



*Policy Executive Summary & Primer*

<b>Policy Title and Number:</b>	Beneficiary Inducement Policy and Waiver of Co Pays/Deductibles	MD-LC-004.4
---------------------------------	---	-------------

*This executive summary document is intended only to provide an overview of the information contained within the policy. In no way does this document replace or supersede the content of the policy.*

**Executive Summary**

- The Beneficiary Inducement Policy and Waiver of Co-Pays/Deductibles (“Policy”) provides guidance regarding compliance with the federal beneficiary inducement statute and outlines the Company’s expectations regarding gifts to beneficiaries and waiver of co-pays and deductibles.

**Key Policy Requirements**

- Providing or offering remuneration to a Medicare or Medicaid beneficiary that is likely to influence the beneficiary’s selection of a particular provider may result in civil money penalties for each wrongful act.
- Company may offer beneficiaries inexpensive gifts (other than cash or cash equivalents) or services with value less than \$15 individually or \$75 in the aggregate annually per beneficiary.
- Company may waive patients’ coinsurance or deductible only under certain criteria.
- Company will not routinely use “financial hardship” forms which state that a beneficiary is unable to pay the coinsurance/deductible.
- Company will not advertise that it will permit a waiver of coinsurance or deductibles for financial hardship and will not utilize certain terms in advertisements.
- Company will follow its Charity Care Policy for patients without insurance when providing services at a discount.