

# **Anti-Kickback and Self-Referrals**

## **POLICY:**

It is the policy of Shepherd Center and Affiliates to ensure full compliance with all applicable federal and state statutes, regulations concerning anti-kickback and self-referrals as well as Stark laws.

## **PROCEDURE:**

To ensure that Shepherd Center and Affiliates are in complete compliance with regulations concerning anti-kickbacks, self-referrals and Stark laws, the Business Ethics Program provides that:

1. All Shepherd Center contracts and arrangements with referral sources comply with all applicable statutes and regulations.
2. Shepherd Center will not submit or cause to be submitted to any governmental program (including, without limitation, any health care program funded in whole or in part by any federal, state or local government) any claim for reimbursement for services provided to any patient who was referred to Shepherd Center in violation of any statutes or regulations pertaining to kickbacks and/or referrals of patients.
3. Shepherd Center will not enter into any financial arrangement with another entity or individual that is designed to provide inappropriate remuneration to either party.