

# Beneficiary Financial Incentives for Gifts, Promotions or Rewards

Effective Date: 7/28/2014

Draft/Review Date: 8/18/2014

## Policy

- A. It is the policy of the ACO to ensure compliance with state and federal regulations prohibiting the ACO, its Participants, Providers/Suppliers, and other individuals or entities performing functions or services related to the ACO's activities from providing any remuneration to Beneficiaries as inducements for receiving, or continuing to receive, items or services.

## Applicability

This policy and procedure is applicable to all Participants, Providers/Suppliers, and other individuals or entities performing functions or services related to the ACO's activities (hereinafter referred to as "the ACO").

## Procedure

- A. Consistent with the requirements of the Medicare Shared Savings Program and all other applicable laws and regulations, the ACO shall not provide gifts or other remuneration to beneficiaries as inducements for receiving, or continuing to receive, items or services from ACO Participants or Providers/Suppliers.
- B. The ACO may provide in-kind items or services to beneficiaries only if:
  1. There is a reasonable connection between the items and services and the medical care of the beneficiary; **and**,
  2. The items or services are preventive care items or services or advance a clinical goal for the beneficiary, including adherence to a treatment regime, adherence to a drug regime, adherence to a follow-up care plan, or management of a chronic disease or condition.
- C. All plans for Marketing Materials and Activities related to rewards and incentives must be submitted to the ACO's Executive Director (ED) or designee. The ED or designee shall then work with CHS Marketing and Compliance for approval of the material and/or activity.

## Reporting

- A. N/A

## Related Documentation

- A. 42 CFR §425.304, §425.310

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- B. Oversight of Marketing Materials Policy