

**Policy and Procedure: Corporate Compliance**  
**Topic: Business Courtesies for Referrals**

**SCOPE OF POLICY**

This policy applies to all CFS employees, including trainees, volunteers, consultants, contractors or subcontractors as well as The Board of Directors.

**STATEMENT OF PURPOSE**

The Center for Family Support (CFS) recognizes that there are legitimate and lawful reasons to accept or provide reasonable business courtesies. However, in healthcare, business courtesies pose a risk for conflict of interest or fraud and/or abuse related to anti-kickback laws and regulations. The Anti-Kickback law prohibits the offer of payment, solicitation or receipt of any form of compensation for the referral of Medicare or Medicaid recipients.

The purpose of this policy is to ensure that The Center for Family Support complies with federal Anti-Kickback laws. The Center for Family Support does not permit or provide any business courtesies intended to elicit potential referrals of Medicare or Medicaid recipients.

For the purpose of this policy, the following definitions apply:

- **Business Courtesies:** Business courtesies include items of value given to another free of cost. Examples include gifts, entertainment, services and /or The Center for Family Support sponsored or hosted social events.
- **Immediate Family Member:** An immediate family member of a person includes:
  - The person's spouse;
  - Natural or adoptive parent, child or sibling;
  - Stepparent, stepchild, stepbrother or stepsister;
  - Father-in-law, mother-in-law; son-in-law; daughter-in-law; brother-in-law; or sister-in-law;
  - Grandparent or grandchild; and
  - Spouse of a grandparent or grandchild.
- **Potential Referral Source:** A potential referral source includes a physician, dentist or chiropractor who could reasonably be a source of referral of individuals to The Center for Family Support for services or treatment.

**STATEMENT OF POLICY**

It is the policy of The Center for Family Support that gifts, entertainment, and other benefits will not be permitted nor provided to potential referral sources and/or to his or her immediate family. Any report or evidence of such actions on the part of any CFS

employee or Board member will be investigated and corrective actions will be taken based upon results of the investigation.

## **IMPLEMENTATION OF POLICY**

1. The Center for Family Support employees and Board members may not offer a potential referral source and/or his or her immediate family members any business courtesies intended to elicit potential referrals of Medicare or Medicaid recipients. All personnel will be informed of such during their orientation.
2. In the event that a report is made, a concern is voiced or there is evidence that there was a violation of this policy, an investigation will be conducted by the CFS Corporate Compliance Officer. Results of this investigation will be reported to and discussed with the Executive Director and Director of Human Resources. Corrective actions including disciplinary actions will be discussed. The Executive Director will make the final determination regarding corrective actions. The Corporate Compliance Officer will share the findings, conclusion and corrective actions with the Corporate Compliance Committee.