Foreign Affiliates Webinar

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Agenda

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Overview

- Provides a comprehensive guide to the billing process for foreign affiliates. The session is designed to equip attendees with the knowledge and tools necessary to ensure accurate and timely billing.
  - The presentation will cover four main areas:
    - ✓ **Introduction:** An overview of the Defense Health Agency's role and the definition of "foreign affiliates" in the context of military healthcare.
    - ✓ **The Billing Workflow:** A step-by-step walkthrough of the entire billing process, from patient registration and care documentation to bill submission and adjudication.
    - ✓ **Key Compliance & Best Practices:** A review of essential documentation, common billing errors to avoid, and best practices for a smooth reimbursement cycle.
    - ✓ **Support and Resources:** Information on where to find help, including key points of contact, online resources, and support tools.

Abbreviations

- ITO – Invitational Travel Orders
- FMS – Foreign Military Sales
- FFM – Foreign Force Member
- IMET – International Military Education and Training
- IMS – International Military Student
- NATO – North Atlantic Treaty Organization
- NATO PfP – NATO Partnership for Peace
- RHCA – Reciprocal Health Care Agreement
- SOFA – Status of Forces Agreement
- FVR – Foreign Visit Request
- EVA – Extended Visit Authorization
- DCSA - Defense Counterintelligence and Security Agency

Statutory & Policy Governance

- **Affiliate Classification and Benefits**
  - **32 CFR § 161.3**: Defines a *foreign affiliate* as a foreign national—including foreign civilian personnel, contractors, and foreign uniformed-services personnel—who is affiliated with the Department of War through an assignment, temporary duty, school, training, policy board, or other defined agreement.
  - **32 CFR § 161.22 and § 161.23**: Establish applicable foreign-affiliate benefits, eligibility documentation, and DEERS enrollment and identification-card procedures.
- **Space-Available Care and Reimbursement**
  - **32 CFR § 108.4**: Establishes regulatory policy for reimbursable and nonreimbursable care for Secretarial designees. Eligible foreign affiliate personnel and approved accompanying dependents may receive space-available MTF care, subject to reimbursement requirements unless an applicable RHCA or other authorized waiver applies.
- **Foreign Military Personnel Care and UBO Operations**
  - **DoDI 6015.23**: Establishes Department of War policy, responsibilities, and procedures for foreign affiliate personnel care at MTFs, including care delivery, reimbursement, Uniform Business Office operations, beneficiary counseling, and debt collection.

Definition & Scope of Foreign Affiliate

- Core Qualifying Groups:
  - Foreign Affiliates must be officially sponsored by their home government under recognized bilateral or multilateral instruments.
    - ✓ Foreign Uniformed Services: Active military officers, enlisted personnel, and exchange forces on formal orders.
    - ✓ Foreign Government Civilians: Civil Service staff assigned to joint commander or cooperative research agreements.
    - ✓ Foreign Contractors: Sourced through allied defense arrangements requiring base or network access.
- Critical Distinction:
  - Family members are not foreign affiliates.
    - ✓ Entitlements flow entirely from the primary sponsor's accredited standing.
    - ✓ Access rights and medical coverage do not automatically mirror the sponsor’s entitlements.
    - ✓ Care authorized only when expressly permitted by treaty or reciprocal bilateral agreement.

Authorized MTF Care Categories

- Foreign Affiliate Personnel
  - Training & Exchange Programs
    - ✓ Stationed on official U.S. duty under programs such as IMET, FMS, or security assistance agreements.
    - ✓ Space available outpatient care; funded via training line of accounting or foreign invoices
- NATO & PfP Personnel
  - Status of Forces Agreements (SOFA)
    - ✓ Allied forces and accompanying family members stationed or on temporary duty under NATO/PfP SOFA terms.
    - ✓ Outpatient services standard; inpatient subject to SOFA billing parameters and agreements.
- RHCA (CONUS ONLY) Bilateral partners
  - Reciprocal Health Care
    - ✓ Forces from nations with bilateral MOUs granting mutual medical support to U.S. forces stationed abroad.
    - ✓ Care authorized under agreed fee schedule or reciprocal fee waiver between defense departments.

Family Member Eligibility Guidelines

- **Eligibility for MTF Care**
  - A foreign force family member's eligibility for care in the United States depends on the sponsoring member's official invitation/orders or official DoD business, the family member's approved accompanying status, registration in the Defense Enrollment Eligibility Reporting System (DEERS), and possession of the appropriate DoD identification card.
  - **Official Travel/Assignment Documentation:** Spouses and eligible children should be listed on the sponsor's Invitational Travel Orders or other official assignment documentation.
  - **Assignment Period:** Eligibility generally corresponds to the sponsor's authorized U.S. assignment period, as reflected in official documentation.
- **Scope of Care**
  - Available care and cost responsibility depend on the applicable NATO Status of Forces Agreement, Partnership for Peace arrangement, Reciprocal Health Care Agreement (RHCA), and other country-specific implementing guidance.
  - **MTF Direct Care:** Eligible foreign force members and approved accompanying family members may receive care at military hospitals and clinics, generally subject to availability and applicable reimbursement rules. An RHCA may waive reimbursement for specified MTF care.
  - **Civilian Care:** Eligible NATO/PfP SOFA family members may receive authorized civilian outpatient care under applicable TRICARE rules and cost-sharing requirements. DoD does not cover civilian inpatient care for foreign force members or eligible family members.
  - **Billing:** When an RHCA or other applicable agreement does not waive costs, MTF care may be reimbursable. Confirm the applicable billing methodology and rate with the local MTF Uniform Business Office and the relevant agreement/eligibility authority.

DEERS Registration & FIN Issuance

- Foreign ID Number (FIN)
  - For foreign personnel and family member lacking a U.S. Social Security Number, DEERS automatically generates a 9-digit FIN identifier.
    - ✓ Format: 9XX-XX-XXXX (Unique system key)
- DEERS Enrollment
  - Enrolls sponsor and family member in the master defense directory to enable Common Access Card (CAC) or DD Form 1173 issuance.
    - ✓ RAPIDS Verification – Base Access
- MHS GENESIS Integration
  - Connects FIN records directly to electronic health records, medication profiling, patient scheduling, and UBO billing accounts.
    - ✓ Centralized Medical Tracking

Billing Pathways & Reimbursement Models

- **Security Assistance—IMET/FMS**
  - Medical costs for International Military Education and Training (IMET) and Foreign Military Sales (FMS) trainees are paid in accordance with the payment method identified in the Invitational Travel Order (ITO), FMS case documentation, or other approved funding arrangements.
  - **Funding:** Apply the case-specific Line of Accounting (LOA) and payment instructions identified in the applicable security-cooperation documentation.
- **Reciprocal Health Care Agreement (RHCA) Fee Waiver**
  - Eligible personnel and approved accompanying family members covered by an RHCA may receive specified MTF inpatient and/or outpatient care without reimbursement charges when the agreement provides a waiver.
  - Any remaining charges, including inpatient subsistence charges where applicable, are governed by the specific RHCA.
  - RHCAs are formal reciprocal arrangements between the Department of War and a foreign country; they are not simply mutual fee offsets between defense ministries.
- **Reimbursable / Embassy Billing**
  - When no applicable RHCA waiver exists, MTF care is generally provided on a reimbursable basis.
  - The responsible payer and billing route—such as the patient, foreign government, military attaché office, embassy, FMS case, or other authorized funding source—must be confirmed using the ITO, agreement terms, and local MTF procedures.
  - Applicable reimbursement rates are determined under current Department of War financial guidance, including interagency and IMET-related rates.
  - **Billing and collections are administered by the MTF Uniform Business Office (UBO).**

MTF Intake & Verification Protocol

- Verify Orders
  - Confirm official ITO, NATO Orders, or bilateral exchange sponsorship documentation.
    - ✓ Check assignment orders
    - ✓ Scan and Upload to Revenue Cycle Registration Person Level
- Verify Country of Origin
  - Revenue Cycle was recently updated to notify the end user when the country field is missing from a Foreign Affiliate profile.
- Confirm DEERS/FIN
  - Ensure active registration in DEERS and valid Foreign Identification Number issuance.
    - ✓ Verify FIN in MHS GENESIS
- Assess Agreement
  - Determine whether treatment falls under SOFA, RHCA, FMS, or standard fee for service.
    - ✓ Determine Billing Code
- UBO Coordination
  - Submit medical bills via appropriate billing stream (DCSA, embassy invoice, waiver, OHI)
    - ✓ Prevent billing delays

Reciprocal Health Care Agreement (RHCA)

A **Reciprocal Health Care Agreement (RHCA)** is a formal arrangement between the Department of War and a foreign government under which each side provides specified medical care to the other country's eligible military personnel, generally on a reciprocal basis.

- **Key points:**
  - **Purpose:** Medical-care access and administrative/payment arrangements for eligible personnel.
  - **Scope:** Eligibility, types of care, reimbursement or reciprocal-cost provisions, documentation, and limits are country- and agreement-specific.
  - **Not a SOFA:** An RHCA does **not** establish visiting-force legal status, criminal jurisdiction, customs privileges, entry authorities, or other SOFA protections.
  - **Verification:** MTF staff should verify the patient's country, status, eligibility category, and the current applicable agreement before authorizing or billing care. DHA identifies RHCAs as one potential basis for care for foreign military personnel, distinct from NATO SOFA and PfP SOFA authorities.
- Current RHCA agreements can be found on the RHCA SharePoint page.



RHCA Statutory & Policy Governance

- Authorization, Eligibility, and Administration
  - Reciprocal Health Care Agreements (RHCAs), foreign military personnel care, and related reimbursement processes are governed by applicable federal statutes, regulations, Department of War policy, and implementing guidance.
    - ✓ **10 U.S.C. § 2559:** Establishes the requirement for reimbursement to the United States for inpatient care provided in the United States to foreign military or diplomatic personnel and their dependents, with exceptions that may include applicable RHCAs.
    - ✓ **32 CFR § 108.1 and § 108.4**: Establish policy for Secretarial-designee health care eligibility and provide that foreign affiliate personnel sponsored or invited by the Department of War, and approved accompanying dependents, may receive space-available MTF care. An RHCA may waive reimbursement for specified inpatient and/or outpatient MTF care in CONUS ONLY.
    - ✓ **32 CFR § 161.22(h) and Table 54**: Identifies benefits for foreign force members and eligible accompanying dependents subject to an RHCA, including applicable dependency and sponsor-household residency conditions.
    - ✓ **DoDI 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities:** Establishes Department of War policy, responsibilities, and procedures for foreign military personnel care, RHCA implementation, eligibility, reimbursement, and MTF UBO cost-recovery activities.
    - ✓ **DHA UBO implementation guidance:** Supports operational processes such as revenue-cycle activities, Patient Category (PATCAT) assignment, billing, and MHS GENESIS workflows.

RHCA Care Scope and Financial Responsibility

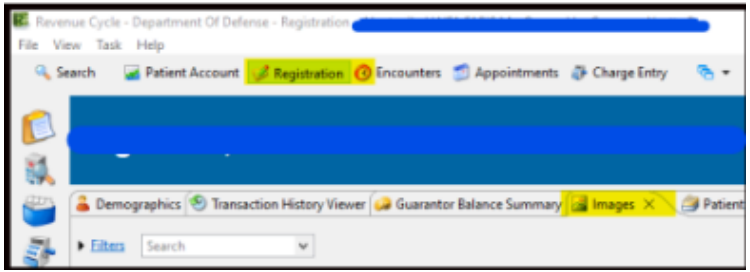
- RHCAs may waive reimbursement for covered MTF care in the United States for eligible foreign force members and approved accompanying family members.
- Eligibility requires confirmation of the applicable RHCA, official travel or assignment documentation, DEERS enrollment, and approved dependent status.
- Outpatient MTF care is generally covered when the RHCA provides a waiver.
- Inpatient MTF care and any subsistence charges depend on the specific RHCA; do not assume all inpatient care is free or reimbursable.
- An RHCA does not independently authorize civilian purchased care or TRICARE benefits.
- The MTF Uniform Business Office validates eligibility and processes billing for any charges not waived under the RHCA

Invitational Travel Orders Overview

- **Invitational Travel Orders (ITOs):** Official travel and training authorizations issued to foreign military personnel and authorized international students participating in U.S.-sponsored military education, training, or exchange programs (e.g., IMET, FMS cases, bilateral cooperative exercises). During their authorized stay, these individuals and their eligible accompanying family member may receive care at Military Treatment Facilities (MTFs).
- **Mandatory ITO Collection & Verification**: The MTF must obtain and verify an official, legible copy of the patient's ITO (including all approved amendments and medical authorization endorsements) prior to or at the time of clinical intake. This must be scanned into the patient's record at the person level in power chart.

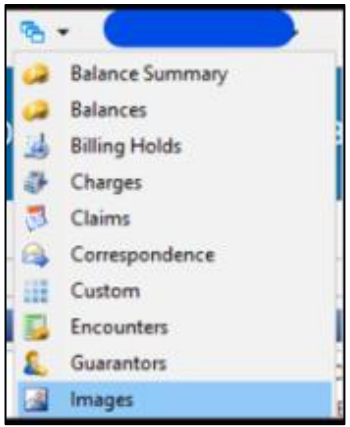
ITO Orders

- When a Foreign Affiliate is identified, determine whether a new P&HP has been added. If not, review the Images tab in the Registration Perspective to locate the ITO orders.

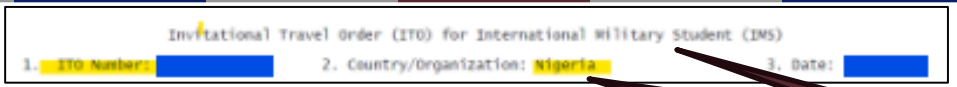


ITO Orders (Cont.)

- If you do not see the Images tab in your view, select the icon with the three file folders, and select Images from the drop down.

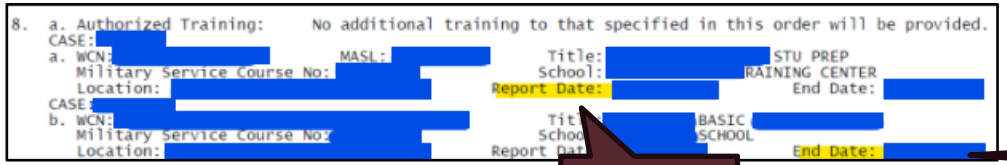


ITO Orders – Example



Country

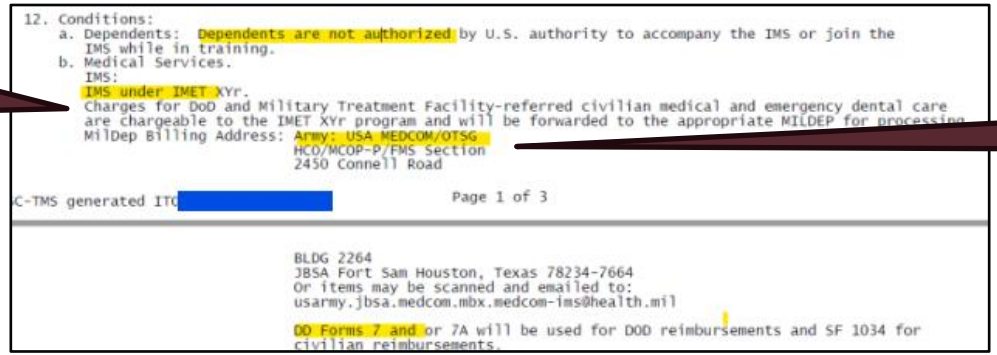
IMS = International Military Student



Start Date

End Date

IMET = International Military Education and Training Program

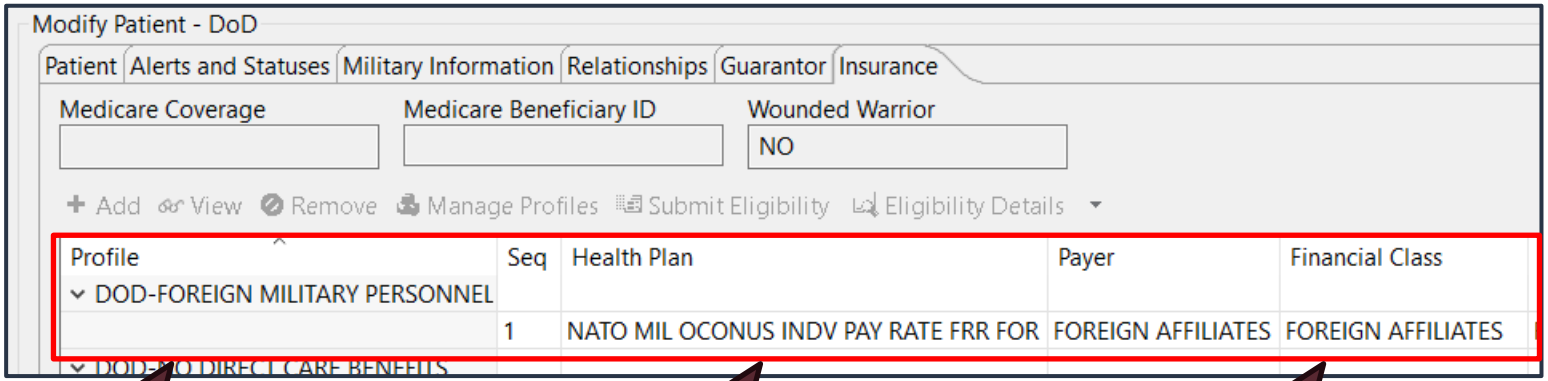


Billing Address

Foreign Military Health Plans

- Assigning an accurate Foreign Affiliate Profile & Health Plan (P&HP) is a crucial step in accurately documenting and billing for the services provided. Recent updates have been made to the available Foreign Military health plans in Revenue Cycle.
  - A spreadsheet to assist with this process has been created to assist the MTF staff in identifying the correct Health Plan.
  - 'UBO (x2) Helpful Handout Foreign Affiliate_1 P&HP Worksheet-Excel'. The spreadsheet is divided into sections; column C-D are the new profile and health plans, columns F-N are used for filtering, and columns P-U are the rates and PATCAT for reference.

Foreign Military Health Plan Example



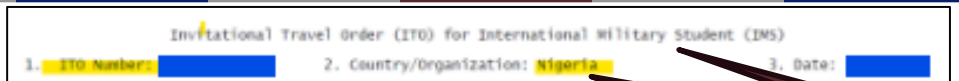
Foreign Military Profile

Health Plan *(select appropriate health plan based on ITO orders)*

Foreign Affiliates Financial Class

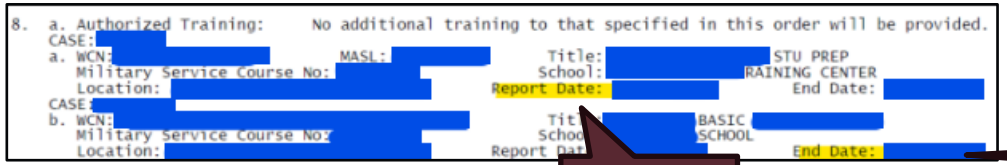
Identifying the Correct Health Plan – Step 1

1. Review ITO orders



Country: Nigeria

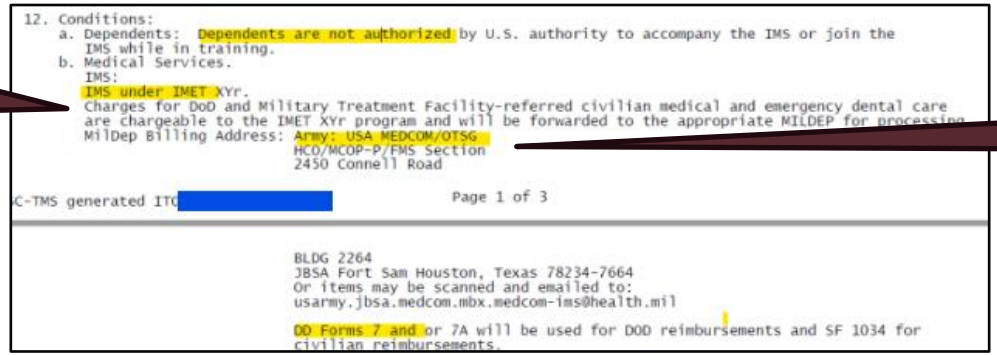
IMS = International Military Student



Start Date

End Date

IMET = International Military Education and Training Program



Billing Address

Identifying the Correct Health Plan – Step 2

2. Review the RHCA SharePoint page to determine if a RHCA exists.
   - This page includes a list of countries with a RHCA, and whether the country is a part of NATO (North Atlantic Treaty Organization)

Identifying the Correct Health Plan – Step 3

3. Navigate to the “Foreign Affiliates HP #1” tab in the Foreign Affiliate P&HP Worksheet.

- This tab includes a list of all Foreign Military health plans in Revenue Cycle
- Filter the list as necessary to determine the correct health plan based on the information we have gathered.
- In our example, we have ITO orders, the patient is an IMET student, Nigeria is a non-NATO country, and the patient is Military.

ITO	FMS	IMET	RECIP	NATO NON-NATO	MIL/CIV FAM MBR	AGENCY INDIV	SF1080 STATEMENT
ITO		IMET		NON-NATO	MIL	AGENCY	SF1080/DD7 STATEMENT

- In the INPT Agency column, select IMET in this example.

INPT Individual	OUTPT Individual	INPT Agency	OUTPT Agency
N/A	N/A	IMET '0.6097' MD	IMO '0.6097' MD

Identifying the Correct Health Plan – Step 4

4. Once the health plan list is filtered based on the information gathered, the appropriate health plan in this example is:

PROFILE	HEALTH PLANS
DOD-FOREIGN MILITARY PERSONNEL	IMET NON NATO MIL AGNCY PAY RATE IMET IMO

- Update the health plan at both the Registration and Encounter perspective.

Foreign Affiliate Placeholder Plan

- The MSA/Reg Clerk will initially use the applicable Foreign Military Placeholder Plan for eligible foreign military sponsors, foreign family members and foreign civilian employees.
- Once MSA/Reg Clerk registers the patient, they will apply the appropriate profile and health plan
- Encounter will then populate into UBO Placeholder work queue and billing staff will review, remove the placeholder plan, and add the real Foreign Military health plan based on ITO
- If the correct P&HP is known, that should be used instead of the placeholder plan.
- Note: DO NOT use foreign profiles returned by DEERS, as they currently provide inaccurate eligibility and rate logic. The guides below detail the correct manual selection and adjustments process for all eligible foreign beneficiaries.
  - PIP-PAD MHS-GENESIS-Foreign-Military-PIP-Selection-Tip-Sheet-21092023.pdf
  - UBO- MHS-GENESIS-Foreign-Military-PIP-Adjustments-Tip-Sheet_21092023.pdf

Foreign Military Work Items

- There are several work item queues for Foreign Affiliate health plans. Each queue may require adding a P&HP, locating an ITO, tracking of encounters, applying an Action Code for resolution, removing a Billing Hold, and/or ongoing research.
- All Foreign Military Work Items have the ‘Foreign Military Review’ Billing Hold. The hold will be cleared once the work item is resolved and an action code is applied.

Foreign Military Review WI

- **Work Item:**
  - The **D310 – DoD Foreign Military Review** work item is assigned to the PAD User Group.
  - UBO may request to have this WI queue added to their view.
- **Cause:**
  - This WI is triggered and routed to PAD when the health plan “DoD-Review Foreign Military” is associated with the encounter. The front desk/check-in staff should review and scan the ITO orders. Review is required to update to the appropriate Foreign Military health plan. Review the patient’s ITO orders in the Images tab.
  - Note: This health plan has been deactivated as of May 2026, and no new items should qualify for this work item. The new health plan is the Placeholder health plan, which will be routed to the Foreign Military Placeholder HP WI. Existing items in the queue still require review.
- **Action Code:**
  - Once the health plan has been updated appropriately, apply the action code “D310 DoD Resolve Foreign Military Review” in the Workflow tab.

Foreign Military Review – UBO WI

- **Work Item:**
  - The **D190 – DoD Foreign Military Review – UBO** work item is assigned to the Pre-Billing User Group.
- **Cause:**
  - This work item is applied by the system after a user applies the ‘Resolve Foreign Military Review’ action code. Provides UBO with the ability to ensure the appropriate updates have been made to the patient’s account and encounters based on the ITO/RHCA documentation. UBO will need to update the encounters with a transmitted claim to match the modification at the person level.
- **Action Code:**
  - Once updated, apply the action code “D190 DoD Foreign Military Review-Complete”

Foreign Military Review – Incorrect Bill

- **Work Item:**
  - The **D191 – DoD Foreign Military Review – Incorrect Bill** work item is assigned to the Pre-Billing User Group.
- **Cause:**
  - This Work Item will be manually identified. Provides UBO with the ability to ensure front-end staff have made the appropriate updates to the patient's account and encounters based on the ITO/RHCA documentation. UBO will need to update the encounters with a transmitted claim to match the modification at the person level
  - Shows In Revenue Cycle as "Foreign Military Review - UBO 'WI'" (same as D190)
- **Action Code:**
  - Once updated, apply the action code “D190 DoD Foreign Military Review-Complete”

Foreign Military Placeholder HP WI

- **Work Item:**
  - The **D329 – DoD Foreign Military Placeholder HP** work item is assigned to the Pre-Billing User Group.
- **Cause:**
  - This work item is applied by the system when a qualifying “Placeholder” health plan is attached to the encounter, and the encounter is discharged. Review is required to update to the appropriate Foreign Military health plan. Review the patient’s ITO orders in the Images tab.
- **Action Code**:
  - Once the health plan has been updated, apply the action code “D329 DoD Resolve Foreign Military”

Foreign Military Billing Processing WI

- **Work Item:**
  - The **D330 – DoD Foreign Military Billing Processing** work item is assigned to the Pre-Billing user group.
- **Cause:**
  - This work item is triggered when an encounter is discharged. UBO should monitor and review this queue as needed. Ensure encounters in this queue have the appropriate health plan attached.
- **Action Code:**
  - Once updated, apply the action code “D329 – DoD Resolve Foreign Military”.

Foreign Military WI Checklist

- **Recommendations:**
  - Registration Perspective
    - ✓ Are there ITO orders on file in the Images tab?
      - – If yes – use the ITO orders to assign the correct health plan.
      - – If no – attempt to obtain a copy by contacting the patient/sponsor
        - » Inform leadership that there are gaps in the front-end ITO scanning process
      - – Review the Country of Origin listed in the Insurance tab, as this can be used to assist in selecting the correct Foreign Military health plan.
        - » The Country of Origin is a required field in RevenueCycle.
        - » Review DEERS (GIQD)

Generating Statement and Posting Payment

- Once the Foreign Military hold has been removed and all charges have rolled to Self Pay, a manual statement can be generated.



- For step by step instructions, please review the “UBO Helpful Handout Foreign Affiliate Process”.

Generating Statement and Posting Payment (Cont.)

- Post payments using the manual remittance process. Please see the “Post Patient Statement Remittance” section in the “UBO Helpful Handout Poster UBO” document.
  - ✓ Note: For bills submitted to MEDCOM FMS, please coordinate with the FMS POC to obtain a list of paid encounters and the associated total amount.
    - Once received, a manual remittance should be created utilizing the following:
      - » Payer name “Other Federal Agencies”
      - » Payment alias “4708 DOD Other Agency Payment”.

Common Discrepancies & Administrative Traps

- **Confusing NATO SOFA with RHCA:** A foreign service member may be from a NATO country (e.g., France, Turkey, or Belgium) covered under the NATO SOFA for legal status, but specific fee waivers depend on whether a separate bilateral RHCA is actively executed.
- **Assuming Family Member Entitlement:** Family Member care is never presumed. family member of foreign affiliates must reside full-time with the sponsor in the U.S. and be explicitly recognized by the nation's bilateral agreement.
- **Emergency Care Obligations:** Regardless of RHCA status, NATO affiliation, or insurance, MTFs will immediately provide emergency stabilizing care to any individual under emergency medical guidelines, with financial reconciliation handled post-stabilization.

Foreign Affiliates, NDAA 716 & CRS

- **Insurance claims:** When insurance information is available for a Foreign Military patient, file the insurance claim first and post all collections received. Do not apply any insurance, prompt-pay, or other discounts to the outstanding debt.
- **Billing the Embassy/Foreign Government:** Upon receipt of the insurance explanation of benefits (EOB), or 120 days after submission of the insurance claim—whichever occurs first—bill the member's Embassy in Washington, DC, unless documentation or orders direct billing to a different office.
- **Centralized Receivables Service (CRS):** The Defense Health Agency Uniform Business Office (DHA UBO) is coordinating with the Department of the Treasury and DHA Office of General Counsel (OGC) to determine whether Embassy debts may be processed through CRS. Additional guidance will be issued once a determination is made.
- **Unpaid or delinquent debts / CSNG:** Embassy and Foreign Government debts may not be referred to the Cross-Servicing Next Generation (CSNG) system. DHA UBO is coordinating with the Defense Finance and Accounting Service (DFAS) to establish procedures for Foreign Government and Embassy debts that remain unpaid after 120 days. Additional guidance will be issued once a determination is made.

Resources

- UBO (a2) Helpful Handout Foreign Affiliate Process 2025
- UBO (x2) Helpful Handout Foreign Affiliate P&HP Worksheet 2025
- Reciprocal Health Care Agreements (RHCA) SharePoint site
- UBO Workflows and Narratives
- 1DOD – Patient Accounting – Foreign Military
- PIP-PAD MHS-GENESIS-Foreign-Military-PIP-Selection-Tip-Sheet-21092023.pdf
- UBO- MHS-GENESIS-Foreign-Military-PIP-Adjustments-Tip-Sheet_21092023.pdf

Questions



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