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SUBJECT: Anti-Kickback Laws, Compliance with A.165 CC *IHN*	EFFECTIVE Date: 08/01/1999
DEPT: CORPORATE COMPLIANCE	REVIEW Date: 01/24/2020

I. Policy:

It is the policy of Inspira Health (herein after referred to as the “Inspira”) to prohibit the soliciting, receiving, offering or paying of any remuneration, directly or indirectly, in cash or in kind, in return for referrals of business paid for by federal or state health care programs (including, but not limited to, Medicare and Medicaid) pursuant to state law, or any private insurer.

II. Responsibility:

It is the responsibility of all that have an affiliation with Inspira Health to adhere to the above policy.

III. Procedure:

1. To ensure compliance with the anti-kickback statute, the Vice President of Corporate Compliance will compile regulations of the Office of the Inspector General (OIG), special fraud alerts and advisory opinions concerning the anti-kickback statute. Inspira policies and procedures are reviewed by reference to these sources to ensure compliance with the anti-kickback statutes and regulations.
2. Inspira does not submit or cause to be submitted to the Federal health care programs, claims for patients who were referred to the hospital pursuant to contracts and financial arrangements that were designed to induce such referrals in violation of the anti-kickback statute.
3. Inspira does not enter into financial arrangements with Hospital-based physicians or any other provider that are designed to provide inappropriate remuneration to the hospital or to the provider in return for the provider’s referral of business involving federal or state health care program beneficiaries to the provider.

The following are examples of activities that are not allowed as they may be interpreted as remuneration in return for referrals of patients or business:

- Providing free pick-up and disposal of bio-hazardous waste products;
- Providing “courtesy services” to referral sources, such as free laboratory testing for health care providers, their families and employees;
- Providing other free or discounted supplies or services to referral sources;
- Leasing space or equipment to physicians or other individuals in a position to generate referrals or business for Inspira below a fair market value;



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- Ambulance restocking without charge to the ambulance company;
- Waivers of copayments or deductibles without demonstrated financial need;
- Providing remuneration to physicians for services rendered, which is not based upon the fair market value of the services that have been rendered.

This list serves only as an example and is not a complete representation of all activities that may be considered a violation of the anti-kickback statute. Any questions regarding the anti-kickback statute that are not addressed by this policy can be referred to the Vice President of Corporate Compliance.