



*Policy Executive Summary & Primer*

<b>Policy Title and Number:</b>	<b><i>Physician Self-Referrals (Stark Law Policy)</i></b>	<b>CORE-LC-003.2</b>
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*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 Physician Self-Referrals (Stark Law) Policy (“Policy”) provides guidance intended to promote compliance with the Federal Physician Self-Referral Statute 42 U.S.C. §1395nn, commonly referred to as the “Stark Law”.
- The Stark Law generally prohibits a physician from referring a patient to an entity with which the physician (or an immediate family member) has a financial relationship.
- The Stark Law applies to entities that provide Designated Health Services (“DHS”), which include, but are not limited to: Home health services, Physical therapy, Occupational therapy, Speech therapy, and Durable medical equipment.
- Certain arrangements may qualify as exceptions to the Stark Law and may be permissible provided that they meet specified criteria, outlined within the law and in the policy.

**Key Policy Requirements**

- The Company will ensure that any remuneration paid or received is not a payment for referrals.
- The Company will structure transactions, arrangements and relationships so that such transactions fit with statutory and regulatory exceptions to the Stark Law.
- The Compliance Officer (“CO”) and/or the Legal Department must review all proposed transactions, arrangements and relationships between the Company and physicians, or family members of physicians, with whom there is a proposed financial relationship before such transactions, arrangements and relationships are finalized.
- Employees, independent contractors, and Company agents should report potential Stark Law violations to the CO.
- CO must investigate any and all reported violations and take necessary actions to prevent recurrence.