

Lifesong Hospice and Palliative Care

POLICY:

Lifesong Hospice and Palliative Care does not exchange (or offer to exchange) anything of value in order to induce or reward referrals to the hospice program.

PROCEDURE:

1. Lifesong Hospice and Palliative Care does not offer or provide gifts, free services, or other incentives to patients, relatives of patients, physicians, nursing facilities, hospitals, contractors or other potential referral sources for the purpose of inducing referrals.
2. All contracts and arrangements with actual or potential referral sources are reviewed for compliance with all applicable statutes and regulations.
3. Lifesong Hospice and Palliative Care does not unlawfully influence the referral of assisted living facility (ALF) patients by:
 - a. Providing payments to the assisted living facility for room and board that exceed what the assisted living facility would have received from private payor sources if the patient had not been enrolled in hospice;
 - b. Paying above fair market value for additional non-core services that private payor sources or Medicaid does not consider included in its room and board payments to the ALF;
 - c. Providing hospice staff or other staff at its expense to perform duties that otherwise would be performed by the assisted living facility; or
 - d. Providing free or below fair market value care to assisted living facility patients receiving any Medicare benefit with the expectation that the patient would receive services from the hospice once the SNF benefit was exhausted.

Created:	Reviewed:	Revised:	Effective:
5/2018	9/2018		4/2019