	Department: Corporate Compliance	Policy No.: 511
	TITLE: PROHIBITION OF IMPROPER PATIENT SOLICITATION ACTIVITIES	
Effective Date: 1/1/15	Revised: 1/1/15	

PROHIBITION OF IMPROPER PATIENT SOLICITATION ACTIVITIES

SCOPE:

All Ascension At Home, LLC colleagues. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors.

PURPOSE:

The purpose of this Policy is to set forth the general guidelines established by Ascension At Home, LLC and its subsidiaries (the “Company”) to ensure that the Company does not engage in improper solicitation of patients for hospice care.

POLICY:

It is Company policy not to engage in improper solicitation activities for the admission or retention of hospice patients.


PROCEDURE:

General Principles

- The Company will not be engaged in prohibited or inappropriate conduct in identifying, admitting, or retaining patients for hospice care.
- The Company will not engage in conduct designed to inappropriately maximize business growth and patient retention.
- The Company will admit and retain patients in accordance with the Company’s policies for Admission of Patients to Hospice Service and Patient Discharge, Revocation, and Transfer, Policies Nos. 501 and 502.

Marketing Materials and Activities

- Company marketing materials will be clear, correct, non-deceptive, and inform the patient, patient’s family, and patient’s physician about hospice care.

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- The Company will not design and use marketing materials that downplay or discount the terminal illness eligibility requirements for hospice care.
- The Company will not engage in marketing and sales strategies that offer incomplete or inadequate information about Medicare entitlement under the Medicare Hospice Benefit to induce beneficiaries to elect hospice care.
- The Company will not improperly review patient records, without a patient’s permission, in nursing or other healthcare facilities to determine potential eligibility.
- Marketing to patients shall be done in accordance with the Company’s Gifts, Entertainment and Marketing to Patients and Actual or Potential Referral Sources Policy, Policy No. 203.
- Marketing to potential or actual referral sources shall be done in accordance with the Company’s Gifts, Entertainment and Marketing to Patients and Actual or Potential Referral Sources Policy, Policy No. 203.