 Hospital for Children
 92 West Miller Street
 Orlando, Florida 32806
 Phone: (321) 843-7777

Orlando Health Cancer Institute
 1400 South Orange Avenue
 Orlando, Florida 32806-2036
 Phone: (321) 841-1869

Orlando Health Winnie Palmer
 Hospital for Women and Babies
 83 West Miller Street
 Orlando, Florida 32806
 Phone: (321) 843-1110



1414 Kuhl Ave.
Orlando, Florida 32806
321.843.7000

Title: **FINANCIAL ASSISTANCE POLICY (FAP)**

Policy #: **1001**

Attachment A – List of Applicable Facilities

South Florida Region

Financial Assistance Team Contact Information

In Person: at any hospital facility
Telephone: (321) 843-8955
Email Address: FinancialAssistance@orlandohealth.com
Website: <https://www.orlandohealth.com/patients-and-visitors/patient-financial-resources/pay-your-bill/financial-assistance>

Mailing Address:
Orlando Health
Attn: Financial Assistance Team
P.O. Box 560176
Orlando FL 32856

Hospital and Physician Billing Team Contact Information

In person: at any hospital facility or physician’s office
Telephone: (321) 841-2596 and (877) 793-0145
Website: <https://www.orlandohealth.com/patients-and-visitors/patient-financial-resources>

Hospital Billing Mailing Address:
Orlando Health
Attn: Patient Accounting Central Business Office
P.O. Box 560176
Orlando FL 32856

Physician Billing Mailing Address:
Orlando Health
Attn: Physician Billing Central Business Office
P.O. Box 560176
Orlando FL 32856

Orlando Health Dr. P. Phillips Hospital
9400 Turkey Lake Road
Orlando, Florida 32819
Phone: (407) 351-8500

Orlando Health-Health Central
Hospital
10000 W. Colonial Drive
Ocoee, Florida 34761
Phone: (407) 296-1000

Orlando Health St. Cloud Hospital
2906 17th Street
St. Cloud, Florida 34769
Phone: (407) 892-2135

Orlando Health Emergency Room –
Osceola
1001 E Osceola Parkway
Kissimmee, Florida 34744
Phone: (321) 842-5052

Orlando Health Horizon West Hospital
17000 Porter Road
Winter Garden, FL 34787
Phone: (407) 635-3210

Orlando Health Emergency Room –
Randal Park
10155 Dowden Road
Orlando, Florida 32832
Phone: (321) 842-2280

Orlando Health Emergency Room –
Reunion Village
8011 Osceola Polk Line Road
Davenport, Florida 33896
Phone: (407) 407-0200



1414 Kuhl Ave.
 Orlando, Florida 32806
 321.843.7000

Title: **FINANCIAL ASSISTANCE POLICY (FAP)**

Policy #: **1001**

Attachment A – List of Applicable Facilities

West Florida Region

Financial Assistance Team Contact Information

In Person: at any hospital facility
 Telephone: (321) 843-8955
 Email Address:
BayfrontStPeteFinancialHelp@orlandohealth.com
 Website: <https://www.bayfronthealth.com/patient-information/financial-information/financial-assistance-program>

Mailing Address:
 Orlando Health
 Attn: Financial Assistance Team
 P.O. Box 560176
 Orlando FL 32856

Hospital and Physician Billing Team Contact Information

In person: at any hospital facility or physician’s office
 Telephone: (321) 841-2596 and (877) 793-0145
 Website: <https://www.bayfronthealth.com/patient-information/financial-information>

Hospital Billing Mailing Address:
 Orlando Health
 Attn: Patient Accounting Central Business Office
 P.O. Box 560176
 Orlando FL 32856

Physician Billing Mailing Address:
 Orlando Health
 Attn: Physician Billing Central Business Office
 P.O. Box 560176
 Orlando FL 32856

Orlando Health Bayfront Hospital
 701 6th Street South
 St. Petersburg, Florida 33701
 Phone: (727) 823-1234

Orlando Health Emergency Room –
 Crossroads
 1800 66th Street North
 St. Petersburg, Florida 33710
 Phone: (727) 893-6325

Orlando Health Emergency Room –
 Pinellas Park
 3070 Grand Avenue
 Pinellas Park, Florida 33782
 Phone: (727) 893-6195