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Administrative Manual
Policy Number: 1288

COMPREHENSIVE CARE FOR JOINT REPLACEMENT
BENEFICIARY INCENTIVES POLICY

Objective: To establish Comprehensive Joint Replacement (CJR) beneficiary incentive requirements, including documentation standards, for Covenant Medical Center Medicare-enrolled patients undergoing Lower Extremity Joint Replacement.

Scope: All Covenant facilities and wholly owned entities.

Policy: Covenant HealthCare recognizes the particular clinical goals of the CJR model, including CJR Eligible Beneficiary:

1. Adherence to drug regimens
2. Adherence to a care plan
3. LEJR procedure readmission and complication reduction
4. Management of chronic diseases and conditions that may be affected by the LEJR procedure

In pursuit of the above clinical goals, Covenant HealthCare may choose to provide CJR Eligible Beneficiaries with in-kind patient engagement incentives during a CJR Episode of Care, subject to all requirements codified at 42 C.F.R. §510.515.

Procedure:

1. All CJR Eligible Beneficiary engagement incentives must be approved by the Board of Directors, or its Committee on Business Ethics and Compliance, prior to implementation.
2. Any engagement incentive must be provided directly to a CJR Eligible Beneficiary by Covenant HealthCare or its agent, under the control or direction of Covenant HealthCare, during a CJR Episode of Care.
3. The item or service provided must be reasonably connected to medical care provided to a beneficiary during an Episode of Care.
4. The item or service provided must be a preventive care item or

service or an item or service that advances a clinical goal, as listed in this policy above, by engaging the CJR Eligible Beneficiary in managing his or her own health.

5. The item or service provided must not be tied to the receipt of items or services from a particular provider or supplier.
6. The availability of the items or services will not be advertised or promoted except that a beneficiary may be made aware of the availability of the items or services at the time the beneficiary could reasonably benefit from them.
7. The cost of the items or services provided will not be shifted to another federal health care program, as defined at section 1128B(f) of the Social Security Act.
8. Once approved by the Board of Directors or its Committee on Business Ethics and Compliance, all CJR Eligible Beneficiary engagement incentives that exceed \$25 in retail value will be documented at the time of providing the incentive(s), in software maintained by the Corporate Compliance department. Required documentation includes the date the incentive is provided and the identity of the beneficiary the item or service was provided to.
9. Documentation of CJR Eligible Beneficiary engagement incentives shall be maintained for a period of ten (10) years from the last day of Covenant HealthCare's participation in the CJR model, or from the date of completion of any audit, evaluation, inspection, or investigation, whichever is later.
10. Items or services provided to CJR Eligible Beneficiaries may not exceed \$1,000 in retail value for any one beneficiary in any one CJR episode. The items or services involving technology provided to a beneficiary must be the minimum necessary to advance a clinical goal as listed above.
11. Items of technology that exceed \$100 must remain the property of Covenant HealthCare and be retrieved from the CJR Eligible Beneficiary at the end of the CJR episode. Retrieval attempts must be documented, including the final date of retrieval. Documented good faith efforts at retrieval will be deemed to have met the retrieval requirement. Retrieval efforts will be documented within software maintained by the Corporate Compliance department.

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Reviewed By: Board of Directors

Approved By:

Lawrence H. Sims, Chairman of the Board

Date

Daniel M. George, Executive Vice President of Operations

Date